

Planning Committee

Agenda 08 November 2024

10.00am

The King's Centre, 63-75 King Street, Norwich, NR1 1PH

John Packman, Chief Executive – Friday 01 November 2024

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

Introduction

1. To receive apologies for absence
2. To receive declarations of interest (see [Appendix 1](#) to the Agenda for guidance on your participation having declared an interest in the relevant agenda item)
3. **To receive and confirm the minutes of the Planning Committee meeting held on 11 October 2024** (Pages 4-12)
4. To note whether any items have been proposed as matters of urgent business
5. Chairman's announcements and introduction to public speaking
Please note that public speaking is in operation in accordance with the Authority's [Code of Practice for members of the Planning Committee and officers](#).
6. Request to defer applications included in this agenda and/or vary the order of the agenda

Planning and enforcement

7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**
 - 7.1. BA/2023/0315/FUL - Silsden, Ropes Hill, Horning (Pages 13-26)
8. **Enforcement update** (Pages 27-33)
Report by Development Manager

Policy

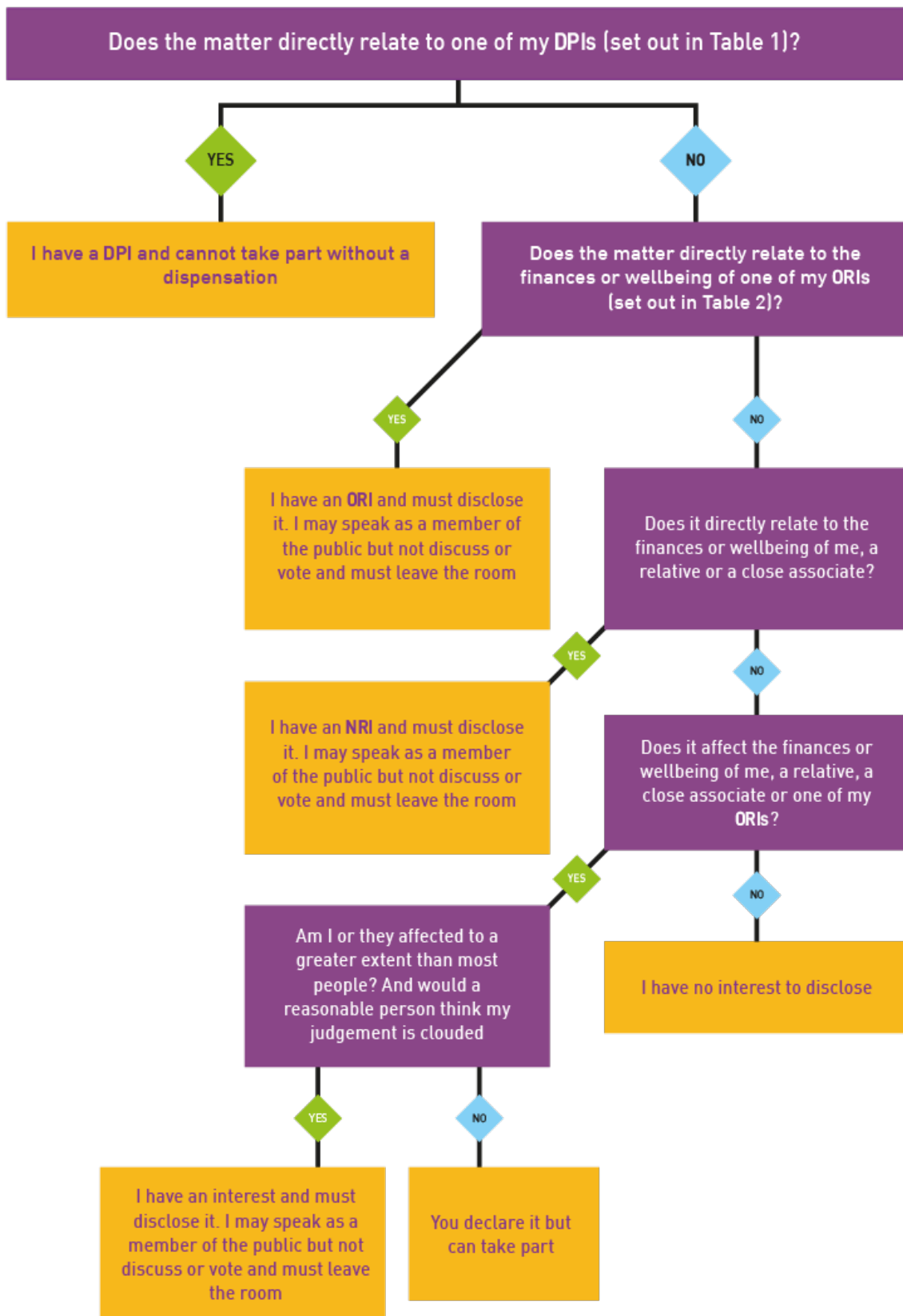
9. **Consultation responses** (Pages 34-38)
Report by Planning Policy Officer
10. **Local Plan - Preparing the Publication Version** (Pages 39-194)
Report by Planning Policy Officer
11. **Local Plan for the Broads Publication Version - Agreeing to consult** (Pages 195-655)
Report by Planning Policy Officer
12. **Broads Authority Design Guide and Code** (Pages 656-657)
Report by Historic Environment Manager

Matters for information

13. **Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q3 (1 July to 30 September 2024)** (Pages 658-664)
Report by Planning Technical Support Officer
14. **Appeals to the Secretary of State update** (Pages 665-668)
Report by Development Manager
15. **Decisions made by Officers under delegated powers** (Pages 669-674)
Report by Head of Planning
16. **To note the date of the next meeting – Friday 06 December 2024 at 10.00am at The King’s Centre, 63-75 King Street, Norwich, NR1 1PH**

For further information about this meeting please contact the [Governance team](#)

Appendix 1 – Extract from the Local Government Association Model Councillor Code of Conduct



Planning Committee

Minutes of the meeting held on 11 October 2024

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Present

Tim Jickells – in the Chair, Harry Blathwayt, Stephen Bolt, Andrée Gee, Tony Grayling, James Harvey, Martyn Hooton, Leslie Mogford, Matthew Shardlow (from item 11), Vic Thomson, Melanie Vigo di Gallidoro and Fran Whymark

In attendance

Natalie Beal – Planning Policy Officer, Jason Brewster – Governance Officer, Stephen Hayden – the Authority’s Arboricultural Consultant, Steve Kenny – Development Manager, Kate Knights – Historic Environment Manager and Ruth Sainsbury – Head of Planning

Members of the public in attendance who spoke

Member of the public

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

There were no apologies.

Openness of Local Government Bodies Regulations 2014

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

2. Declarations of interest and introductions

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

3. Minutes of last meeting

The minutes of the meeting held on 13 September 2024 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business

5. Chair’s announcements and introduction to public speaking

No members of the public had registered to speak.

The Chair thanked the Authority for organising the recent Planning Design Quality Tour, the participants had found this training event to be beneficial. There would a virtual tour for those unable to attend September's event and the Chair asked Members to indicate their availability when requested to do so by the Governance Team.

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

The Chair had received a question from a Member relating to a delegated decision associated with Land at the former Bridge Hotel, The Causeway, Repps with Bastwick. As this site was the subject of item 9, it was agreed to bring forward the delegated decisions item 14 to before item 8 (Enforcement update).

7. Applications for planning permission

There were no applications for consideration.

As indicated in item 6, item 14 was taken at this point.

8. Enforcement update

Members received an update report from the Development Manager on enforcement matters previously referred to the Committee. No further updates were provided at the meeting.

9. BA/2024/0012/TPO Land at former Bridge Hotel, Repps With Bastwick

The Chair thanked Tony Grayling for chairing the site visit on Friday 6 September and reminded Members that participation in this item was open to all irrespective of whether they attended the site visit or not.

The Historic Environment Manager (HEM) presented the report recommending confirmation of a provisional Tree Preservation Order (TPO) on a group of White Willows, two Crack Willows and a single White Willow on Land at the former Bridge Hotel, The Causeway, Repps with Bastwick.

The HEM indicated that application BA/2021/0490/FUL had proposed the erection of twelve flats for holiday use with restaurant and covered carpark on this site. This application had been refused by the Planning Committee (4 March 2022) and the applicant had subsequently appealed the decision. The Planning Inspector dismissed this appeal and in their decision, issued 16 May 2024, had noted a group of willows on the north-west and north-eastern boundary of the site for their "role in the landscape when looking from the river and also when on the footpath to the east, as it softens the built form and infuses it with trees so characteristic of the area" and added that by removing this "group of trees the scheme would fail to conserve a key characteristic of the Broads". The Authority's Arboricultural Consultant (AAC) had subsequently performed a tree assessment of the site using the Tree Evaluation Method for Preservation Orders (TEMPO). This assessment identified that the group of White

Willows (G1) plus two Crack Willows (T1 and T2) and a single White Willow (T3) all contributed to the amenity value of the area and all warranted a TPO. A provisional TPO (BA/2024/0012/TPO) had been served on 13 June 2024 and the HEM indicated that this would need to be confirmed by 13 December 2024.

An objection had been received on the 18 June 2024 stating that the trees did not contribute to the amenity value of the site and surrounding area, that the willow trees aggressive root system could cause damage to the land and waterways and that the TPO should not be confirmed so that the site could be developed and made presentable for both residents and visitors. The objection had been received within the 28-day consultation period and as per the Authority's Scheme of powers delegated to the Chief Executive and other officers, paragraph 50 (ii), this matter would need to be determined by the Planning Committee.

The HEM presented a location map, a site map and various photographs of the trees associated with the provisional TPO as taken on the site visit held on 6 September 2024. The images were taken from the A149 road bridge looking south over the river towards Potter Heigham bridge, at various points along the recreation area on the north-western bank of the river opposite the site, from both approaches to Potter Heigham bridge, from The Causeway along the south-west boundary of the site and from the public footpath leading to Repps with Bastwick located to the south-east of the site.

The HEM explained the Authority's response to the objection taking each of the three points raised in turn:

- With respect to the amenity value of the trees the Authority considered the trees to be an integral part of the riparian character of the site and the surrounding area. The trees are all mature to veteran specimens that had been managed to date and had not caused undue concern.
- Willows could be vigorous trees although this growth could be managed with appropriate ongoing maintenance to avoid potential risks.
- The TPO would not, and was not intended to, preclude development or tidying up of the site. It was aimed at securing the necessary protection for the existing tree cover on the site as part of any future development.

The HEM added that the trees played an important role in the biodiversity of the site and its surrounds and that the recommendation was to confirm the provisional TPO.

A Member asked what the impact of the site's extant permission, as discussed in item 14, would be on the trees associated with the provisional TPO. The HEM presented a site map of the extant permission that showed the two Crack Willows (T1 and T2) adjacent to the proposed development. The HEM indicated that the group of White Willows (G1) and the single White Willow (T3) had grown since the application had been submitted in 1993. The HEM noted that the location of the single White Willow (T3) was not included in the proposed development and that the location of the group of White Willows (G1) would be in a rear yard within the proposed development, so there could be scope to retain them. She confirmed

that as per any TPO, any works to these trees would need to be approved by the Authority beforehand and this work could, in appropriate circumstances, entail the removal of a tree.

A Member believed there was a sewage pipe running under the site and concerns had been raised that the trees' roots could damage this piece of infrastructure. The HEM explained that this matter had not been raised by the objector and that there was some confusion as to whether the sewage pipe was capable of functioning or not.

Members were keen to see the trees maintained and in particular for them to be pollarded. The AAC confirmed that the trees had been pollarded in the past and the Authority would be supportive of this form of ongoing maintenance work. In response to a question the AAC confirmed that the TPO could not be conditioned however the TPO confirmation letter would encourage the owner to manage the trees appropriately by prior agreement from the Authority.

Members supported the recommendation acknowledging the value of the trees to the amenity of the site and surrounding area.

Andrée Gee proposed, seconded by Stephen Bolt

It was resolved unanimously to confirm Tree Preservation Order BA/2024/0012/TPO Land at former Bridge Hotel, The Causeway, Repps With Bastwick.

10. BA/2024/0013/TPO Nicholas Everitt Park, Lowestoft - Site visit

The Historic Environment Manager (HEM) presented the report to determine whether a site visit was required in relation to a Tree Preservation Order (TPO) for an oak tree at Nicholas Everitt Park, Bridge Road, Lowestoft. The applicant had submitted a tree works application for six trees in the park and the proposed works on five trees had been approved. The proposed work on the remaining tree, an oak, to reduce its height to a standing stem of 4-5m from ground level was deemed to be inappropriate. A provisional TPO had been served and the HEM indicated that this would need to be confirmed by 18 January 2024.

The applicant had objected to the provisional TPO stating the tree posed a significant risk, that its rooting was eroding over time and that, if it were to fall, given its location adjacent to a public car park, it could cause significant harm/injury to persons or damage to property.

The objection had been received within the 28-day consultation period and as per the Authority's Scheme of powers delegated to the Chief Executive and other officers, paragraph 50 (ii), this matter would need to be determined by the Planning Committee. In preparation for this determination the HEM explained that Members could undertake a site visit however, in this instance, a detailed photographic survey of the tree and its surrounds, in conjunction with information provided by the Authority's Arboricultural Consultant, would be adequate to determine the provisional TPO and the recommendation was not to undertake a site visit.

Members acknowledged the need for site visits under certain circumstances however, given the technical nature of the objection, Members agreed that there was no value in this instance.

Stephen Bolt proposed, seconded by Fran Whymark

It was resolved unanimously to not undertake a site visit before the provisional TPO BA/2024/0013/TPO was considered at a future Planning Committee meeting.

Matthew Shardlow joined the meeting.

11. Reedham Neighbourhood Plan – adoption

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

In response to a question the PPO agreed to confirm the referendum result via an email to Members.

Leslie Mogford proposed, seconded by Martyn Hooton

It was resolved unanimously to recommend to the Broads Authority that the Reedham Neighbourhood Plan was made/adopted.

12. Local Plan - Preparing the Publication Version

The Planning Policy Officer (PPO) presented the report which included a topic paper proposing a minimum Biodiversity Net Gain (BNG) greater than 10% and amendments to the Pubs Local Plan policy. The PPO proposed to discuss each section of the report in turn and welcomed members' feedback.

BNG greater than 10%

The PPO had investigated the possibility of the Authority setting a BNG target greater than the statutory minimum of 10% and concluded that a higher value could be justified. The topic paper at Appendix 1 of the report detailed this justification and included the resulting assessment of the impact and viability of increasing the minimum BNG to 20%. The PPO indicated that the BNG policy and the Authority's Local Validation Checklist would be updated to reflect this new minimum BNG of 20%.

In response to a question the PPO confirmed that other Local Planning Authorities (LPAs) across England and Wales had adopted minimum BNGs greater than 10% although she was not aware whether any neighbouring LPAs or National Park LPAs had done so. The PPO explained that, if other LPAs intended to change their BNG minimum percentage, it was expedient to do so when updating their Local Plan; the only neighbouring LPA in the process of updating their Local Plan was North Norfolk District Council. The PPO would review North Norfolk's Local Plan and notify the Planning Committee of their chosen BNG minimum percentage.

A Member asked whether the Authority had the capacity to support the extra monitoring required for BNG. The Head of Planning responded that monitoring was important to the Authority and was undertaken not just with respect to planning conditions but also the ecology of the Broads as a protected landscape. The Development Manager added that the Authority did not expect significant extra work to be required for monitoring BNG as the number of anticipated BNG applicable applications were low. The HoP indicated that the Authority had received just four such applications, since BNG requirements were mandated on 12 February 2024, of which one had been approved.

Members welcomed the increase to the BNG minimum percentage which was considered to better reflect the importance of biodiversity to the Broads.

Tony Grayling proposed, seconded by Stephen Bolt

It was resolved unanimously to endorse:

- **A minimum Biodiversity Net Gain of 20% for inclusion in the Local Plan**
- **The More than 10% Biodiversity Net Gain Topic Paper as evidence for the Local Plan.**

Pubs network policy

Policy SSPUBS (Pubs network) had been amended to include considerations for local flood risk, guidance regarding change of use, diversification and Assets of Community Value and some improvements/clarifications to the supporting text.

Andrée Gee proposed, seconded by Melanie Vigo di Gallidoro

It was resolved unanimously to endorse the amendments to the Pubs network policy.

The PPO provided an overview of the next meeting's Local Plan related agenda explaining that, along with the Regulation 19 version of the Local Plan for the Broads, there would be a new policy, Viability Assessment, an updated Great Yarmouth and Broads Authority Gypsy, Traveller & Residential Caravans Accommodation Assessment, Habitats Regulations Assessment and Sustainability Appraisal. The Chair reminded Members that they had overseen the Local Plan for two previous consultations and that this final iteration would be the culmination of this process. The PPO indicated that the most recent changes associated with the publication version of the Local Plan would be marked.

The PPO confirmed the intention to submit the Local Plan for examination in June 2025 and, given the uncertainty of when the proposed changes to the National Planning Policy Framework (NPPF) would be published and the associated transitional arrangements, there were a number of permutations required to achieve this submission date. The PPO had mapped out a number of scenarios, based on differing assumptions of when the NPPF changes would be delivered, and these would form the basis for a number of recommendations to ensure the June 2025 submission date was achieved. The intention was to avoid the need to re-consult the Planning Committee on this matter although the PPO acknowledged that if none of the assumptions proved correct then she would have no choice but to bring the Local Plan back to the Planning Committee.

The Head of Planning noted the urgency of endorsing the Local Plan at the next meeting and asked that if Members had any questions arising from Local Plan related material to please email them to the report authors in advance of the meeting to ensure that officers had time to prepare the responses.

13. Appeals to the Secretary of State

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

14. Decisions made by officers under delegated powers

As indicated in item 6, this item was taken before item 8.

The Committee received a schedule of decisions made by officers under delegated powers from 3 September 2024 to 27 September 2024 and there were no Tree Preservation Orders confirmed within this period.

A Member noted that application BA/2021/0490/FUL for 12 flats for holiday use at Land at former Bridge Hotel, Repps with Bastwick had been refused and asked why the extant permission raised by application BA/2024/0283/CPLUD had not been identified previously. The Head of Planning (HoP) indicated that the appeal associated with application BA/2021/0490/FUL had been dismissed on 16 May 2024. Subsequently the applicant had submitted evidence to demonstrate that application BA/1993/0165/HISTAP for the reinstatement of fire damaged Bridge Hotel and provision of additional dining and toilet facilities, site and demolition works had commenced in 1994 and, following legal advice, this application was confirmed to be extant (application BA/2024/0283/CPLUD). The HoP confirmed it was not the Authority's responsibility to monitor extant permissions and that the burden of proof for an extant permission fell to the applicant. The 1993 permission referred to the demolition of the fire damaged Bridge Hotel and this, in conjunction with a Section 215 Notice issued 30 December 1994 requesting the clearance of the site, had been determining factors in the granting of the Certificate of Lawfulness of Proposed Use or Development associated with BA/2024/0283/CPLUD. In response to a question the HoP confirmed that this decision was a legal matter and there were no consultees.

15. Date of next meeting

The next meeting of the Planning Committee would be on Friday 08 November 2024 10.00am at The King's Centre, 63-75 King Street, Norwich.

The meeting ended at 11:10am.

Signed by

Chair

Appendix 1 – Declaration of interests Planning Committee, 11 October 2024

Member	Agenda/minute	Nature of interest
Andrée Gee	10	East Suffolk Councillor - other registerable interest
Leslie Mogford	9	Great Yarmouth Borough Councillor – other registerable interest

DRAFT

Planning Committee

08 November 2024

Agenda item number 7.1

BA/2023/0315/FUL - Silsden, Ropes Hill, Horning

Report by Planning Officer

Proposal

Proposed replacement dwelling

Applicant

Mr & Mrs C Yates

Recommendation

Approval with conditions

Reason for referral to committee

District Member call in

Application target date

05 October 2023

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1. Description of site and proposals

- 1.1. The subject comprises a modest timber chalet with a pitched roof on the southern side of Ropes Hill Dyke and to the north of Ropes Hill, the section accessed from Lower Street. The chalet sits close to the eastern boundary of the plot and features a lean-to car port to its western side which extends up to the western boundary of the plot. The plot has areas of lawn to the road and dyke sides, and an area of hardstanding beneath the car port. There is a mooring cut and slipway on the western side of the plot fronting onto the dyke. The orientation of the dwelling takes its cue from the angle of the flank boundaries, this being a common approach on this section of Ropes Hill so that the buildings are not square on to the dyke. The lawful use of the property is as a residential dwelling with a holiday use restriction.
- 1.2. The adjacent plot to the east features a 1.5 storey dwelling which sits further into the plot (away from the dyke) than the subject dwelling. The plot to the west was previously two plots which have been combined, it features a boatshed adjacent to the boundary with the subject property, and a single storey dwelling to the south-east portion of the site. Directly south of the single storey dwelling is a further plot featuring a boatshed and a sizeable 1.5 storey dwelling.
- 1.3. On this section of Ropes Hill there is a continuous band of development to the northern side and at the western end. To the south of this section of Ropes Hill is an area of private moorings. In terms of this report Ropes Hill is the private road accessed via Lower Street, as opposed to Ropes Hill to the north which forms part of the A1064. It is noted that Ropes Hill splits in two at the western end, one side providing access to properties on the northern side of Ropes Hill Dyke, and the other to the southern side of Ropes Hill Dyke. Ropes Hill Dyke is a private dyke accessed from the River Bure. The site is outside of the Horning Conservation Area and development boundary. The site is located in Flood Zone 3.

- 1.4. The proposal is to replace the existing single storey dwelling with a 1.5 storey dwelling on the location within the site although with an extended footprint.
- 1.5. The design is for a building of a traditional form, albeit with contemporary elements. The materials are timber cladding painted white for the walls, with a slate roof and grey aluminium windows. The dwellinghouse features a raised terrace at ground floor level and a balcony at first floor level, both facing onto Ropes Hill Dyke.
- 1.6. The existing dwelling has a footprint of 34.65sqm, which including the existing car port is 55.48sqm. The dwelling has a maximum height of 3.45m with an eaves height of 2.25m. The proposed dwellinghouse has a footprint of 65.75sqm with a maximum height of 7.88m with an eaves height of 3.94m. It is noted that the proposed dwelling is raised above ground level by 0.63m.
- 1.7. In addition to the replacement dwelling, the proposal also seeks permission to replace the existing metal piling and timber quayheading on a like-for-like basis. There would be a minimal widening of the existing mooring cut by approximately 0.9m and removal of the slipway at the rear of the cut.

2. Site history

- 2.1. BA/1993/2505/HISTAP - Alterations and extension to chalet. Approved with conditions
- 2.2. BA/1994/2379/HISTAP - Removal of condition 3 of approval B1 930842 PF (use of building as a dwellinghouse). Approved with conditions.
- 2.3. BA/1995/2348/HISTAP - Removal of condition 3 of planning permission B1 930842 PF to permit use of building as a permanent dwellinghouse. Refused.
- 2.4. BA/2002/1580/HISTAP - Certificate of Lawfulness for existing use as a residential dwelling. Issued for use as a holiday home, dated 18/9/03.
- 2.5. BA/2002/1620/HISTAP - Certificate of lawfulness for existing use as holiday dwelling. Issued for use as holiday accommodation for June, July, and August, dated 6/9/02.

3. Consultations received

Parish Council

- 3.1. The Council objects to this planning application on the grounds of overshadowing.

Cllr Varley

- 3.2. I feel that this application should be determined by the planning committee if this is being considered for approval. There are concerns over the scale of this development and the overall vernacular, how this would correlate with its surroundings and other dwellings in the immediate area. I think this warrants further scrutiny.

Environment Agency

- 3.3. We have reviewed the submitted Building Regulations Part G compliance document and have decided to withdraw our objection. However, we consider that the Local Planning Authority must now decide whether the applicant has provided sufficient evidence for this application to be consistent with the Horning Knackers Wood Joint Position Statement agreed between North Norfolk District Council, the Broads Authority and the Environment Agency, as well as Policy DM2 of the Broads Authority Local Plan. We have set out some observations and suggestions below that may aid in the decision-making process.

Water Quality

- 3.4. We note that the submitted Building Regulations Part G compliance document demonstrates compliance with the 110 litres per person per day, as required for all new property in Norfolk as a water stressed area. However, the policy requires that there is to be no net additional foul water load arising from the proposed development. The calculated use for the existing building of over 178 litres per person per day is significantly greater than the average for the Anglian Water Services area, which is 133 litres per person per day.
- 3.5. The calculation for the existing building appears to assume 365 days occupation but the Applicant has not provided confirmation of the previous pattern of occupation, as recommended in our letter of 26 June 2024, nor any metered water consumption. They have also not submitted any explanation as to why this has not been provided.
- 3.6. We do not currently have the relevant expertise to review the calculations made in the submitted document and provide a definitive conclusion. However, you may find that your own Building Regulations team can provide useful advice to help you reach a conclusion, as water consumption data is required for section G2 of the Building Regulations.

Anglian Water

- 3.7. No comments provided for schemes of less than 10 dwellings.

BA Ecologist

- 3.8. No objection subject to conditions to secure biodiversity enhancements and informatives regarding the construction phase.

BA Historic Environment Manager

- 3.9. The proposed scheme has reduced the height of the stairwell element, which is successful in helping to break up the massing of the side elevations. The eaves line has also been reduced and the pitch of the roof increased, which again gives the building a more traditional form, albeit with contemporary elements.
- 3.10. It is noted that solar panels are now proposed on the west roof slope, which are PD. However, I would advise that their appearance would be enhanced if they could have a non-reflective surface, matt black frames and fixings and if they can be recessed into

the roof covering, rather than being mounted on top of it. This will make them appear more integral to the building, rather than an add-on, and given that this is a new roof that should be possible to achieve. Alternatively solar slates could be considered on part of the roof.

4. Representations

4.1. The Broads Society responded with no objection to this application.

5. Policies

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

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

- DM2 - Water Quality and Foul Drainage
- DM4 - Water Efficiency
- DM5 - Development and Flood Risk
- DM10 - Peat soils
- DM13 - Natural Environment
- DM16 - Development and Landscape
- DM21 - Amenity
- DM22 - Light Pollution and Dark Skies
- DM30 - Holiday accommodation – new provision and retention
- DM32 - Riverbank Stabilisation
- DM40 - Replacement Dwellings
- DM43 - Design

5.3. Material considerations

- National Planning Policy Framework
- Planning Practice Guidance
- Landscape Character Areas 23: Bure Valley – downstream Wroxham to Fleet Dyke, South Walsham
- Joint Position Statement on Development in the Horning Knackers Wood Water Recycling Centre Catchment

6. Assessment

- 6.1. The proposal is for a change from a 1-bed dwelling with an established use as a holiday home to a 1-bed dwelling not restricted to holiday use. The main issues in the determination of this application are the principle of development, the design and appearance of the proposed dwelling, impact on landscape and river scene, impact on neighbouring amenity and privacy, and flood risk and the Horning Knackers Wood Water Recycling Centre Catchment situation.

Principle of development

- 6.2. The site lies outside of a development boundary. Policy DM40 of the Local Plan for the Broads permits replacement dwellings in this circumstance on a one-for-one basis. Taking into account the existing dwelling would be demolished to make way for the proposed dwelling, the proposal is considered to represent one-for-one development and therefore acceptable in principle.
- 6.3. Policy DM40 provides criteria for the consideration of a proposed replacement dwelling. Under criterion a) the policy requires that the existing dwelling has a lawful use. The lawful use of the existing dwelling was established through a Certificate of Lawful Use although with a restriction that the use be as a holiday home, but still compliant with criterion a) of Policy DM40. This is the only restriction on the use of the dwelling which may be occupied throughout the year, such a restriction is considered to be the same as a second home use.
- 6.4. In policy terms existing holiday accommodation is protected under Policy DM30, however the policy seeks to retain a supply of tourist accommodation to prevent it being used as a second home. Given that the use is already established as a second home, and there is no history of genuine tourism use or the short-term letting of the dwelling for such a use, the proposal is considered to fall outside of the restrictions expressed under Policy DM30. With that in mind there is no policy based justification to resist the loss of the holiday home and in terms of the use alone the proposed development is considered to be acceptable. It is noted that the subject site is within the Horning Knackers Wood Water Recycling Centre catchment and therefore warrants closer consideration of the potential impacts of a change of use in that regard, this is included later in this report.
- 6.5. Turning back to Policy DM40, under criterion b) the policy requires that the existing dwelling has no historic, architectural or cultural significance making it worthy of retention. The existing dwellinghouse does not retain historic, architectural, or cultural value to be worthy of retention and is therefore acceptable with regard to criterion (b) Policy DM40.

Design and impact on the landscape

- 6.6. Criterion c) of policy DM40 requires that the scale, mass, height, design and external appearance of the replacement dwelling are appropriate to its setting and the landscape character of the location. Design considerations are also assessed against

Policy DM43 and landscape considerations against Policy DM16, along with Landscape Character Areas 23: Bure Valley.

- 6.7. Considering the scale, mass, height, design and external appearance of the proposed dwelling, it is acknowledged that the building is very different in all aspects to the existing chalet, save for the external cladding material. In assessing the proposed scheme an understanding of the site context is essential. The level of development at Ropes Hill Dyke is quite surprising, partly due to the limited views of the area from public vantage points. The majority of plots have been developed and these are predominantly in residential use. The scale of development varies, with a mix of single storey, 1.5 storey, and 2 storey dwellings. There are also a number of boathouses of varying size, some with accommodation in an upper floor.
- 6.8. Walking along the northern section of Ropes Hill, effectively to the opposite side of the dyke to the subject site, views are dominated by the built form and mature trees. Depending on the viewpoint there can be up to three dwellinghouse roofs in the backdrop to the subject site, with the existing chalet somewhat dwarfed by this. The change in height between existing and proposed is not insignificant, going from 3.45m to 7.88m, but it is considered in the site context to represent an acceptable scale of development, and one which would not be detrimental to the appearance of the site, surrounding area or river scene. This is helped by the design which has a low eaves level and a fairly steep roof pitch, providing the first floor mostly within the roof, reducing the mass of the building. While the proposed dwelling is close to the dyke, replicating the front building line of the existing chalet, it maintains enough of a separation so that it would represent an overbearing form, assisted by the 1.5 storey design. In terms of the plot width coverage, this is very slightly reduced from the existing structure, and whilst taking up much of the plot width, this is a fairly common approach on Ropes Hill Dyke due mostly to the size of the plots in that area.
- 6.9. The design of the dwelling has evolved over the course of the application process, this has included a reduction from 2 storey to 1.5 storey, a reduction in the number of windows, and a lowering of the rear section which provides the entrance and staircase. Along with lessening the scale and mass, this results in an acceptable design, one which has a more traditional appearance, but includes contemporary elements which are appropriate to a new dwelling. It picks up on visual cues of surrounding development and strikes a reasonable balance between a dwelling and boathouse form which is appropriate for the location and surroundings.
- 6.10. Considering wider views of the site, the property would sit comfortably amongst the surrounding development which overall is of a comparable scale. The land to the north of the subject site rises noticeably and provides a tree line and dwellings which dominate the backdrop in views from the south, this ensures that the dwelling would not be a dominant presence or of a scale which is out of character or keeping within this setting. In views along the dyke the dwelling would not appear out of place or

unnecessarily dominant. Overall, it is considered that the proposed dwelling would not have an unacceptable landscape or river scene impact.

- 6.11. Taking into account the above assessment the proposal is considered to be acceptable in terms of design and impact on the landscape, with regard to criterion c) of the Policy DM40, along with Policies DM16 and DM43 of the Local Plan for the Broads.

Amenity of residential properties

- 6.12. The subject site sits opposite a series of mooring cuts and the occasional boathouse which serve properties which sit to the north of the dyke. The dwellings within those properties are a comfortable distance from the subject site and sit much higher in the landscape. It is noted that the proposed dwelling includes a first floor balcony, however this is not an uncommon feature, and taking into account the generally open dyke side of the properties, there would not be an undue loss of privacy for residents to the north of the subject site.
- 6.13. To the immediate west of the subject site is a double width boathouse which dominates that section of the site, part of a wider residential property with the dwelling itself to the southern part of the site. There is amenity space to the west of the boathouses but taking into account the separation by virtue of the boathouse and the vegetation existing within the neighbouring site, it is considered that there would not be an undue loss of amenity or privacy for occupants of the neighbouring dwelling.
- 6.14. To the immediate east of the subject site is a residential property which comprises a boathouse with accommodation in the roof, and a 1.5 storey dwelling known as South Wood, but one which, given its lower roof pitch and taller eaves height, is noticeably stouter than the subject proposed 1.5 storey dwelling. The dwelling sits adjacent to the boundary with the subject property. However, while both dwellings have the same orientation on the site, the set back from the dyke edge is notably different. The result is that the rear building line of the proposed dwelling is forward of the front building line of the neighbouring dwelling. As the proposed dwelling is on the same siting as the existing dwelling this relationship is established and follows a four property building line which begins at the site to the east of the neighbouring dwelling and takes in the neighbouring dwelling, the subject dwelling, and the double boathouse to the west. The siting has been considered in this respect and is largely dictated by the way the subject site narrows noticeably to the rear, putting a limit on development in that area of the site, in addition to restricting parking which is an issue on this section of Ropes Hill.
- 6.15. The neighbouring dwelling known as South Wood, being on the same orientation as the proposed dwelling, faces onto Ropes Hill Dyke rather than facing the neighbouring site. The ground floor has a single window, with windows and doors at first floor level opening onto a balcony. Taking into account the orientation of the dwellings and the separation between the two, it is considered that the proposed dwelling would not have an undue impact on the amenity enjoyed by residents of the neighbouring dwelling in terms of light and outlook from the dwelling itself and external balcony.

South Wood has its principal windows to both sides of the dwelling and given the siting of the proposed dwelling there would be no impact on these windows. The existence of these windows would also place a limitation on the potential to develop the rear of the subject site, which further supports the siting of the proposed dwelling.

- 6.16. To the immediate north of the neighbouring dwelling is a sizeable mooring cut, and between this and the boundary with the subject site is an area of grassed amenity space. With the siting of the proposed dwelling in mind, there would not be overshadowing of this area for the most part of the day. The proposed dwelling is markedly taller than the existing dwelling, so there could be potential for the dwelling to be an overbearing presence in relation to the grassed amenity space. However, it is noted that the proposed eaves height at 3.94m, separated from the shared boundary by 1.05m, is not excessive, and the roof pitches away from the shared boundary at an angle of 45 degrees, which would reduce the sense of an overbearing structure when experienced from the neighbouring site. It is acknowledged that the proposed dwelling taking into account its overall height would have some impact on the amenity enjoyed by neighbouring residents, but this impact is considered to be within an acceptable range and would not warrant a reason to refuse the application. Finally, it is noted that through two neighbour consultations, no objection has been raised by the residents of the neighbouring dwelling known as South Wood. The proposed dwelling is therefore considered acceptable with regard to Policy DM21 of the Local Plan for the Broads.

Horning Knackers Wood

- 6.17. The site is within the Horning Knackers Wood Water Recycling Centre (WRC) catchment and therefore requires careful consideration of Policy DM2 and the Joint Position Statement on Development in the Horning Knackers Wood Water Recycling Centre Catchment. The WRC does not currently have capacity to accommodate further foul flows. The Joint Position Statement stipulates that 'Whilst flows to the Water Recycling Centre remain high, measures to reduce existing flows and prevent additional flows to the catchment need to be taken. Development that could increase the flows to the Water Recycling Centre therefore needs to be avoided. All opportunities to prevent and reduce clean surface, ground or fluvial water entering the sewage system also need to be taken'. It goes on to state that 'This means that there will be a presumption against developments that increase flows to the WRC'.
- 6.18. The proposal is to replace a 1-bed unit with a 1-bed unit and would therefore appear acceptable. However, there is a change from the established use as a holiday home or second home, to a primary home. While there is no restriction on occupying the existing dwelling all year round, the reality is that this is never likely to be the case and it would be reasonable to assume that the level of occupancy in terms of days per calendar year would increase. The Environment Agency (EA) in its first consultation response raised an objection citing an additional en-suite bathroom as well as a larger dwelling and more intensive use going from a holiday let to a full dwelling house. The applicants subsequently provided a Statement of Use & Water Efficiency Proposal, this

was reviewed by the EA which maintained the objection arguing that the information does not include sufficient information to withdraw the objection.

- 6.19. Further information was provided by the applicants in the form of Design Stage Water Efficiency Calculations. A third consultation was carried out with the EA and it withdrew the objection, advising that the Local Planning Authority must decide whether the Applicant has provided sufficient evidence for this application to be consistent with the Horning Knackers Wood Joint Position Statement. It is considered that the calculations provided stating existing use of 178.9 litres/day/person appear to be an overestimation, and there is no metered information provided. Given the age and type of property it would not be expected that a water meter would be present to provide such information and the absence of a meter has been confirmed by the applicants. The EA has referred to the average water consumption for the Anglian Water Services area, which is 133 litres per person per day, it is considered reasonable to use that figure as a baseline for comparison between the existing and proposed consumption. Both existing and proposed are 1-bed dwellings so a direct comparison is realistic.
- 6.20. The existing dwelling has no known water efficiency measures. A comparison of the existing flow rates and capacities and the proposed flow rates and capacities shows a significant reduction, this would contribute to water saving in the standard occupation of the dwelling, and therefore reduced flows to the WRC. Low water consumption washing machine and dishwasher would be used, a basic rainwater harvesting system and a greywater system would be installed. In addition is the suggestion of treating effluent on site to a high standard before discharging to Knackers Wood and could be beneficial in terms of nutrient loading but would not reduce flows which is the key consideration here.
- 6.21. It is noted that the current Building Regulations Part G standard of 125 litres per person per day is discussed, but in accordance with Policy DM4 it would be necessary to limit water demand equivalent to 110 litres per person per day. On a basic measure that would result in savings of 46 litres per day compared to the average consumption. Once the other measures are factored in there would be a meaningful reduction in water consumption and flows to the WRC.
- 6.22. Consideration must then turn to the difference between the existing use and the proposed use. As noted in paragraph 6.18, there would be an expected increase in the occupation of the dwelling as a main residence is generally occupied all year round aside from occasional holidays, whereas a holiday home or second home is not. The fallback position must be considered in that there is no restriction on the number of days the dwelling can be occupied, so the occupation could be nearly the same as for a main residence. There is a lack of data for second home occupation in terms of days per calendar year, and without the need to keep records of occupation as is often required for holiday lets there is no data for this particular property.

- 6.23. It is clear that there would be a notable reduction in flows to the WRC. Taking this into account it would not be reasonable to assert that the occupation would be so markedly different that, even with the reduction in flows, the overall flows to the WRC would increase. Taking a balanced approach to the consideration of this issue and noting the clear benefits of all the measures for water consumption reduction proposed, it is concluded that the proposed replacement dwelling for use without a holiday home restriction is acceptable with regard to Policy DM2 and the Joint Position Statement on Development in the Horning Knackers Wood Water Recycling Centre Catchment.
- 6.24. One final point is that the proposal includes an office which has the potential to provide bedroom accommodation. Any grant of planning permission will include a condition restricting the use of this room to ensure that it does not provide additional sleeping accommodation.

Flood risk

- 6.25. In consideration of flood risk the EA has noted that the replacement dwelling is of a slightly larger size and layout to the existing dwelling, but as the existing dwelling could be extended to this larger size, our view is that there is no increase in vulnerability at the site and the flood risk to the proposed development remains the same as the risk faced by the existing development. The proposed replacement dwelling also provides betterment through the inclusion of raised floor levels, safe refuge on the first floor level, Flood Evacuation Plan and dwelling raised on stilts allowing flood water to be stored below the dwelling. Taking these points into consideration the proposal is acceptable with regards to flood risk. The recommendation is to sign up for Flood Warnings, as this is an essential part of ensuring the safety of occupants it is proposed to include this as a requirement secured by planning condition.
- 6.26. The EA has discussed the need to pass the Sequential and Exception Tests as detailed in paragraphs 168 and 170 of the NPPF. As the proposal is for a replacement of an existing dwelling it is considered that the tests as set out in the NPPF do not apply to this application.
- 6.27. The proposed development is considered acceptable in flood risk terms with regard to Policy DM5, criterion d) of Policy DM40, and the NPPF.

Other issues

- 6.28. A modest widening of the existing mooring cut is proposed along with a removal of the slipway at the rear of the cut. The additional width would be narrower at the dyke end and wider at the rear, with an average width across the length of the cut of 0.9m. This is a minor operation and would have no impact on the appearance of the site or the adjacent dyke. The site is in an area of peat soils, it is proposed to use any extracted peat to fill in the area of the existing slipway and behind the quayheading which would be compliant with policy DM10 of the Local Plan for the Broads.
- 6.29. The existing hard banks comprise steel piling within the mooring cut, and timber quayheading to the dyke bank. It is proposed to replace both areas like-for-like which

would maintain the existing appearance of the site and dyke. The proposal is therefore acceptable with regard to policy DM43 of the Local Plan for the Broads.

- 6.30. The BA Ecologist has appraised the proposal and raised no objection. Advice is provided on timing of the works and protocol regarding protected species if discovered during the works. Biodiversity protocols are provided, along with proposals for biodiversity enhancements which are included in the recommendation below to be secured by planning condition. The proposal is considered to be in accordance with Policy DM13 of the Local Plan for the Broads.
- 6.31. The site is within Dark Sky Zone category 2, with Policy DM22 requiring strict control of external lighting, this would be controlled by planning condition, and it is noted that no external lighting is shown on the submitted plans. Discussions with the applicants have taken place regarding light spill, the amount of glazing fronting the dyke has been reduced compared to the originally submitted scheme, the number of rooflights has been reduced, and the glazing to the southern end of the dwelling is proposed to include measures to limit light spill. The proposal is considered to be in accordance with Policy DM22 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The proposed replacement of the existing dwelling is acceptable in principle as it represents a one-for-one replacement, the dwelling has an existing lawful use, is not worthy of retention, and would not result in the loss of existing tourism accommodation. The proposed dwelling has a simple design and is of a reasonable scale for the site and setting, it would not be detrimental to the character of the surrounding area or the river scene and would not unduly impact on the amenity and privacy enjoyed by neighbouring residents. Subject to a raft of measures to restrict waste water flows the proposal would be acceptable with regard to the Horning Knackers Wood Water Recycling Centre. The proposal provides benefits in terms of flood risk including flood water storage capacity. The proposal is acceptable in consideration of the area dark skies status and will have no adverse impact on ecology. Consequently the proposal is considered to be in accordance with Policies DM2, DM4, DM5, DM10, DM13, DM16, DM21, DM22, DM30, DM40, and DM43 of the Local Plan for the Broads, and the Joint Position Statement on Development in the Horning Knackers Wood Water Recycling Centre Catchment and the National Planning Policy Framework (2023) which are material considerations in the determination of this application.

8. Recommendation

- 8.1. That planning permission be granted subject to the following conditions:
- Time limit
 - In accordance with plans and documents
 - In accordance with FRA, including Appendix A - Void Maintenance Plan

- Details of materials and large scale details of joinery
- Details of solar panels
- Provision of water measures
- Water consumption rate of no more than 110 litres/person/day
- Reuse of peat within 7 days and to be kept wet
- Sign up to Flood Warnings
- No additional sleeping accommodation (e.g. office)
- No external lighting without prior written permission
- Provision of two Summer Roost/ Nursery Bat boxes
- Provision of three Woodcrete Swallow nesting cups
- Removal of Permitted Development rights (Part 1 all relevant, and Part 2 Class A)

9. Reason for recommendation

- 9.1. The proposal is considered to be in accordance with Policies DM2, DM4, DM5, DM10, DM13, DM16, DM21, DM22, DM30, DM40, and DM43 of the Local Plan for the Broads, and the Joint Position Statement on Development in the Horning Knackers Wood Water Recycling Centre Catchment and the National Planning Policy Framework (2023) which are material considerations in the determination of this application.

Author: Nigel Catherall

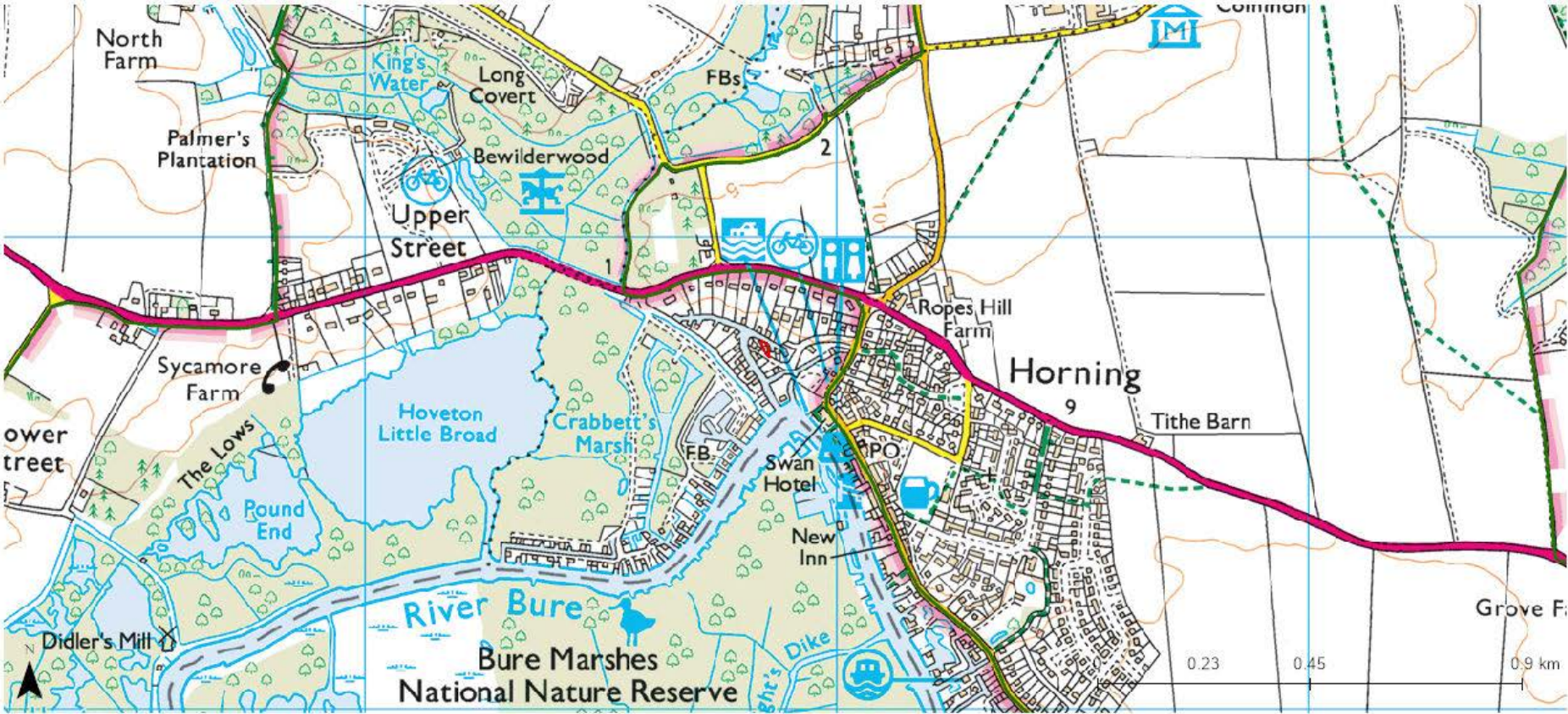
Date of report: 21 October 2024

Background papers: BA/2023/0315/FUL

Appendix 1 – Location map

Appendix 1 – Location map

BA/2023/0315/FUL - Silsden, Ropes Hill, Horning, NR12 8PB



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Planning Committee

08 November 2024

Agenda item number 8

Enforcement update

Report by Development Manager

Summary

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

Recommendation

To note the report.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
14 September 2018 BA/2018/0047/ UNAUP3	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravans (Units X and Y)	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the removal of unauthorised static caravans on land at the Beauchamp Arms Public House should there be a breach of planning control and it be necessary, reasonable and expedient to do so. • Site being monitored. October 2018 to February 2019. • Planning Contravention Notices served 1 March 2019.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Site being monitored 14 August 2019. • Further caravan on-site 16 September 2019. • Site being monitored 3 July 2020. • Complaints received. Site to be visited on 29 October 2020. • Three static caravans located to rear of site appear to be in or in preparation for residential use. External works requiring planning permission (no application received) underway. Planning Contravention Notices served 13 November 2020. • Incomplete response to PCN received on 10 December. Landowner to be given additional response period. • Authority given to commence prosecution proceedings 5 February 2021. • Solicitor instructed 17 February 2021. • Hearing date in Norwich Magistrates Court 12 May 2021. • Summons issued 29 April 2021. • Adjournment requested by landowner on 4 May and refused by Court on 11 May. • Adjournment granted at Hearing on 12 May. • Revised Hearing date of 9 June 2021. • Operator pleaded 'not guilty' at Hearing on 9 June. Trial scheduled for 20 September at Great Yarmouth Magistrates Court. • Legal advice received in respect of new information. Prosecution withdrawn and new PCNs served on 7 September 2021.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Further information requested following scant PCN response and confirmation subsequently received that caravans 1 and 3 occupied on Assured Shorthold Tenancies [27/10/2021] • Verbal update to be provided on 3 December 2021 • Enforcement Notices served 30 November, with date of effect of 29 December 2021. Compliance period of 3 months for cessation of unauthorised residential use and 4 months to clear the site [06/12/2021] • Site to be visited after 29 March to check compliance. 23 March 2022 • Site visited 4 April and caravans appear to be occupied. Further PCNs served on 8 April to obtain clarification. There is a further caravan on site [11/04/2022] • PCN returned 12 May 2022 with confirmation that caravans 1 and 3 still occupied. Additional caravan not occupied. • Recommendation that LPA commence prosecution for failure to comply with Enforcement Notice [27/05/2022] • Solicitor instructed to commence prosecution [31/05/2022] • Prosecution in preparation [12/07/2022] • Further caravan, previously empty, now occupied. See separate report on agenda [24/11/2022] • Planning Contravention Notice to clarify occupation served 25 November 2022 [20/01/2023] • Interviews under caution conducted 21 December 2022 [20/01/2023] • Summons submitted to Court [04/04/2023]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Listed for hearing on 9 August 2023 at 12pm at Norwich Magistrates' Court [17/05/2023] • Operator pleaded 'not guilty' at hearing on 9 August and elected for trial at Crown Court. Listed for hearing on 6 September 2023 at Norwich Crown Court [09/08/2023] • Hearing at Norwich Crown Court adjourned to 22 September 2023 [01/09/2023] • Hearing at Norwich Crown Court adjourned to 22 December 2023 [26/09/2023] • Hearing postponed at request of Court, to 8 April 2024 rescheduled date [16/01/2024] • Hearing postponed at request of Court, to 14 May rescheduled date [10/04/2024] • Court dismiss Defendants' application to have prosecution case dismissed. Defendants plead 'not guilty' and trial listed for seven days commencing 23 June 2025 [14/05/2024]
13 May 2022 BA/2022/0023/ UNAUP2	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised operation development comprising erection of workshop, kerbing and lighting	<ul style="list-style-type: none"> • Authority given by Chair and Vice Chair for service of Temporary Stop Notice requiring cessation of construction 13 May 2022 • Temporary Stop Notice served 13 May 2022. • Enforcement Notice and Stop Notice regarding workshop served 1 June 2022 • Enforcement Notice regarding kerbing and lighting served 1 June 2022 • Appeals submitted against both Enforcement Notices [12/07/2022] • Appeals dismissed and Enforcement Notices upheld 29 July 2024.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Workshop to be dismantled and removed off site within two months; all associated structures and fixtures to be removed off site, services (electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months • Kerbed structure and lighting columns to be taken down and electricity connections to be taken up, all within two months; all structures, materials and associated debris arising from the above to be removed off site and the land to be made good within three months [30/07/2024] • Site visit to be carried out and owner reminded of compliance periods [27/09/2024]
<p>21 September 2022</p> <p>BA/2017/0006/UNAUP1</p>	<p>Land at Loddon Marina, Bridge Street, Loddon</p>	<p>Unauthorised static caravans</p>	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravans. • Enforcement Notice served [04/10/2022] • Enforcement Notice withdrawn on 19 October due to minor error; corrected Enforcement Notice re-served 20 October 2022 • Appeals submitted against Enforcement Notice [24/11/2022] • Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024. • Residential use of the caravans to cease, the caravans and associated structures, fixtures, fittings and domestic paraphernalia to be removed off site, services (including water and electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good, all within six months [30/07/2024]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> Owner to be reminded that notice to be complied with by 29 January 2025 [27/09/2024]
<p>9 December 2022 BA/2018/0047/ UNAUP3</p>	<p>Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter</p>	<p>Unauthorised static caravan (Unit Z)</p>	<ul style="list-style-type: none"> Planning Contravention Notice to clarify occupation served 25 Nov 2022. Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravan Enforcement Notice served 11 January 2023 [20/01/2023] Appeals submitted against Enforcement Notice [16/02/2023] Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024. Residential use of the caravan to cease within two months; the caravan and associated structure or fixtures to be removed off site, services (electricity and water) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months [30/07/2024] Site visit to be carried out and owner reminded of compliance periods [27/09/2024]
<p>31 March 2023 BA/2023/0004/ UNAUP2</p>	<p>Land at the Berney Arms, Reedham</p>	<p>Unauthorised residential use of caravans and outbuilding</p>	<ul style="list-style-type: none"> Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of the caravans Enforcement Notice served 12 April 2023 Enforcement Notice withdrawn on 26 April 2023 due to error in service. Enforcement Notice re-served 26 April 2023 [12/05/2023] Appeal submitted against Enforcement Notice [25/05/2023]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
2 February 2024 BA/2022/0007/ UNAUP2	Holly Lodge. Church Loke, Coltishall	Unauthorised replacement windows in listed building	<ul style="list-style-type: none"> • Authority given to serve a Listed Building Enforcement Notice requiring the removal and replacement of the windows and the removal of the shutter. Compliance period of 15 years • LPA in discussions with agent for landowner [10/04/2024] • No resolution achieved through discussion. Legal advice sought [29/08/2024] • Case review – Listed Building enforcement notice to be served, in process of content being considered and drafted [27/09/2024]

Author: Steve Kenny

Date of report: 28 October 2024

Background papers: Enforcement files

Planning Committee

08 November 2024

Agenda item number 9

Consultation responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed responses.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 18 October 2024

Appendix 1 – Planning Policy consultations received

Appendix 1 – Planning Policy consultations received

Ministry of Housing, Communities and Local Government

Document: [Brownfield Passport: Making the Most of Urban Land](#)

Due date: No end date given

Status: Planning Reform Working Paper

Proposed level: Planning Committee Endorsed.

Notes

This paper invites views on further action that we could take through the planning system to support the development of brownfield land in urban areas. It proposes options for a form of ‘brownfield passport’, which would be more specific about the development that should be regarded as acceptable, with the default answer to suitable proposals being a straightforward “yes”.

The proposals relate to the principle, the scale, and the form of development, and to the potential wider use of Local Development Orders to grant area-wide permissions – all in a way that retains appropriate local oversight. A series of questions are posed at the end of the paper, to inform discussions with the sector before determining whether any of these proposals are taken forward.

Proposed response

2. What caveats should accompany any general expectation that development on brownfield land within urban settlements is acceptable?
 - Impact on amenity
 - Design
 - Heritage assets
 - Conservation areas
 - Flood risk
 - Habitats and species. For example, open mosaic habitat. You may want to talk to PAS about this habitat type and BNG as through the PAS BNG forum, various issues have been raised about this habitat type and BNG and it being difficult to offset or address as I understand it is quite a unique habitat type that may not be easy to recreate.
 - Contamination
3. How best can urban areas be identified and defined if this approach is pursued?
 - We already do a call for sites as part of Local Plan production. But potentially ask the Parish or Town Council to identify sites. Land registry could then be used to find the owner.

4. Could national policy play a role in setting expectations about the minimum scale of development which should be regarded as acceptable in accessible urban locations?
 - Some Local Plans already have density policies. But the idea of setting density or scale could be explored through national policy
5. What parameters could be set for both the scale of development and accessibility?
 - Would the scale be somewhat constrained by the access and where the access leads to as in what kind of road in terms of route hierarchy?
6. Could more use be made of design guidance and codes to identify specific forms of development that are acceptable in particular types of urban area?
 - Yes. Would expect funding to be available to Local Planning Authorities (LPA) for this – please note the term LPA is essential here rather than Council or Local Authority to include protected landscapes (National Parks and the Broads Authority) which are LPAs for their areas.
7. What sort of areas would be most suited to this approach, and at what geographic scale could such guidance and codes be used?
 - This reflects the density or scale of development that national policy may set. Perhaps across the built-up area?
9. Are there any other issues that we should consider if any of these approaches were to be taken forward, in particular to ensure they provide benefits as early as possible?
 - A requirement for applicants to deliver the development they have permission for. There has been nothing from Government about addressing this.
 - Funding for LPAs as budgets are tight and Local Plans are being prepared at the same time.
 - Adequately addressing the local constraints to a site.

Broadland and South Norfolk Councils

Document: [Broadland & South Norfolk Design Code](#)

Due date: 11 November 2024

Status: 2nd Public Consultation

Proposed level: Planning Committee Endorsed.

Notes

Broadland District Council and South Norfolk Council have appointed Tibbalds Planning and Urban Design to develop a district wide Design Code for both South Norfolk and Broadland. The aim of the Design Code is to strengthen the design quality and consistency of new residential developments across the area. It will provide straightforward guidance to ensure high quality and appropriate development, covering themes such as the height of buildings, their design and materials, landscaping, the design of bin stores, and the design of parking spaces. It is anticipated that the Design Code will be applicable to all new development, although it is expected to be most relevant to new residential developments that are under 500 homes.

The Design Code will be used to help in the planning applications process to ensure that new development is of appropriate quality, responds to the local context, and provides great places for people to live. As part of this Code, particular emphasis will be given to the quality of landscaping, the character of local buildings, and the use of distinctive materials. It is intended that the new Code will eventually be adopted by each Council as a Supplementary Planning Document (SPD). SPDs are used to provide guidance on planning policies.

Proposed response

Norwich fringe

- What does this mean? ‘Provide a biodiversity net gain and enhanced ecological situation on-site’ – under Norwich fringe settlements. I am not sure what an enhanced ecological situation means.
- Development is likely to be on the edge of settlements. Therefore, lighting needs to be fully justified and if required, well-designed. There is little, if any, mention of lighting in the document. This is relevant to all development.

Market town and key service centres

- Says ‘New homes should be contextual and respond to local character. But in some instances, there is an opportunity for contemporary, sustainable and innovative design responses’ – shouldn’t all homes be sustainable? Perhaps you mean zero carbon or the like?

- Development is likely to be on the edge of settlements. Therefore, lighting needs to be fully justified and if required, well-designed. There is little, if any, mention of lighting in the document. This is relevant to all development.

Medium and Large Villages

- Development is likely to be on the edge of settlements. Therefore, lighting needs to be fully justified and if required, well-designed. There is little, if any, mention of lighting in the document. This is relevant to all development.

Dispersed Settlements and Countryside

- Development is likely to be on the edge of settlements. Therefore, lighting needs to be fully justified and if required, well-designed. There is little, if any, mention of lighting in the document. This is relevant to all development.

Planning Committee

08 November 2024

Agenda item number 10

Local Plan- Preparing the Publication Version

Report by Planning Policy Officer

Summary

This report introduces some updated evidence and policies that will support the next version of the Local Plan. These are the Gypsy and Traveller Need Assessment in Great Yarmouth and the Whole Local Plan Viability Assessment.

Recommendations

It is recommended that members endorse:

- i. the Great Yarmouth Borough – Gypsy and Traveller Need Assessment Addendum as evidence for the Local Plan;
 - ii. the Whole Local Plan Viability Appraisal as evidence for the Local Plan;
 - iii. the approach to off-site affordable housing as set out at section 3.2 of this report;
 - iv. all dwellings to be designed to be accessible and adaptable – M4(2) unless site constraints dictate otherwise and
 - v. 10% of affordable housing is designed for wheelchairs - M4(3) standard.
-

1. Introduction

1.1. This report introduces some updated evidence and policies that will support the next version of the Local Plan. These are the Gypsy and Traveller Need Assessment in Great Yarmouth and the Whole Local Plan Viability Assessment.

2. Great Yarmouth Borough – Gypsy and Traveller Need Assessment Addendum

2.1. The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Great Yarmouth. Great Yarmouth includes two local planning authority areas; Great Yarmouth Borough and part of the Broads Authority.

- 2.2. This is a partial update to the previous GTAA's that have been completed covering Great Yarmouth Borough and the areas of the Broads Authority in Great Yarmouth. The outcomes of the GTAA have been split to identify figures for the areas of Great Yarmouth that are in the Broads Authority, and the area that is outside of the Broads Authority.
- 2.3. A total of 14 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Great Yarmouth Borough and a total of 13 interviews with Gypsies and Travellers on sites in the Broads Authority part of Great Yarmouth. No Travelling Showpeople yards were identified in either area.
- 2.4. The study identified the need for Gypsy and Travellers in the Broads Authority part of Great Yarmouth borough until 2041 as 26 pitches in total. There is a current need of 22 pitches and a future need of 4 pitches.
- 2.5. In terms of meeting the need, or the current need, we are investigating how long caravans and residential buildings have been in their current location on the Cobholm Island part of Great Yarmouth using aerials and meeting with representatives on site. We believe that some have been there the requisite period of time to be immune to planning enforcement action and these will be deducted from the 22.
- 2.6. In terms of meeting the residual current need, we are undertaking a call for sites for gypsy and traveller sites.
- 2.7. We will also work with Great Yarmouth Borough Council under the Duty to Cooperate.
- 2.8. For the future need of 4, we will continue to include a criteria-based policy in the Local Plan.

3. Whole Local Plan Viability Appraisal

- 3.1. Three Dragons were commissioned to assess the viability of the proposed policies in the Local Plan. The final report is included at Appendix 2, with technical appendices at Appendix 3.
- 3.2. The study concludes that we can continue to seek off site affordable housing contributions for schemes of fewer than 10 dwellings (as follows) and this will be reflected in the Local Plan affordable housing policy. Whereas the current Local Plan seeks off-site contributions for schemes of 6-9 dwellings, the viability assessment concluded that lower thresholds were viable as follows:
 - 1) Brownfield schemes located on the waterfront: 3-9 dwellings
 - 2) Other brownfield schemes: 5-9 dwellings
 - 3) Greenfield schemes: 3-9 dwellings.
- 3.3. BNG of 20% is found to be viable and this was discussed at the last Planning Committee.

- 3.4. There is an optional Building Regulations standard that a Local Plan can implement relating to accessible and adaptable dwellings, called M4(2) standard. The viability study presumes all dwellings will be built to be accessible and adaptable to changing needs and finds this approach viable. The Local Plan therefore is amended to reflect this, although if site constraints do not permit this, then the standard will not be applied.
- 3.5. The study also assessed the potential for 10% of affordable homes to be designed to be wheelchair accessible (standard M4(3)). This is found to be viable and is included in the Local Plan.
- 3.6. Turning to how the viability assessment has addressed the issue of mitigating nutrient enrichment, it has presumed £3,500 mitigation per dwelling. Taking this into account, the standards discussed in the report and at previous paragraphs of this section are found to be viable.

Author: Natalie Beal

Date of report: 22 October 2024

Appendix 1 – [Great Yarmouth Borough Gypsy and Traveller Accommodation Assessment](#)

Appendix 2 – [Local Plan Viability Assessment Report](#)

Appendix 3 – [Local Plan Viability Assessment Technical Appendices](#)



GREAT YARMOUTH
BOROUGH COUNCIL



Broads
Authority

Great Yarmouth Gypsy and Traveller Accommodation Assessment (GTAA) Update

Final Report

September 2024



Opinion Research Services, The Strand, Swansea SA1 1AF

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1. EXECUTIVE SUMMARY

Introduction and Methodology

- 1.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Great Yarmouth. Great Yarmouth includes two local planning authority areas; Great Yarmouth Borough and part of the Broads Authority.
- 1.2 This is a partial update to the previous GTAAs that have been completed covering Great Yarmouth Borough and the areas of the Broads Authority in Great Yarmouth. The GTAA Update provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2024/25 to 2041/42 to cover both Council's and the Broads Authority's Local Plans periods and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS) 2023¹.
- 1.3 The outcomes of the GTAA have been split to identify figures for the areas of Great Yarmouth that are in the Broads Authority, and the area that is outside of the Broads Authority.
- 1.4 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the area through a combination of desk-based research, and engagement with members of the Travelling Community living on all known sites, yards, and encampments.
- 1.5 A total of 14 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Great Yarmouth Borough and a total of 13 interviews with Gypsies and Travellers on sites in the Broads Authority part of Great Yarmouth. No Travelling Showpeople yards were identified in either area.
- 1.6 Despite efforts, it was not possible to complete any interviews with households living in bricks and mortar in either Great Yarmouth or the Broads Authority.
- 1.7 The fieldwork for the study was completed between April 2024 and June 2024, and the baseline date for the study is June 2024.

¹ The PPTS planning definition was updated in December 2023. See Chapter 2 for further details.

Key Findings

Pitch Needs – Gypsies and Travellers

- ^{1.8} Overall, the pitch needs for Gypsies and Travellers for the period 2024/25-2041/42 are set out below. Needs are set out for those households that met the 2023 PPTS planning definition of a Gypsy or Traveller; for any undetermined households² where an interview was not able to be completed due to households not being present despite up to three visits to each site; and for those households that did not meet the 2023 PPTS planning definition – although this is not a requirement for a GTAA.
- ^{1.9} Only the need from those households who met the planning definition should be formally considered as need arising from the GTAA. The need arising from households that met the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies as appropriate, or through consideration of regularising any temporary or unauthorised sites.
- ^{1.10} The Local Planning Authorities will need to carefully consider how to address any need associated with undetermined Travellers, as it is unlikely that all this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan Policies, the Local Planning Authorities should consider the use of a criteria-based policy (as suggested in PPTS) for any undetermined households, as well as to deal with any windfall applications, and need from bricks and mortar.
- ^{1.11} In general terms, the need for those households who do not meet the planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies. This approach is specifically referenced in the National Planning Policy Framework (NPPF) 2023.
- ^{1.12} Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance, or a locally derived figure in the case of National Parks.
- ^{1.13} Paragraph 63 then states that [emphasis added] *‘Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These grounds should include (but are not limited to) those who require affordable housing; families with children; older people; (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; **travellers**; people who rent their homes and people wishing to commission or build their own homes’*. The footnote to this section states that *‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.’*
- ^{1.14} The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showpeople. Whilst the findings in this report are aggregated totals for the whole of Great Yarmouth and the Broads Authority, due to data protection issues, the Local Planning Authorities have more detailed data to support the preparation of any future Local Plan Policies.

² See Chapter 3 for further information on undetermined households.

Great Yarmouth Borough (excluding the Broads Authority)

- 1.15 There is only one public site in Great Yarmouth borough (excluding the Broads Authority) at Gapton Hall. There were 6 Gypsy or Traveller households that were interviewed that met the 2023 PPTS planning definition and 12 households that did not meet the PPTS planning definition in Great Yarmouth. There were no undetermined households as it was possible to complete an interview with households living on all occupied pitches.
- 1.16 In Great Yarmouth borough there is **no need for any pitches for households that met the 2023 PPTS planning definition**. Whilst the household interviews did identify a current need for 3 pitches for concealed or doubled-up households or adults children, there were a total of 6 vacant pitches on the site.
- 1.17 Given that it was possible to complete interviews with households living on all occupied pitches there is **no need from undetermined households**.
- 1.18 Whilst not now a requirement to include in a GTAA, there is a need in Great Yarmouth borough for **8 pitches for households that did not meet the 2023 PPTS planning definition**. This is made up of 1 doubled-up household; 4 from a 5-year need from teenagers; and 6 from new household formation derived from the demographics of the households that were interviewed. This need has been netted off against a further 3 vacant pitches on the site.
- 1.19 Figure 1 summarises the identified need and
- 1.20 Figure 2 breaks this down by 5-year periods.

Figure 1 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) 2024-41

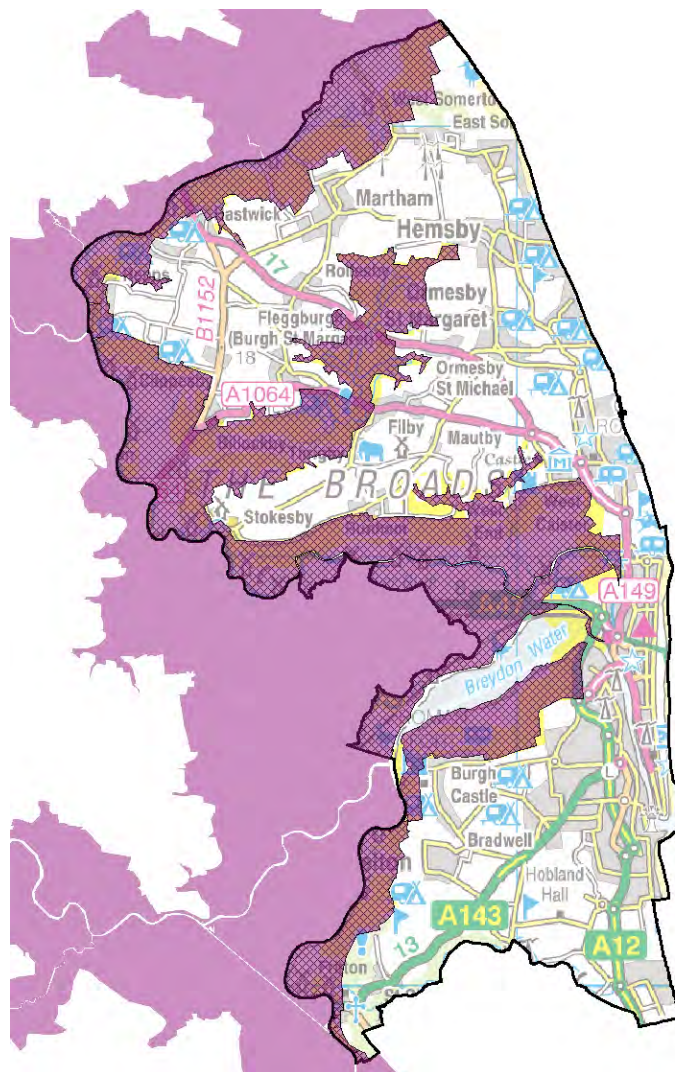
Status	2024 - 2041
Meet Planning Definition	0
Undetermined	0
Do not meet Planning Definition	8
TOTAL	8

Figure 2 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 - 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 18	2039 – 41	0
0 – 18	2024 - 41	0

Broads Authority Part of Great Yarmouth Borough

- ^{1.21} The assessment of need has also covered the parts of the Broads Authority that are located within Great Yarmouth (see map below). There are 9 small unauthorised private Gypsy and Traveller sites located in the Broads Authority part of Great Yarmouth at Cobholm Island.



- ^{1.22} There were 15 Gypsy or Traveller households that were identified that met the 2023 PPTS planning definition and 2 households that did not meet the planning definition in the Broads Authority part of Great Yarmouth Borough. There were no undetermined households as it was possible to complete an interview with households living on all occupied pitches.
- ^{1.23} In the Broads Authority part of Great Yarmouth borough there is a need for **24 pitches for households that met the planning definition**. This is made up of 11 unauthorised pitches; 4 concealed/doubled-up households or single adults; 5 from a 5-year need from teenagers; and 4 from new household formation derived from the household demographics.

- ^{1.24} It should be noted that it is understood that several of the unauthorised pitches may have been occupied for over 10 years and therefore may be immune from any enforcement action. The Broads Authority will need to complete additional investigations to determine which of these pitches could be classed as tolerated for planning purposes and this may reduce the levels of identified need.
- ^{1.25} Given that it was possible to complete interviews with households living on all occupied pitches there is **no need from undetermined households**.
- ^{1.26} There is a need for **2 pitches for households that did not meet the planning definition** from 2 unauthorised pitches.
- ^{1.27} Again it should be noted that it is understood that some of the unauthorised pitches may have been occupied for over 10 years and therefore may be immune from any enforcement action. The Broads Authority will need to complete additional investigations to determine which of these pitches could be classed as tolerated for planning purposes and this may reduce the levels of identified need.

Figure 3 summarises the identified need and Figure 4

- ^{1.28} Figure 2 breaks this down by 5-year periods.

Figure 3 - Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough 2024-41

Status	2024 - 2041
Meet Planning Definition	24
Undetermined	0
Do not meet Planning Definition	2
TOTAL	26

Figure 4 - Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 - 28	20
6 – 10	2029 – 33	1
11 – 15	2034 – 38	2
16 – 18	2039 – 41	1
0 – 18	2023 - 41	24

Plot Needs – Travelling Showpeople

- ^{1.29} There were no Travelling Showpeople identified living on yards in Great Yarmouth or the Broads Authority part of Great Yarmouth so there is no current or future need for plots.

Transit Recommendations

- ^{1.30} Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at

this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.

- 1.31 As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- 1.32 It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- 1.33 In the short-term the Local Planning Authorities should continue to use their current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.
- 1.34 The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Local Planning Authority and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- 1.35 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

2. INTRODUCTION

- 2.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in The Borough of Great Yarmouth. Great Yarmouth borough includes two local planning authority areas; Great Yarmouth Borough and parts of the Broads Authority.
- 2.2 This is a partial update to the previous GTAAs that have been completed covering Great Yarmouth Borough and the parts of the Broads Authority in Great Yarmouth. The GTAA Update provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2024/25 to 2041/42 to cover both the Council's and the Broads Authority's Local Plans periods³ and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS) 2023⁴.
- 2.3 The outcomes of the GTAA have been split to identify figures for the parts of Great Yarmouth borough that are in the Broads Authority, and the area that is outside of the Broads Authority.
- 2.4 The study provides an evidence base to enable the Local Planning Authorities to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2023, the Housing and Planning Act (2016), the National Planning Policy Framework (NPPF) 2023, and the Planning Practice Guidance (PPG) 2021.
- 2.5 As well as identifying current and future permanent accommodation needs, it also seeks to identify any need for the provision of transit sites or emergency stopping places.
- 2.6 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- 2.7 The baseline date for the study is June 2024, which is when the fieldwork was completed.

Definitions

- 2.8 The only planning definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2023). The previous definitions set out in the Housing Act (2004) were repealed by the Housing and Planning Act (2016).

The Planning Definition in PPTS (2023)

- 2.9 For the purposes of the planning system, the definition was changed in PPTS (2023). The planning definition is set out in Annex 1 and states that:

³ Whilst the Broads Authority Local Plan period is from 2021-2041 the GTAA Update has assumed that supply and demand for the period 2021-2024 net to zero.

⁴ The PPTS planning definition was updated in December 2023. See Chapter 2 for further details.

For the purposes of this planning policy “gypsies and travellers” means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

a) Whether they previously led a nomadic habit of life.

b) The reasons for ceasing their nomadic habit of life.

c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

For the purposes of this planning policy, “travelling showpeople” means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

***Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG),
December 2023***

- ^{2.10} The key change that was made to both definitions in the December 2023 revision to PPTS was the reintroduction of those who have ceased to travel permanently. These households were excluded from the 2015 PPTS planning definition.

Definition of Travelling

- ^{2.11} One of the most important questions that GTAA’s will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term ‘nomadic’.
- ^{2.12} **R v South Hams District Council (1994)** – defined Gypsies as “persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- ^{2.13} In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.

- ^{2.14} In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- ^{2.15} The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought judicial review of the Local Authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.
- ^{2.16} That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- ^{2.17} **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- ^{2.18} The implication of these rulings in terms of applying the planning definition is that it will only include those who travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence. It can include those who have a permanent site or place of residence, but that it will not include those who have never travelled for work, or those who have never travelled. It will not cover those who commute to work daily from a permanent place of residence (see **APP/E2205/C/15/3137477**).
- ^{2.19} It may also be that within a household some family members travel for nomadic purposes on a regular basis, but other family members stay at home to look after children in education, or other dependents with health problems etc. In these circumstances the household unit would be defined as travelling under the planning definition.
- ^{2.20} Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily or permanently as a result of their own or their family's or dependants' educational, health needs or old age. In order to have ceased to travel temporarily or permanently these households will need to demonstrate that they have travelled for work, or for seeking work, in the past.
- ^{2.21} This approach was endorsed by a Planning Inspector in Decision Notice for an appeal in East Hertfordshire (**Appeal Ref: APP/J1915/W/16/3145267**) that was issued in December 2016. A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to ‘purposive activities including work’ also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

- ^{2.22} This was further reinforced in a Decision Notice for an appeal in Norfolk that was issued in February 2018 (**Ref: APP/V2635/W/17/3180533**) that stated:

As discussed during the hearing, although the PPTS does not spell this [the planning definition] out, it has been established in case law (R v South Hams DC 1994) that the nomadism must have an economic purpose. In other words, gypsies and travellers wander or travel for the purposes of making or seeking their livelihood.

Legislation and Guidance for Gypsies and Travellers

- ^{2.23} Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:

- » The Housing Act, 1985
- » Planning Policy for Traveller Sites (PPTS), 2023
- » The Housing and Planning Act, 2016
- » National Planning Policy Framework (NPPF), 2023
- » Planning Practice Guidance⁵ (PPG), 2021

- ^{2.24} In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews need to be taken into consideration. Relevant examples have been included in this report.

- ^{2.25} The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the 2023 PPTS. It should be read in conjunction with the National Planning Policy

⁵ With particular reference to the sections on Housing needs of different groups (May 2021).

Framework (NPPF) 2023. In addition, the Housing and Planning Act (2016) makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the planning definition – through the assessment of all households living in caravans.

Planning Policy for Traveller Sites (PPTS) 2023

^{2.26} PPTS (2023), sets out the direction of Government policy. As well as introducing the planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- » Local planning authorities should make their own assessment of need for the purposes of planning.
- » To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
- » To encourage local planning authorities to plan for sites over a reasonable timescale.
- » That plan-making and decision-taking should protect Green Belt from inappropriate development.
- » To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites.
- » That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.
- » For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- » To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.
- » To reduce tensions between settled and Traveller communities in plan-making and planning decisions.
- » To enable provision of suitable accommodation from which Travellers can access education, health, welfare, and employment infrastructure.
- » For local planning authorities to have due regard to the protection of local amenity and local environment.

^{2.27} In practice, the document states that (PPTS Paragraph 9):

- » Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.

^{2.28} PPTS goes on to state (Paragraph 10) that in producing their Local Plan, local planning authorities should:

- » Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.
- » Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

- » Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a Duty-to-Cooperate on strategic planning issues that cross administrative boundaries).
- » Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.
- » Protect local amenity and environment.

^{2.29} Local Authorities now have a duty to ensure a 5-year land supply to meet the identified needs for Traveller sites. However, PPTS also notes in Paragraph 11 that:

- » Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community.

National Planning Policy Framework (NPPF) 2023

^{2.30} The most recent version of the National Planning Policy Framework was issued in December 2023. Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance, or a locally derived method in the case of National Parks.

^{2.31} Paragraph 63 then states that [emphasis added] *'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These grounds should include (but are not limited to) those who require affordable housing; families with children; older people; (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'*

^{2.32} This sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.

^{2.33} In an Appeal Decision that was published in March 2020 for an appeal in Central Bedfordshire (**APP/P0240/C/18/3213822**) the Inspector concluded in relation to the then Paragraph 61 of the NPPF (now paragraph 62) that:

It seems to me that this wording makes clear that it is only those meeting that definition that should be included in an assessment of need for 'planning definition' travellers and that gypsies who have ceased travelling should be counted and provided for elsewhere and this is the approach proposed in the emerging Local Plan. This does not, of course mean that these gypsies should be allocated 'bricks and mortar' type housing. They will also need a suitable supply of caravan sites to meet their needs.

Levelling-up and Regeneration Act (2023)

^{2.34} Among other things, this Act seeks to make provision about town and country planning. The Act received Royal Assent in October 2023. Whilst there is currently no specific reference to changes to policy and guidance for Gypsies and Travellers, the Local Planning Authorities may need to consider the outcomes of any changes to planning legislation that may impact on the accommodation needs of Gypsies and Travellers. In addition, the Act will seek to abolish the Duty to Cooperate that was introduced by the Localism Act in 2011.

Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities and others [2022]

^{2.35} In October 2022 the Court of Appeal handed down judgment in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391*. The case was a challenge to a specific appeal decision and concerned whether the planning definition of Gypsies and Travellers contained in Annex 1 of the PPTS (2015) is discriminatory against Travellers who are settled and who no longer travel for work due to old age or disability. The Court of Appeal allowed the appeal and quashed the Inspectors decision from 2018 and referred the case back to The Secretary of State for redetermination.

^{2.36} Whilst certain parts of the PPTS planning definition of a Traveller were found to be discriminatory, as the PPTS 2015 itself was not the subject of the case it has not been quashed or declared unlawful at this time.

^{2.37} As a result of the Lisa Smith Judgement the Government made changes to the PPTS in December 2023 to reintroduce those who have ceased to travel permanently under the definition.

3. METHODOLOGY

Background

- 3.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of changes to the 2015 PPTS, the 2023 PPTS, the Housing and Planning Act (2016), the NPPF (2023), and the PPG (2021). It has also responded to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 3.2 PPTS contains a number of requirements for local authorities which must be addressed in any GTAA methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.
- 3.3 ORS would note that the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in Bedford, Brentwood, Cambridge, Castle Point, Central Bedfordshire, Cheltenham, Cotswold, Daventry, East Hertfordshire, Gloucester, Maldon, Milton Keynes, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.
- 3.4 An Appeal Decision for a Hearing in Central Bedfordshire (**APP/P0240/C/18/3213822**) that was issued in March 2020 concluded:

'...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.'

- 3.5 The Inspector for the East Herts District Plan also found the evidence base in relation to Gypsies and Travellers to be sound in her Inspection Report that was issued in July 2018. She concluded:

'The need of the travelling community has been carefully and robustly assessed and locations to meet identified needs have been allocated for the plan period. Policy HOU9 sets out the need for 5 permanent pitches for Gypsies and Travellers... the approach to the provision of housing is comprehensive, positively prepared, appropriate to the needs of the area and consistent with national policy.'

- 3.6 The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.

Desk-Based Review

- 3.7 ORS collated a range of secondary data that was used to support the study. This included:
- » Census data.
 - » Traveller Caravan Count data.
 - » Planning history for existing sites.
 - » Records of unauthorised sites/encampments.
 - » Information on planning applications/appeals.
 - » Information on enforcement actions.
 - » Existing Needs Assessments and other relevant local studies.
 - » Existing national and local policy, guidance, and best practice.

Stakeholder Engagement

- 3.8 Whilst no formal interviews with wider stakeholders were completed for this GTAA Update, detailed discussions were held with key Council and Broads Authority Officers to determine any changes since the previous GTAA was completed.

Working Collaboratively with Neighbouring Planning Authorities

- 3.9 As this was an update of an existing GTAA there was no formal engagement programme completed with neighbouring planning authorities.

Survey of Travelling Communities

- 3.10 Through the desk-based research and the discussions with Officers from the Council and the Broads Authority, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather the robust information needed to assess households against the planning definition of a Traveller, up to 3 attempts were made to contact households where it was not initially possible to conduct an interview because they were not available at the time.
- 3.11 Our experience suggests that an attempt to interview households on all pitches is more robust. A sample-based approach often leads to an under-estimate of need – and is an approach which is regularly challenged by the Planning Inspectorate and at Planning Appeals.
- 3.12 ORS worked closely with the Local Planning Authorities to ensure that the interviews collected all the necessary information to support the study. The site interview questions that were used (see **Appendix D: Households that did not meet the Planning Definition**) take account of changes to PPTS in 2023 and collect the information ORS feel is necessary to apply the current planning definition of a Traveller.

- 3.13 All interviews were completed by members of our dedicated team of experienced Researchers who work on our GTAA studies across England and Wales. Researchers attempted to conduct semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics. They used the ORS households interview questions (see **Appendix F**) as the basis for their discussions. ORS Researchers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.
- 3.14 Researchers also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- 3.15 Where it was not possible to undertake an interview, Researchers sought to capture as much information as possible about each pitch through a proxy interview from sources including neighbouring residents and site management (if present).

Engagement with Bricks and Mortar Households

- 3.16 The 2021 Census recorded 52 households who identified as either Gypsies or Irish Travellers, or Roma who lived in a house or bungalow in Great Yarmouth borough and 39 living in a flat or maisonette.
- 3.17 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; intelligence from discussions with Council Officers and Officers from the Broads Authority – including any households on the waiting list for the public site. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known.
- 3.18 As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard.

Timing of the Fieldwork

- 3.19 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS would normally aim to complete fieldwork during the non-travelling season, and also to avoid days of known local or national events. The fieldwork and review of previous fieldwork was completed between May 2023 and June 2024 and Researchers were able to collect information for residents living on sites in Great Yarmouth borough.

Applying the PPTS Planning Definition

- ^{3.20} The primary change to PPTS in December 2023 in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. There are a number of relevant appeal decisions that have been issued by the Planning Inspectorate on how the planning definition should be applied (see Paragraphs 2.20 and 2.21 for examples) – these support the view that households need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily or permanently due to education, ill health or old age.
- ^{3.21} The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:
- » Whether any household members have travelled in the past 12 months.
 - » Whether household members have ever travelled.
 - » The reasons for travelling.
 - » Where household members travelled to and for how long.
 - » The times of the year that household members travelled.
 - » Where household members stay when they are away travelling.
 - » When household members stopped travelling.
 - » The reasons why household members stopped travelling.
 - » Whether household members intend to travel again in the future.
 - » When and the reasons why household members plan to travel again in the future.
- ^{3.22} When the household interviews were completed, the answers from the questions on travelling were used to determine the status of each household against the planning definition in PPTS 2023. Through a combination of responses, households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily or permanently due to education, ill health or old age. This included information on the type of work that is undertaken; which family members travelled for work; the times of the year that family members travelled for work; the duration of the trips for work; and where the family members stay when travelling away from home for work. A similar definition applies to Travelling Showpeople as to Gypsies and Travellers.
- ^{3.23} Households that need to be formally considered in the GTAA fall under one of three classifications. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:
- » Households that travel under the planning definition.
 - » Households that have ceased to travel temporarily or permanently under the planning definition.
 - » Households where an interview was not possible who may fall under the planning definition.
- ^{3.24} Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they have been assessed to provide the Local Planning Authorities with components of need to

consider as part of their work on wider housing needs assessments. This is consistent with the requirements of the NPPF (2023).

Undetermined Households

- ^{3.25} As well as calculating need for households that meet the planning definition, a GTAA has to consider the needs of any households where an interview was not able to be completed (either due to refusal to be interviewed or households that were not present during the fieldwork period). Whilst there is no guidance that sets out how the needs of these households should be addressed; an approach was taken that sought an estimate of potential need from these households. This is an additional need figure over and above the need identified for households that meet the planning definition.
- ^{3.26} The estimate sought to identify potential current and future need from any pitches known to be temporary or unauthorised, and through new household formation. As the demographics of any undetermined households are unknown, the ORS national household formation rate of 1.50% has been used. In addition, need from concealed-doubled-up households and from teenagers has been modelled based on the outcomes from completed interviews.
- ^{3.27} ORS believe it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.
- ^{3.28} However, data that has been collected from over 5,500 household interviews that have been completed by ORS across England since the changes to PPTS in 2015 suggests that overall, approximately 30% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 500 interviews that have been completed) – and in some local authorities, no households meet the planning definition.
- ^{3.29} ORS are not implying that this is an official national statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken with households on approximately 40% of them at a representative range of sites. Approximately 30% meet the planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2023) and should be seen as a robust statistical figure.
- ^{3.30} This suggests that only a proportion of any need identified from undetermined households would need to be considered alongside need from households that met the planning definition, and that the remaining needs from undetermined households will have to be addressed through separate Local Plan Policies, alongside need from households that did not meet the planning definition.
- ^{3.31} The ORS methodology to address the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex. In his Report that was published on 29th June 2017 he concluded:

The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.

Households that Do Not Meet the Planning Definition

^{3.32} Households who do not travel for work, or have never travelled, now fall outside of the planning definition of a Traveller set out in PPTS (2023). However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010) as a result of their protected characteristics. In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance⁶ related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. This is echoed in the NPPF (2023).

^{3.33} Paragraph 63 of the NPPF states that [emphasis added]:

'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These grounds should include (but are not limited to) those who require affordable housing; families with children; older people; (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

⁶ Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. DCLG (March 2016).

Calculating the Current and Future Need

^{3.34} To identify need, PPTS requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

^{3.35} The first stage of the assessment sought to determine the number of occupied, vacant, and potentially available supply in the study area:

- » Current vacant pitches.
- » Pitches currently with planning consent due to be developed within 5 years.
- » Pitches vacated by people moving to housing.
- » Pitches vacated by people moving from the study area (out-migration).

^{3.36} It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation – i.e. on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically, vacant pitches on small private family sites are not included as components of available supply but can be used to meet any current and future need from the family living on the site.

Current Need

^{3.37} The second stage was to identify components of current need, which is not necessarily the need for pitches because they may be able to be addressed by space already available in the study area. It is important to address issues of double counting:

- » Households on unauthorised developments for which planning permission is not expected.
- » Concealed, doubled-up or over-crowded households (including single adults).
- » Teenage children in need of a pitch of their own in the next 5 years.
- » In-migration/roadside.
- » Households in bricks and mortar needing to move to sites.
- » Households in need on waiting lists for public sites.

Future Need

^{3.38} The final stage was to identify components of future need. This includes the following components:

- » Households living on sites with temporary planning permission.
- » New household formation.

^{3.39} Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 6 of this report.

- 3.40 ORS are also increasingly identifying households and adult household members who have been forced to leave sites due to over-crowding or exceeding planning conditions on the number of caravans permitted on sites. These households are typically living on the roadside or doubling-up on pitches in neighbouring local authorities. ORS include these households as components of hidden need and term them displaced in-migration.
- 3.41 All of these components of supply and need are presented in tabular format which identify the overall net need for current and future accommodation for Gypsies, Travellers and Travelling Showpeople. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers and Travelling Showpeople are identified separately, and the needs are to 2041.

Pitch Turnover

- 3.42 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches on sites are not available to meet any local need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example **APP/J3720/A/13/2208767** found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

- 3.43 In addition, Best Practice for Assessing the Accommodation Needs of Gypsies and Travellers⁷ produced jointly in June 2016 by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply relies upon making assumptions, a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

- 3.44 As such, other than current vacant pitches on sites that are known to be available, or pitches that are known to become available through the household interviews, pitch turnover has not been considered as a component of supply in this GTAA.

⁷ See www.londongypsiesandtravellers.org.uk/resources/ for details.

Transit Provision

^{3.45} GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
- » **Emergency stopping places** - more limited facilities.
- » **Temporary sites and stopping places** - only temporary facilities to cater for an event.
- » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.

^{3.46} Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.

^{3.47} An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but has much more limited facilities with typically only a source of water and chemical toilets provided.

^{3.48} Another alternative is 'negotiated stopping'. The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.

^{3.49} Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

^{3.50} The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable transit pitch on a relevant caravan site is available within the same local authority area (or within the county in two-tier local authority areas).

^{3.51} Consideration will also have to be given to the Police, Crime, Sentencing and Courts Act which came in to force in June 2022. Part 4 of the Act gives the Police additional powers to deal with unauthorised encampments through new offences relating to residing on land without consent in or with a vehicle and new powers in relation to the seizure of property.

^{3.52} In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Ministry for Housing, Communities and Local Government (MHCLG) Traveller Caravan Count. The outcomes of the discussions with Council and Broads Authority Officers were also taken into consideration when determining this element of need in the study area.

4. GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES AND POPULATION

Introduction

- 4.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size⁸. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.
- 4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- 4.3 The alternative to a public residential site is a private residential site and yard for Gypsies, Travellers and Travelling Showpeople, respectively. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- 4.4 The Gypsy, Traveller and Travelling Showpeople population also has other types of sites due to its mobile nature, as described more fully in Chapter 3 above. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or

⁸ Whilst it has now been withdrawn, *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

Sites and Yards

4.6 In Great Yarmouth borough (excluding the Broads Authority), on the base date for the GTAA, there was:

- » 1 public site (18 permanent pitches and 6 transit pitches)⁹.

4.7 See **Appendix E**: Site and Yard list for further details.

Figure 5 - Total amount of provision in Great Yarmouth (excluding the Broads Authority) June 2024

Category	Sites/Yards	Pitches/Plots
Public sites	0	0
Private with permanent planning permission	1	18
Private with temporary planning permission	0	0
Tolerated pitches	0	0
Unauthorised sites	0	0
Public transit pitches	0	6
Travelling Showpeople yards	0	0
TOTAL	1	24

4.8 In the Broads Authority part of Great Yarmouth, on the base data for the GTAA, there were:

- » 9 unauthorised sites (13 pitches)

Figure 6 - Total amount of provision in the Broads Authority part of Great Yarmouth borough June 2024

Category	Sites/Yards	Pitches/Plots
Public sites	0	0
Private with permanent planning permission	0	0
Private with temporary planning permission	0	0
Tolerated pitches	0	0
Unauthorised sites	9	13
Public transit sites	0	0
Travelling Showpeople yards	0	0
TOTAL	9	13

⁹ 3 of these pitches allow for permanent occupancy.

MHCLG Traveller Caravan Count

- ^{4.9} Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year and reported to the MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England. With effect from July 2013, the Gypsy and Traveller Caravan Count was renamed the Traveller Caravan Count due to the inclusion of information on Travelling Showpeople caravans.
- ^{4.10} As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to support the identification of the need to provide for transit provision and this is set out later in this report.
- ^{4.11} The most recent Traveller Caravan Count in January 2024 recorded 26 caravans on socially rented sites. The Caravan Count does not separate out information for the Broads Authority part of Great Yarmouth.

5. SURVEY OF TRAVELLING COMMUNITIES

Interviews with Gypsies and Travellers

- 5.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area, and also efforts to engage with the bricks and mortar community.
- 5.2 In Great Yarmouth borough (excluding the Broads Authority), at the base date for the GTAA, there was 1 public Gypsy and Traveller site with 18 permanent pitches and 6 public transit pitches.
- 5.3 See **Appendix E: Site and Yard list** for further details.
- 5.4 The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

Figure 7 – Interviews completed in Great Yarmouth borough (excluding the Broads Authority)

Site Status	Pitches/ Plots	Interviews	Reasons for not completing interviews/additional interviews
Public Sites			
Gapton Hall	18	12	6 x vacant
Private Sites			
None	-	-	-
Temporary Sites			
None	-	-	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites			
None	-	-	-
Public Transit Pitches			
Gapton Hall	6	2	1 x double pitch, 3 x vacant
TSP			
None	-	-	-
TOTAL	24	14	

- 5.5 In the Great Yarmouth part of the Broads Authority, at the base date for the GTAA, there were 9 unauthorised sites. See **Appendix E: Site and Yard list** for further details. The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

Figure 8 - Interviews completed in the Broads Authority part of Great Yarmouth borough

Site Status	Pitches/ Plots	Interviews	Reasons for not completing interviews/additional interviews
Public Sites			
None	-	-	-
Private Sites			
None	-	-	-
Temporary Sites			
None	-	-	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites ¹⁰			
Blackgate Farm	1	1	-
Blackgate Stables	1	1	-
Corner Plot	1	1	-
Hunters Lodge/Maple Lodge	2	2	-
Land north of The Lodge	1	1	-
New Cut Farm (rear of retail park)	3	3	-
Sequoia Lodge	1	1	-
Sheltanlee Stud	2	2	-
The Lodge	1	1	-
Public Transit Sites			
None	-	-	-
TSP			
None	-	-	-
TOTAL	13	13	

¹⁰ Some of the interviews that were completed on these sites were proxy interviews.

6. CURRENT AND FUTURE PITCH PROVISION

Introduction

- 6.1 This section focuses on the pitch provision which is needed in the study area currently and to 2041. This includes both current unmet need and need which is likely to arise in the future¹¹. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- 6.2 We would note that this section is based upon a combination of the on-site surveys, planning records and the outcomes of discussions with Council Officers and Officers from the Broads Authority. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- 6.3 This section concentrates not only upon the total provision, which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

New Household Formation Rates

- 6.4 Nationally, a household formation and growth rate of 3.00% net per annum¹² has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for pitches unrealistically. In this context, ORS prepared a Technical Note on Gypsy and Traveller Household Formation and Growth Rates in 2015 and updated it in June 2020. The main conclusions are set out here and the full paper is in **Appendix G: Technical Note on Household Formation and Growth Rates**.
- 6.5 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.
- 6.6 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.
- 6.7 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers (in addition

¹¹ See Paragraphs 3.41 and 3.42 for details of components on current and future need.

¹² Page 25, *Gypsy and Traveller Accommodation Needs Assessments – Guidance* (DCLG – 2007) Now withdrawn.

research by ORS has identified a national growth rate of 1.00% for Travelling Showpeople) and this has also been adjusted locally based on site demographics.

- 6.8 This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (**Ref: APP/F4410/W/15/3133490**) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.

- 6.9 Another more recent case was in relation to an appeal in Guildford that was issued in March 2018 (**Ref: APP/W/16/3165526**) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.

- 6.10 ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.
- 6.11 Overall, the household growth rate used for the assessment of future needs is informed by local evidence. This local demographic evidence is usually used to adjust the ORS national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by planning status).

- 6.12 However, in certain circumstances where the numbers of households and children are low, or the population age structure cohorts are skewed by certain age groups, it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.
- 6.13 The latter approach has been applied in Great Yarmouth and the Broads Authority for the following reasons:
- » Great Yarmouth borough (excluding the Broads Authority) Gypsies and Travellers that meet the planning definition – no children aged under 18.
 - » Great Yarmouth borough (excluding the Broads Authority) households that do not meet the planning definition – low numbers of children aged under 3.
 - » Broads Authority part of Great Yarmouth borough Gypsies and Travellers that meet the planning definition – skewed population cohorts with low numbers aged 8-12 and 0-2.
 - » Broads Authority part of Great Yarmouth borough Gypsies and Travellers that do meet the planning definition – no children aged under 18.
- 6.14 New household formation has been calculated from year 6 of the GTAA period onwards. New household formation for years 0-5 of the GTAA period is from teenagers in need of a pitch in the next 5 years who have been identified as components of need in the household interviews. This eliminates any double counting in the assessment of need.

Breakdown by 5 Year Bands

- 6.15 In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, and net movement from bricks and mortar) in the first 5 years. In addition, the total net new household formation is split across the GTAA period based on the compound rate of growth that was applied rather than being split equally over time.

Applying the PPTS Planning Definition

- 6.16 The outcomes from the household interviews were used to determine the status of each household against the planning definition in PPTS (2023). This assessment was based on the responses to the questions given to Researchers. Only those households that met the planning definition or those who demonstrated that they have ceased to travel temporarily or permanently (due to education, ill health, or old age) form the components of need in the GTAA that will need to be addressed through a Gypsy and Traveller Local Plan Policy.
- 6.17 In addition, households where an interview was not completed who may meet the planning definition have also been included as a potential additional component of need from undetermined households. Whilst they do not need to be formally considered in the GTAA, need from households that did not meet the planning

definition has also been assessed to provide the Local Planning Authorities with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.

- ^{6.18} The information used to assess households against the planning definition included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future and for what reasons. The tables below set out the planning status of households that were interviewed for the Great Yarmouth GTAA. This includes any hidden households that were identified during the household interviews including concealed and doubled-up households or single adults and accepted in-migration.

Figure 9 – Planning status of households in Great Yarmouth borough (excluding the Broads Authority)

Status	Meet Planning Definition	Do Not Meet Planning Definition	Undetermined
Gypsies and Travellers			
Public Sites	6	12	0
Private Sites	0	0	0
Temporary Sites	0	0	0
Tolerated Sites	0	0	0
Unauthorised Sites	0	0	0
TOTAL	6	12	0

Figure 10 - Planning status of households in the Broads Authority part of Great Yarmouth borough

Status	Meet Planning Definition	Do Not Meet Planning Definition	Undetermined
Gypsies and Travellers			
Public Sites	0	0	0
Private Sites	0	0	0
Temporary Sites	0	0	0
Tolerated Sites	0	0	0
Unauthorised Sites	15	2	0
TOTAL	15	2	0

- ^{6.19} Figure 99 shows that for Gypsies and Travellers in Great Yarmouth borough, 6 households met the planning definition of a Traveller in that they were able to demonstrate that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence or have ceased to travel temporarily or permanently.
- ^{6.20} A total of 12 Gypsy and Traveller households did not meet the planning definition as they were not able to demonstrate that they travel have travelled for work in the past or have ever travelled.

- 6.21 Figure 1010 shows that for Gypsies and Travellers in the Broads Authority part of Great Yarmouth borough 15 households met the planning definition of a Traveller in that they were able to demonstrate that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence or have ceased to travel temporarily or permanently.
- 6.22 A total of 2 Gypsy and Traveller households did not meet the planning definition.

Interviews with Gypsies and Travellers in Bricks and Mortar

- 6.23 Following all of the efforts that were made it was not possible to interview any households living in bricks and mortar.

Migration/Roadside

- 6.24 The study also sought to identify any need from households who have been forced to move from sites due to overcrowding and who are currently living on the roadside or on sites in other local authorities – and who have strong family links with households in Great Yarmouth borough. These are referred to as roadside households or displaced in-migration.
- 6.25 Evidence drawn from the household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews did not identify any households living predominantly on the roadside in Great Yarmouth borough or outside of Great Yarmouth borough with a need to move to a permanent pitch in the area.
- 6.26 Therefore, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- 6.27 It is important to note that any applications for new sites or additional pitches as a result of in-migration should be seen as windfall need and should be dealt with by Criteria-Based Local Plan Policies.

Waiting List for Public Sites

- 6.28 The Council have confirmed that there are no households on a waiting list for the public site at Gapton Hall.

Gypsy and Traveller Needs

Pitch Needs – Gypsies and Travellers that met the Planning Definition – Great Yarmouth Borough (excluding the Broads Authority)

^{6.29} Analysis of the household interviews indicated that there is a need for 3 pitches from households or single adults that are concealed or doubled-up; and for none from new household formation. This is netted off by 3 of the vacant pitches on the public site. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller in Great Yarmouth borough is **for no pitches over the GTAA period.**

Figure 11 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that met the Planning Definition

Gypsy & Traveller – Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	3
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	3
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	3
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	3
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No children aged under 18)</i>	
Total Future Need	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 12 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 28	2039 – 41	0
0 – 18	2023 – 41	0

Pitch Needs – Undetermined Gypsies and Travellers – Great Yarmouth Borough (excluding the Broads Authority)

^{6.30} There were no undetermined households so there is no current or future need for pitches.

^{6.31} See **Appendix C**: Undetermined households for further details.

Pitch Needs – Gypsies and Travellers that do not meet the Planning Definition – Great Yarmouth Borough (excluding the Broads Authority)

^{6.32} It is not now a requirement for a GTAA to include an assessment of need for households that do not meet the planning definition. However, this assessment is included for illustrative purposes, to help fulfil the requirements of the Housing Act (1985) and the NPPF (2023) and to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies.

^{6.33} On this basis, it is evident that whilst any needs from the households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as many identified as Irish and Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing.

^{6.34} The assessment identified **a need for 8 pitches for households that do not meet the planning definition** in Great Yarmouth borough. This is made up of 1 concealed/doubled-up household or single adult; 4 from a 5-year need from teenagers; and 6 from new household formation, derived from the household demographics. Current need is netted of by 3 of the vacant pitches on the public site.

^{6.35} See **Appendix D**: Households that did not meet the Planning Definition for further details.

Pitch Needs – Gypsies and Travellers that meet the Planning Definition – Broads Authority part of Great Yarmouth borough

^{6.36} Analysis of the household interview information in the Broads Authority part of Great Yarmouth borough indicated that there is a need for 11 pitches for households on unauthorised developments; 4 concealed/doubled-up households or single adults; 5 from a 5-year need from teenagers; and for 4 from new household formation, derived from the household demographics. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller **is for 24 pitches over the GTAA period.**

^{6.37} It should be noted that it is understood that several of the unauthorised pitches may have been occupied for over 10 years. The Broads Authority will need to complete additional investigations to determine which of these pitches could be classed as tolerated for planning purposes and this may reduce the levels of identified need.

Figure 13 - Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough

Gypsy & Traveller – Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	11
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	4
5 year need from teenage children	5
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	20
Future Need	
Households on pitches with temporary planning permission	0
New household formation	4
<i>(Formation from demographics)</i>	
Total Future Need	4
Net Pitch Need = (Current and Future Need – Total Supply)	24

Figure 14 – Need for Gypsy and Traveller households the Broads Authority part of Great Yarmouth borough that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024-28	20
6 – 10	2029-33	1
11 – 15	2034-38	2
16 – 18	2039-41	1
0 – 18	2023-41	24

Pitch Needs – Undetermined Gypsies and Travellers – Broads Authority Part of Great Yarmouth Borough

^{6.38} There were no undetermined households so there is no current or future need for pitches.

^{6.39} See **Appendix C**: Undetermined households for further details.

Pitch Needs – Gypsies and Travellers that do not meet the Planning Definition – Broads Authority Part of Great Yarmouth Borough

^{6.40} It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes, to help fulfil the requirements of the Housing Act (1985) and the NPPF (2023) and to provide the Broads Authority with information on levels of need that will have to be addressed through separate Local Plan Policies.

^{6.41} On this basis, it is evident that whilst any needs from the households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Broads Authority will still need to ensure that arrangements are in place to properly address these needs – Criteria-Based Local Plan Policies for example.

^{6.42} There is a need for **2 pitches for households that did not meet the planning definition** from 2 unauthorised pitches.

^{6.43} Again it should be noted that it is understood that some of the unauthorised pitches may have been occupied for over 10 years and therefore may be immune from any enforcement action. The Broads Authority will need to complete additional investigations to determine which of these pitches could be classed as tolerated for planning purposes and this may reduce the levels of identified need.

^{6.44} See **Appendix D**: Households that did not meet the Planning Definition for further details.

Travelling Showpeople Needs

6.45 There were no Travelling Showpeople identified living on yards In Great Yarmouth borough so there is no current or future need for plots.

Transit Requirements

6.46 When determining the potential need for transit provision the assessment has looked at data from the MHCLG Traveller Caravan Count; the outcomes of the discussions with Council and Broads Authority Officers; and records on numbers of encampments.

MHCLG Traveller Caravan Count

6.47 Data from the Traveller Caravan Count shows that there have been no unauthorised caravans recorded in the study area on the Caravan Count days in January and July in recent years.

Officer Engagement and Local Data

6.48 There are 6 public transit pitches on the Gapton Hall site in Great Yarmouth. The discussions with Council Officers determined that these are very rarely used and that 3 are currently occupied on a permanent basis as a result of this.

6.49 Information held by the Local Planning Authorities has indicated that whilst there have been no unauthorised caravans recorded in the Caravan Count in recent years, there were 75 recorded encampments between May 2018 and July 2023 (approximately 12 each year) and that these were all short-term and transient in nature and mainly during the summer months.

6.50 This data includes encampments on Great Yarmouth Council land and also some on privately owned land. It is important to note that where private land is concerned, Great Yarmouth Council may not hold all of the relevant data as they only record what is known to them or what they are notified of.

Transit Recommendations

6.51 Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.

6.52 As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle

permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).

- ^{6.53} It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- ^{6.54} In the short-term the Local Planning Authorities should continue to use their current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.
- ^{6.55} The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Local Planning Authority and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- ^{6.56} Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

7. CONCLUSIONS

^{7.1} This study provides a robust evidence base to enable the Local Planning Authorities to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites 2023, the Housing and Planning Act 2016, the National Planning Policy Framework 2023, and Planning Practice Guidance 2021. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers – Great Yarmouth Borough (excluding the Broads Authority)

- ^{7.2} In summary, in Great Yarmouth borough, for the GTAA period 2024 to 2041, there is a need for:
- » No pitches for Gypsy and Traveller households for Gypsy and Traveller households that met the 2023 PPTS planning definition.
 - » No pitches for undetermined Gypsy and Traveller households that may meet the planning definition.
 - » 8 pitches for Gypsy and Traveller households who did not meet the planning definition.

Gypsies and Travellers – Broads Authority Part of Great Yarmouth Borough

- ^{7.3} In summary, in the Broads Authority part of Great Yarmouth borough, for the GTAA period 2024 to 2041, there is a need for:
- » 24 pitches for Gypsy and Traveller households that met the 2023 PPTS planning definition.
 - » No pitches for undetermined Gypsy and Traveller households that may meet the planning definition.
 - » 2 pitches for Gypsy and Traveller households who did not meet the planning definition.
- ^{7.4} In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.
- ^{7.5} The Local Planning Authorities will also need to carefully consider how to address any needs from households seeking to move to Great Yarmouth borough and the Broads Authority (in-migration), or from households currently living in bricks and mortar who may wish to move to a site. In terms of the Local Plan Policies, the Local Planning Authorities should continue to use adopted Local Plan Policies (when in place) which are a criteria-based policy (as suggested in PPTS) for any undetermined households, as well as to deal with any windfall applications, need from in-migration, and need from bricks and mortar.

- ^{7.6} Regarding need from households that did not meet the planning definition, in general terms, it is the Government's intention that any need for households that do not fall within the 2023 PPTS planning definition should be met as a part of general housing need, through separate Local Plan Policies. This is reflected in Paragraph 63 of the NPPF (2023)
- ^{7.7} Future need from new household formation could also be met through natural turnover of pitches over time.
- ^{7.8} Whilst the findings in this report are aggregated totals for Great Yarmouth borough and the Broads Authority due to data protection issues, the Local Planning Authorities have more detailed data to enable an accurate review of Local Plan allocations to be made.

Transit Provision

- ^{7.9} Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.
- ^{7.10} It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- ^{7.11} In the short-term the Local Planning Authorities should continue to use its current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.

APPENDICES

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Appendix B: Glossary of Terms / Acronyms Used

Glossary

Amenity block meaning a building where basic plumbing amenities are provided. This could include a bath, a shower, a WC and a sink.

Bricks and mortar is used to describe mainstream housing.

Caravan is used to describe mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.

Concealed household is used to describe households living within other households, who are unable to set up separate family units.

Doubling-Up refers to there being more than the permitted number of caravans on a pitch or plot.

Emergency Stopping Place is a temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.

Green Belt refers to a land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns.

Household Formation is the process in which individuals form separate households. This is normally though adult children setting up their own household.

In-migration refers to movement of households into a region or community.

Local Plans are Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.

Out-migration refers to the Movement from one region or community in order to settle in another.

Pitch/plot is an area of land on a site or development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.

Private site is an authorised site owned privately. This can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

Site refers to an area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans, chalets, or vehicles. Can contain one or multiple pitches or plots.

Social/Public/Council Site is an authorised site owned by either the local authority or a Registered Housing Provider.

Temporary planning permission refers to a private site with planning permission for a fixed period of time.

Tolerated site/yard refers to long-term tolerated sites or yards where enforcement action is not expedient, and a certificate of lawful use would be granted if sought.

Transit provision refers to a site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.

Unauthorised Development refers to caravans on land owned by Gypsies and Travellers and without planning permission.

Unauthorised Encampment refers to caravans on land not owned by Gypsies and Travellers and without planning permission.

Waiting list is a record held by the local authority or site managers of applications to live on a site.

Yard is a name often used by Travelling Showpeople to refer to a site.

Acronyms and Initials

GTAA	Gypsy and Traveller Accommodation Assessment
LPA	Local Planning Authority
MHCLG	Ministry for Housing, Communities and Local Government
NPPF	National Planning Policy Framework
ORS	Opinion Research Services
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites

Appendix C: Undetermined households

Figure 15 – Need for undetermined Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority)

Gypsy & Traveller – Undetermined	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding (modelled)	0
5 year need from teenage children (modelled)	6
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No undetermined households)</i>	
Total Future Need	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 16 – Need for undetermined Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 18	2039 – 41	0
0 – 18	2023 – 41	0

Figure 17 - Need for undetermined Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough

Gypsy & Traveller – Undetermined	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	0
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No undetermined households)</i>	
Total Future Need	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 18 – Need for undetermined Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 18	2039 – 41	0
0 – 18	2023 – 41	0

Appendix D: Households that did not meet the Planning Definition

Figure 19 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that did not meet the Planning Definition

Gypsy & Traveller – Not Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	3
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	3
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	1
5 year need from teenage children	4
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	5
Future Need	
Households on pitches with temporary planning permission	0
New household formation	6
<i>(Formation from demographics)</i>	
Total Future Need	6
Net Pitch Need = (Current and Future Need – Total Supply)	8

Figure 20 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that did not meet the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	2
6 – 10	2029 – 33	2
11 – 15	2034 – 38	3
16 – 18	2039 – 41	1
0 – 18	2023 – 41	8

Figure 21 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough that did not meet the Planning Definition

Gypsy & Traveller – Not Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	2
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	0
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	2
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No formation from 2 households)</i>	
Total Future Need	0
Net Pitch Need = (Current and Future Need – Total Supply)	2

Figure 22 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough that did not meet the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	2
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 18	2039 – 41	0
0 – 18	2023 – 41	2

Appendix E: Site and Yard list

Great Yarmouth Borough (excluding the Broads Authority)

Site/Yard	Tenure	Authorised	Unauthorised
Gapton Hall	Public	18	-
Gapton Hall	Public Transit ¹³	6	-
Total Pitches		24	0


Broads Authority Part of Great Yarmouth Borough

Site/Yard	Tenure	Authorised	Unauthorised
Blackgate Farm	Unauthorised	-	1
Blackgate Stables	Unauthorised	-	1
Corner Plot	Unauthorised	-	1
Hunters Lodge/Maple Lodge	Unauthorised	-	2
Land north of The Lodge	Unauthorised	-	1
New Cut Farm (rear of retail park)	Unauthorised	-	3
Sequoia Lodge	Unauthorised	-	1
Sheltanlee Stud	Unauthorised	-	2
The Lodge	Unauthorised	-	1
Total Pitches		0	13

¹³ 3 pitches are permitted for permanent occupation.

Appendix F: Questionnaire

Interview or Proxy?



Project Code

GTAA Questionnaire

Introduction

Good morning / afternoon My name is [INTERVIEWER] from Opinion Research Services, working on behalf of [CLIENT]

The Council are undertaking a study of Gypsy, Traveller and Travelling Showmen accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showmen household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showmen households.

All questions are optional and all information you provide will be processed by ORS in accordance with the Data Protection Act and GDPR. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showmen households

A: General Information

Q1. Name of planning authority

Please write in

Q1b Sub area (if needed)

Q2. Address & pitch number

Please write in

Q3. Date of visit

Please write in – DD/MM/YY

Q4. Time of visit

Please write in – HH:MM

Q5. Status of Private Site?

----- Private rented

----- Private owned

----- N/A

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<p>Q6. Name of respondent Please write in</p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div>	<p>Q10. Where is your main residence? Please write in</p> <div style="border: 1px solid black; height: 110px; width: 100%;"></div>
<p>Q7. Which of these best describes you? READ OUT: Please tick ONE box only</p> <p>Romany Gypsy <input type="checkbox"/></p> <p>Irish Traveller <input type="checkbox"/></p> <p>Scots Gypsy or Traveller <input type="checkbox"/></p> <p>Travelling Showmen <input type="checkbox"/></p> <p>New Traveller <input type="checkbox"/></p> <p>English Traveller <input type="checkbox"/></p> <p>Welsh Gypsy <input type="checkbox"/></p> <p>Non Traveller <input type="checkbox"/></p> <p>Other <input type="checkbox"/></p> <p>Please write in</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>	<p>Q11. How long have you lived here? Years and months</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div> <p>IF MOVED IN PAST FIVE YEARS ASK</p> <p>Q12. Where did you move from? Please write in</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>
<p>Q8. How many units are on the pitch? Please write a number in each box</p> <p>Mobile homes / Static caravans <input type="text"/></p> <p>Touring caravans <input type="text"/></p> <p>Day Rooms / Utility Shed <input type="text"/></p> <p>Bungalows / Bricks and Mortar <input type="text"/></p> <p>Other (e.g. Park Home or American Caravan) <input type="text"/></p>	<p>Q13. Do you live here out of choice or because there is no other option?</p> <p>Choice <input type="checkbox"/> SKIP TO Q15</p> <p>No other option <input type="checkbox"/> ANSWER Q14</p> <p>Q14. Why do you feel there is no other choice? Please write in</p> <div style="border: 1px solid black; height: 180px; width: 100%;"></div>
<p>Q9. Is this site your main place of residence?</p> <p>Yes <input type="checkbox"/> SKIP TO Q11</p> <p>No <input type="checkbox"/> ANSWER Q10</p>	<p>Q15. Is this site suitable for your household?</p> <p>Yes <input type="checkbox"/> SKIP TO Q17</p> <p>No <input type="checkbox"/> ANSWER Q16</p>
<p><small>@2023 Opinion Research Services</small></p>	

Q16. Why do you feel this site isn't suitable?

PROBE: SCHOOLS, WORK, HEALTHCARE, FAMILY AND FRIENDS

Please write in

Q17. How many separate families or single adults live on this pitch?

Please write a number in the box

B: HOUSEHOLD DEMOGRAPHICS

Q18. Please tell me about the members of your household

Please complete below for the main household on this pitch. Any further families pertinent to this pitch should be included in section G using the format below.

For example, a seven year old daughter should be entered as

F	07
Daughter	

Person 1	Person 2								
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="text-align: center;">Interviewee</td> </tr> </table>	GENDER	AGE	Interviewee		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE		
GENDER	AGE								
Interviewee									
GENDER	AGE								
Person 3	Person 4								
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE		
GENDER	AGE								
GENDER	AGE								
Person 5	Person 6								
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE		
GENDER	AGE								
GENDER	AGE								
Person 7	Person 8								
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE		
GENDER	AGE								
GENDER	AGE								

Person 9

GENDER	AGE

Person 10

GENDER	AGE

How many additional families or single adults are included in Section G?

Please write a number

C: ACCOMMODATION NEEDS

Q19. How many families or single adults living on this pitch will need a pitch of their own in the next five years?

An adult is defined as 18+
Please write a number

Q20. How many of your children will need a home of their own in the next 5 years?

Please write a number

IF ZERO SKIP TO Q24

Q21. Do the individuals counted above currently live on this site?

Yes GO TO Q22

No SKIP TO Q23

Q22. Would they wish to stay here and, if not, where would they wish to move to?

Please write in

Q23. Where do they currently live? And would they wish to move to this site or another local site if possible?

Please write in

D: FUTURE ACCOMMODATION NEEDS

Q24. Do you plan to move from this site in the next five years?

Yes **GO TO Q32**

No **SKIP TO Q36**

Q25. Why do you plan to move?

Please write in

Q26. Where do you plan to move to?

Another site in this area

A site in another council area

Bricks & mortar in this area

Bricks & mortar in another council area

Other (e.g. land they own elsewhere)

Please provide more detail on the answer above

Q27. Would you prefer to buy a site or rent on a public or private site?

Private buy

Private rent

Public rent

Q28. Can you afford to buy a private pitch or site?

Yes

No

Don't know

Q29. Are you aware of, or do you own any land that has potential for new pitches

Yes **GO TO Q37**

No **SKIP TO Q38**

Q30. Where is the site and who owns it?

Please write in

E: Travelling

Q31. How many trips, living in a caravan or a trailer, have you or members of your family made away from your permanent base in the last 12 months?

0 **SKIP TO Q44**

1

2

3 **GO TO Q39**

4

5+

Q32. Which family members travelled?

All the family

Adult males

Other

Please write in

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<p>Q33. What were the reasons for travelling?</p> <p>Work <input type="checkbox"/></p> <p>-----</p> <p>Holidays <input type="checkbox"/></p> <p>-----</p> <p>Visiting family <input type="checkbox"/></p> <p>-----</p> <p>Fairs <input type="checkbox"/></p> <p>-----</p> <p>Other <input type="checkbox"/></p> <p>If work, please write I profession or trade; and if fairs, holidays or visiting family, probe whether this involves any elements of work.</p>	<p>IF BEEN TRAVELLING - GO TO Q49</p> <p>NON-TRAVELLING ANSWER Q44 - Q48</p>
<p>Q34. At what time of year do you or family members usually travel?</p> <p>All year <input type="checkbox"/></p> <p>-----</p> <p>Summer <input type="checkbox"/></p> <p>-----</p> <p>Winter <input type="checkbox"/></p>	<p>Q37. Are there any reasons you don't travel at the moment?</p> <p>Please write in</p>
<p>Q35. How long do you usually travel for?</p> <p>Please write in</p>	<p>Q38. Have you or family members ever travelled</p> <p>Yes <input type="checkbox"/> GO TO Q46</p> <p>-----</p> <p>No <input type="checkbox"/> SKIP TO Q49</p>
<p>Q36. Where do you or family members usually stay when they are travelling?</p> <p>LA transit sites <input type="checkbox"/></p> <p>-----</p> <p>Private transit sites <input type="checkbox"/></p> <p>-----</p> <p>Roadside <input type="checkbox"/></p> <p>-----</p> <p>Friends / Family <input type="checkbox"/></p> <p>-----</p> <p>Other <input type="checkbox"/></p> <p>Please write in</p>	<p>Q39. When did you or family members last travel?</p> <p>Please write in</p>
	<p>Q40. What were the reasons for travelling?</p> <p>Work <input type="checkbox"/></p> <p>-----</p> <p>Holidays <input type="checkbox"/></p> <p>-----</p> <p>Visiting family <input type="checkbox"/></p> <p>-----</p> <p>Fairs <input type="checkbox"/></p> <p>-----</p> <p>Other <input type="checkbox"/></p> <p>Please write in or list profession if for work. If for work, please write profession or trade; and if fairs, holidays or visiting family, probe whether this involves any elements of work.</p>

Q41. Why do you not travel anymore?

- Children in school

- Ill health

- Old age

- Settled now

- Nowhere to stop

- No work opportunities

- Other

Please write in

Q42. Do you or other family members plan to travel in the future

- Yes **ANSWER Q50**

- No **SKIP TO Q51**

- Don't know **SKIP TO Q51**

Q43. When and why do you / they plan to travel?

Please write in

Q44. Is there anything else you'd like to tell us about your travelling patterns?

Please write in

F: Contact information

Q45. Is there anything else you'd like to tell us about this site and your accommodation needs?

Please write in

Q46. Would you like ORS to contact you again regarding future needs assessments?

- Yes **GO TO Q54**

- No **SKIP TO Q56**

47. Would you like the Council to contact you about your accommodation needs?

- Yes **GO TO Q55**

- No **SKIP TO Q56**

Q48. Can I confirm the details they should use to contact you?

We cannot guarantee if and when they will make contact with you.

Name

Phone number

Email address

Q48a. Do you know of anyone living in Bricks and Mortar who we should contact for this study?

- Yes

- No

Q48b. Can you provide their contact details?

Name

Phone number

Email address

If can't provide details will you ask them to contact us on 0800 0789786

Appendix G: Technical Note on Household Formation and Growth Rates



Report for the Broads Authority

Local Plan Viability Assessment

Report – October 2024



Document control sheet	
Project name	Broads Authority Local Plan
Project reference	Viability Assessment
Report title	Broads Authority Local Plan Viability Assessment
Doc ref	Final report
Date	October 2024
Prepared by	Laura Easton, Tom Marshall
Reviewed by	Lin Cousins
Quality statement	In preparing this report, the authors have followed national and professional standards, acted with objectivity, impartially, without interference and with reference to appropriate available sources of information. No performance-related or contingent fees have been agreed and there is no known conflict of interest in advising the client group.
Use of this report	<p>This report is not a formal land valuation or scheme appraisal. It has been prepared using the Three Dragons toolkit and is based on local level data supplied by the Broads Authority, consultant team inputs and quoted published data sources. The toolkit provides a review of the development economics of illustrative schemes and the results depend on the data inputs provided. This analysis should not be used for individual scheme appraisal.</p> <p>No responsibility whatsoever is accepted to any third party who may seek to rely on the content of the report unless previously agreed.</p>
Cover photo	Reedham riverside (Three Dragons)

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Three Dragons

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EXECUTIVE SUMMARY

Context

1. The Broads Authority (BA) is reviewing its Local Plan. The new Local Plan will set out the opportunities for development across the Broads Authority Executive Area for the period up to 2041, alongside the policies to support that development, as well as policies to conserve and enhance the natural environment. As part of the review process, the BA needs evidence to demonstrate the deliverability of potential future policies, including what balance of affordable and market housing is viable and whether this varies across the area.
2. The Viability Assessment has been prepared in consultation with the development industry and other key stakeholders and has followed the relevant regulations and government guidance. As is standard practice, it has adopted a residual value approach for analysis. Residual value is the value of the completed development (known as the gross development value or GDV) less scheme costs. The residual value of a scheme is compared with a benchmark land value and if it exceeds this, the scheme is said to be viable.

Typologies

3. In consultation with the Broads Authority, a suite of case study typologies was drawn up. The typologies were reflective of the type of sites likely to come forward over the life of the new Local Plan, including allocations in the Local Plan.
4. Typologies are tested on both brownfield (BF) as well as greenfield (GF) sites. The brownfield sites are split further into waterfront and general (inland) sites. They range in size from 1-unit up to 100-units and include a specialist older person housing scheme. Typologies above and below the national 10 dwelling affordable housing threshold were included, to ascertain whether smaller sites are able to support an affordable housing contribution.
5. Residential moorings are beyond the scope of this study and it is considered that they will come forward if it is viable and practical to do so.

Testing assumptions

6. Based on Land Registry data, two distinct residential value areas, general (inland) and waterfront, were identified. House prices were found to be higher in the waterfront value area.
7. For build costs, the Build Cost Information Service (BCIS) was the primary data source. Additional costs for plot costs and site infrastructure were also identified. Allowances were also made for recent updates to Building Regulations Part L, O, F and S, as advised by BCIS.
8. In arriving at a benchmark land value (BMLV) for the Broads Authority, a number of data sources were reviewed including existing use values. From these, a range of BMLV were identified ranging from £350,000 per gross ha for a greenfield site through to £450,000 per gross ha for brownfield land and £720,000 for a brownfield waterfront site.
9. Other costs and values have been benchmarked to industry standards or based upon published sources including government impact assessments.

Draft policies

10. The viability assessment has taken account of the cost implications of policies in the Regulation 19 Publication Local Plan 2041 that will impact on development viability. This includes policies for affordable housing, which in turn refers to the policies of the six districts that retain responsibility for housing across the BA. Affordable housing was tested as 33% of development units, reflecting the predominant requirement across the BA. Single unit development was tested without affordable housing.
11. Policies reviewed and implications taken into account in the testing include:
 - Policy PUBDM2: Embodied Carbon
 - Policy PUBSP1: Responding to the Climate Emergency
 - Policy PUBDM6: Boat wash-down facilities
 - Policy PUBDM7: Water efficiency and re-use
 - Policy PUBSP2: Strategic flood risk policy
 - Policy PUBDM8: Development and flood risk
 - Policy PUBDM16: Biodiversity Net Gain
 - Policy PUBDM17: Mitigating Recreational Impacts
 - Policy PUBDM18: Mitigating Nutrient Enrichment Impacts
 - Policy PUBDM20: Energy demand and performance of new buildings (including extensions)
 - Policy PUBSP15: Residential development
 - Policy PUBDM43: Affordable housing
 - Policy PUBDM48: Elderly and specialist needs housing
 - Policy PUBDM51: Custom/self-build
 - Policy PUBDM52: Design
 - Policy PUBDM53: Source of heating
 - Policy PUBDM55: Non-residential development and BREEAM
 - Policy PUBDM60: Planning obligations and developer contributions.
12. A number of sensitivity tests were carried out to consider the effect of possible alternative market scenarios including the following;
 - a) The introduction of Future Homes as proposed by the previous government administration in December 2023 through a consultation document and impact assessment. Two options were put forward in the consultation document– option 1, the more expensive option, was used for this viability study because this best improves energy efficiency for occupiers
 - b) The effect of switching all affordable rented units to social rent
 - c) The impact of higher build costs on general typologies.

Residential testing results and implications for policy

13. The results of the viability testing present a picture of good general viability and ability to deliver policy compliant affordable housing for most residential typologies across the Broads Authority, with headroom in many instances for further policy costs as well as those associated with national policies such as Future Homes, should it be taken forward by the new government.
14. The 1-unit typology however is not viable and would not be able to make a contribution to affordable housing. This is not unusual for single-unit typologies which are often built non-speculatively for occupation by the household that commissioned the development, or where a small developer/contractor builds at a lower profit margin.
15. The 3-unit typology on general brownfield sites, whilst viable with affordable housing in the main testing scenario, is weakened where additional costs are applied, although this is not the case for waterfront or greenfield typologies. Again, with the exception of the 3-unit general brownfield typology and the 1-unit typology in all areas, delivery of social rent is viable should this be the preferred affordable rented tenure.
16. Specialist older persons housing was only viable with affordable housing in the waterfront area.
17. The good viability achieved on most residential development typologies indicates headroom to respond to market changes, higher development costs or land values if applicable over the plan period.

Policy implications for residential development

18. An affordable contribution of at least 33% is achievable on most typologies across the Broads Authority, including on those of fewer than 10 dwellings. The clear exceptions to this in viability terms are developments of 1-unit on any site type and older persons housing apart from on waterfront sites. For the typologies of 3-units a contribution is realistic on waterfront sites and greenfield sites – on general (inland) brownfield sites collection is still feasible but could be compromised if there are additional development cost pressures such as higher environmental costs. As some results are positive, the authority could still ask for a contribution on these sites but may then have to assess a viable contribution on a site-by-site basis.
19. Potential national increases in development standards in respect of carbon reduction (such as Future Homes for residential development and Future Buildings – for non residential development) would reduce residual values but does not change our conclusion. Similarly for local policies for carbon reduction such as Policy PUBDM20: Energy demand and performance of new buildings (including extensions).
20. As well as affordable housing, the testing included allowances for policies in the Publication Local Plan, including:
 - Biodiversity Net Gain at 20%
 - Accessibility to Building Regulations M4(2) standard on every dwelling
 - Accessibility to Building Regulations M4(3) standard on 10% of affordable homes

- Self and custom build housing at 5% on sites of 100 dwellings or more.

The results of the viability testing show these policies to be achievable.

Non-residential development

21. For non residential development, there is a limited number of policies that directly impact on development viability. Those that do include BREEAM and Biodiversity Net Gain. Whilst this does increase the cost, the impact of these policies is minimal and would not, either on their own or in combination, effect delivery of these forms of development.

Chapter 1 Introduction

Context

- 1.1 The Broads Authority (BA) is reviewing its Local Plan. The new Local Plan will set out the opportunities for development across the Broads Authority Executive Area for the period up to 2041 alongside the policies to support that development, as well as policies to conserve and enhance the natural environment. As part of the review process, the BA needs evidence to demonstrate the deliverability of potential future policies, including what balance of affordable and market housing is viable and whether this varies across the area.
- 1.2 The assessment includes an analysis of the impact of the policies set out in the Publication Local Plan and has been undertaken in accordance with national policy and guidance - including the December 2023 National Planning Policy Framework and Planning Practice Guidance.
- 1.3 Underlying the assessment is a series of tests that calculate the viability of a set of notional sites, representative of the types of development likely to come forward over the life of the Local Plan. The Viability Assessment has been prepared in consultation with the development industry and other key stakeholders.
- 1.4 Unlike other local planning authorities, those covering National Parks and the Broads are **not** the local housing authority. The designated Broads Authority Executive Area covers parts of Norfolk and North Suffolk, as shown on the map below. The area includes parts of Broadland District, South Norfolk District, North Norfolk District, Great Yarmouth Borough, Norwich City, and East Suffolk Council area. Together, these are referred to as the district authorities or as the districts throughout the report. The districts for those 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, and are also the Lead Local Flood Authority.

Figure 1.1 Broads Authority Executive Area (in green)



1.5 It is important to note that the BA in preparing its Local Plan has had regard to the affordable housing policies of the districts.

Viability in plan making

- 1.6** An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient for the landowner to sell the land for the development proposed. If these conditions are not met, a scheme will not be viable.
- 1.7** This report sets out the typologies and assumptions used to inform the viability testing reflecting latest available information. The viability testing for this report has:
- Reviewed broad costs associated with addressing the proposed policies in the Publication Local Plan
 - Tested the quantum and broad form of proposed development
 - Been designed to assess the balance around development contributions including the amount of affordable housing that development can support and whether there are differences in viability across different areas within the Authority or between different types of development that are sufficient to justify different policy approaches.
- 1.8** The testing has drawn on the following evidence:
- Review of the types of sites outlined in the Publication Local Plan
 - Review of the policies in the Publication Local Plan and central government guidance that may have implications for development viability
 - Review of recent planning consents including details on unit sizes, density, built form
 - A review of recent developer contributions agreed by the BA as well as discussion with Authority officers about the proposed use of s106 going forward
 - Consultation with BA officers and with officers from the six districts, including planning and housing
 - Desk research to form initial views on the values and costs of residential development in BA
 - A range of consultation exercises with the development industry and registered providers (housing associations).
- 1.9** In addition to this report a technical appendix provides further evidence and background information in support of the analysis undertaken.

Chapter 2 Local and national policy context

National policy

- 2.1** National policy and guidance on viability for plan making and Community Infrastructure Levy is set out in [National Planning Policy Framework](#) (NPPF) December 2023 and the [Planning Practice Guidance](#) (PPG). There is also useful guidance contained within 'Viability Testing Local Plans - Advice for planning practitioners' (Harman 2012) and 'Assessing Viability in Planning' (RICS 2021). The viability testing undertaken within this study complies with this national policy and guidance, the details of which are set out in Appendix I.
- 2.2** There are a number of other national policies recently introduced that have a bearing on development costs and which have been included in the viability testing undertaken. These include:
- More stringent requirements to improve building standards, including to reduce carbon emissions in new homes, particularly the update to Building Regulations Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating)
 - Update to Part S - Infrastructure for Charging Electric Vehicles which requires new development to provide electric vehicle charging points where a parking space is provided or cabling elsewhere
 - Provision for biodiversity net gain introduced through the Environment Act 2021, with 10% net gain a mandatory requirement for most development types from April 2024
 - The introduction of First Homes, providing a nationally defined low cost home ownership option and a requirement through a Written Ministerial Statement (24 May 2021) that these should form a minimum of 25% of affordable housing units secured through developer contributions.
- 2.3** In July 2024 the incoming Labour government introduced a [consultation on a wide range of changes to the NPPF](#). Whilst this is not yet policy it is prudent to be mindful of some of the proposals. Implications for viability testing are focussed on the provision of affordable housing in that there is a stronger emphasis on social rent as an affordable tenure and a proposal to remove the requirement that a minimum of 25% of affordable housing units should be First Homes. It is also proposed that the requirement that 10% of units on s106 sites should be for affordable home ownership be removed. These proposals have been accounted for in our viability modelling.
- 2.4** In December 2023 the previous government issued a consultation on the [Future Homes and Buildings Standard](#) which seeks to make further improvements to the level of carbon emissions in new homes and non-domestic buildings and is anticipated to come into force in 2025. The status of this document and which options may be pursued is unclear since the July 2024 change

of government but we nonetheless comment on headroom for the additional related costs associated with the standard should it be introduced.

Local Plan policy

- 2.5 It is intended that the new Local Plan will replace the existing Local Plan for the Broads 2015-2036, adopted May 2019. The NPPF is clear that viability testing should take into account the costs of any requirements arising from the Local Plan likely to be applied to development (paragraphs 34 and 58).
- 2.6 Table 2.1 below summarises the policies in the Publication Local Plan 2041 which have viability implications which have been taken into account in the testing, alongside other national requirements.

Table 2.1 Publication Local Plan strategic policies with viability implications

Policy	Response
Policy PUBDM2: Embodied Carbon	The testing has been carried out to Building Regs 2021 standard for Parts L, O, and F and included additional cost as estimated by BCIS. Comment is provided on the impact of higher standards for the Future Homes Standard and The Future Buildings Standard.
Policy PUBSP1: Responding to the Climate Emergency	The EVA has tested development to Building Regs 2021 standard for Parts L, O, and F and included additional cost as recommended by BCIS. EV charging points for every dwelling (Part S). Allowance for Biodiversity Net Gain. Comment is provided on the impact of higher standards for the Future Homes Standard and The Future Buildings Standard. The testing identifies the viability headroom available for additional building efficiency standards such as the implementation of the Future Homes and Future Buildings Standard (s)
Policy PUBDM6: Boat wash-down facilities	Account is taken within site infrastructure allowances and/or accounted for within land value.
Policy PUBDM7: Water efficiency and re-use	Allowance made for water efficiency within build and infrastructure costs. BREEAM is discussed within the non-residential section
Policy PUBSP2: Strategic flood risk policy	Allowances for drainage, including SUDS included within build and infrastructure costs.
Policy PUBDM8: Development and flood risk	Allowances for flood resilience and mitigation is made within the viability testing for waterfront development, where higher build

Policy	Response
	costs are used, noting that any significant measures required should also be reflected in the land value.
Policy PUBDM16: Biodiversity Net Gain	Cost allowances are made within the viability testing for provision of 20% BNG.
Policy PUBDM17: Mitigating Recreational Impacts	Allowance made within testing for Recreation Disturbance Avoidance and Mitigation Strategies (RAMS)
Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	This affects parts of the BA designated area and comment is made on headroom for these mitigations.
Policy PUBDM20: Energy demand and performance of new buildings (including extensions)	The viability testing allows for financial headroom which is available to meet any costs arising from the impact of higher standards for the Future Homes Standard and The Future Buildings Standard is discussed.
Policy PUBSP15: Residential development	The Plan sets out how the objectively assessed housing need of 358 dwellings over for the Plan period (2021 to 2041) will be met. For the purposes of establishing typologies, housing mixes, unit sizes and type are determined by the 2017 SHMA, the policies and practice of the six districts and boroughs within the area of the Broads Authority as well as an analysis of past delivery and permitted development.
Policy PUBDM43: Affordable housing	Major development is tested with 33% affordable housing; a percentage which is high enough to cover the varying levels of affordable housing contributions required by all six districts and boroughs. Smaller development typologies are also tested for ability to provide an off-site contribution. Affordable housing mix is based on the policies, needs and past and potential delivery of the BA and the six districts and boroughs.
Policy PUBDM48: Elderly and specialist needs housing	The viability testing includes typologies for older person housing.
Policy PUBDM51: Custom/self-build	Typologies of 100 or more dwellings are tested with 5% custom/self-build homes.
Policy PUBDM52: Design	The viability assessment allows for additional costs associated with meeting the requirement that all homes should be built to building standard M4(2) as a minimum and that the M4(3)a accessibility standards is applicable to 10% of affordable homes. The policy references the Design Guide which, whilst it does not set out specific items that may incur extra costs, it does put

Policy	Response
	forward a high standard of design. To take account of this, all waterfront typologies employ upper quartile build costs from BCIS. Additionally, as a sensitivity test, upper quartile costs are used in testing non-waterfront residential typologies.
Policy PUBDM53: Source of heating	The testing has been carried out to Building Regs 2021 standard for Part L and included additional cost as recommended by BCIS. Comment is provided on the impact of higher standards for the Future Homes Standard and The Future Buildings Standard.
Policy PUBDM55: Non-residential development and BREEAM	Non-residential analysis includes BREEAM Very Good Standard and higher credits for larger buildings
Policy PUBDM60: Planning obligations and developer contributions	Developer contributions are based on past collection and future aspirations as advised by the Authority.
Policy PUBNOR1: Utilities Site	This allocated site is not included in the testing as it is subject to a separate viability assessment

Allocated sites

- 2.7** The Publication Local Plan does not make any specific housing allocations that do not already have planning permission, with the exception of Policy PUBNOR1: Utilities Site which is allocated for mixed-use development including potential for around 250 dwellings.
- 2.8** Policy NOR1 deals with the redevelopment of the Utilities Site which is part of the wider East Norwich Regeneration Area, the majority of which is allocated for sustainable mixed use redevelopment in the Greater Norwich Local Plan. It sets out that “Redevelopment of this area will be sought to realise its potential contribution to the strategic needs of the wider Norwich area. The site is allocated for mixed-use development which could include around 250 dwellings”. This site is subject to a separate viability assessment for the wider East Norwich regeneration area to support development of a Supplementary Planning Document and for this reason has not been included in our testing for the Broads Authority. This position has been agreed with the Broads Authority and Norwich City Council.

Consultation with the development industry

- 2.9** The PPG sets out that:

“Plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.” (Paragraph: 006 Reference ID: 10-006-20190509)

2.10 Consultation with the development industry, undertaken for this assessment, involved a range of activities which provided opportunities for the development industry to engage with the process. The activities were:

- A workshop consultation exercise with developers active within the Authority in June 2024 (a note of the workshop is appended at Appendix II)
- A note of the workshop was sent to those who attended, those who sent apologies as well as a longer list of known developers in the area, offering a further opportunity to comment or discuss – consequently follow up consultation with individual developer stakeholders during August 2024
- Consultation with housing associations active in the Authority and the surrounding area to discuss assumptions for affordable housing and issues around delivery; these took place during July and August 2024.

2.11 The industry consultation was broadly supportive or raised no issues with the majority of viability assumptions accepted. Some stakeholders raised the following issues:

- Values tend to be very specific to individual sites, although for the purposes of this high-level exercise the values and variations for waterfront and inland sites was about right
- First Homes are not considered a suitable product in the Broads
- The proposed 3-bed market home was considered too large at 110 sqm – this was subsequently reduced
- Land values would be expected to flex to accommodate additional abnormal development costs such as piling
- Consultation with the housing associations mainly confirmed our affordable housing assumptions, although it was commented that the size of a 4-bed home and the rate of finance capitalisation were both too low – these were subsequently raised.

Chapter 3 Approach to testing and viability

Approach viability and typologies

3.1 As is standard practice and described in PPG (Paragraph: 010 Reference ID: 10-010-20180724), we have adopted a residual value approach to our analysis. Residual value is the value of the completed development (known as the Gross Development Value or GDV) less scheme costs. The value of the scheme includes both the value of the market housing and affordable housing. Scheme costs include the costs of building the development, plus professional fees, scheme finance and a return to the developer as well as any planning obligations or other policy costs and the costs of the land (as a benchmark land value) and its purchase, as described in PPG:

“Viability assessment is a process of assessing whether a site is financially viable, by looking at whether the value generated by a development is more than the cost of developing it. This includes looking at the key elements of gross development value, costs, land value, landowner premium, and developer return.”

3.2 In respect of the types of sites to test, PPG states that:

“Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage”. (Paragraph: 003 Reference ID: 10-003-20180724)

3.3 This has informed our approach to testing and use of typologies as a high-level proxy for sites likely to come forward during the life of the Publication Local Plan.

Uses included in the testing

3.4 The uses tested are listed below and focus on developer-led forms of development rather than publicly led uses such as new infrastructure facilities or development types that are not common:

- Residential for sale
- Older person homes
- Non-residential.

Typology selection

3.5 We worked with the Authority draw up a suite of typologies. These are intended to reflect the type of sites likely to come forward over the life of the new Local Plan. These generic typologies are not intended to represent specific development proposals but to reflect typical forms of development that are likely to come forward over the plan period. The typologies were shared with stakeholders during the consultation process, where it was agreed that these were broadly representative. These are set out below.

Residential typologies

- 3.6** The generic residential typologies are set out in Table 3.1. These include sites above and below the 10-dwelling NPPF threshold for affordable homes generally. The proportion of net developable area reflects policy requirements as well as typical characteristics of this site type.
- 3.7** Typologies are tested on both brownfield (BF) as well as greenfield (GF) sites. The brownfield sites are divided further into waterfront and general (inland) sites.
- 3.8** For brownfield sites, the testing does not assume that there is any existing floorspace on the site. It is possible that this will be the case in practice and that there will be existing space that should be netted off against the affordable housing liability, thus increasing the residual value and strengthening the viability position of the scheme. (see PPG Paragraph: 027 Reference ID: 23b-027-20190315) However, this can only be realistically assessed on a scheme by scheme basis, at planning application. The approach taken in this study is a conservative one which will therefore tend to under estimate viability on some brownfield sites.
- 3.9** The residential typologies are labelled Res1 through to Res 7 and the older persons typology is labelled OP1. The dwelling sizes and mixes are set out in the testing assumptions in Chapter 4.

Table 3.1 Typologies

Reference	Number of dwellings	Density - dwellings/ hectare	Gross site area (hectares)	Net site area (hectares)
Res 1	1 unit		0.067	0.067
Res 2	3 units	15 dph	0.2	0.2
Res 3	5 units	15 dph	0.33	0.33
Res 4	8 units	20 dph	0.4	0.4
Res 5	12 units	20 dph	0.63	0.63
Res 6	30 units	25 dph	1.33	1.2
Res 7	100 units	30 dph	3.11	2.33
OP 1	50 units sheltered	100 dph	0.5	0.5

Note - self and custom build homes were included in Res 7 (100 units) – 5% of total

- 3.10** Residential moorings are beyond the scope of this study and it is considered that they will come forward if it is viable and practical to do so.

Affordable housing requirements

3.11 Local Plan policy PUBDM43 requires that the affordable housing contribution from development is delivered “in accordance with the requirements of the adopted standards and policies of the relevant District Council”. The requirements in the local plans are set out in the table below, noting that the most relevant local plans are at different stages.

Table 3.2 Affordable housing policies from the districts

District	Plan	Policy ref	% requirement
East Suffolk (1)	Suffolk Coastal Local Plan Adopted September 2020	Policy SCLP5.10	33%
East Suffolk (2) (Lowestoft)	Waveney Local Plan Adopted March 2019	Policy WLP8.2	20%
East Suffolk (2) (rest)	Waveney Local Plan Adopted March 2019	Policy WLP8.2	30%
Great Yarmouth	First Draft Local Plan Consultation 13 March to 8 May 2024	HOU1	25%
North Norfolk (zone 1 - Broads)	Local Plan proposed submission version publication stage regulation 19 January 2022	HOU2	15%
North Norfolk (zone 2 incl Hoveton)	Local Plan proposed submission version publication stage regulation 19 January 2022	HOU2	35%
Norwich / South Norfolk / Broadland	Greater Norwich Local Plan (adopted March 2024)	Policy 5	33%

3.12 In our testing we have used a base point of 33% affordable housing as this covers the majority of the designation Broads Authority area. We note that the percentage is lower in the emerging Great Yarmouth Local Plan as well as most of North Norfolk and parts of East Suffolk, therefore in those areas the viability assessment takes a cautious approach and viability is likely to be stronger in practice than reported here. There is small part of North Norfolk that requires a higher percentage (35%) but we understand that much of the area within the BA is in a flood plain and unlikely to see much development.

3.13 Further discussion about value areas can be found in Chapter 4.

3.14 We have tested typologies above and below the national 10 dwelling affordable housing threshold to ascertain whether smaller sites are able to support an affordable housing contribution.

3.15 Sites with affordable housing are tested with an affordable tenure mix of 70% affordable rent and 30% shared ownership as this best reflects the policies and housing need of the districts. Although the districts and Registered Providers (RPs) report that most affordable rented housing is expected to be affordable rent, especially on s106 sites, there is a national and local shift towards social rent and we have also carried some sensitivity testing where the affordable rented homes are switched to social rent.

Non-residential typologies

3.16 Non-residential development is discussed in Chapter 6 where comment is made on the typologies that will potentially come forward in the BA and the policy cost implications.

Chapter 4 Testing assumptions

4.1 We used a range of data sources, including government impact assessments, national datasets, local examples of development, to draw up a series of assumptions that were reviewed at the development industry workshops, adjusted as necessary following feedback, with a final set of testing assumptions agreed with the BA. The final set of assumptions were used in the viability testing. This chapter summarises the key assumptions and the data they rely on.

Dwelling mix, unit size and tenure

4.2 The overall size and mix of dwellings in the typologies used in the testing takes account of requirements from the local plans of the districts, the [Local Housing Needs Assessment 2022](#) (version 2), recent planning applications in the BA and feedback received from local developers, Registered Providers (RPs) and officers.

4.3 The tenure mix of the affordable housing also relies on the policies of the districts and consultation to arrive at a split between rented and shared ownership homes. On the advice of the Authority, local RPs and other stakeholders, the tenure mix does not include First Homes taking into account the WMS discussed in chapter 2 and the consistent feedback that this tenure is not suitable or desirable in the BA.

4.4 The size of dwellings used, affects both their market value (as sale values were assessed on a per sq m basis) and their development costs – also based on dwelling size. Unit sizes meet Nationally Described Space Standards (NDSS). Development costs for flats will include non-saleable circulation and common areas, although we have assumed that flatted development will be 1-2 storeys, often ‘maisonette style’ with more limited communal areas:

- for schemes with 1 -2 storeys the allowance is 10%
- an allowance of 25% floor area is added for sheltered homes, which allows for circulation, common and service areas and has been informed by discussion with the retirement housing industry.

4.5 The housing mixes used for the generic typologies in the study are shown in tables 4.1 and 4.2 below.

Table 4.1 Market housing mix and size for residential typologies – showing differences between typologies

	sqm	1-unit and 3-unit typologies	100-unit typology	Specialist older persons 50 units	all other typologies i.e. 5, 8, 12, 30 units
1 bed flat	55		10%	50%	
2 bed flat	70		5%		
2 bed flat (older persons)	75			50%	
2 bed house	80		25%		33%
3 bed house	95	100%	30%		33%
3 bed bungalow	95				
4 bed house	140		30%		33%
5 bed house	190				
		100.00%	100.00%	100%	100.00%

Table 4.2 Affordable housing mix and size for residential typologies Res 3-7 (5, 8, 12 30 and 100 units)

	Sqm	Rented (70% of affordable mix)	Shared ownership (30% of affordable mix)
1 bed flat	50	20%	
2 bed flat	61		
2 bed house	79	40%	50%
3 bed house	93	30%	50%
4 bed house	106	10%	

4.6 The affordable mix for the 1-unit typology (Res 1) and 3-unit typology (Res 2) was tested with 3-bed houses only and for the specialist older persons typology (OP1) there was a 50/50 split between 1 and 2-bed flats.

Values – standard residential market

4.7 Unlike defined local authority areas, there was no one definitive data source available from which to derive market values for the BA. We therefore relied on a range of published sources to arrive at market values:

- Land Registry data for new build properties for parishes where some part of the parish was within the Broads Authority area. The data was taken over the last five year period and

updated by the House Price Index to end of quarter 1 2024 (the latest date at which there was sufficient data to generate a reliable indexation); the Land Registry data was matched to Energy Performance Certificates to enable a value per sq m to be generated for the different house types, based on over 1,000 records

- An analysis of property available on Rightmove, where dwelling sizes and price were both available
- The house prices from the previous viability study (Hampson Barron Smith 2018) were updated by the latest House Price Index
- A sense check was made to recent valuations for homes known to be within the BA.

- 4.8** A value of £3,750 per square metre was arrived at which is slightly below the value of £3,900 which was presented to and endorsed by the developer workshop but takes into account later comment that prices are often location specific in practice and vary across the Broads. On this basis we adopted a more cautious approach and the value of £3,750 per square metre.
- 4.9** There was clear comparative evidence in the sales data that properties in waterfront locations achieve values significantly above other, inland, locations. Where locations are waterfront we have added a further 30% to values for all property types. Again, there was agreement by the development industry consulted that, for this high-level plan wide testing, this was 'about right'. Therefore two value areas have been identified; general (or inland) and waterfront.
- 4.10** Where properties are identified as bungalows the data supports a 20% value uplift for this type of dwelling. Older persons units are based on the recommendations made by the Retirement Housing Group (RHG) Viability Guidance 2016, with the value of a 2-bed apartment being equal to the resale value of a semi-detached house and a 1-bed at 75% of this.
- 4.11** The values used in the viability testing are shown for each value area in Table 4.3 below. These are shown as unit values, based on the sizes set out in the housing mix section earlier in the chapter. The background data for the house price analysis, including sample data from Land Registry, can be found in Appendix III.

Table 4.3 Market values

Unit Type	Size - sqm	Value – general (inland)	Value - Waterfront
1 bed flat	55	£206,250	£268,125
2 bed flat	70	£262,500	£341,250
2 bed house	80	£300,000	£390,000
3 bed house	95	£356,250	£463,125
3 bed bungalow	95	£427,500	£555,750
4 bed house	140	£525,000	£682,500
1 bed flat – sheltered (C3)	55	£267,200	£347,350
2 bed flat – sheltered (C3)	75	£356,250	£463,125

Source: Land Registry/EPC and local data

4.12 The custom and self build homes were modelled as 3-bed detached units and an additional 5% was added to the value. This is consistent with published research undertaken by Three Dragons with the Right to Build Task Force into the costs and values of self-build and custom housebuilding (Area-wide Approaches to Viability Assessment Right to Build Task Force & Three Dragons July 2023 Guidance Note PG3.7).

Values - Affordable housing

4.13 Initial estimates of the value of affordable housing were produced using a capitalised net rent approach i.e. the notional amount the provider of the unit can borrow against the net income received. The assumptions were based on known industry standards informed by an analysis of annual reports for six actively developing RPs (A2 Dominion; Accent; Aster; L&Q; Stonewater; Sovereign 2023) as well as the government global accounts (2022) and these were then used as the basis of consultation with RPs active in the BA, with input from the housing districts.

4.14 In calculating the capitalised net rent the assumptions set out in the table below were used, following the consultation.

Table 4.5 Affordable housing assumptions

Type	Assumption
Affordable housing rent	
Affordable Rent	100% LHA rate
Social rent	75% LHA rate
Management & maintenance (annual)	£1,250
Voids/bad debts	2.5%
Repairs reserve (annual)	£600
Capitalisation	5%
Service charges (weekly)	Flats - £7 Houses - £5
Affordable housing – shared ownership	
Share size	40%
Rental share	2.75%
Capitalisation	5%
Repairs	£4,000

4.15 The affordable housing assumptions were discussed at the developer workshop and with local Registered Providers (RPs) in one-to-one interviews and checked against the accounts referred to in paragraph 4.13 above (where the information was quoted). No significant alternatives to our approach were identified but some adjustments were made with increases to the management and maintenance charge and the capitalisation rates and a decrease in the initial share purchased, to account for a changing market.

4.16 The table below summarises the values attributed to the affordable housing property types included in the testing, using these assumptions.

Table 4.6 Affordable homes values (figures are rounded)

Summary	Capital value for social rent	Capital value for affordable rent	Shared ownership - Value General (Inland)	Shared ownership - Value Area Waterfront
1 bedroom flat	£66,000	£94,000	N/A	N/A
2 bedroom house	£85,000	£118,000	£206,000	£268,000
3 bedroom house	£103,000	£142,000	£243,000	£317,000
4 bedroom house	£165,000	£224,000	£277,000	£362,000

Development costs

Build costs

- 4.17** The Build Cost Information Service (BCIS) provides benchmarking information for build costs, adjusted for the location. Residential build costs are based on actual tender prices for new builds and the tender price data is rebased to 1st Quarter 2024 (in line with values) and Norfolk location prices using BCIS defined adjustments, to give the build costs for different types of schemes.
- 4.18** We understand from work with housebuilders and cost consultants that volume and regional house builders can comfortably operate within the BCIS lower quartile cost figures, especially given that they are likely to achieve significant economies of scale in the purchase of materials and the use of labour. Many smaller and medium sized developers of houses are usually unable to attain the same economies, so their construction costs may be higher although this will vary between housebuilders and sites. We have worked with BCIS to identify how costs change according to the size of the development. We have used this analysis by BCIS to inform our approach to testing in the BA. The variable build costs by site size have been applied to houses only, as flat build costs primarily vary by height.
- 4.19** Our testing also accounted for the higher build costs reported by developers for waterfront development, where we have used upper quartile costs. In addition, we have tested some of our general (inland) typologies with the higher quartile build costs, noting that the (draft) BA Design Guide includes some higher quality design standards and principles which may come forward on some (but not all) sites away from the waterfront.
- 4.20** For self build and custom housebuilding an additional 5% was added to build costs. This is consistent with published research undertaken by Three Dragons with the Right to Build Task Force (Guidance note PG3.7 Area-wide Approaches to Viability Assessment Right to Build Task Force & Three Dragons July 2023).

Table 4.7 Residential development costs

Type	Base build cost – mean £/sq m	Base build cost – upper quartile £/sqm	Site sizes (number homes)
One off detached	£2,678	£3,171	1
Estate housing (index +5% and self-build))	£1,513	£1,617	2-5
Estate housing (as per index)	£1,441	£1,578	6-9
Estate housing (index x 95%)	£1,369	£1,499	10-50
Estate housing (index x 92%)	£1,326	£1,452	51-100
Bungalows	£1,720	N/A	2-5
Flats 1-2 storey	£1,605	N/A	All
Supported housing	£1,818	N/A	All

Source: BCIS – see Appendix V for BCIS report

Other residential development costs

- 4.21** A range of other standard costs have been used in the viability testing. These were discussed with the development industry at the workshop and are based on PPG and experience of other high level plan making viability testing. Further information providing background to some of the costs is set out in the following table.
- 4.22** Allowances are made for an additional 15% on build costs for plot costs, site infrastructure works and contingency. These are industry standards on which we monitor what is happening elsewhere in similar locations in the UK as well as consulting with the local development industry.
- 4.23** Separate allowances are made for garages and we have allowed for a single garage for all 4 bed detached homes. This is on the basis that not all detached homes will have a garage but some may have a double. No allowances are made for garages for semi-detached, terraces or within the flat led developments as is usual for the BA.
- 4.24** A cost is included below for Future Homes 2025 (see chapter 2 for summary of what this entails). This proposed standard was introduced by the previous government and is still at consultation stage with no indication of how it might be taken forward. We do not therefore include it in the standard testing but nonetheless comment on available viability headroom should it be adopted nationally. Costs are based on the government impact assessment (DLUHC December 2023). There are two options included in the consultation and we have taken Option 1 which is the higher cost because this option takes better account of the cost to the consumer. We have also increased the cost to account for the larger dwelling sizes in the BA. This approach was agreed with the Authority.

Table 4.8 Other residential development costs

Type	Cost	Metric
Site costs		
Plot costs, site infrastructure works and contingency – all typologies	15%	On build cost
2021 updates to Building Regulations (as recommended by BCIS June 2023)	3.9%	On build costs Part L 2.8% Part F 0.4% Part O 0.7%
Garages	£8,100 per single garage	4 bed detached and single units
Fees and finance costs		
Professional fees	10%	of build costs including plot costs/contingency
Finance	7%	of total development costs including land purchase
Marketing/legal/sales fees	3% 6%	of market GDV of older persons GDV
Affordable home legal fee	£500	per affordable unit
Developer return	17.5% 6%	market GDV (mid point of the range set out in the PPG) affordable homes GDV
Agents and legal	1.75%	land cost (BLV)
Stamp duty	prevailing rate	land cost (BLV)
Policy and mitigation costs		
Biodiversity net gain (20%)	£1,272 £304	per unit (greenfield) per unit (brownfield)
EV charging points Part S	£865	per dwelling
Accessibility M4(2)	£1,400	per unit except for those with M4(3)
Accessibility M4(3)(a)	Flat £10,000 House £14,500	applicable to 10% of affordable units
General s106	£2,500	per unit
Self & custom build	Additional 5% build costs	5% of units on sites of 100 homes plus (not flats)
Future Homes 2025 (Option 1)	House £6,000 Flat £4,000	Applied as a sensitivity test

National and local policy requirements

4.25 Biodiversity net gain – The allowance for biodiversity net gain (BNG) is drawn from the government’s impact assessment (MHCLG, 2019, Biodiversity net gain and local nature recovery

strategies impact assessment) which was published with the consultation on the amendments to the Environment Act. The Publication Local Plan requires 20% biodiversity net gain which is above the national requirement of 10%. The government's Impact Assessment suggests that this will increase costs to developers by 19% of the MHCLG published allowance (Section 6.11.2) - the actual costs used in the testing are shown in Table 4.8 above. A cross-typology allowance, split by greenfield and brownfield is used.

- 4.26** However, it should be noted that, as biodiversity net gain is site specific depending on both the existing site characteristics and the ability of development form to both mitigate and provide additional gain, it is difficult to gauge a suitable allowance for meeting the requirements. It is also of note that the NHBC with the RSPB have issued guidance on how to achieve net gain within new development. At the launch of the guidance both the authors and one of the major housebuilders (Barratt Homes) emphasised that incorporating measures for biodiversity net gain during the design phase meant additional costs were minimal (Biodiversity in new housing developments RSPB / NHBC April 2021). This suggests that, whilst an allowance is included, the actual cost could be much lower and therefore the testing allowances are a conservative estimate. It is also relevant that the government Impact Assessment (page 42) highlights research findings about the costs of new policies to development stating that “development costs are passed back through to land prices” and over time it is therefore land values that absorb these costs.
- 4.27 Part S EV charging** - An allowance for ‘fast charge’ electric vehicle charging points is made for all dwellings at a ratio of 1 per dwelling for general housing. On this basis the total allowance on a site basis is considered sufficient to meet need and both national and local policy. It is recognised that there is also a desire for rapid chargers, however these are generally operated (and brought forward) on a commercial basis and therefore have not been included within the costs. The EV charger costs are based upon the impact assessment produced by the government (DfT/MHCLG, 2021, Residential charging infrastructure provision impact assessment).
- 4.28 Part M Accessibility** - The accessibility costs for M4(2) are applied to every unit as per draft Policy PUBDM52: Design and are based on the government impact assessment. The costs for Part M4(3) are based on cost consultant advice and other published studies, these are applied to 10% of affordable units, again in line with the draft policy.
- 4.29 Nutrient neutrality** – Development in certain areas of Norfolk falls within the nutrient neutrality catchment area of the Broads SAC and Broadland Ramsar. Policy PUBDM18 requires that this is mitigated before development can go ahead. As the policy does not cover the entire BA area, we comment on headroom available for this mitigation using the costs of credits which, based on assessments some of the districts provided through the consultation process, is £3,500 per dwelling, although this can vary in practice.
- 4.30** The cost of nutrient neutrality is in addition to the recreational mitigation cost collected through payment of either Suffolk Coast or Norfolk, Recreation Disturbance Avoidance and Mitigation

Strategy (RAMS), which is assumed to be collected for every unit tested and therefore included within the testing.

Benchmark land value

4.31 National guidance on setting benchmark land values (BMLVs) is clear that BMLVs should not be based on market values (although these can be used as a sense-check), or indeed the price paid for a particular site, but rather on the existing value of land plus an uplift to provide an incentive to the landowner. The appropriate scale of the uplift is not set out in any of the current guidance, although PPG does define that a 'premium' for a landowner should:

“Provide a reasonable incentive for a land owner to bring forward land for development while allowing a sufficient contribution to fully comply with policy requirements” (PPG Paragraph: 016 Reference ID: 10-016-20190509).

4.32 However, a landowner premium of 10-30% for brownfield land and 10-20 x agricultural value for greenfield land is well established as an industry norm for strategic high level viability studies (see Homes and Communities Agency, 2010, Appendix 1 (Transparent Viability Assumptions p9). More recent research from [Lichfields \(2020\)](#) has a similar finding.

“Unsurprisingly, the level of uplift was found to vary, with an increase of 20% common for brownfield sites and a multiplier of 15-20 times above EUV or an uplift of 20% plus an additional allowance of between £250,000 and £650,000/ha being applied in respect of greenfield sites.”

4.33 In arriving at a benchmark land value for the BA, we have reviewed data for existing use values as well as checking against land values used in previous viability studies for the BA and for the housing districts (both area wide and site specific) and known values achieved within and adjacent to the BA. We have used a range of figures in the testing, from £350,000 per gross ha for a greenfield site through to £720,000 per gross ha for waterfront brownfield land. General inland brownfield typologies have a benchmark land value of between £400,000 and £450,000 hectare, dependent on location, and we have tested at both rates.

4.34 The values were presented to the developer workshop which commented that the values seemed 'broadly reasonable' and did not offer any other alternatives, although cautioned that abnormal costs such as piling should be reflected in land values – as per PPG which states that abnormal costs as well as site infrastructure costs should be taken into account when defining the land value (Paragraph 012 Reference ID: 10-012-20180724).

4.35 In arriving at the benchmark land values we use, we understand that where the market is able to pay a higher premium, it will do so. However, the guidance in the PPG is clear that benchmark land values should not be based on market values.

4.36 The table below shows the full range of benchmark land values that can be achieved within the 'industry standard' premium range described above. Where a site is of poorer quality or has

marginal viability then we would expect the lower value point to be achieved and there will be some premium sites where the higher value point can be reached.

Table 4.9 Benchmark Land Values

Site type	BLV/ha	Based on	EUV Source
Greenfield	£350,000	15 times agricultural value	3D review, MHCLG* + land value inflation**
Brownfield 1	£400,000	Standard brownfield EUV + 20%	MHCLG* - industrial land for the housing districts excluding Greater Norwich) Review of local viability studies
Brownfield 2	£450,000	Standard brownfield EUV + 20%	MHCLG* - industrial land for the housing districts including Greater Norwich Review of local viability studies
Brownfield 3 Waterfront	£720,000	Standard brownfield EUV + 20%	MHCLG* - industrial land Greater Norwich***

* note MHCLG refers to 'Land Value estimates for Policy Appraisal' MHCLG 2019

** Savills (Rural Land Values June 2024) estimate a greenfield land value inflation of 10%

*** Based on advice that waterfront development achieves land values akin to Greater Norwich

4.37 Land values were sense checked with the market, noting that details of local transactions were limited.

Residential sensitivity testing

4.38 A number of sensitivity tests were carried out to consider the effect of possible alternative market scenarios and were:

- a) **The effect of switching all affordable rented units to social rent.** This would account for the growing importance of social rent as an affordable tenure that is more affordable to households on low earned incomes or subject to the benefit cap – as the rent is lower social rent has lower transfer values than affordable rent and would there reduce viability headroom.
- b) **The effect of upper quartile build costs on general brownfield development.** This helps examine the potential for higher development costs association with the Design Guide.
- c) **The impact of delivering bungalows.** We have tested the 3-unit typology as a 'bungalow' scheme, noting that bungalows tend to be a popular type of home in the BA.

4.39 Finally we make comment on capacity of development to meet the Future Homes Standard or other local higher environmental requirements from Policy PUBDM20: Energy demand and performance of new buildings (including extensions) – this requires applicants “to demonstrate what measures they have taken to achieve more energy efficiency beyond the building regulation standards” (paragraph 4).

Non-residential assumptions

4.40 Non-residential development is discussed in more detail in chapter 6, although the majority of proposed policies are not considered to significantly add to the development costs for non-residential uses in the Plan period. However, to note that the following policies that may have some impact on the viability of non-residential development:

Policy PUBDM16: Biodiversity Net Gain all types of development are expected to achieve a minimum of 20% Biodiversity Net Gain (BNG). A Government Impact Assessment undertaken by DEFRA in Table 15 estimates that a 10% BNG is estimated to represent a cost of £14,334 per hectare. Further, para 6.11.2 of the same impact assessment estimates that the impact of increasing the net gain to 20% increases the cost to developers by 19%. Therefore, it is assumed that a 20% BNG could represent a cost of £17,058 per hectare.

Policy PUBDM55: Non-residential development and BREEAM non residential development above 250 sqm must achieve a minimum of BREEAM Very Good. Additionally, non-residential development above 250 sqm must also achieve 3 credits in BREEAM category Wat 01 and those over 1,000 sqm must achieve 5 credits. Historically, BREEAM has been commonly used to categorise non-residential building standards, with five categories – Pass; Good; Very Good; Excellent and Outstanding. Work undertaken by BRE suggests that the uplift over base construction costs varies between 0.1% and 0.2% for BREEAM Very Good.

Chapter 5 Results of the residential viability modelling

5.1 The results of the residential modelling are discussed in this chapter and non-residential development is discussed in Chapter 6.

Residential Overview

5.2 The base testing includes the standard development costs and affordable housing for each of the two value areas, i.e. general (inland) typologies and waterfront typologies and other policy costs as set out in chapter 4. The viability results take into account land costs, finance and developer return.

5.3 The results are shown as a net residual value per dwelling so that different development mixes and scheme sizes can be easily compared. A negative figure means a scheme is not viable (as tested). A positive residual value shows a viable scheme and represents the theoretical maximum 'headroom' available to support either additional policy costs, planning obligations and/or higher land values/developer return. Where we refer to results as 'Marginal' we define this as being up to plus/minus £5,000 per dwelling. This is an arbitrary definition used in this report and with the purpose of identifying typologies and policy tests where a small change in the assumptions used could switch a site from having a positive to negative residual value or vice versa.

5.4 The results of the testing are grouped under the following sub-headings and include some sensitivity testing:

- General typologies - Greenfield and brownfield
- Waterfront typologies - Brownfield
- Specialist older persons housing
- Delivery of social rent
- Higher build costs
- Headroom for further policy costs.

5.5 Results are shown with 33% affordable housing. The results shown are with the higher benchmark land value of £450,000 gross hectare for general brownfield sites, £350,000 gross hectare for greenfield sites and £720,000 gross hectare for waterfront brownfield sites – see Table 4.9 above, but other land values were tested. A full set of results showing results per scheme and per unit, as well as at the full range of land values can be found at Appendix VII.

General (inland) typologies

5.6 The following table shows the results on a per unit basis for the general typologies.

Table 5.1 Modelling results for the general typologies - £s per unit

Ref	Units	Greenfield Residual Value per unit	Brownfield Residual Value per unit
Res 1	1	-£108,800	-£115,000
Res 2	3	£13,900	£7,800
Res 2 (b/low*)	3		£29,100
Res 3	5	£29,200	£23,100
Res 4	8	£42,400	£38,000
Res 5	12	£48,200	£43,300
Res 6	30	£51,800	£47,800
Res 7	100	£50,800	£46,700

* Bungalow – typology test with 3 x 3 bed bungalows

5.7 The general typologies show good overall viability with 33% affordable housing on both greenfield and brownfield typologies. Where the 3 unit typology (Res 2) was tested with bungalows on a brownfield site, viability improved. The single unit typology (Res 1) was tested without affordable housing but was not viable on either land type, reflecting the higher costs and lack of economies of scale associated with building a single unit.

Waterfront typologies

5.8 The following table shows the results on a per unit basis for the waterfront typologies, where land values, build costs and sales values are higher than for the general testing.

Table 5.2 Modelling results for the Waterfront typologies - £s per unit

Ref	Units	RV per unit
Res 1	1	-£114,100
Res 2	3	£33,900
Res 2 (b/low*)	3	£86,400
Res 3	5	£54,700
Res 4	8	£74,600
Res 5	12	£79,800
Res 6	30	£87,000
Res 7	100	£85,400

* Bungalow – typology test with 3 x 3 bed bungalows

5.9 The waterfront typologies again show good overall viability with 33% affordable housing. Indeed, viability is improved compared to the general typologies with the increase in build costs more than ameliorated by the higher values associated with developing here. However the single unit typology (Res 1) which was tested without affordable housing remains unviable.

Specialist older persons housing

5.10 The following table shows the results for the specialist older persons housing scheme (sheltered) on a greenfield, a brownfield and a brownfield waterfront typology. Costs and cashflows are different for this type of housing, compared to 'ordinary' houses or flats. As well as modelling with 33% affordable housing we have, in one instance, modelled a scheme without affordable housing – this is on a general brownfield site which is the type of site such schemes typically come forward.

Table 5.3 Modelling results for the specialist older persons typologies - £ per unit

Ref	Units	Greenfield Residual Value per unit	Brownfield Residual Value per unit	Waterfront Brownfield Residual Value per unit
OP1	50	-£32,100	-£32,200	£25,200
OP1 - without affordable homes	50		£10,300	

5.11 Specialist older persons housing was only viable with 33% affordable housing on the waterfront typology. In other locations viability was negative indicating that 33% affordable housing is not deliverable on such schemes. However, a viable result on a general brownfield typology was produced when affordable housing was removed from the model suggesting that there may be some headroom for a reduced affordable housing contribution.

Delivery of social rented units

5.12 We also looked at the impact on viability of delivering social rent in place of affordable rent. Social rents are almost always lower than affordable rents, giving a reduced transfer value. The results are shown in the table below – note that Res 1, the single unit typology has not been modelled here as it was not viable with affordable rent (and so it is reasonable to assume it would not be viable with social rent).

Table 5.4 Sample results where affordable rented units are switched to social rent - £s per unit

Ref	Units	Brownfield Residual Value per unit	Waterfront Brownfield Residual Value per unit
Res 2	3	-£700	£25,400
Res 3	5	£15,200	£46,800
Res 4	8	£30,100	£66,700
Res 5	12	£35,400	£71,900
Res 6	30	£39,800	£79,100
Res 7	100	£38,500	£77,400

5.13 The results illustrate that changing the type of affordable rented tenure (from affordable rent to social rent) reduces viability. However, case studies Res 3 through to Res 7 remained viable on general brownfield land and in waterfront locations with 33% affordable housing. Res 2 (3 units) was unviable on a general brownfield typology, although marginally so and could likely be ameliorated by a small adjustment to the housing mix or land value to accommodate this.

Increasing build costs to account for higher specification design

5.14 We also reviewed the impact of higher build costs on general brownfield sites, to a standard similar to that of waterfront development and the results are shown in the following table.

Table 5.5 Sensitivity modelling on general brownfield typology – showing the impact of upper quartile build costs - £ per unit

Ref	Units	Brownfield Residual Value per unit
Res 2	3	-£10,600
Res 3	5	£4,600
Res 4	8	£20,400
Res 5	12	£26,500
Res 6	30	£31,000
Res 7	100	£31,400

5.15 Although viability is reduced when build costs are increased to the upper quartile (with no corresponding increase in value), typologies of 5 or more units remained viable with 33% affordable housing. Res 2, the 3-unit typology, however was no longer viable.

Headroom for further policy costs

5.16 Higher carbon reduction standards such as those proposed in the 2023 Future Homes Consultation or through the Publication Local Plan Policy PUBDM20: Energy demand and performance of new buildings (including extensions) have implications for higher costs. The impact assessment for Future Homes (discussed in chapter 4) suggests a figure of £6,000 could be applicable to houses to reach the standard. (Figure is adjusted from the Impact Assessment to account for the larger dwellings in the BA.)

5.17 Where development falls within the catchment area of the Broads SAC and Broadland Ramsar, a mitigation cost will apply for nutrient neutrality and this could be in the region of £3,500 for the areas in which it applies.

5.18 These two figures suggest a possible additional cost to development of between £3,500 and £9,500 per unit if the above circumstances prevail. However, the results in this chapter indicate that the majority of development within the BA is able to absorb these costs. Of the typologies

that were previously viable, the 3-unit typology and the specialist older persons typology on a general brownfield site could struggle to accommodate the costs if providing affordable housing as well, as could the 5-unit typology on a similar site if also built to upper quartile build costs. These results do not take into account that additional value could be generated to schemes by increased house prices at the time Future Homes is adopted.

Review of the residential results

- 5.19** The results of testing viability of the residential typologies identified present a picture of good general viability and ability to deliver policy compliant affordable housing for most residential typologies across the Broads Authority, with headroom in many instances for further policy costs as well as those associated with national policies such as Future Homes.
- 5.20** The 1-unit typology however is not viable, even without affordable housing, and would not be able to make a contribution to affordable housing. This is not unusual for single-unit typologies which are often built non-speculatively for occupation by the household that commissioned the development, or where a small developer/contractor builds at a lower profit margin.
- 5.21** The 3-unit typology on general brownfield sites, whilst viable with affordable housing in the main testing scenario, is weakened where additional costs are applied, although this is not the case for waterfront or greenfield typologies. Again, with the exception of the 3-unit general brownfield typology and the 1-unit typology in all areas, delivery of social rent is viable should this be the preferred affordable rented tenure.
- 5.22** Specialist older persons housing was only viable with affordable housing in the waterfront area.
- 5.23** The good viability achieved on most development typologies indicates headroom to respond to market changes, higher development costs or land values if applicable over the plan period.

Chapter 6 Non-residential development

- 6.1** This chapter summarises the impact of the publication version of the Local Plan policies on the viability of non-residential development. There are few Local Plan policies that directly affect the viability of non-residential development however the BA wants to understand the impact of those policies which do imply additional non-residential standards.
- 6.2** A review of recent local plan and/or CIL viability studies for the local authorities that comprise the Broads Authority demonstrate that non-residential typologies generally perform weakly, in viability terms, when assessed using a Residual Land Value approach. For instance:
- **Great Yarmouth Local Plan Viability Assessment** (HDH 2023) (para 12.91): finds that employment uses are generally “not being brought forward to on a speculative basis” and instead the limited amount of office and industrial development that is being developed tended to be as a user-led scheme that fit the requirements of that specific developer, rather than for investment purposes. Retail warehouses and supermarkets were demonstrated to be viable.
 - **East Suffolk CIL Review Study** (Aspinal Verdi 2022) (paras 10.13 & 10.21): found office and industrial development to be “considerably unviable in the District” and “currently unviable” respectively. Convenience retail was demonstrated as being viable, whereas comparison retail was judged to be unviable.
 - **North Norfolk District Council Plan Wide Viability Assessment** (NCS 2022) (para 1.2): demonstrated that “only food retail development showed significant viability” and that “[a]ll of the remaining commercial use class appraisals indicate negative viability though this does not mean that this type of development is not deliverable”.
 - **Greater Norwich Development Partnership**: do not appear to consider non-residential typologies in any of the viability assessments that have been submitted as part of the Greater Norwich Local Plan which was submitted for examination on 30th July 2021.
- 6.3** The clear conclusion from the reviewed work was that only retail development was consistently viable on a speculative basis but that development was still likely to come forward to meet occupiers’ commercial needs.
- 6.4** From the policy review of the publication version of the Local Plan set out in Chapter 2, the majority of proposed policies are not considered to significantly add to the development costs for non-residential uses in the plan period. The following policies that may have some impact on the viability of non-residential development are:
- **Policy PUBDM16: Biodiversity Net Gain** all type of development is expected to achieve a minimum of 20% Biodiversity Net Gain (BNG). A Government Impact Assessment undertaken by DEFRA (2019) in Table 15 estimates that a 10% BNG is estimated to represent a cost of £14,334 per hectare. Further, para 6.11.2 of the same impact

assessment estimates that the impact of increasing the net gain to 20% increases the cost to developers by 19%. Therefore, it is assumed that a 20% BNG could represent a cost of £17,058 per hectare. Compared to the total development costs of non-residential development as a whole, this cost is relatively modest.

- **Policy PUBDM55: Non-residential development and BREEAM** non-residential development above 250 sqm must achieve a minimum of BREEAM Very Good. Additionally, non-residential development above 250 sqm must also achieve 3 credits in BREEAM category Wat 01 and those over 1,000 sqm must achieve 5 credits. Historically, BREEAM has been commonly used to categorise non-residential building standards, with five categories – Pass; Good; Very Good; Excellent and Outstanding. Work undertaken by BRE (Building Research Establishment, 2016, The value of BREEAM) suggests that the uplift over base construction costs varies between 0.1% and 0.2% for BREEAM Very Good.

- 6.5** Generally, it is considered that the requirements of these policies are not unreasonable for non-residential development and that the order of magnitude of the potential cost uplift outlined above would not unduly jeopardise development. Indeed, anecdotal evidence indicates that potential occupiers are increasingly requesting higher standard for potential premises to meet their own Environmental Social and Governance (ESG) objectives meaning that, given the magnitude of the costs, many developers are adopting such standards regardless.
- 6.6** It is important to note that the analysis considers development that might be built for subsequent sale or rent to a commercial tenant. However, there will also be development that is undertaken for specific commercial operators, either as owners or pre-lets. In these circumstances the economics of the development relate to the profitability of the enterprise accommodated within the buildings rather than the market value of the buildings. Therefore, it should be noted that while the testing suggests that all types of development are not viable, they may still be brought forward for individual occupiers to meet their specific requirements. In particular, if the required return is reduced to the level of a contractor return, then unviable sites may be marginal or (marginally) positive.

Summary for non-residential testing

- 6.7** Non-residential development has not been viability tested within this study for the following reasons. Firstly, the BA does not expect a significant amount of non-residential development within the Broads area over the plan period; and that the local plan's 'deliverability' is not reliant on such development. Secondly, the policies that the Authority has included that are directly relevant to these types of developments only represent modest costs. Given the weak viability for commercial uses that has been identified in similar viability studies conducted recently it is unlikely that these policies, given the magnitude of the costs, would have a significant impact on the overall delivery of the Local Plan should they be included or not.

Chapter 7 Summary and conclusions

7.1 To inform the Regulation 19 Publication Local Plan we have modelled the viability of a range of typologies across the Broads Authority. These are representative of the types of development anticipated to come forward during the plan period and include costs attributed to the draft policies. The testing assumptions used have been derived from published sources and consulted upon with the development industry and other key stakeholders. The implications drawn from the results are discussed below.

Policy Implications

7.2 An affordable contribution of at least 33% is achievable on most typologies across the Broads Authority, including on those of fewer than 10 dwellings. The clear exceptions to this in viability terms are developments of 1-unit on any site type and older persons housing apart from on waterfront sites. For the typologies of 3-units a contribution is realistic on waterfront sites and greenfield sites – on general (inland) brownfield sites collection is still feasible but could be compromised if there are additional development cost pressures such as higher environmental costs. As some results are positive, the authority could still ask for a contribution on these sites but may then have to assess a viable contribution on a site-by-site basis.

7.3 Potential national increases in development standards in respect of carbon reduction (Future Homes and Future Buildings) would reduce residual values but does not change our conclusion.

7.4 As well as affordable housing, the testing included allowances for policies in the Publication Local Plan including:

- Biodiversity Net Gain at 20%
- Accessibility to Building Regulations M4(2) standard on every dwelling
- Accessibility to Building Regulations M4(3) standard on 10% of affordable homes
- Self and custom build housing at 5% on sites of 100 dwellings or more.

The results of the viability testing show these policies to be achievable.

7.5 For non residential development, there is a limited number of policies that directly impact on development viability. Those that do include BREEAM and Biodiversity Net Gain. Whilst this does increase the cost, the impact of these policies is minimal and would not, either on their own or in combination, effect delivery of these forms of development.

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Report for the Broads Authority

Local Plan Viability Assessment

Technical Appendices – October 2024



Document control sheet	
Project name	Broads Authority Local Plan
Project reference	Viability Assessment
Report title	Broads Authority Local Plan Viability Assessment – Technical Appendices
Doc ref	Final report
Date	October 2024
Prepared by	Laura Easton, Tom Marshall
Reviewed by	Lin Cousins
Quality statement	In preparing this report, the authors have followed national and professional standards, acted with objectivity, impartially, without interference and with reference to appropriate available sources of information. No performance-related or contingent fees have been agreed and there is no known conflict of interest in advising the client group.
Use of this report	<p>This report is not a formal land valuation or scheme appraisal. It has been prepared using the Three Dragons toolkit and is based on local level data supplied by the Broads Authority, consultant team inputs and quoted published data sources. The toolkit provides a review of the development economics of illustrative schemes and the results depend on the data inputs provided. This analysis should not be used for individual scheme appraisal.</p> <p>No responsibility whatsoever is accepted to any third party who may seek to rely on the content of the report unless previously agreed.</p>
Cover photo	Reedham riverside (Three Dragons)

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Appendix I - National policy and guidance

National policy context

- i. **National framework** - The National Planning Policy Framework (NPPF) recognises the importance of positive and aspirational planning but states that this should be done 'in a way that is aspirational but deliverable'.(Para 16)
- ii. The NPPF advises that cumulative effects of policy should not combine to render plans unviable:

'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.'(Para 34)
- iii. The government has signalled its desire to simplify the planning process, including development contributions. The NPPF advises that:

'All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.' (Para 58)
- iv. In terms of affordable homes the government has reiterated previous policy on affordable homes thresholds and a desire to increase affordable home products that can potentially lead to home ownership:

'Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.' (Para 65)

'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.' (Para 66)
- v. With regard to non-residential development, the NPPF states that local planning authorities should:

'set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth...local policies for economic development and regeneration...seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment...be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.' (Para 86)

- vi. However, the NPPF does not state that all sites must be viable now in order to appear in the plan. Instead, the NPPF is concerned to ensure that the bulk of the development is not rendered unviable by unrealistic policy costs and that overall, Local Plan policies should not undermine the deliverability of the plan (Para 34). It is important to recognise that economic viability will be subject to economic and market variations over the local plan timescale. In a free market, where development is largely undertaken by the private sector, the local planning authority can seek to provide suitable sites to meet the needs of sustainable development. It is not within the local planning authority's control to ensure delivery actually takes place; this will depend on the willingness of a developer to invest and a landowner to release the land. So, in considering whether a site is deliverable now or developable in the future, we have taken account of the local context to help shape our viability assumptions.
- vii. **Written Ministerial Statements - Affordable Homes Update** (24 May 2021) is specifically referenced in NPPF and sets out the Government's plans for the delivery of First Homes and the new model for Shared Ownership. First Homes criteria includes the requirement for a discount in perpetuity of at least 30% against market value to a maximum discounted price of £250,000 (£420,000 in Greater London). A minimum of 25% of all affordable housing units secured through developer contributions should be First Homes. First Homes are an affordable home ownership product and count towards the NPPF requirement that 10% of all homes are affordable home ownership. First Homes are exempt from CIL.
- viii. **Written Ministerial Statements - Local Energy Efficiency Standards Update** (13 December 2023) recognises that for a number of years, the plans of some local authorities have sought to go further than national standards for energy efficiency. The WMS states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations unless they have a well-reasoned and robustly costed rationale that ensures development remains viable and that any additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate calculated using a specified version of the Standard Assessment Procedure.
- ix. **Planning Practice Guidance** - Planning Practice Guidance (PPG) provides further detail about how the NPPF should be applied. PPG contains general principles for understanding viability (also relevant to CIL viability testing). The approach taken reflects the latest version of PPG. In order to understand viability, a realistic understanding of the costs and the value of development is required and direct engagement with development sector may be helpful (Paragraph: 010 Reference ID: 10-010-20180724). Evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability, with further detail for strategic sites that provide a significant proportion of planned supply (Paragraph: 005 Reference ID: 10-004-20180724).
- x. All development costs should be taken into account, including within setting of benchmark land values, in particular para 014 within the PPG Viability section states that:
 - 'Costs include:
 - build costs based on appropriate data, for example that of the Building Cost Information Service

- abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value
 - site-specific infrastructure costs, which might include access roads, sustainable drainage systems, green infrastructure, connection to utilities and decentralised energy. These costs should be taken into account when defining benchmark land value
 - the total cost of all relevant policy requirements including contributions towards affordable housing and infrastructure, Community Infrastructure Levy charges, biodiversity net gain (as required by Schedule 7A of the Town and Country Planning Act), and any other relevant policies or standards. These costs should be taken into account when defining benchmark land value
 - general finance costs including those incurred through loans
 - professional, project management, sales, marketing and legal costs incorporating organisational overheads associated with the site. Any professional site fees should also be taken into account when defining benchmark land value
 - explicit reference to project contingency costs should be included in circumstances where scheme specific assessment is deemed necessary, with a justification for contingency relative to project risk and developers return.'
- xi. Land values (Paragraph: 013 Reference ID: 10-013-20190509 and 014 Reference ID: 10-014-20190509) should be defined using a benchmark land value that is established on the basis of Existing Use Value plus a premium for the landowner. The premium should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The benchmark should reflect the implications of abnormal costs, site specific infrastructure and fees. It can be informed by market evidence including current costs and values but that this should be based on development that is compliant with policies, where evidence is not available adjustments should be made to reflect policy compliance.
- xii. PPG states that developer return should be 15 - 20% of gross development value and that a lower figure may be more appropriate for affordable homes delivery (Paragraph: 018 Reference ID: 10-018-20190509)
- xiii. **Other guidance on viability testing for development** - Guidance has been published to assist practitioners in undertaking viability studies for policy making purposes - "*Viability Testing Local Plans - Advice for planning practitioners*". (The guide was published in June 2012 and is the work of the Local Housing Delivery Group, chaired by Sir John Harman, which is a cross-industry group, supported by the Local Government Association and the Home Builders Federation.) The foreword to the Advice for planning practitioners includes support from DHCLG, the LGA, the HBF, PINS and POS. Within the guidance, PINS and the POS state that:
- 'The Planning Inspectorate and Planning Officers Society welcome this advice on viability testing of Local Plans. The use of this approach will help enable local authorities to meet their obligations under NPPF when their plan is examined'*

- xiv. The approach to viability testing adopted for this study follows the principles set out in the Advice. The Advice re-iterates that:

'The approach to assessing plan viability should recognise that it can only provide high level assurance'

- xv. The Advice also comments on how viability testing should deal with potential future changes in market conditions and other costs and values and states that:

'The most straightforward way to assess plan policies for the first five years is to work on the basis of current costs and values'. (page 26)

- xvi. But that:

'The one exception to the use of current costs and current values should be recognition of significant national regulatory changes to be implemented.....' (page 26)

Principles of viability testing

- xvii. The Advice for planning practitioners summarises viability as follows:

'An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.' (page 14)

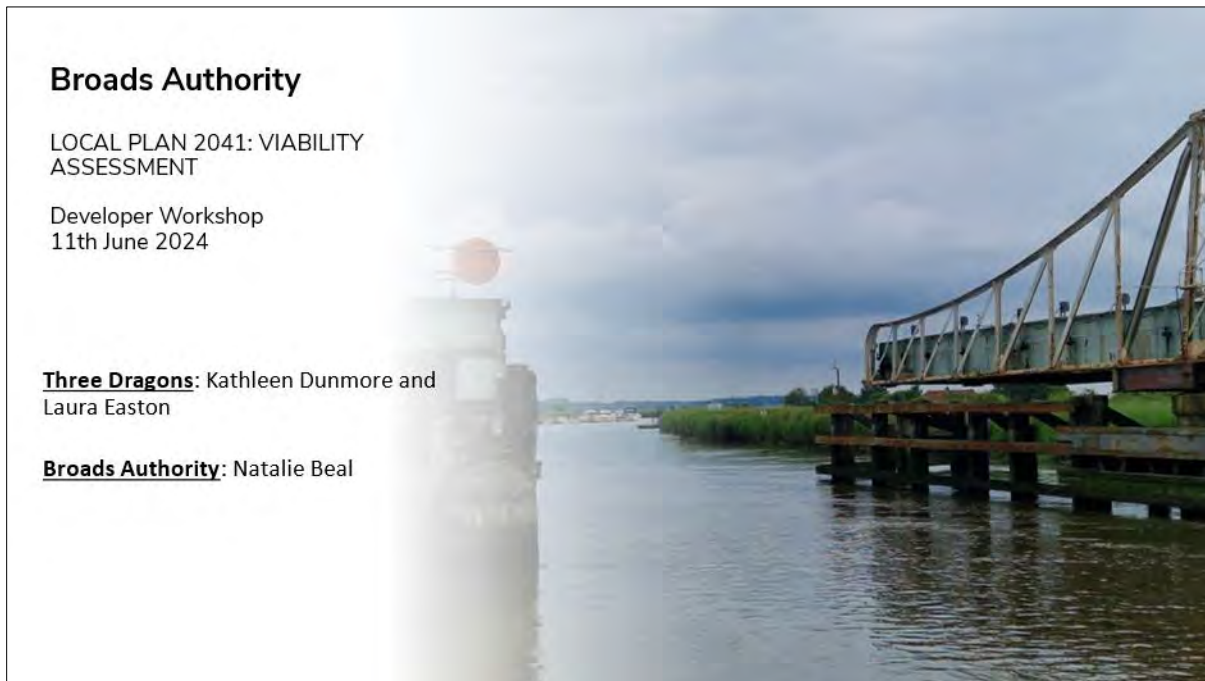
- xviii. Reflecting this definition of viability, and as specifically recommended by the Advice for planning practitioners, we have adopted a residual value approach to our analysis. Residual value is the value of the completed development (known as the Gross Development Value or GDV) less the costs of undertaking the development. The residual value is then available to pay for the land. The value of the scheme includes both the value of the market homes and affordable homes (and other non-residential values). Scheme costs include the costs of building the development, plus professional fees, scheme finance and a return to the developer. Scheme costs also include planning obligations (including affordable homes, direct s106 costs) and the greater the planning obligations, the less will be the residual value.

- xix. The residual value of a scheme is then compared with a benchmark land value. If the residual value is less than the benchmark value, then the scheme is less likely to be brought forward for development and is considered unviable for testing purposes. If the residual value exceeds the benchmark, then it can be considered viable in terms of policy testing.

- xx. PPG paragraph 012 - 015 sets out that benchmark land values should be based on the current use value of a site plus an appropriate site premium in most cases. The principle of this approach is that a landowner should receive at least the value of the land in its 'pre-permission' use, which would normally be lost when bringing forward land for development. The benchmark land values used in this study are based on the principle of 'Existing Use Value Plus' which is considered further in other parts of this report.

- xxi. Note the approach to Local Plan level viability (or CIL) assessment does not require all sites in the plan to be viable. The Harman Report says that a site typologies approach (i.e. assessing a range of example development sites likely to come forward) to understanding plan viability is sensible, a view echoed in CIL guidance. Viability '*...is to provide high level assurance that the policies with the plan are set in a way that is compatible with the likely economic viability of development needed to deliver the plan*'.

Appendix II - Notes from the developer workshop



Present

Natalie Beal The Broads Authority Planning Dept
Kathleen Dunmore Three Dragons
Laura Easton Three Dragons
Stone Planning and Keystone Development
Badger Building

Apologies

FW Properties
Walsingham Plan
Greene King
Rural Solutions

1. Introduction to the session

The chair, Kathleen Dunmore from Three Dragons welcomed everyone to the meeting and explained that this was an opportunity to input into key assumptions underlying the viability appraisal which would provide supporting evidence for the emerging Broads Authority local plan.

Participants were encouraged to make comments at this meeting, by email or in writing or by telephone afterwards. They were informed that the meeting would be recorded and copies of the notes sent to everyone who had indicated an interest in attending.

Three Dragons

The structure of the session is set out in the slide below.

Welcome to Today's Session

- **Introductions and housekeeping**
- **Local Plan Update**
- **Overview of Methodology**
- **Presentation of Initial Testing Assumptions**
- **Opportunity for Views and Questions**

2. Review of Broads Authority Local Plan

Local Plan Review

- Why the Broads Authority is reviewing its Local Plan
- Issues to address
- Steps taken so far
 - Housing needs
 - Call for sites
 - Issues and Options
- Next steps and timetable



The Local Plan for the Broads: Review
Plan period 2021 to 2041
Preferred Options consultation



Maps of the Broads Authority



Natalie Beal from the Broads Authority explained that the current local plan has been in place since 2019. An issues and options paper was prepared in 2022 and the regulation 18 draft plan was released for consultation in March 2024. Over 700 responses have been received and the Authority is now reviewing the adopted Local Plan.

The Broads Authority has carried out two calls for sites but no suitable sites have come forward. There is a need for 358 dwellings over the Plan period with some 271 dwellings to come forward through the Utilities site allocation at East Norwich.

The Authority intends to consult on its publication plan in December 2024 and needs to submit it for examination by June 2025 at the latest so as to meet the pre-LURA (Levelling Up & Regeneration Act) transition dates and be adopted by the end of 2026.

3. Approach to testing

<p>Approach to viability testing</p> <ul style="list-style-type: none"> • Residual value approach • NPPF and PPG compliant • Harman, Viability testing local plans • Based on notional typologies 	<p>Total development value</p> <p><i>Minus</i></p> <p>Development costs (incl. build costs, planning obligations and return to developer, interest/cashflow where relevant, sales costs and legal fees)</p> <p>=</p> <p>residual value</p> <p><i>Minus</i></p> <p>Benchmark land value</p> <p><i>If result positive, development is viable</i></p>
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The viability testing will be based on a residual value approach as set out in PPG.

4. Typologies

Residential Typologies		
Suggested typologies	Market housing mix	Densities
1 unit	1 x 3 bed detached	
3 units	3 x 3 bed detached	15dph
5 units	Equal split of 2/3/4bed	15 dph
8 units	Equal split of 2/3/4bed	20 dph
12 units	Equal split of 2/3/4bed	20 dph
50 units	Equal split of 2/3/4bed	25 dph
200 units	10% 1 beds and equal split of 2/3/4bed	30 dph

Laura Easton set out the proposed residential typologies for testing, highlighting that most development in the Broads consists of small sites of under 10 units.

Discussion concluded that the typology list was broadly reasonable. As indicated in the proposed typology list, density is lower on smaller sites than on larger sites and smaller sites are more likely to include bungalows.

A site of 15 to 20 units at Gillingham half a mile from the Broads is being built out and can provide information about the mix density and size of units.

Sites can take a long time to build out due to issues such as prohibitive costs of piling or because small businesses have other competing priorities.

5. Residential values

Housing Market Values

Very little new build in last few years – so very little evidence

Looked at last viability study and indexed to today's values (Nov 2018 to Jan 24) – 35% increase

Land Registry new build – hard to be certain of locations

Checked against properties on the market today

Are these values realistic – across the Broads?

House - £3,900 per sqm

House – waterfront £5,070 per sqm

On the market today -

4B det £425,000 - £735,000

3B semi £235,000 - £300,000



MARKET VALUES –BROADS AUTHORITY

Dwelling	Market value	Market value - waterfront
2 bed house – 80 sqm	£312,000	£405,600
3 bed house – 110 sqm	£429,000	£557,700
4 bed house – 140 sqm	£546,000	£709,800
4 / 5 bed house – 190 sqm	£741,000	£963,300

Laura Easton presented suggested housing market values. These were based on a combination of the values in the previous viability study uplifted by inflation, Information from Rightmove and other house price websites about prices of properties currently on sale in the Broads and Land Registry data on recent newbuilds.

It was agreed that this methodology was broadly reasonable and that as a mean of the Broads, the values were about right. There are higher value areas in more attractive locations with proximity to the waterfront and the proposed uplift seemed about right, although not all waterfront locations are attractive and are thus less likely they are to qualify as a premium house price area

Prices are often location specific in practice and vary across the Broads, participants referred to two developments quite close to each other where house prices for similar properties were 500K (Romsey Road) and 900K (Riverside).

Houses are not selling as fast as they were but are selling. The lower end of the market is buoyant but the market for properties priced at £500,000 and over is slower.

6. Benchmark Land value

Benchmark Land Value

<p>Benchmark land value should:</p> <ul style="list-style-type: none"> • be based upon existing use value • allow for a premium to landowners (including equity resulting from those building their own homes) • reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees <p style="text-align: center;">PPG paragraph 14</p>	<p>Benchmark Land Value – enough to enable transaction but not the same as best price. Land will transact above this value</p> <p><i>“Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.”</i></p> <p>PPG paragraphs 6, 11, 14 and 18</p>
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Benchmark Land Value

Broads Authority Value per gross ha					Greenfield – 15 x agricultural value Brownfield - EUV +20%
Single plot (0.05 ha)	Greenfield sites (range £0.2m - £0.4m)	Sites with existing brownfield use / Edge of Norwich and waterfront	Sites with existing brownfield use /elsewhere	Rural Exception Sites	
£50k	£0.30m	£0.75m	£0.40m	10K per plot	

Benchmark land values are taken from a variety of sources, including existing use values from DLUHC, current sales, and values used in viability appraisals across the 6 local authorities that make up the Broads. It was agreed that they were broadly reasonable but land values would be influenced by exceptional build costs such as remediation - particularly likely on edge of Norwich sites. Piling costs to a depth of 16-18 metres also need to come off land value (examples of piling costs were requested).

If the single plot site has planning permission then the cost of the land would be closer to £100k.

7. Dwelling sizes

Residential Testing – dwelling sizes

House type description	Affordable sqm	Market sq m
1 bedroom flat	50 (2p)	n/a in Broads
2 bedroom bungalow or flat	70 (4p)	80
2 bedroom house	79 (4p)	80
3 bedroom house	93 (5p)	110
4 bedroom house	97 (5p)	140
4/5 bed detached house		190
Single plots or waterfront only?		
An allowance of 10% of floor area will be added to the flats for circulation and common areas (20% for sheltered)		
Units are compliant with Nationally Described Space Standards		

The dwelling sizes quoted were considered broadly realistic with the exception that 110 square metres was considered too large for a three bed house. It was noted that dwellings are often quite large in the broads and Badger Homes to send some examples – other examples were also requested. **Post meeting suggestion - would a 3-bed unit of 95 square metres be more realistic?.**

8. Affordable housing

Affordable Housing Dwelling Mix – Mixed Tenure Sites

	Sqm	Rented (70%)	First Homes (25%)	Shared ownership (5%)
1 bed	50	20%		
2 bed	79	40%	50%	50%
3 bed	93	30%	50%	50%
4 bed	97	10%		

Current policies range from 15% to 35%
 Our starting point 33% on all sites
 On Sites less than 10 dwellings potential for commuted sum (but same impact on viability)
 RES – start at 100% affordable

Do the targets in the table look realistic as a starting point?

- Mix encompasses differing areas – is it deliverable?
- We will test alternatives
- We will talk to RPs & enablers separately – but are there any particular issues to raise now?

Currently affordable housing is required on sites over 10 dwellings in the Broads and commuted sums payable on sites of 6-9 dwellings. There has been no direct affordable housing delivery in the Broads Authority area in recent years but some commuted sum payments. The emerging plan will give consideration to whether affordable housing should be sought on sites of 1-5 dwellings. From a viability perspective the payment should be the same whether the affordable homes are on-site or as a commuted sum. In either case it is necessary to calculate a realistic mix of affordable housing in order to arrive at the appropriate commuted sum.

Some discussion about whether First Homes are required in the Broads. They are not appropriate for rural exception sites but schemes within the Broads which are not classified as rural exceptions will be expected to provide First Homes, unless an evidence backed policy case can be made for not developing these.

Badger Homes has set up an inhouse registered provider to provide affordable housing. Contact to be provided to be included in the RP consultation process.

9. Costs

Build Cost (BCIS mean 5yr Norfolk)		
Type	Broads Authority	
Flats (1-2 storey)	£1,605	Per sqm
One-off houses - detached	£2,678	Per sqm
2-5 houses (general)	£1,513	Per sqm
6-9 houses (general)	£1,441	Per sqm
10+ houses (general)	£1,369	Per sqm
100+ houses (general)	£1,282	Per sqm
Bungalows	£1,638	Per sqm
Sheltered flats	£1,818	Per sqm
Plot costs and site infrastructure	15%	Up to 100 dwellings
	20%	100+ dwellings
Part L	3.9%	Per unit
Accessibility – Part M4	£1,400	Per dwelling to meet M4(2)
Delivery Rates – any comments?		

Other costs		
Professional fees	6-10%	Of build costs
Finance	7%	Of development costs
Marketing fees	3%	Of Market GDV
Developer return	17.5%	Of GDV
Contractor return (for affordable)	6%	
Agents & Legal	1.75%	
SDLT	Per HMRC figures	
S106	RAMS	Going rate – all dwellings
	£2,000 £10,000 - £20,000	Per dwelling, sites 10 + Sites over 100 units
Future Homes Standard (sensitivity)	£4,000 - £6,000	Per house (lower for flats)
Electric Vehicle Charging	£865	Per unit
Biodiversity net gain	£995 - £1,185	Per unit – 10-20% (Brownfield) Central scenario from Govt impact assessment

The build costs proposed looked broadly reasonable - more information is requested about the costs of pile foundations

One-offs such as Passivhaus or particular designs will carry additional costs but this may be offset by premium price: an uplift of 10% in both cases was suggested but would need to be verified.

Sales rates are slower than national averages as builders are unlikely to sell off plan. First sale typically 18 months from commencement on site and could be longer if there are complicated groundworks.

Local developers and the Broads Authority, like other affected LPAs, is still working out how to cope with nutrient neutrality and this will be an additional sum in some areas of the Broads. **(Post workshop note** – a figure of £3,500 has been suggested as appropriate by one of the district authorities.) Natalie advised developers to look at Norfolk Environmental Credits and check specific schemes with Natural England. She will also provide contact for Three Dragons at Broadland Council.

10. Non-residential development

Non-residential development

- What types of non-residential should be modelled?
- Relevance of location?
- Applicability of BREEAM standard?



Limited activity at present, Greene King is developing leisure site in Station Road, Hoveton (waterside facilities / hotel / dining). Paddle board sites are popular.

11. Next steps and contacts for comments

NEXT STEPS

- Workshop notes/slides to be circulated – another opportunity for input to the study
- Follow up interviews with RPs
- Follow up interviews with other stakeholders if appropriate, or if need for confidential discussion
- Initial testing undertaken
- Presentation of findings to BA
- Sensitivity testing
- Reporting

(slide with contact details removed)

Please contact the Three Dragons team on these email addresses if you have any information you would like to feed in to the viability process, evidenced where possible. Any identifying information will remain confidential.

Comments and information also most welcome from those who were unable to attend the meeting.

Thank you everyone for your participation

Appendix III – Sample house price data

Sample (from 1,146 record) house price data – Norfolk – Indexed

Date	Index at Transaction date	Index at latest date	Indexed Sales value	postcode	Indexed Sales value per sqm	FLSP	price_paid	property_type	new_build	estate_type	locality
May 2019	123.66	155.7	£324,847	NR12 7DE	£3,867	84	258000	S	Y	F	CROSTWICK
May 2019	123.66	155.7	£346,252	NR12 7DE	£3,570	97	275000	S	Y	F	CROSTWICK
February 2020	125.58	150.1	£298,814	NR12 7DE	£3,557	84	250000	T	Y	F	CROSTWICK
September 2021	139.7	150.1	£204,145	NR12 7DE	£3,293	62	190000	T	Y	F	CROSTWICK
November 2020	130.18	150.1	£207,543	NR12 7DE	£3,193	65	180000	T	Y	F	CROSTWICK
October 2021	139.7	150.1	£201,458	NR12 7DE	£3,198	63	187500	T	Y	F	CROSTWICK
September 2019	123.71	150.1	£266,931	NR12 7DE	£4,171	64	220000	T	Y	F	CROSTWICK
May 2019	123.64	150.1	£267,082	NR12 7DE	£4,239	63	220000	T	Y	F	CROSTWICK
November 2020	130.18	150.1	£207,543	NR12 7DE	£3,193	65	180000	T	Y	F	CROSTWICK
February 2021	131.6	150.1	£205,304	NR12 7DE	£3,366	61	180000	T	Y	F	CROSTWICK
December 2020	128.97	150.1	£209,491	NR12 7DE	£3,223	65	180000	T	Y	F	CROSTWICK
November 2021	140.2	150.1	£192,710	NR12 7DE	£2,965	65	180000	T	Y	F	CROSTWICK
April 2019	122.82	150.1	£274,976	NR12 7DE	£4,230	65	225000	T	Y	F	CROSTWICK
December 2020	128.97	150.1	£209,491	NR12 7DE	£3,379	62	180000	T	Y	F	CROSTWICK
September 2019	123.71	150.1	£256,617	NR12 7DE	£4,139	62	211500	T	Y	F	CROSTWICK
September 2020	131.02	150.1	£206,213	NR12 7DE	£3,173	65	180000	T	Y	F	CROSTWICK
March 2021	132.3	150.1	£215,563	NR12 7DE	£3,534	61	190000	T	Y	F	CROSTWICK
June 2019	124.53	154.8	£696,121	NR12 8FE	£3,446	202	560000	D	Y	F	WROXHAM
January 2019	127.76	155.7	£365,601	NR12 8FE	£3,584	102	299995	S	Y	F	WROXHAM
September 2021	136.3	154.4	£455,950	NR12 8QB	£3,965	115	402500	D	Y	F	HOVETON
September 2020	137.12	154.4	£444,778	NR12 8QB	£3,868	115	395000	D	Y	F	HOVETON

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Date	Index at Transaction date	Index at latest date	Indexed Sales value	postcode	Indexed Sales value per sqm	FLSP	price_paid	property_type	new_build	estate_type	locality
September 2020	139.14	156.3	£325,765	NR12 8QB	£4,654	70	290000	S	Y	F	HOVETON
November 2020	143.36	156.3	£272,566	NR12 8QB	£3,839	71	250000	S	Y	F	HOVETON
March 2021	137.7	156.3	£334,847	NR12 8QB	£4,784	70	295000	S	Y	F	HOVETON
December 2020	142.26	156.3	£296,647	NR12 8QB	£3,532	84	270000	S	Y	F	HOVETON
December 2020	139.45	154.4	£553,603	NR12 8QB	£3,376	164	500000	D	Y	F	HOVETON
November 2020	140.62	154.4	£439,198	NR12 8QB	£3,819	115	400000	D	Y	F	HOVETON
January 2021	137.7	154.4	£549,426	NR12 8QB	£3,350	164	490000	D	Y	F	HOVETON
November 2020	143.36	156.3	£321,627	NR12 8QB	£3,496	92	295000	S	Y	F	HOVETON
January 2021	139.9	156.3	£325,113	NR12 8QB	£3,737	87	291000	S	Y	F	HOVETON
March 2021	136.7	154.4	£534,809	NR12 8QB	£3,495	153	473500	D	Y	F	HOVETON
June 2021	142.7	154.4	£524,765	NR12 8QB	£3,430	153	485000	D	Y	F	HOVETON
January 2021	137.7	154.4	£616,703	NR12 8QB	£3,606	171	550000	D	Y	F	HOVETON
December 2020	139.45	154.4	£542,531	NR12 8QB	£3,308	164	490000	D	Y	F	HOVETON
April 2021	137	154.4	£371,856	NR12 9AX	£3,262	114	329950	D	Y	F	STALHAM
April 2021	137	154.4	£394,396	NR12 9AX	£3,259	121	349950	D	Y	F	STALHAM
April 2021	137	154.4	£377,491	NR12 9AX	£3,120	121	334950	D	Y	F	STALHAM
April 2021	137	154.4	£400,031	NR12 9FY	£4,211	95	354950	D	Y	F	STALHAM
May 2021	139	154.4	£399,829	NR12 9FY	£4,209	95	359950	D	Y	F	STALHAM
May 2021	139	154.4	£355,398	NR12 9FY	£3,118	114	319950	D	Y	F	STALHAM
May 2021	139	154.4	£388,721	NR12 9FY	£3,213	121	349950	D	Y	F	STALHAM
July 2021	140.8	154.4	£400,201	NR12 9FY	£4,213	95	364950	D	Y	F	STALHAM
August 2021	137.3	154.4	£382,289	NR12 9FY	£2,731	140	339950	D	Y	F	STALHAM
July 2021	140.8	154.4	£328,922	NR12 9FY	£4,272	77	299950	D	Y	F	STALHAM
November 2021	145.8	154.4	£370,592	NR12 9FY	£3,901	95	349950	D	Y	F	STALHAM
March 2022	152.4	137.7	£171,628	NR12 9FZ	£3,178	54	189950	F	Y	L	STALHAM
November 2021	143.6	137.7	£164,885	NR12 9FZ	£3,747	44	171950	F	Y	L	STALHAM
November 2021	143.6	137.7	£161,050	NR12 9FZ	£3,660	44	167950	F	Y	L	STALHAM

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December 2021	146	137.7	£219,235	NR12 9FZ	£3,322	66	232450	F	Y	L	STALHAM
June 2022	153.2	137.7	£220,167	NR12 9FZ	£3,016	73	244950	F	Y	L	STALHAM
December 2021	146	137.7	£167,362	NR12 9FZ	£3,638	46	177450	F	Y	L	STALHAM
December 2021	146	137.7	£167,362	NR12 9FZ	£3,719	45	177450	F	Y	L	STALHAM
December 2021	146	137.7	£179,151	NR12 9FZ	£3,445	52	189950	F	Y	L	STALHAM
May 2022	153.7	137.7	£223,483	NR12 9FZ	£3,193	70	249450	F	Y	L	STALHAM
November 2021	143.6	137.7	£232,489	NR12 9FZ	£3,274	71	242450	F	Y	L	STALHAM
November 2022	156.8	137.7	£223,894	NR12 9FZ	£2,834	79	254950	F	Y	L	STALHAM
December 2021	146	137.7	£254,132	NR12 9FZ	£3,217	79	269450	F	Y	L	STALHAM
March 2022	152.4	137.7	£221,323	NR12 9FZ	£3,032	73	244950	F	Y	L	STALHAM
January 2022	150.5	137.7	£263,002	NR12 9FZ	£2,711	97	287450	F	Y	L	STALHAM
December 2021	140.9	154.8	£335,083	NR13 3DN	£4,654	72	304995	D	Y	F	ACLE
November 2022	154.9	154.8	£524,661	NR13 3DN	£3,105	169	525000	D	Y	F	ACLE
December 2021	140.9	154.8	£329,590	NR13 3DN	£3,329	99	299995	D	Y	F	ACLE
July 2022	151.3	154.8	£475,706	NR13 3DN	£2,815	169	464950	D	Y	F	ACLE
December 2022	154.2	154.8	£269,043	NR13 3DN	£3,449	78	268000	D	Y	F	ACLE
July 2023	146.1	154.8	£381,437	NR13 3DN	£4,058	94	360000	D	Y	F	ACLE
January 2023	154.2	154.8	£411,595	NR13 3DN	£3,374	122	410000	D	Y	F	ACLE
March 2023	151.7	154.8	£319,396	NR13 3DN	£3,671	87	313000	D	Y	F	ACLE
February 2023	153.1	154.8	£414,553	NR13 3DN	£3,398	122	410000	D	Y	F	ACLE
March 2023	151.7	154.8	£255,109	NR13 3DN	£3,313	77	250000	D	Y	F	ACLE
January 2023	154.2	154.8	£266,031	NR13 3DN	£3,411	78	265000	D	Y	F	ACLE
March 2023	151.7	154.8	£443,889	NR13 3DN	£3,468	128	435000	D	Y	F	ACLE
February 2023	153.1	154.8	£424,664	NR13 3DN	£3,318	128	420000	D	Y	F	ACLE
March 2023	151.7	154.8	£346,948	NR13 3DN	£3,691	94	340000	D	Y	F	ACLE
February 2023	153.1	154.8	£328,609	NR13 3DN	£3,496	94	325000	D	Y	F	ACLE
March 2023	151.7	154.8	£448,991	NR13 3DN	£3,508	128	440000	D	Y	F	ACLE

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September 2021	138.5	154.8	£307,359	NR13 3DT	£4,269	72	274995	D	Y	F	ACLE
February 2022	148	155.7	£260,897	NR13 3DT	£3,433	76	247995	S	Y	F	ACLE
September 2021	138.5	154.8	£307,359	NR13 3DT	£4,269	72	274995	D	Y	F	ACLE
December 2021	143	155.7	£270,020	NR13 3DT	£3,553	76	247995	S	Y	F	ACLE
September 2021	138.5	154.8	£329,713	NR13 3DT	£3,790	87	294995	D	Y	F	ACLE
September 2021	138.5	154.8	£318,536	NR13 3DT	£3,579	89	284995	D	Y	F	ACLE
September 2021	138.5	154.8	£318,536	NR13 3DT	£3,579	89	284995	D	Y	F	ACLE
March 2022	147.2	154.8	£262,908	NR13 3EF	£2,954	89	250000	D	Y	F	ACLE
July 2022	151.3	154.8	£352,976	NR13 3EF	£3,238	109	344995	D	Y	F	ACLE
September 2022	155	154.8	£354,537	NR13 3EF	£3,253	109	354995	D	Y	F	ACLE
March 2022	147.2	154.8	£289,193	NR13 3EF	£4,017	72	274995	D	Y	F	ACLE
March 2022	148.8	155.7	£209,274	NR13 3EF	£2,683	78	200000	S	Y	F	ACLE
March 2022	147.2	154.8	£273,424	NR13 3EF	£3,072	89	260000	D	Y	F	ACLE
March 2022	148.8	155.7	£209,274	NR13 3EF	£2,683	78	200000	S	Y	F	ACLE
February 2019	125.53	154.8	£413,112	NR13 3FA	£3,083	134	335000	D	Y	F	ACLE
April 2019	122.44	154.8	£423,538	NR13 3FA	£3,161	134	335000	D	Y	F	ACLE
November 2019	123.16	154.8	£421,062	NR13 3FA	£4,010	105	335000	D	Y	F	ACLE
May 2019	123.07	154.8	£421,370	NR13 3FA	£4,013	105	335000	D	Y	F	ACLE
May 2019	123.07	154.8	£371,057	NR13 3FA	£4,217	88	295000	D	Y	F	ACLE
July 2019	124.66	154.8	£391,160	NR13 3FA	£4,445	88	315000	D	Y	F	ACLE
August 2019	125.14	155.7	£261,283	NR13 3FA	£3,438	76	210000	S	Y	F	ACLE
May 2019	123.66	155.7	£264,410	NR13 3FA	£3,479	76	210000	S	Y	F	ACLE
June 2019	125.03	155.7	£261,513	NR13 3FA	£3,441	76	210000	S	Y	F	ACLE
June 2019	125.03	155.7	£261,513	NR13 3FA	£3,441	76	210000	S	Y	F	ACLE
April 2019	122.44	154.8	£614,446	NR13 3FF	£3,531	174	486000	D	Y	F	REEDHAM
September 2020	130.24	154.8	£600,230	NR13 3FF	£3,262	184	505000	D	Y	F	REEDHAM
March 2019	123.07	154.8	£396,214	NR13 3FF	£5,213	76	315000	D	Y	F	REEDHAM

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May 2020	126.69	154.8	£366,564	NR13 3FF	£3,363	109	300000	D	Y	F	REEDHAM
August 2019	124.51	154.8	£379,198	NR13 3FF	£4,989	76	305000	D	Y	F	REEDHAM
November 2019	123.16	154.8	£395,924	NR13 3FF	£3,632	109	315000	D	Y	F	REEDHAM
July 2020	128.68	154.8	£348,865	NR13 3FF	£4,531	77	290000	D	Y	F	REEDHAM
July 2019	124.66	154.8	£440,831	NR13 3FF	£3,584	123	355000	D	Y	F	REEDHAM
September 2019	123.45	154.8	£376,185	NR13 3FF	£4,886	77	300000	D	Y	F	REEDHAM
December 2020	128.69	154.8	£418,005	NR13 3FF	£4,058	103	347500	D	Y	F	REEDHAM
August 2020	128.77	155.7	£238,199	NR13 3FF	£3,722	64	197000	S	Y	F	REEDHAM
March 2020	125.2	155.7	£242,504	NR13 3FF	£3,789	64	195000	S	Y	F	REEDHAM
August 2020	128.05	154.8	£404,982	NR13 3FF	£3,000	135	335000	D	Y	F	REEDHAM
September 2019	123.45	154.8	£432,612	NR13 3FF	£3,517	123	345000	D	Y	F	REEDHAM
May 2022	146.6	154.8	£369,572	NR13 3FH	£3,974	93	349995	D	Y	F	ACLE
June 2022	147.5	154.8	£367,317	NR13 3FH	£3,950	93	349995	D	Y	F	ACLE
May 2022	146.6	154.8	£356,901	NR13 3FH	£3,838	93	337995	D	Y	F	ACLE

Appendix IV – Building and construction costs



£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 01-Jun-2024 07:27

Rebased to 1Q 2024 (390) and Norfolk (95; sample 121)

MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
810. Housing, mixed developments (15)	1,453	776	1,255	1,402	1,593	3,604	1272
810.1 Estate housing							
Generally (15)	1,441	748	1,221	1,383	1,578	4,951	1405
Single storey (15)	1,638	968	1,379	1,572	1,795	4,951	234
2-storey (15)	1,387	748	1,196	1,345	1,522	3,011	1090
3-storey (15)	1,505	895	1,262	1,446	1,725	2,920	76
4-storey or above (15)	3,011	1,468	2,402	2,682	4,035	4,466	5
810.11 Estate housing detached (15)	1,916	1,055	1,458	1,605	2,115	4,951	19
810.12 Estate housing semi detached							
Generally (15)	1,453	838	1,237	1,420	1,592	3,200	354
Single storey (15)	1,618	1,046	1,409	1,591	1,760	3,200	80
2-storey (15)	1,404	838	1,222	1,361	1,535	2,432	263
3-storey (15)	1,443	1,049	1,166	1,383	1,710	2,051	11
810.13 Estate housing terraced							
Generally (15)	1,462	852	1,198	1,372	1,594	4,466	229

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
Single storey (15)	1,676	1,065	1,386	1,657	1,951	2,372	18
2-storey (15)	1,398	852	1,190	1,338	1,522	3,011	177
3-storey (15)	1,515	895	1,258	1,415	1,667	2,920	32
4-storey or above (15)	4,250	4,035	-	-	-	4,466	2
816. Flats (apartments)							
Generally (15)	1,698	849	1,403	1,597	1,915	5,804	811
1-2 storey (15)	1,605	979	1,362	1,515	1,786	3,183	173
3-5 storey (15)	1,678	849	1,398	1,595	1,887	3,491	541
6 storey or above (15)	1,993	1,221	1,609	1,895	2,157	5,804	94
820.1 'One-off' housing detached (3 units or less)							
Generally (15)	2,678	1,051	1,845	2,381	3,171	6,869	121
Single storey (15)	2,187	1,285	1,615	2,087	2,771	3,939	28
2-storey (15)	2,636	1,051	1,821	2,290	3,028	6,624	65
3-storey (15)	3,067	1,413	2,475	3,117	3,396	5,506	23
4-storey or above (20)	4,507	2,047	2,860	4,678	6,057	6,869	6
843. Supported housing							
Generally (15)	1,818	925	1,503	1,691	2,005	3,649	130
Single storey (15)	2,146	1,297	1,674	2,063	2,264	3,649	13
2-storey (15)	1,828	945	1,501	1,655	2,117	3,175	44
3-storey (15)	1,678	925	1,503	1,607	1,842	2,472	44
4-storey or above (15)	1,857	1,136	1,488	1,730	1,897	3,534	26
843.1 Supported housing with shops, restaurants or the like (15)	1,747	1,103	1,468	1,651	1,908	2,914	36

Appendix V – Results sheets

Greenfield sites

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Broads general : 0% AH	Base	Greenfield	1	0.067	0.067	14.93	100.0%	356,250	350,000	-108,754	-108,754
Res2a VA: Broads general : 33% AH	Base	Greenfield	3	0.200	0.200	15.00	100.0%	886,640	350,000	41,805	13,935
Res3a VA: Broads general : 33% AH	Base	Greenfield	5	0.330	0.330	15.15	100.0%	1,581,534	350,000	145,863	29,173
Res4a VA: Broads general : 33% AH	Base	Greenfield	8	0.400	0.400	20.00	100.0%	2,530,431	350,000	339,026	42,378
Res5a VA: Broads general : 33% AH	Base	Greenfield	12	0.630	0.630	19.05	100.0%	3,795,588	350,000	578,522	48,210
Res6a VA: Broads general : 33% AH	Base	Greenfield	30	1.330	1.200	25.00	90.2%	9,488,970	350,000	1,555,142	51,838
Res7a VA: Broads general : 33% AH	Base	Greenfield	100	3.110	2.330	42.92	74.9%	30,379,275	350,000	5,081,813	50,818
OP1 VA: Broads general : 33% AH	Base	Greenfield	50	0.500	0.500	100.00	100.0%	12,747,215	350,000	- 1,606,447	-32,129
Res2a VA: Broads general : 33% AH	70% Social Rent	Greenfield	3	0.200	0.200	15.00	100.0%	859,613	350,000	16,399	5,466
Res3a VA: Broads general : 33% AH	70% Social Rent	Greenfield	5	0.330	0.330	15.15	100.0%	1,539,492	350,000	106,343	21,269
Res4b VA: Broads general : 33% AH	70% Social Rent	Greenfield	8	0.400	0.400	20.00	100.0%	2,463,164	350,000	275,795	34,474

Three Dragons

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Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res5a VA: Broads general : 33% AH	70% Social Rent	Greenfield	12	0.630	0.630	19.05	100.0%	3,694,687	350,000	483,675	40,306
Res6a VA: Broads general : 33% AH	70% Social Rent	Greenfield	30	1.330	1.200	25.00	90.2%	9,236,718	350,000	1,316,304	43,877
Res7a VA: Broads general : 33% AH	70% Social Rent	Greenfield	100	3.110	2.330	42.92	74.9%	29,538,435	350,000	4,283,501	42,835
OP1 VA: Broads general : 33% AH	70% Social Rent	Greenfield	50	0.500	0.500	100.00	100.0%	12,394,940	350,000	- 1,966,856	-39,337

Brownfield sites

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Broads general : 0% AH	Base	Brownfield	1	0.067	0.067	14.93	100.0%	356,250	400,000	-111,383	-111,383
Res2a VA: Broads general : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0%	886,640	400,000	34,104	11,368
Res3a VA: Broads general : 33% AH	Base	Brownfield	5	0.330	0.330	15.15	100.0%	1,581,534	400,000	133,206	26,641
Res4b VA: Broads general : 33% AH	Base	Brownfield	8	0.400	0.400	20.00	100.0%	2,530,431	400,000	325,627	40,703
Res5a VA: Broads general : 33% AH	Base	Brownfield	12	0.630	0.630	19.05	100.0%	3,795,588	400,000	554,609	46,217

Three Dragons

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Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res6a VA: Broads general : 33% AH	Base	Brownfield	30	1.330	1.200	25.00	90.2%	9,488,970	400,000	1,509,327	50,311
Res7a VA: Broads general : 33% AH	Base	Brownfield	100	3.110	2.330	42.92	74.9%	30,379,275	400,000	4,927,251	49,273

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Broads general: 0% AH	Base	Brownfield	1	0.067	0.067	14.93	100.0 %	356,250	450,000	-115,031	-115,031
Res2a VA: Broads general: 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0 %	886,640	450,000	23,399	7,800
Res3a VA: Broads general: 33% AH	Base	Brownfield	5	0.330	0.330	15.15	100.0 %	1,581,534	450,000	115,543	23,109
Res4b VA: Broads general: 33% AH	Base	Brownfield	8	0.400	0.400	20.00	100.0 %	2,530,431	450,000	304,218	38,027
Res5a VA: Broads general: 33% AH	Base	Brownfield	12	0.630	0.630	19.05	100.0 %	3,795,588	450,000	519,233	43,269
Res6a VA: Broads general: 33% AH	Base	Brownfield	30	1.330	1.200	25.00	90.2%	9,488,970	450,000	1,433,369	47,779
Res7a VA: Broads general: 33% AH	Base	Brownfield	100	3.110	2.330	42.92	74.9%	30,379,275	450,000	4,673,448	46,734
OP1 Brownfield VA: Broads general : 33% AH	Base	Brownfield	50	0.500	0.500	100.00	100.0 %	12,747,215	450,000	- 1,610,566	-32,211
Res2b Bungalows VA: Broads general : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0 %	1,046,558	450,000	87,370	29,123

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroo m per unit £s
Res2a VA: Broads general : 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0 %	859,613	450,000	-2,006	-669
Res3a VA: Broads general : 33% AH	70% SR	Brownfield	5	0.330	0.330	15.15	100.0 %	1,539,492	450,000	76,024	15,205
Res4b VA: Broads general : 33% AH	70% SR	Brownfield	8	0.400	0.400	20.00	100.0 %	2,463,164	450,000	240,986	30,123
Res5a VA: Broads general : 33% AH	70% SR	Brownfield	12	0.630	0.630	19.05	100.0 %	3,694,687	450,000	424,386	35,365
Res6a VA: Broads general : 33% AH	70% SR	Brownfield	30	1.330	1.200	25.00	90.2%	9,236,718	450,000	1,194,531	39,818
Res7a VA: Broads general : 33% AH	70% SR	Brownfield	100	3.110	2.330	42.92	74.9%	29,538,435	450,000	3,845,465	38,455
OP1 Brownfield VA: Broads general : 33% AH	70% SR	Brownfield	50	0.500	0.500	100.00	100.0 %	12,394,940	450,000	-1,971,263	-39,425
Res2b Bungalows VA: Broads general: 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0 %	1,019,531	450,000	61,965	20,655

Brownfield – Upper Quartile build costs

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Broads general : 0% AH	Base	Brownfield	1	0.067	0.067	14.93	100.0%	356,250	450,000	-181,015	-181,015
Res2a VA: Broads general : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0%	886,640	450,000	-31,802	-10,601
Res3a VA: Broads general : 33% AH	Base	Brownfield	5	0.330	0.330	15.15	100.0%	1,581,534	450,000	22,841	4,568
Res4b VA: Broads general : 33% AH	Base	Brownfield	8	0.400	0.400	20.00	100.0%	2,530,431	450,000	163,104	20,388
Res5a VA: Broads general : 33% AH	Base	Brownfield	12	0.630	0.630	19.05	100.0%	3,795,588	450,000	318,382	26,532
Res6a VA: Broads general : 33% AH	Base	Brownfield	30	1.330	1.200	25.00	90.2%	9,488,970	450,000	929,033	30,968
Res7a VA: Broads general : 33% AH	Base	Brownfield	100	3.110	2.330	42.92	74.9%	30,379,275	450,000	3,137,251	31,373
Res2a VA: Broads general : 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0%	859,613	450,000	-57,207	-19,069
Res3a VA: Broads general : 33% AH	70% SR	Brownfield	5	0.330	0.330	15.15	100.0%	1,539,492	450,000	-16,679	-3,336
Res4b VA: Broads general : 33% AH	70% SR	Brownfield	8	0.400	0.400	20.00	100.0%	2,463,164	450,000	99,873	12,484
Res5a VA: Broads general : 33% AH	70% SR	Brownfield	12	0.630	0.630	19.05	100.0%	3,694,687	450,000	223,535	18,628
Res6a VA: Broads general : 33% AH	70% SR	Brownfield	30	1.330	1.200	25.00	90.2%	9,236,718	450,000	690,195	23,006
Res7a VA: Broads general : 33% AH	70% SR	Brownfield	100	3.110	2.330	42.92	74.9%	29,538,435	450,000	2,303,989	23,040

Waterfront

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Waterfront : 0% AH	Base	Brownfield	1	0.067	0.067	14.93	100.0%	463,125	720,000	-114,087	-114,087
Res2a VA: Waterfront : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0%	1,123,436	720,000	101,612	33,871
Res3a VA: Waterfront : 33% AH	Base	Brownfield	5	0.330	0.330	15.15	100.0%	2,010,925	720,000	273,300	54,660
Res4a VA: Waterfront : 33% AH	Base	Brownfield	8	0.400	0.400	20.00	100.0%	3,217,449	720,000	596,726	74,591
Res5a VA: Waterfront: 33% AH	Base	Brownfield	12	0.630	0.630	19.05	100.0%	4,826,097	720,000	957,336	79,778
Res6a VA: Waterfront : 33% AH	Base	Brownfield	30	1.330	1.200	25.00	90.2%	12,065,243	720,000	2,611,153	87,038
Res7a VA: Waterfront : 33% AH	Base	Brownfield	100	3.110	2.330	42.92	74.9%	38,591,663	720,000	8,538,218	85,382
OP1 Brownfield VA: Waterfront : 33% AH	Base	Brownfield	50	0.500	0.500	100.00	100.0%	16,203,904	720,000	1,260,923	25,218
Res2b Bungalows VA: Waterfront : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0%	1,331,004	720,000	259,300	86,433
Res2a VA: Waterfront : 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0%	1,096,409	720,000	76,206	25,402
Res3a VA: Waterfront : 33% AH	70% SR	Brownfield	5	0.330	0.330	15.15	100.0%	1,968,883	720,000	233,781	46,756
Res4b VA: Waterfront : 33% AH	70% SR	Brownfield	8	0.400	0.400	20.00	100.0%	3,150,182	720,000	533,495	66,687
Res5a VA: Waterfront: 33% AH	70% SR	Brownfield	12	0.630	0.630	19.05	100.0%	4,725,196	720,000	862,489	71,874

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res6a VA: Waterfront : 33% AH	70% SR	Brownfield	30	1.330	1.200	25.00	90.2%	11,812,991	720,000	2,372,315	79,077
Res7a VA: Waterfront : 33% AH	70% SR	Brownfield	100	3.110	2.330	42.92	74.9%	37,750,823	720,000	7,740,765	77,408
OP1 Brownfield VA: Waterfront : 33% AH	70% SR	Brownfield	50	0.500	0.500	100.00	100.0%	15,851,629	720,000	901,969	18,039
Res2b Bungalows VA: Waterfront : 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0%	1,303,977	720,000	233,894	77,965

Appendix VI – Sample summary appraisals

Sample of viability summary reports from the models

Summary Report 3											
Site Name	Res1b VA: Broads general : 0% AH										Land and Developer Returns Assumptions Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow
Site Information											
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res1b				
Summary Details					Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.07	hectares		1.00	95.0	18.0	18.0	131.0		
	Gross Area	0.07	hectares	Market	1.00	95.0	18.0	18.0	131.0		
	Net to Gross %	100.00%		% Affordable	-	-	-	-	-		
Density	14.93	per net ha		% Affordable	0.00%						
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	1.00	1.00	-	-	-	-	-	-	-	-	-
Total NIA exc garages & circ space (sq m)	95.0	95.0	-	-	-	-	-	-	-	-	-
Garages (sq m)	18.0	18.0	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	113.0	113.0	-	-	-	-	-	-	-	-	-
Tenure Split (by %)		100.00%									
Sales Revenue (£)	356,250	356,250	-	-	-	-	-	-	-	-	-
Average Revenue per unit	356,250	356,250	-	-	-	-	-	-	-	-	-
Average Revenue per sq m GIA	3,750	3,750	-	-	-	-	-	-	-	-	-
Capital Contributions											
0	-										
0	-										
0	-										
0	-										
0	-										
0	-										
0	-										
Total Capital contributions (£)	-										
Total Revenue (£)	356,250										
Scheme Development Costs											
Land	30,150	450,000	per gross ha								
SDLT at prevailing rate	-										
Agents Fees (1%), Legal Fees (0.75%) Total -	528										
Land & associated fees Total	30,678	457,881	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	264,332	264,332	-	-	-	-	-	-	-	-	-
Plot costs (£)	17,809	17,809	-	-	-	-	-	-	-	-	-
Garage Build Costs (£)	8,100	8,100	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	113	113	-	-	-	-	-	-	-	-	-
Total Contingency - 0% Build Costs	-	-	-	-	-	-	-	-	-	-	-
Total Build Cost (£)	290,241	290,241	-	-	-	-	-	-	-	-	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	22,897										
Biodiversity (20%) inc. service charge	304										
Part M4(2)	1,400										
Part M4(3) House	-										
Part M4(3) Flat	-										
S106 (sites over 10 units)	-										
Electric Charging Vehicle	865										
RAMS	221										
Voids (older persons only)	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	25,687										
Sales & Marketing/Legal Fees (mkt)	10,688	10,688	-	-	-						
Sales & Marketing/Legal Fees (aff)	-										
Professional Fees Total (£)	36,280	36,280	-	-	-						
CIL (£)	-										
Total Development Costs (£)	393,573										
Development Period: 1 Year											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Notes											
You can add notes here! And they print											
Revenue and Capital Contributions	356,250										
Land & associated Fees - inc in interest calc	30,678										
Development Costs	362,895										
Finance	15,364										
ADR Cost	0										
Total Dev Costs inc Finance & ADR Costs	408,937										
Gross Residual Value inc land less finance (£)	-52,687										
Total Developer/Contractor Return	62,344										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	-115,031										

Summary Report 3												
Site Name	Res2b VA: Broads general : 33% AH						Land and Developer Returns Assumptions					
Site Information							Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow					
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res2b					
Summary Details						Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.20	hectares			3.00	283.0	36.2	36.2	355.4		
	Gross Area	0.20	hectares	Market		2.01	191.0	36.2	36.2	263.3		
	Net to Gross %	100.00%		Affordable		0.99	92.1	-	-	92.1		
	Density	15.00	per net ha	% Affordable		33.00%						
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
	Total No of Units	3.00	2.01	-	-	-	-	0.69	-	-	0.30	-
	Total NIA exc garages & circ space (sq m)	283.0	191.0	-	-	-	-	64.4	-	-	27.6	-
	Garages (sq m)	36.2	36.2	-	-	-	-	-	-	-	-	-
	Total NIA inc garages exc circ space (sq m)	319.2	227.1	-	-	-	-	64.4	-	-	27.6	-
	Tenure Split (by %)		67.00%					23.10%			9.90%	
	Sales Revenue (£)	886,640	716,063	-	-	-	-	98,406	-	-	72,171	-
	Average Revenue per unit	295,547	356,250	-	-	-	-	142,000	-	-	243,000	-
	Average Revenue per sq m GIA	3.133	3,750	-	-	-	-	1,527	-	-	2,613	-
Capital Contributions												
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	Total Capital contributions (£)	-										
	Total Revenue (£)	886,640										
Scheme Development Costs												
	Land	90,000	450,000	per gross ha								
	SDLT at prevailing rate	-										
	Agents Fees (1%), Legal Fees (0.75%) Total	1,575										
	Land & associated fees Total	91,575	457,875	per gross ha								
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
	Build Cost (£)	444,909	300,175	-	-	-	-	101,314	-	-	43,420	-
	Plot costs (£)	29,975	20,224	-	-	-	-	6,826	-	-	2,925	-
	Garage Build Costs (£)	16,281	16,281	-	-	-	-	-	-	-	-	-
	Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
	Total GIA inc circ space & garages (sq m)	319	227	-	-	-	-	64	-	-	28	-
	Total Contingency - 0% Build Costs	-										
	Total Build Cost (£)	491,165	336,679	-	-	-	-	108,140	-	-	46,346	-
Policy & Infrastructure Costs												
	Total Site Infrastructure Costs	37,682										
	Biodiversity (20%) inc. service charge	912										
	Part M4(2)	4,200										
	Part M4(3a) House	1,436										
	Part M4(3a) Flat	-										
	S106 (sites over 10 units)	-										
	Electric Charging Vehicle	2,595										
	RAMS	664										
	Voids (older persons only)	-										
		-										
		-										
		-										
		-										
		-										
		-										
		-										
	Total Policy & Infrastructure Costs (£)	47,489										
	Sales & Marketing/Legal Fees (mkt)	21,482	21,482	-	-	-						
	Sales & Marketing/Legal Fees (aff)	495						347	-	-	149	-
	Professional Fees Total (£)	49,117	33,668	-	-	-		10,814	-	-	4,635	-
	CIL (£)	-										
	Total Development Costs (£)	701,322										
Development Period: 1 Year												
	Debit Interest Rate	7.00%										
	Credit Interest Rate	0.00%										
	Annual Discount Rate	0.00%										
Notes												
You can add notes here! And they print												
	Revenue and Capital Contributions	886,640										
	Land & associated Fees - inc in interest calc	91,575										
	Development Costs	609,747										
	Finance	26,372										
	ADR Cost	0										
	Total Dev Costs Inc Finance & ADR Costs	727,695										
	Gross Residual Value inc land less finance (£)	158,945										
	Total Developer/Contractor Return	135,546										
	Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	23,399										

Summary Report 3												
Site Name	Res2b VA: Waterfront : 33% AH						Land and Developer Returns Assumptions					
Site Information							Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow					
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res2b					
Summary Details						Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.20	hectares			3.00	283.0	36.2	36.2	355.4		
	Gross Area	0.20	hectares	Market		2.01	191.0	36.2	36.2	263.3		
	Net to Gross %	100.00%		Affordable		0.99	92.1	-	-	92.1		
	Density	15.00	per net ha	% Affordable		33.00%						
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		3.00	2.01	-	-	-	-	0.69	-	-	0.30	-
Total NIA exc garages & circ space (sq m)		283.0	191.0	-	-	-	-	64.4	-	-	27.6	-
Garages (sq m)		36.2	36.2	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		319.2	227.1	-	-	-	-	64.4	-	-	27.6	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		1,123,436	930,881	-	-	-	-	98,406	-	-	94,149	-
Average Revenue per unit		374,479	463,125	-	-	-	-	142,000	-	-	317,000	-
Average Revenue per sq m GIA		3,969	4,875	-	-	-	-	1,527	-	-	3,409	-
Capital Contributions		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
Total Capital contributions (£)		-	-									
Total Revenue (£)		1,123,436										
Scheme Development Costs												
Land		144,000	720,000	per gross ha								
SDLT at prevailing rate		-										
Agents Fees (1%), Legal Fees (0.75%) Total		2,520										
Land & associated fees Total		146,520	732,600	per gross ha								
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)		487,254	328,744	-	-	-	-	110,957	-	-	47,553	-
Plot costs (£)		32,827	22,148	-	-	-	-	7,475	-	-	3,204	-
Garage Build Costs (£)		16,281	16,281	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)		-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)		319	227	-	-	-	-	64	-	-	28	-
Total Contingency - 0% Build Costs		-	-									
Total Build Cost (£)		536,362	367,173	-	-	-	-	118,432	-	-	50,757	-
Policy & Infrastructure Costs												
Total Site Infrastructure Costs		41,269										
Biodiversity (20%) inc. service charge		912										
Part M4(2)		4,200										
Part M4(3a) House		1,436										
Part M4(3a) Flat		-										
S106 (sites over 10 units)		-										
Electric Charging Vehicle		2,595										
RAMS		664										
Voids (older persons only)		-										
		-										
		-										
		-										
		-										
		-										
Total Policy & Infrastructure Costs (£)		51,076										
Sales & Marketing/Legal Fees (mkt)		27,926	27,926	-	-	-						
Sales & Marketing/Legal Fees (aff)		495						347	-	-	149	-
Professional Fees Total (£)		53,636	36,717	-	-	-		11,843	-	-	5,076	-
CIL (£)		-										
Total Development Costs (£)		816,016										
Development Period		1 Year										
Debit Interest Rate		7.00%										
Credit Interest Rate		0.00%										
Annual Discount Rate		0.00%										
Revenue and Capital Contributions		1,123,436										
Land & associated Fees - inc in interest calc		146,520										
Development Costs		669,496										
Finance		31,351										
ADR Cost		0										
Total Dev Costs Inc Finance & ADR Costs		847,367										
Gross Residual Value inc land less finance (£)		276,069										
Total Developer/Contractor Return		174,458										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)		101,612										
Notes	You can add notes here! And they print											

Summary Report 3												
Site Name	Res3a VA: Broads general : 33% AH										Land and Developer Returns Assumptions Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow	
Site Information												
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res3a					
Summary Details						Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.33	hectares			5.00	486.8	-	1.3	488.1		
	Gross Area	0.33	hectares		Market	3.35	351.8	-	-	351.8		
	Net to Gross %	100.00%			Affordable	1.65	135.1	-	1.3	136.4		
	Density	15.15	per net ha	% Affordable	33.00%							
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		5.00	3.35	-	-	-	-	1.16	-	-	0.50	-
Total NIA exc garages & circ space (sq m)		486.8	351.8	-	-	-	-	92.5	-	-	42.6	-
Garages (sq m)		-	-	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		486.8	351.8	-	-	-	-	92.5	-	-	42.6	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		1,581,534	1,319,102	-	-	-	-	151,305	-	-	111,128	-
Average Revenue per unit		316,301	393,750	-	-	-	-	131,000	-	-	224,500	-
Average Revenue per sq m GIA		3,249	3,750	-	-	-	-	1,635	-	-	2,610	-
Capital Contributions												
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
Total Capital contributions (£)		-										
Total Revenue (£)		1,581,534										
Scheme Development Costs												
Land	148,500	450,000 per gross ha										
SDLT at prevailing rate	-											
Agents Fees (1%), Legal Fees (0.75%) Total	2,599											
Land & associated fees Total	151,099	457,876 per gross ha										
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)		788,569	552,970	-	-	-	-	148,679	-	-	66,920	-
Plot costs (£)		51,780	37,255	-	-	-	-	10,017	-	-	4,509	-
Garage Build Costs (£)		-	-	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)		-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)		488	352	-	-	-	-	94	-	-	43	-
Total Contingency - 0% Build Costs		-	-	-	-	-	-	-	-	-	-	-
Total Build Cost (£)		820,350	590,225	-	-	-	-	158,696	-	-	71,429	-
Policy & Infrastructure Costs												
Total Site Infrastructure Costs	65,095											
Biodiversity (20%) inc. service charge	1,520											
Part M4(2)	7,000											
Part M4(3a) House	2,058											
Part M4(3a) Flat	231											
S106 (sites over 10 units)	-											
Electric Charging Vehicle	4,325											
RAMS	1,106											
Voids (older persons only)	-											
	-											
	-											
	-											
	-											
	-											
Total Policy & Infrastructure Costs (£)	81,335											
Sales & Marketing/Legal Fees (mkt)	39,573	39,573	-	-	-	-	-	-	-	-	-	-
Sales & Marketing/Legal Fees (aff)	825	-	-	-	-	-	578	-	-	248	-	-
Professional Fees Total (£)	82,035	59,022	-	-	-	-	15,870	-	-	7,143	-	-
CIL (£)	-											
Total Development Costs (£)	1,175,217											
Development Period: 1 Year												
Debit Interest Rate	7.00%											
Credit Interest Rate	0.00%											
Annual Discount Rate	0.00%											
Notes												
You can add notes here! And they print												
Revenue and Capital Contributions	1,581,534											
Land & associated Fees - inc in interest calc	151,099											
Development Costs	1,024,118											
Finance	44,185											
ADR Cost	0											
Total Dev Costs Inc Finance & ADR Costs	1,219,402											
Gross Residual Value inc land less finance (£)	362,132											
Total Developer/Contractor Return	246,589											
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	115,543											

Summary Report 3												
Site Name	Res4b VA: Broads general : 33% AH									Land and Developer Returns Assumptions		
Site Information										Land & associated costs included in cashflow		
										Developer & contractor returns excluded from cashflow		
Date	19/08/2024	Updated		Compiled by		TM	Reference	Res4b				
Summary Details						Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
Net Area		0.40	hectares			8.00	778.9	32.2	34.2	845.3		
Gross Area		0.40	hectares	Market		5.36	562.8	32.2	32.2	627.1		
Net to Gross %		100.00%		Affordable		2.64	216.1	-	2.1	218.2		
Density		20.00	per net ha	% Affordable		33.00%						
Scheme Revenue												
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected	
Total No of Units	8.00	5.36	-	-	-	-	1.85	-	-	0.79	-	
Total NIA exc garages & circ space (sq m)	778.9	562.8	-	-	-	-	148.0	-	-	68.1	-	
Garages (sq m)	32.2	32.2	-	-	-	-	-	-	-	-	-	
Total NIA inc garages exc circ space (sq m)	811.1	595.0	-	-	-	-	148.0	-	-	68.1	-	
Tenure Split (by %)		67.00%					23.10%			9.90%		
Sales Revenue (£)	2,530,431	2,110,539	-	-	-	-	242,088	-	-	177,804	-	
Average Revenue per unit	316,300	393,750	-	-	-	-	131,000	-	-	224,500	-	
Average Revenue per sq m GIA	3,249	3,750	-	-	-	-	1,635	-	-	2,610	-	
Capital Contributions												
0	-											
0	-											
0	-											
0	-											
0	-											
0	-											
0	-											
Total Capital contributions (£)	-											
Total Revenue (£)	2,530,431											
Scheme Development Costs												
Land	180,000	450,000	per gross ha									
SDLT at prevailing rate	-											
Agents Fees (1%), Legal Fees (0.75%) Total	3,150											
Land & associated fees Total	183,150	457,875	per gross ha									
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected	
Build Cost (£)	1,172,812	842,639	-	-	-	-	228,196	-	-	101,977	-	
Plot costs (£)	79,015	56,771	-	-	-	-	15,374	-	-	6,870	-	
Garage Build Costs (£)	14,472	14,472	-	-	-	-	-	-	-	-	-	
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-	
Total GIA inc circ space & garages (sq m)	813	595	-	-	-	-	150	-	-	68	-	
Total Contingency - 0% Build Costs	-											
Total Build Cost (£)	1,266,300	913,882	-	-	-	-	243,570	-	-	108,848	-	
Policy & Infrastructure Costs												
Total Site Infrastructure Costs	99,333											
Biodiversity (20%) inc. service charge	2,432											
Part M4(2)	11,200											
Part M4(3a) House	3,292											
Part M4(3a) Flat	370											
S106 (sites over 10 units)	-											
Electric Charging Vehicle	6,920											
RAMS	1,769											
Voids (older persons only)	-											
-	-											
-	-											
-	-											
-	-											
-	-											
-	-											
Total Policy & Infrastructure Costs (£)	125,316											
Sales & Marketing/Legal Fees (mkt)	63,316	63,316	-	-	-	-	-	-	-	-	-	
Sales & Marketing/Legal Fees (aff)	1,320	-	-	-	-	-	924	-	-	396	-	
Professional Fees Total (£)	126,630	91,388	-	-	-	-	24,357	-	-	10,885	-	
CIL (£)	-											
Total Development Costs (£)	1,766,032											
Development Period: 1 Year												
Debit Interest Rate	7.00%											
Credit Interest Rate	0.00%											
Annual Discount Rate	0.00%											
Notes												
You can add notes here! And they print												
Revenue and Capital Contributions	2,530,431											
Land & associated Fees - inc in interest calc	183,150											
Development Costs	1,582,882											
Finance	65,644											
ADR Cost	0											
Total Dev Costs inc Finance & ADR Costs	1,831,676											
Gross Residual Value inc land less finance (£)	698,756											
Total Developer/Contractor Return	394,538											
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	304,218											

Summary Report 3											
Site Name	Res5b VA: Waterfront : 33% AH						Land and Developer Returns Assumptions				
Site Information							Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow				
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res5b				
Summary Details						Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)	
	Net Area	0.63	hectares			12.00	1,168.4	48.2	51.3	1,268.0	
	Gross Area	0.63	hectares		Market	8.04	844.2	48.2	48.2	940.7	
	Net to Gross %	100.00%			Affordable	3.96	324.2	-	3.1	327.3	
	Density	19.05	per net ha	% Affordable		33.00%					
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	12.00	8.04	-	-	-	-	2.77	-	-	1.19	-
Total NIA exc garages & circ space (sq m)	1,168.4	844.2	-	-	-	-	222.0	-	-	102.2	-
Garages (sq m)	48.2	48.2	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	1,216.6	892.4	-	-	-	-	222.0	-	-	102.2	-
Tenure Split (by %)		67.00%					23.10%			9.90%	
Sales Revenue (£)	4,826,097	4,115,475	-	-	-	-	363,132	-	-	347,490	-
Average Revenue per unit	402,175	511,875	-	-	-	-	131,000	-	-	292,500	-
Average Revenue per sq m GIA	4,130	4,875	-	-	-	-	1,635	-	-	3,401	-
Capital Contributions											
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
Total Capital contributions (£)	-										
Total Revenue (£)	4,826,097										
Scheme Development Costs											
Land	453,600	720,000	per gross ha								
SDLT at prevailing rate	12,180										
Agents Fees (1%), Legal Fees (0.75%) Total	7,938										
Land & associated fees Total	473,718	751,933	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	1,827,935	1,314,809	-	-	-	-	354,003	-	-	159,123	-
Plot costs (£)	123,152	88,582	-	-	-	-	23,850	-	-	10,720	-
Garage Build Costs (£)	21,708	21,708	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	1,220	892	-	-	-	-	225	-	-	102	-
Total Contingency - 0% Build Costs	-										
Total Build Cost (£)	1,972,795	1,425,098	-	-	-	-	377,853	-	-	169,843	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	154,820										
Biodiversity (20%) inc. service charge	3,648										
Part M4(2)	16,800										
Part M4(3a) House	4,939										
Part M4(3a) Flat	554										
S106 (sites over 10 units)	30,000										
Electric Charging Vehicle	10,380										
RAMS	2,654										
Voids (older persons only)	-										
	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	223,795										
Sales & Marketing/Legal Fees (mkt)	123,464	123,464	-	-	-						
Sales & Marketing/Legal Fees (aff)	1,980						1,386	-	-	594	-
Professional Fees Total (£)	197,280	142,510	-	-	-		37,785	-	-	16,984	-
CIL (£)	-										
Total Development Costs (£)	2,993,032										
Development Period: 1 Year											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Notes											
You can add notes here! And they print											
Revenue and Capital Contributions	4,826,097										
Land & associated Fees - inc in interest calc	473,718										
Development Costs	2,519,314										
Finance	112,884										
ADR Cost	0										
Total Dev Costs Inc Finance & ADR Costs	3,105,915										
Gross Residual Value inc land less finance (£)	1,720,182										
Total Developer/Contractor Return	762,845										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	957,336										

Summary Report 3												
Site Name	Res6b VA: Broads general : 33% AH						Land and Developer Returns Assumptions					
Site Information							Land & associated costs included in cashflow					
							Developer & contractor returns excluded from cashflow					
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res6b					
Summary Details							Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)	
	Net Area	1.20	hectares				30.00	2,921.0	120.6	128.3	3,169.9	
	Gross Area	1.33	hectares		Market		20.10	2,110.5	120.6	120.6	2,951.7	
	Net to Gross %	90.23%			Affordable		9.90	810.5	-	7.7	818.2	
	Density	25.00	per net ha		% Affordable		33.00%					
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		30.00	20.10	-	-	-	-	6.93	-	-	2.97	-
Total NIA exc garages & circ space (sq m)		2,921.0	2,110.5	-	-	-	-	555.1	-	-	255.4	-
Garages (sq m)		120.6	120.6	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		3,041.6	2,231.1	-	-	-	-	555.1	-	-	255.4	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		9,488,970	7,914,375	-	-	-	-	907,830	-	-	666,765	-
Average Revenue per unit		316,299	393,750	-	-	-	-	131,000	-	-	224,500	-
Average Revenue per sq m GIA		3,249	3,750	-	-	-	-	1,635	-	-	2,610	-
Capital Contributions												
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
Total Capital contributions (£)		-										
Total Revenue (£)		9,488,970										
Scheme Development Costs												
Land	598,500	450,000	per gross ha									
SDLT at prevailing rate	19,425											
Agents Fees (1%), Legal Fees (0.75%) Total -	10,474											
Land & associated fees Total	628,399	472,480	per gross ha									
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected	
Build Cost (£)	4,184,656	3,001,956	-	-	-	-	819,392	-	-	363,307	-	
Plot costs (£)	281,931	202,249	-	-	-	-	55,204	-	-	24,477	-	
Garage Build Costs (£)	54,270	54,270	-	-	-	-	-	-	-	-	-	
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-	
Total GIA inc circ space & garages (sq m)	3,049	2,231	-	-	-	-	563	-	-	255	-	
Total Contingency - 0% Build Costs	-	-	-	-	-	-	-	-	-	-	-	
Total Build Cost (£)	4,520,856	3,258,475	-	-	-	-	874,597	-	-	387,784	-	
Policy & Infrastructure Costs												
Total Site Infrastructure Costs	354,427											
Biodiversity (20%) inc. service charge	9,120											
Part M4(2)	42,000											
Part M4(3a) House	11,823											
Part M4(3a) Flat	1,386											
S106 (sites over 10 units)	75,000											
Electric Charging Vehicle	25,950											
RAMS	6,635											
VOIDS (older persons only)	-											
	-											
	-											
	-											
	-											
	-											
Total Policy & Infrastructure Costs (£)	526,341											
Sales & Marketing/Legal Fees (mkt)	237,431	237,431	-	-	-							
Sales & Marketing/Legal Fees (aff)	4,950						3,465	-	-	1,485	-	
Professional Fees Total (£)	452,086	325,848	-	-	-		87,460	-	-	38,778	-	
CIL (£)	-											
Total Development Costs (£)	6,370,063											
Development Period 6 Quarters												
Debit Interest Rate	7.00%											
Credit Interest Rate	0.00%											
Annual Discount Rate	0.00%											
Notes												
You can add notes here! And they print												
Revenue and Capital Contributions	9,488,970											
Land & associated Fees - inc in interest calc	628,399											
Development Costs	5,741,664											
Finance	206,047											
ADR Cost	0											
Total Dev Costs Inc Finance & ADR Costs	6,576,110											
Gross Residual Value inc land less finance (£)	2,912,860											
Total Developer/Contractor Return	1,479,491											
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	1,433,369											

Summary Report 3												
Site Name	Res6a VA: Broads general : 33% AH									Land and Developer Returns Assumptions		
Site Information										Land & associated costs included in cashflow		
										Developer & contractor returns excluded from cashflow		
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res6a					
Summary Details												
					Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)			
	Net Area	1.20	hectares		30.00	2,921.0	120.6	128.3	3,169.9			
	Gross Area	1.33	hectares	Market	20.10	2,110.5	120.6	120.6	2,351.7			
	Net to Gross %	90.23%		Affordable	9.90	810.5	-	7.7	818.2			
	Density	25.00	per net ha	% Affordable	33.00%							
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		30.00	20.10	-	-	-	-	6.93	-	-	2.97	-
Total NIA exc garages & circ space (sq m)		2,921.0	2,110.5	-	-	-	-	555.1	-	-	255.4	-
Garages (sq m)		120.6	120.6	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		3,041.6	2,231.1	-	-	-	-	555.1	-	-	255.4	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		9,488,970	7,914,375	-	-	-	-	907,830	-	-	666,765	-
Average Revenue per unit		316,299	393,750	-	-	-	-	131,000	-	-	224,500	-
Average Revenue per sq m GIA		3,249	3,750	-	-	-	-	1,635	-	-	2,610	-
Capital Contributions												
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
Total Capital contributions (£)		-										
Total Revenue (£)		9,488,970										
Scheme Development Costs												
Land	465,500	350,000	per gross ha									
SDLT at prevailing rate	12,775											
Agents Fees (1%), Legal Fees (0.75%) Total	8,146											
Land & associated fees Total	486,421	365,730	per gross ha									
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected	
Build Cost (£)	4,184,656	3,001,956	-	-	-	-	819,392	-	-	363,307	-	
Plot costs (£)	281,931	202,249	-	-	-	-	55,204	-	-	24,477	-	
Garage Build Costs (£)	54,270	54,270	-	-	-	-	-	-	-	-	-	
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-	
Total GIA inc circ space & garages (sq m)	3,049	2,231	-	-	-	-	563	-	-	255	-	
Total Contingency - 0% Build Costs	-											
Total Build Cost (£)	4,520,856	3,258,475	-	-	-	-	874,597	-	-	387,784	-	
Policy & Infrastructure Costs												
Total Site Infrastructure Costs	354,427											
Biodiversity (20%) inc. service charge	38,160											
Part M4(2)	42,000											
Part M4(3a) House	11,823											
Part M4(3a) Flat	1,386											
S106 (sites over 10 units)	75,000											
Electric Charging Vehicle	25,950											
RAMS	6,635											
Voids (older persons only)	-											
	-											
	-											
	-											
	-											
	-											
Total Policy & Infrastructure Costs (£)	555,381											
Sales & Marketing/Legal Fees (mkt)	237,431	237,431	-	-	-	-	-	-	-	-	-	
Sales & Marketing/Legal Fees (aff)	4,950											
Professional Fees Total (£)	452,086	325,848	-	-	-	-	87,460	-	-	38,778	-	
CIL (£)	-											
Total Development Costs (£)	6,257,125											
Development Period												
Development Period	6	Quarters										
Debit Interest Rate	7.00%											
Credit Interest Rate	0.00%											
Annual Discount Rate	0.00%											
Notes												
You can add notes here! And they print												
Revenue and Capital Contributions	9,488,970											
Land & associated Fees - inc in interest calc	486,421											
Development Costs	5,770,704											
Finance	197,212											
ADR Cost	0											
Total Dev Costs inc Finance & ADR Costs	6,454,337											
Gross Residual Value inc land less finance (£)	3,034,633											
Total Developer/Contractor Return	1,479,491											
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	1,555,142											

Summary Report 3											
Site Name	Res7b VA: Broads general : 33% AH										Land and Developer Returns Assumptions Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow
Site Information											
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res7b				
Summary Details					Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	3.33	hectares		100.00	9,368.2	271.8	403.9	10,043.9		
	Gross Area	4.44	hectares	Market	67.00	6,666.5	271.8	378.2	7,316.5		
	Net to Gross %	75.00%		Affordable	33.00	2,701.7	-	25.7	2,727.4		
	Density	30.00	per net ha	% Affordable	33.00%						
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Self Build	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	100.00	62.00	-	-	5.00	-	23.10	-	-	9.90	-
Total NIA exc garages & circ space (sq m)	9,368.2	5,966.5	-	-	700.0	-	1,850.3	-	-	851.4	-
Garages (sq m)	271.8	271.8	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	9,640.0	6,238.3	-	-	700.0	-	1,850.3	-	-	851.4	-
Tenure Split (by %)		62.00%			5.00%		23.10%			9.90%	
Sales Revenue (£)	30,379,275	22,374,375	-	-	2,756,250	-	3,026,100	-	-	2,222,550	-
Average Revenue per unit	303,793	360,877	-	-	551,250	-	131,000	-	-	224,500	-
Average Revenue per sq m GIA	3,243	3,750	-	-	3,938	-	1,635	-	-	2,610	-
Capital Contributions											
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
Total Capital contributions (£)		-									
Total Revenue (£)	30,379,275										
Scheme Development Costs											
Land	1,777,600	400,000	per gross ha								
SDLT at prevailing rate	78,380										
Agents Fees (1%), Legal Fees (0.75%) Total	31,108										
Land & associated fees Total	1,887,088	424,637	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Self Build	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	13,470,664	8,626,187	-	-	1,010,810	-	2,660,681	-	-	1,172,986	-
Plot costs (£)	907,558	581,168	-	-	68,223	-	179,141	-	-	79,027	-
Garage Build Costs (£)	122,310	122,310	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	9,772	6,345	-	-	700	-	1,876	-	-	851	-
Total Contingency - 0% Build Costs	-	-	-	-	-	-	-	-	-	-	-
Total Build Cost (£)	14,500,532	9,329,665	-	-	1,079,033	-	2,839,822	-	-	1,252,013	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	1,140,930										
Biodiversity (20%) inc. service charge	30,400										
Part M4(2)	140,000										
Part M4(3a) House	41,151										
Part M4(3a) Flat	4,620										
S106 (sites over 10 units)	250,000										
Electric Charging Vehicle	86,500										
RAMS	22,117										
Voids (older persons only)	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	1,715,718										
Sales & Marketing/Legal Fees (mkt)	753,919	671,231	-	-	82,688						
Sales & Marketing/Legal Fees (aff)	16,500						11,550	-	-	4,950	-
Professional Fees Total (£)	1,477,029	932,966	-	-	134,879		283,982	-	-	125,201	-
CIL (£)	-										
Total Development Costs (£)	20,350,786										
Development Period: 3 Years											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Notes											
You can add notes here! And they print											
Revenue and Capital Contributions	30,379,275										
Land & associated Fees - inc in interest calc	1,887,088										
Development Costs	18,463,698										
Finance	388,460										
ADR Cost	0										
Total Dev Costs Inc Finance & ADR Costs	20,739,246										
Gross Residual Value inc land less finance (£)	9,640,029										
Total Developer/Contractor Return	4,712,778										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	4,927,251										

Summary Report 3											
Site Name	OP1 Brownfield VA: Broads general : 33% AH										Land and Developer Returns Assumptions Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow
Site Information											
Date	19/08/2024	Updated		Compiled by	TM	Reference	DP1 Brownfield				
Summary Details					Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.50	hectares		50.00	3,250.0	-	1,083.3	4,333.3		
	Gross Area	0.50	hectares	Market	33.50	2,177.5	-	725.8	2,903.3		
	Net to Gross %	100.00%		Affordable	16.50	1,072.5	-	357.5	1,430.0		
Density	100.00	per net ha	% Affordable	33.00%							
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	50.00	33.50	-	-	-	-	11.55	-	-	4.95	-
Total NIA exc garages & circ space (sq m)	3,250.0	2,177.5	-	-	-	-	750.8	-	-	321.8	-
Garages (sq m)	-	-	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	3,250.0	2,177.5	-	-	-	-	750.8	-	-	321.8	-
Tenure Split (by %)		67.00%					23.10%			9.90%	
Sales Revenue (£)	12,747,215	10,442,788	-	-	-	-	1,224,300	-	-	1,080,127	-
Average Revenue per unit	254,944	311,725	-	-	-	-	106,000	-	-	218,208	-
Average Revenue per sq m GIA	3,922	4,796	-	-	-	-	1,631	-	-	3,357	-
Capital Contributions											
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
Total Capital contributions (£)	-	-	-	-	-	-	-	-	-	-	-
Total Revenue (£)	12,747,215										
Scheme Development Costs											
Land	225,000	450,000	per gross ha								
SDLT at prevailing rate	-										
Agents Fees (1%), Legal Fees (0.75%) Total	3,938										
Land & associated fees Total	228,938	457,876	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	8,185,242	5,484,112	-	-	-	-	1,890,791	-	-	810,339	-
Plot costs (£)	551,460	369,478	-	-	-	-	127,387	-	-	54,595	-
Garage Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	4,333	2,903	-	-	-	-	1,001	-	-	429	-
Total Contingency - 0% Build Costs	-										
Total Build Cost (£)	8,736,702	5,853,590	-	-	-	-	2,018,178	-	-	864,933	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	693,264										
Biodiversity (20%) inc. service charge	15,200										
Part M4(2)	-										
Part M4(3a) House	-										
Part M4(3a) Flat	-										
S106 (sites over 10 units)	125,000										
Electric Charging Vehicle	43,250										
RAMS	11,059										
Voids (older persons only)	100,000										
	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	987,773										
Sales & Marketing/Legal Fees (mkt)	313,284	313,284	-	-	-	-	-	-	-	-	-
Sales & Marketing/Legal Fees (aff)	8,250	-	-	-	-	-	5,775	-	-	2,475	-
Professional Fees Total (£)	873,670	585,359	-	-	-	-	201,818	-	-	86,493	-
CIL (£)	-										
Total Development Costs (£)	11,148,617										
Development Period: 4 Years											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Revenue and Capital Contributions	12,747,215										
Land & associated Fees - inc in interest calc	228,938										
Development Costs	10,919,679										
Finance	1,243,410										
ADR Cost	0										
Total Dev Costs Inc Finance & ADR Costs	12,392,027										
Gross Residual Value inc land less finance (£)	355,188										
Total Developer/Contractor Return	1,965,753										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	-1,610,566										
Notes											
You can add notes here! And they print											

Summary Report 3											
Site Name	OP1 Brownfield VA: Waterfront : 33% AH										Land and Developer Returns Assumptions
Site Information											Land & associated costs included in cashflow
											Developer & contractor returns excluded from cashflow
Date	19/08/2024	Updated		Compiled by	TM	Reference	DP1 Brownfield				
Summary Details						Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)	
	Net Area	0.50	hectares			50.00	3,250.0	-	1,083.3	4,333.3	
	Gross Area	0.50	hectares	Market		33.50	2,177.5	-	725.8	2,903.3	
	Net to Gross %	100.00%		Affordable		16.50	1,072.5	-	357.5	1,430.0	
	Density	100.00	per net ha	% Affordable		33.00%					
Scheme Revenue							Affordable			Shared	
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Rent	Not Selected	Not Selected	Ownership	Not Selected
Total No of Units	50.00	33.50	-	-	-	-	11.55	-	-	4.95	-
Total NIA exc garages & circ space (sq m)	3,250.0	2,177.5	-	-	-	-	750.8	-	-	321.8	-
Garages (sq m)	-	-	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	3,250.0	2,177.5	-	-	-	-	750.8	-	-	321.8	-
Tenure Split (by %)		67.00%					23.10%			9.90%	
Sales Revenue (£)	16,203,904	13,575,456	-	-	-	-	1,224,300	-	-	1,404,148	-
Average Revenue per unit	324,078	405,238	-	-	-	-	106,000	-	-	283,666	-
Average Revenue per sq m GIA	4,986	6,234	-	-	-	-	1,631	-	-	4,364	-
Capital Contributions	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
	0	-	-	-	-	-	-	-	-	-	-
Total Capital contributions (£)	-	-	-	-	-	-	-	-	-	-	-
Total Revenue (£)	16,203,904										
Scheme Development Costs											
Land	360,000	720,000	per gross ha								
SDLT at prevailing rate	7,500										
Agents Fees (1%), Legal Fees (0.75%) Total	6,300										
Land & associated fees Total	373,800	747,600	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	8,185,242	5,484,112	-	-	-	-	1,890,791	-	-	810,339	-
Plot costs (£)	551,460	369,478	-	-	-	-	127,387	-	-	54,595	-
Garage Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	4,333	2,903	-	-	-	-	1,001	-	-	429	-
Total Contingency - 0% Build Costs	-	-	-	-	-	-	-	-	-	-	-
Total Build Cost (£)	8,736,702	5,853,590	-	-	-	-	2,018,178	-	-	864,933	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	693,264										
Biodiversity (20%) inc. service charge	15,200										
Part M4(2)	-										
Part M4(3a) House	-										
Part M4(3a) Flat	-										
S106 (sites over 10 units)	125,000										
Electric Charging Vehicle	43,250										
RAMS	11,059										
Voids (older persons only)	100,000										
	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	987,773										
Sales & Marketing/Legal Fees (mkt)	407,264	407,264	-	-	-						
Sales & Marketing/Legal Fees (aff)	8,250						5,775	-	-	2,475	-
Professional Fees Total (£)	873,670	585,359	-	-	-		201,818	-	-	86,493	-
CIL (£)	-										
Total Development Costs (£)	11,387,459										
Development Period	4	Years									
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Revenue and Capital Contributions	16,203,904										
Land & associated Fees - inc in interest calc	373,800										
Development Costs	11,013,659										
Finance	1,022,110										
ADR Cost	0										
Total Dev Costs inc Finance & ADR Costs	12,409,569										
Gross Residual Value inc land less finance (£)	3,794,335										
Total Developer/Contractor Return	2,533,412										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	1,260,923										
Notes	You can add notes here! And they print										

List of appendices

List of appendices in this report

Appendix I – National policy and guidance

Appendix II – Notes from the developer workshop

Appendix III – Sample house price data

Appendix IV – Building and construction costs

Appendix V – Results sheets

Appendix VI – Sample summary appraisals

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.

Author: Natalie Beal

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



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

Habitats Regulations Assessment

LC-785	Document Control Box
Client	Broads Authority
Report Title	Publication Consultation Habitats Regulations Assessment Report
Status	Final
Filename	LC-785_Local Plan for the Broads_Regulation 19 HRA_8_071024SC.docx
Date	October 2024
Author	SC/EH
Reviewed	SC
Approved	ND

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.

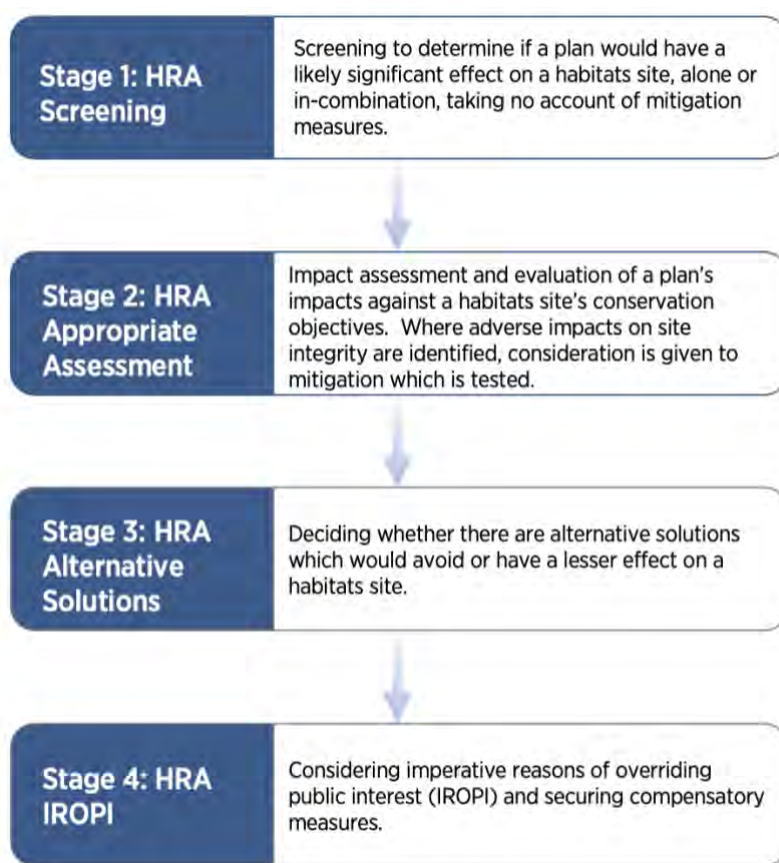


Figure 2.1: Stages in the Habitats Regulations Assessment process¹⁷

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].

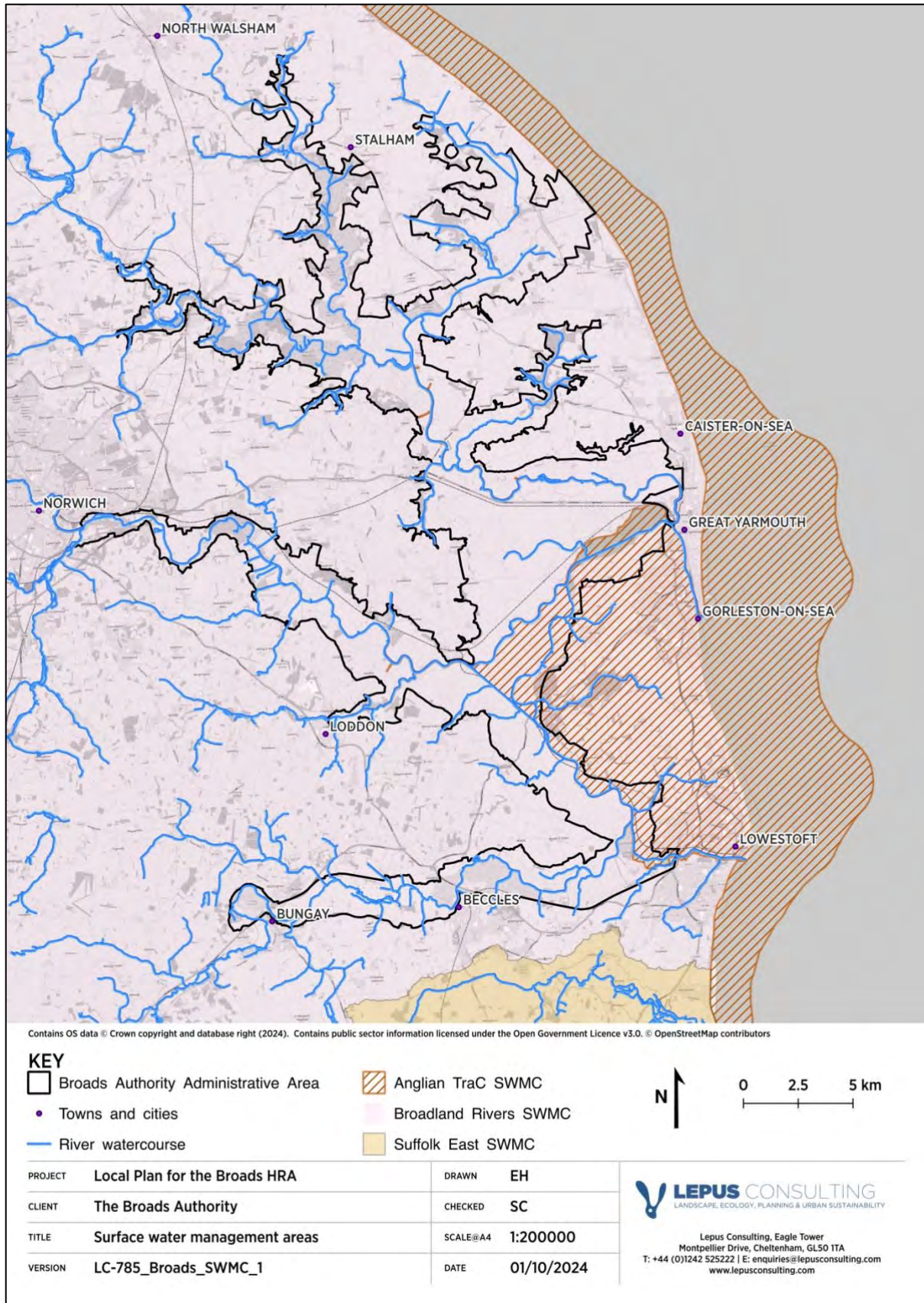


Figure 3.1: Surface water management catchment (SWMC) areas in the Plan area

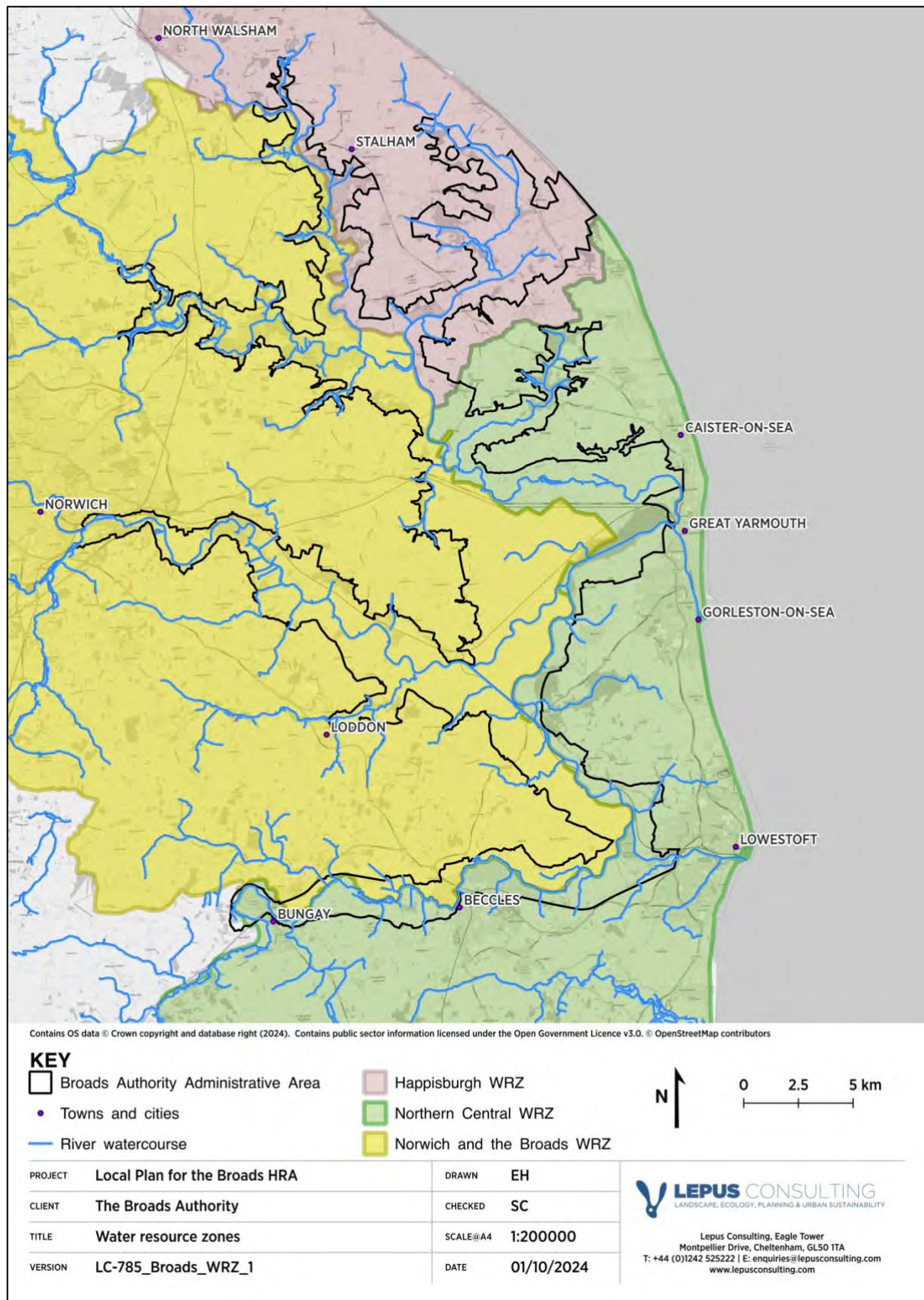


Figure 3.2: Water Resource Zones (WRZs) in the Plan area

- 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-Walberswick 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	

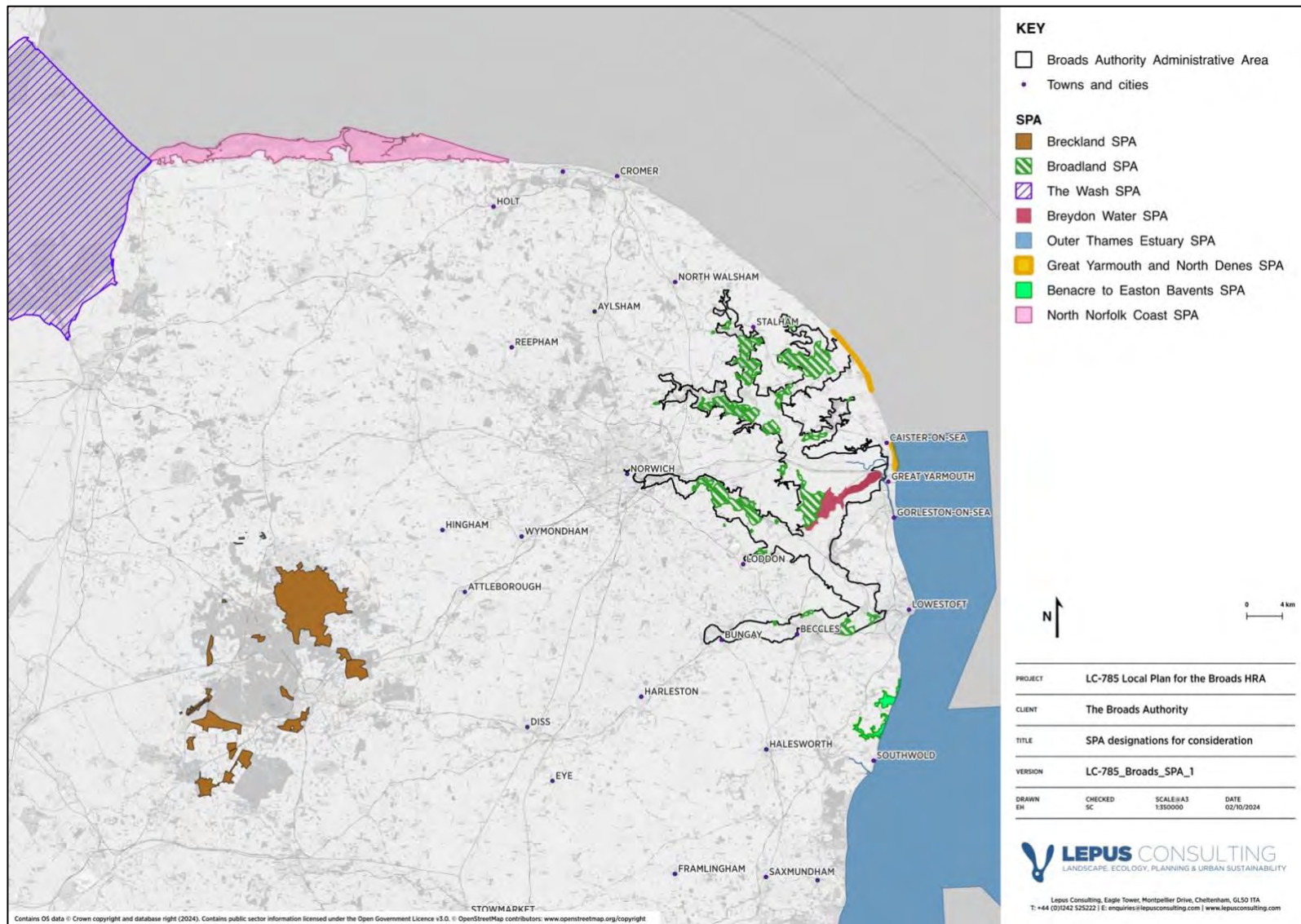


Figure 3.4: SPAs for consideration in the HRA process

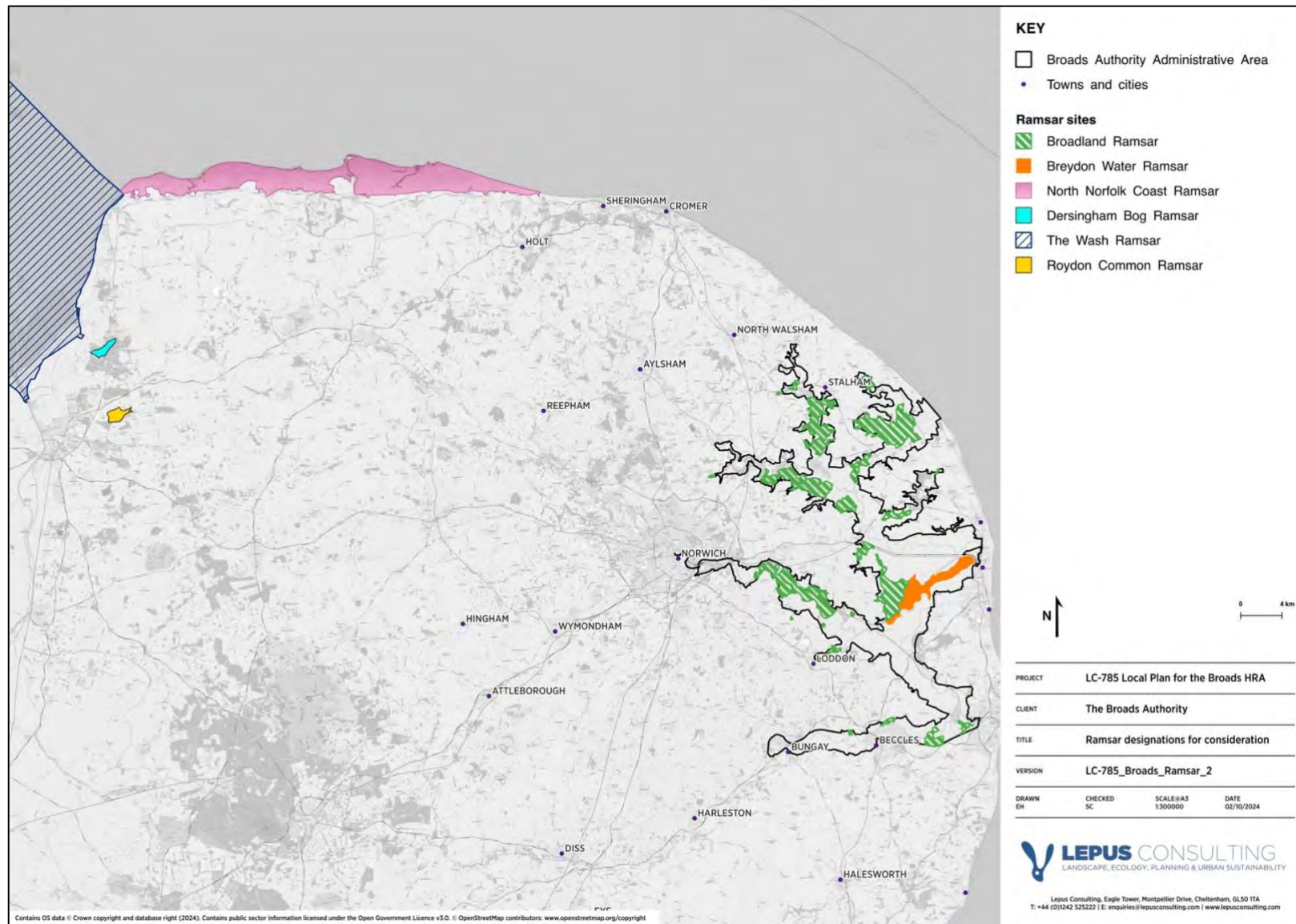


Figure 3.5: Ramsar sites for consideration in the HRA process

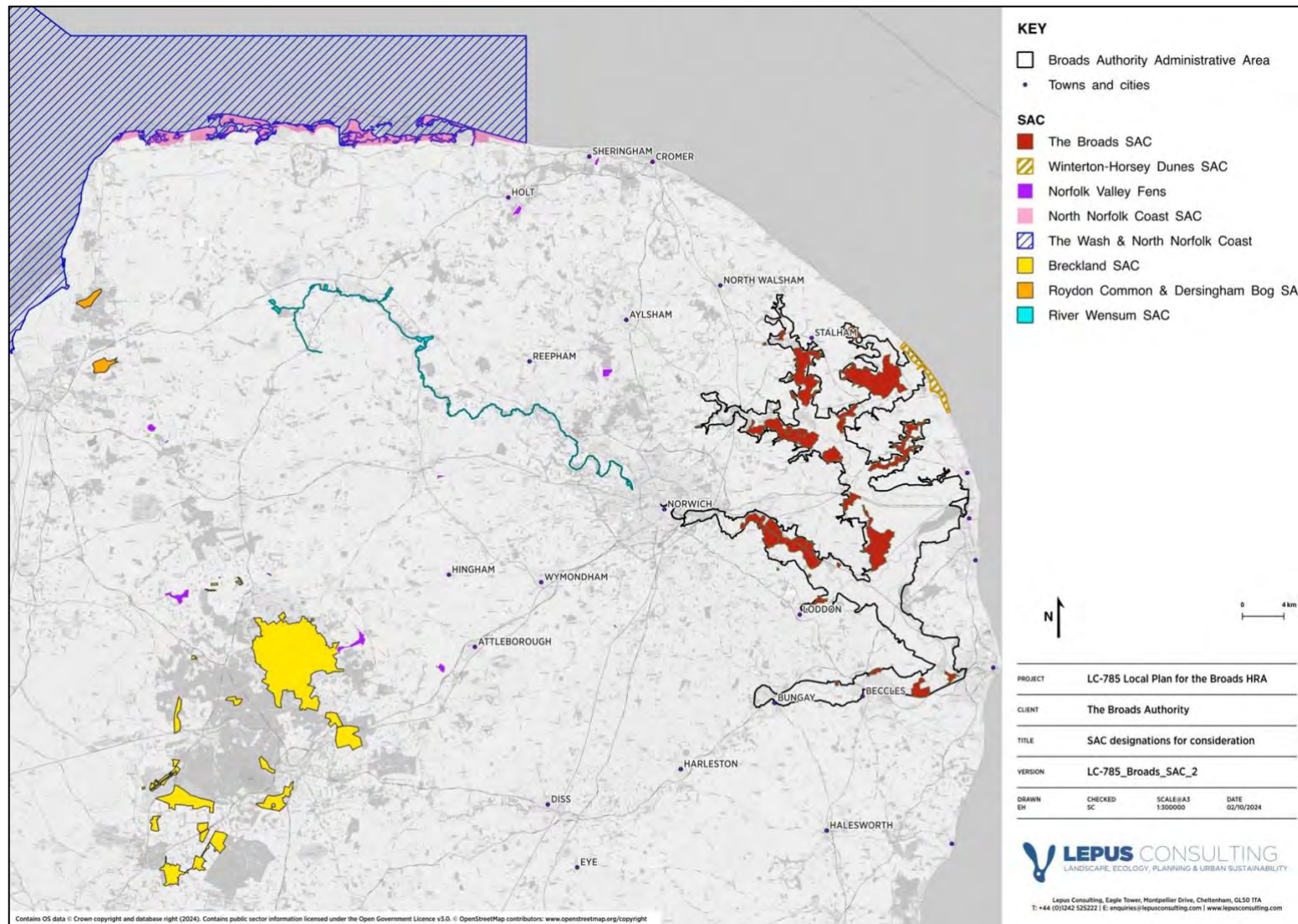


Figure 3.6: SACs for consideration in the HRA process

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.

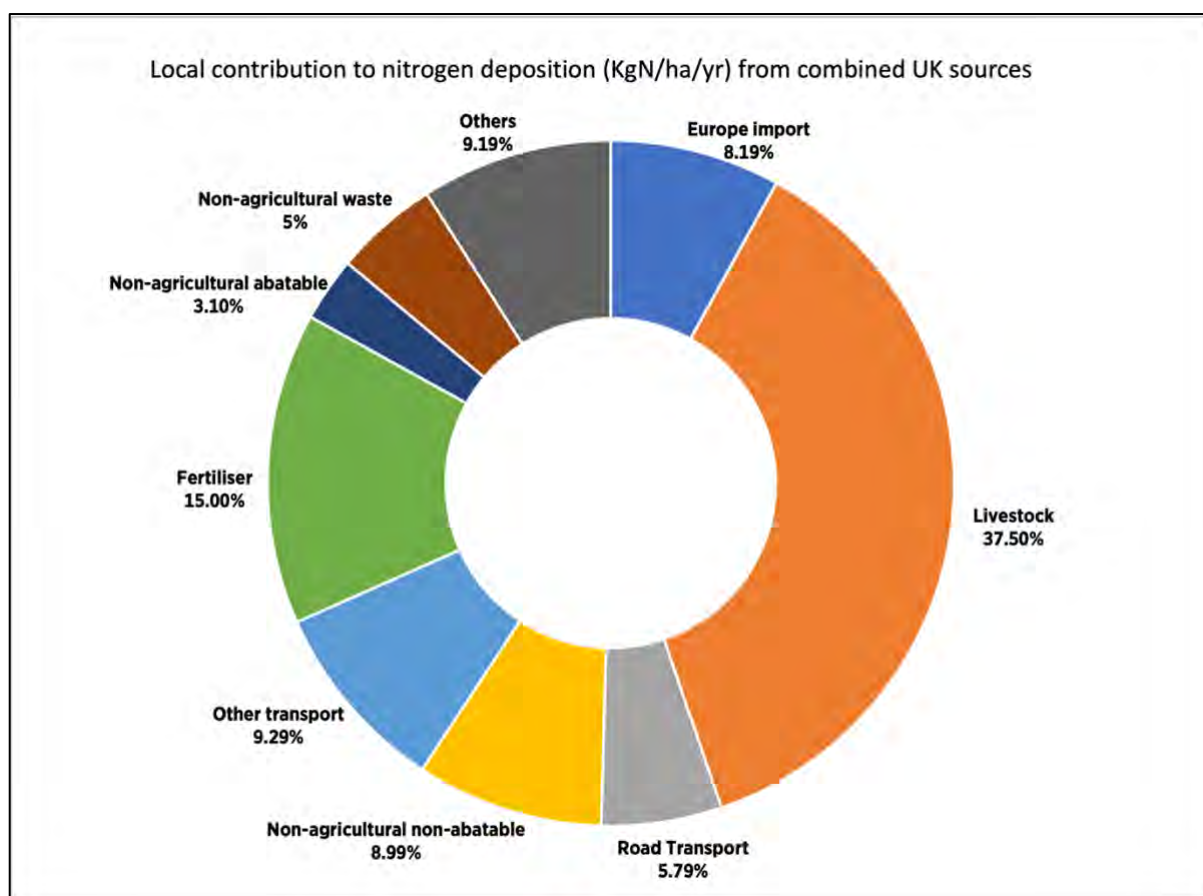


Figure 5.1: Pie chart to illustrate local contributions to nitrogen deposition to the SPA and SAC

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.

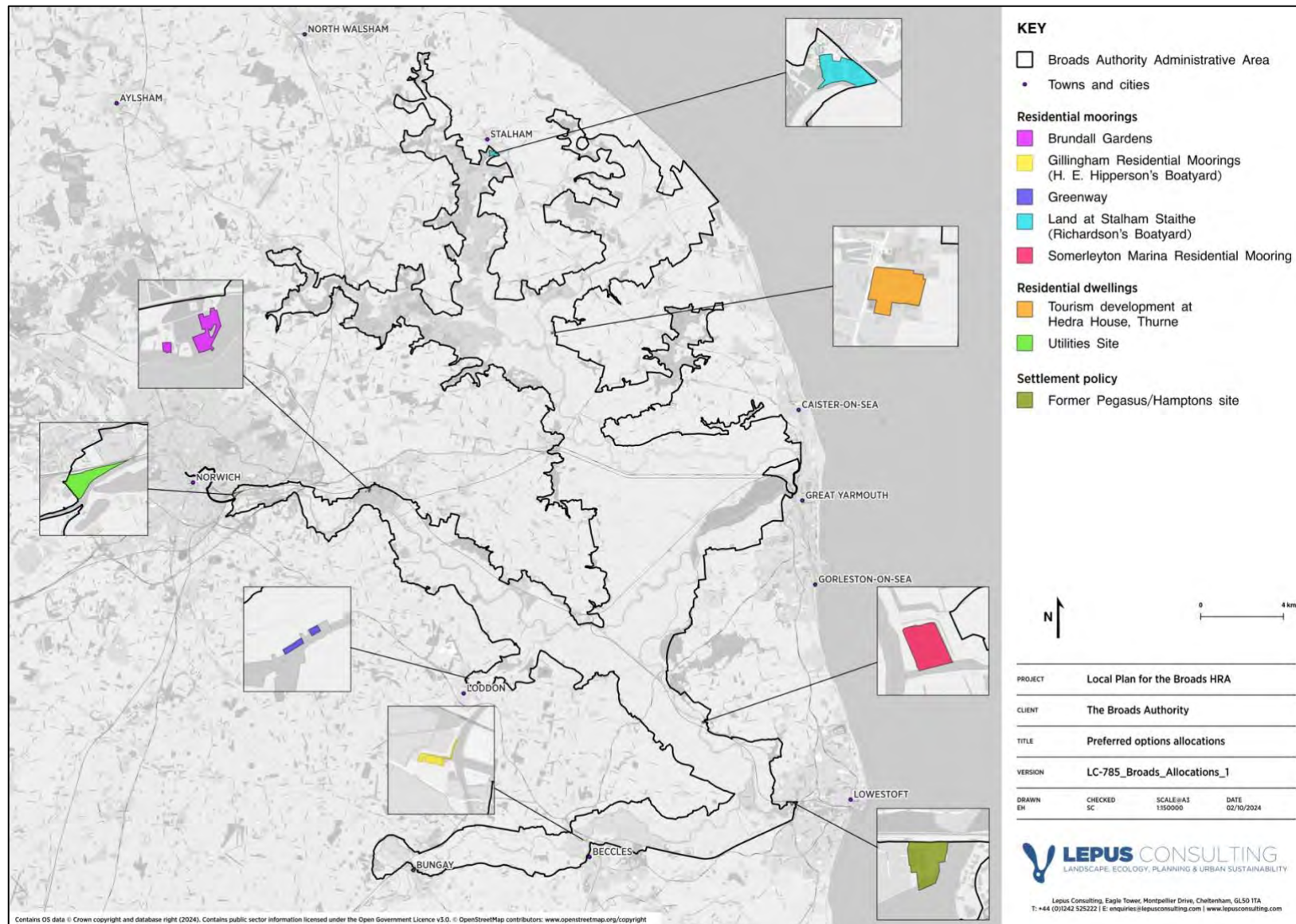


Figure 7.1: Local Plan allocations

- 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

- 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)
 A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)
 A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)
 A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
 A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
 A084 *Circus pygargus*; Montagu's harrier (Breeding)
 A132 *Recurvirostra avosetta*; Pied avocet (Breeding)
 A143 *Calidris canutus*; Red knot (Non-breeding)
 A191 *Sterna sandvicensis*; Sandwich tern (Breeding)
 A193 *Sterna hirundo*; Common tern (Breeding)
 A195 *Sterna albifrons*; Little tern (Breeding) Waterbird assemblage

Threats and Pressures at habitats site which may be affected by the Local Plan²⁴:

- Public Access / Disturbance
- Air Pollution

North Norfolk Ramsar²⁵

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 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	Qualifying Species/populations (as identified at designation): Species regularly supported during the breeding season: <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) Species with peak counts in spring/autumn: <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) Species with peak counts in winter:

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
<p>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;</p> <ul style="list-style-type: none"> • 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. <p>Qualifying features: A133 <i>Burhinus oedicnemus</i>; Stone-curlew (Breeding) A224 <i>Caprimulgus europaeus</i>; European nightjar (Breeding) A246 <i>Lullula arborea</i>; Woodlark (Breeding)</p> <p>Threats and Pressures at habitat site which may be affected by the Local Plan²⁹:</p> <ul style="list-style-type: none"> • Water Pollution • Air Pollution • Public Access and disturbance • Habitat Fragmentation

Breckland SAC³⁰
<p>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;</p> <ul style="list-style-type: none"> • 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. <p>Qualifying features: H2330. Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands; Open grassland with grey-hair grass and common bent grass of inland dunes H3150. Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i>-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed</p>

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

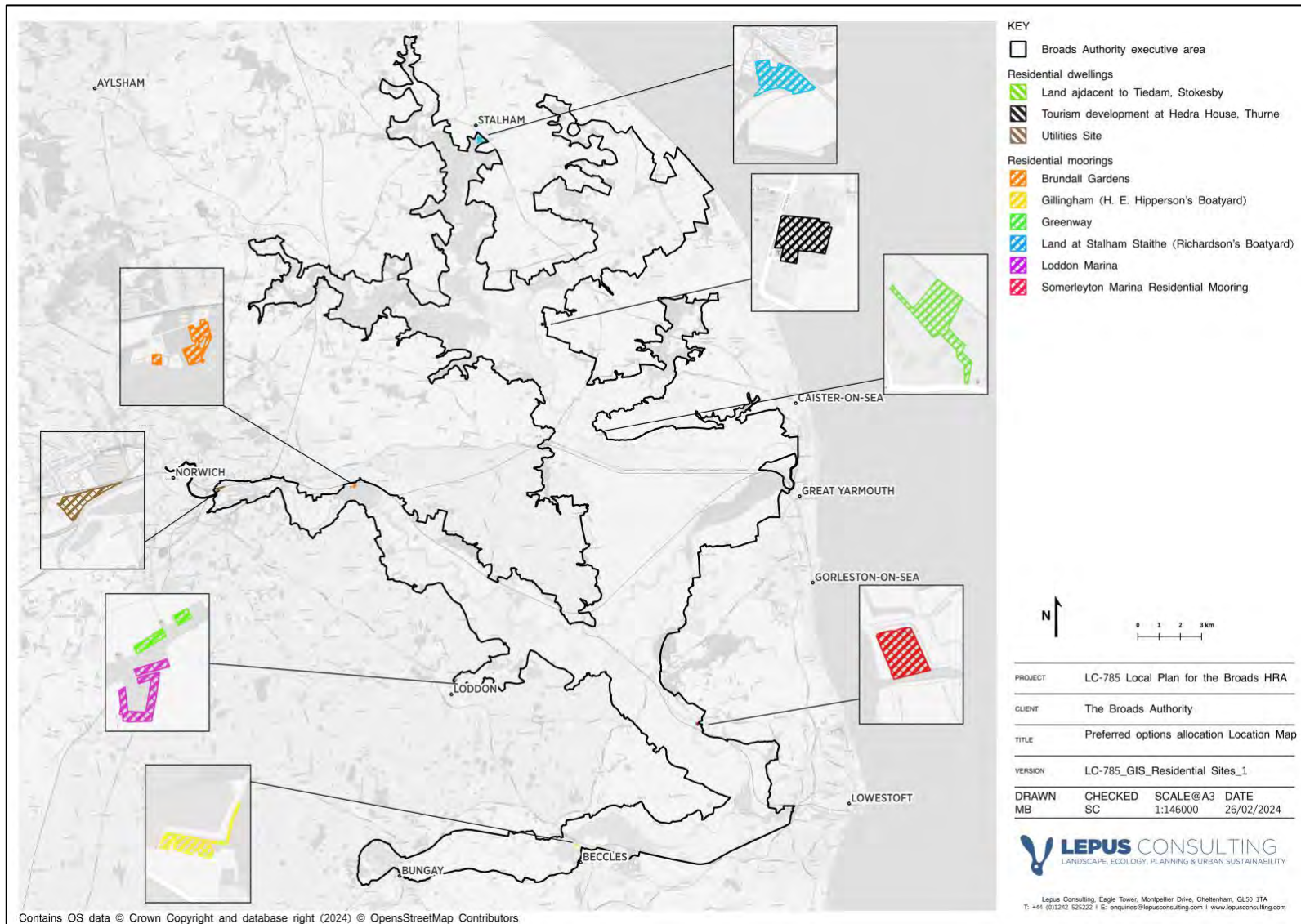


Figure C.1: Preferred Options allocation location map

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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Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Habitat and Ecology Surveys

Biodiversity Net Gain



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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	<p>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.</p>	Noted. We will consider this amendment.	Consider adding dark skies to the special qualities.
#4	Laura Mundy	East Suffolk Council	<p>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.</p>	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>	<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.</p>	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?
ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.	Economic activity.	<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?
ECO2: To ensure the economy actively contributes to social and environmental well-being.	Economic activity. Population and human health. Inclusive communities	<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
ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.	Economic activity. 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"> ○ 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		<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 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			<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 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		
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		

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 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	?			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					
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		<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	?			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.		?	+
ENV4	+	The area has intrinsically dark skies.		?	+
ENV5	+	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,		?	+
ENV8					
ENV9					
ENV10	+	The policy requires well designed lighting if it can be justified.		?	+
ENV11	+	The policy fundamentally addresses light pollution.		?	+
ENV12					
SOC1	+	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.	+
ECO2	?			+
ECO3	?			+
				Fundamentally, the policy is about promoting employment.

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			Not having a policy does not mean that the benefits of having a policy will not be realised. A policy adds certainty.	
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.	+	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
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 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			
ENV2	+ Policy refers to water pollution.	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 water pollution. Also mentioned issue of capacity at Horning Water Recycling Centre.
ENV3	+ Policy refers to impact on biodiversity.		+ Policy refers to impact on biodiversity. Also mentioned RAMs requirement.
ENV4	+ Policy refers to landscaping and integrating into the landscape.		+ Policy refers to landscaping and integrating into the landscape.
ENV5			
ENV6	+ Policy refers to issue of flood risk.		+ Policy refers to issue of flood risk.
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			+ Policy mentions light pollution.
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	?		+	+
ECO3	?		+	+

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	+		+ The land uses in the District Centre are part of the local economy.	?	
ECO3	+		+ The land uses in the District Centre are part of the local economy.	?	

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.
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

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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.

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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.

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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	New employment land. Employment land lost to other uses.
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.	Planning applications in accordance (or otherwise) with this policy
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.	

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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.	

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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.	

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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

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
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.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
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 PUBSTRACKS: 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.

Planning Committee

08 November 2024

Agenda item number 12

Broads Authority Design Guide and Code

Report by Historic Environment Manager

Summary

Work on the Broads Authority Design Guide and Code has been ongoing since 2022 and we now seek approval for the document to go out to consultation with the Broads Local Plan, as an appendix to the Local Plan.

Recommendation

To endorse the Broads Authority Design Guide and Code for consultation concurrently with the Local Plan.

1. Introduction

- 1.1. The National Planning Policy Framework (2023) (NPPF) includes a requirement for all Local Planning Authorities (LPAs) to prepare design guides or codes consistent with the principles set out in the National Design Guide (2021) and National Model Design Code (2021). The Government's commitment to the production of design codes by LPAs has been strengthened in the recent Levelling Up and Regeneration Act (2023), which requires all LPAs to have a design code in place covering their entire areas.
- 1.2. The purpose of a Design Code is to provide clarity of design expectations at an early stage in the development process and to ensure that good design is considered at all spatial scales, down to development sites and individual plots. The Design Code should reflect local character and the NPPF specifically states that codes should be grounded in an understanding and evaluation of each area's defining characteristics. Codes should reflect local design preferences and should involve effective community engagement, taking into account national design guidance. The level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place.
- 1.3. It is intended that the document should be used by anybody proposing new development, to give them an understanding of the key characteristics of built form in the area and guidance on what form new development should take and what is likely to be acceptable. The focus is on both urban design principles, as well as more detailed design (e.g. the elevational treatment of buildings).

2. Progress to date

- 2.1. Work commenced on the document in 2022 when we worked with consultants, Turley, on the first draft of the document. There have been two previous rounds of consultation: the first at the beginning of 2022 prior to work commencing, and the second on the first draft of the document over winter 2022-2023.
- 2.2. Subsequently the document has developed and changes have been made to it. This is in response to consultation feedback and changing national and local planning policy.
- 2.3. The document is arranged in two parts. The first part of the document is the Design Guide, which sets out the characteristics of the main building types and forms of development that we deal with in the Broads (for example, waterside chalets and farm buildings). This is to ensure people understand the context in which they are proposing to develop and to encourage them to consider their surroundings when developing proposals. The second part of the document is the Design Code. This sets out parameters and requirements that must be met when applying for planning permission, with a checklist that should be submitted with planning applications.

3. Next steps

- 3.1. In order to ensure the Design Guide and Code carries sufficient weight in planning decisions, it is proposed that it should be an appendix to the new Local Plan. As such, it will be necessary to carry out consultation concurrently with the Broads Local Plan. For timings, please see the scenarios and recommendations set out in the Local Plan report for this committee.

4. Conclusion

- 4.1. It is recommended that the Planning Committee endorse the Design Guide and Code for public consultation.

Author: Kate Knights

Date of report: 23 October 2024

[Broads Plan](#) strategic objectives: F4

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

Appendix 1 – Draft Design Guide and Code for the Broads (October 2024)

Planning Committee

08 November 2024

Agenda item number 13

Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q3 (1 July to 30 September 2024)

Report by Planning Technical Support Officer

Summary

This report sets out the development control statistics for the quarter ending

Recommendation

To note the report.

1. Development control statistics

1.1. The development control statistics for the quarter ending are summarised in the tables below.

Table 1

Number of applications

Category	Number of applications
Total number of applications determined	49
Number of delegated decisions	47
Numbers granted	46
Number refused	3
Number of Enforcement Notices	0
Consultations received from Neighbouring Authorities	17

Table 2

Speed of decision

Speed of decision	Number	Percentage of applications
Under 8 weeks	29	59.2

Speed of decision	Number	Percentage of applications
8-13 weeks	3	6.1
13-16 weeks	0	0.0
16-26 weeks	0	0.0
26-52 weeks	0	0.0
Over 52 weeks	0	0.0
Within agreed extension ¹	17	34.7
Outside of agreed extension	0	0.0

- 1.2. Extensions of time were agreed for seventeen applications. Sixteen of these were required because further information was awaited, amendments had been made to the scheme, there had been other discussions which had taken it over time or because a re-consultation was underway. One was due to the application being taken to Planning Committee.

Table 3

National performance indicators: BV 109 The percentage of planning applications determined in line with development control targets to determine planning applications.

National target	Actual
60% of Major applications ¹ in 13 weeks (or within agreed extension of time)	100%
65% of Minor applications ² in 8 weeks (or within agreed extension of time)	100%
80% of other applications ³ in 8 weeks (or within agreed extension of time)	100%

Author: Thomas Carter

Date of report: 17 October 2024

Appendix 1 – [PS1 returns](#)

Appendix 2 – [PS2 returns](#)

¹ Majors refers to any application for development where the site area is over 10,000m²

² Minor refers to any application for development where the site area is under 10,000m² (not including Household/ Listed Buildings/Changes of Use etc.)

³ Other refers to all other application types

Appendix 1 – PS1 returns

Measure	Description	Number of applications
1.1	On hand at beginning of quarter	52
1.2	Received during quarter	46
1.3	Withdrawn, called in or turned away during quarter	7
1.4	On hand at end of quarter	41
2.	Number of planning applications determined during quarter	49
3.	Number of delegated decisions	47
4.	Number of statutory Environmental Statements received with planning applications	0
5.1	Number of deemed permissions granted by the authority under regulation 3 of the Town and Country Planning General Regulations 1992	0
5.2	Number of deemed permissions granted by the authority under regulation 4 of the Town and Country Planning General Regulations 1992	0
6.1	Number of determinations applications received	0
6.2	Number of decisions taken to intervene on determinations applications	0
7.1	Number of enforcement notices issued	0
7.2	Number of stop notices served	0
7.3	Number of temporary stop notices served	0
7.4	Number of planning contravention notices served	0
7.5	Number of breach of conditions notices served	0
7.6	Number of enforcement injunctions granted by High Court or County Court	0
7.7	Number of injunctive applications raised by High Court or County Court	0

Appendix 2 – PS2 returns

Table 1

Major applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	1	1	0	0	1	0	0	0	0	0
Offices/ Light Industry	0	0	0	0	0	0	0	0	0	0
Heavy Industry/Storage/Warehousing	1	1	0	0	1	0	0	0	0	0
Retail Distribution and Servicing	0	0	0	0	0	0	0	0	0	0
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Large-Scale Major Developments	2	2	0	0	1	0	0	0	0	1
Total major applications	4	4	0	0	3	0	0	0	0	1

Table 2

Minor applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	3	2	1	1	0	0	0	0	0	2
Offices/Light Industry	0	0	0	0	0	0	0	0	0	0
General Industry/Storage/Warehousing	1	1	0	0	0	0	0	0	0	1
Retail Distribution and Servicing	0	0	0	0	0	0	0	0	0	0
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Minor Developments	10	9	1	5	0	0	0	0	0	5
Minor applications total	14	12	2	6	0	0	0	0	0	8

Table 3

Other applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Minerals	0	0	0	0	0	0	0	0	0	0
Change of Use	2	2	0	1	0	0	0	0	0	1
Householder Developments	22	21	1	15	0	0	0	0	0	7
Advertisements	2	2	0	2	0	0	0	0	0	0
Listed Building Consent to Alter/Extend	5	5	0	5	0	0	0	0	0	0
Listed Building Consent to Demolish	0	0	0	0	0	0	0	0	0	0
Certificates of Lawful Development ⁴	2	1	1	2	0	0	0	0	0	0
Notifications ⁴	1	1	0	1	0	0	0	0	0	0
Other applications total	34	32	2	26	0	0	0	0	0	8

⁴ Applications for Lawful Development Certificates and Notifications are not counted in the statistics report for planning applications. As a result, these figures are not included in the total row in Table 4.

Table 4

Totals by application category

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Major applications	4	4	0	0	3	0	0	0	0	1
Minor applications total	14	12	2	6	0	0	0	0	0	8
Other applications total	31	30	1	23	0	0	0	0	0	8
TOTAL	49	46	3	29	3	0	0	0	0	17
Percentage (%)		93.9	6.1	59.2	6.1	0.0	0.0	0.0	0.0	34.7

Planning Committee

08 November 2024

Agenda item number 14

Appeals to the Secretary of State update

Report by Development Manager

Summary

This report sets out the position regarding appeals against the Authority.

Recommendation

To note the report.

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2022/0221/TPOA APP/TPO/E9505/9259	Mr R Stratford	Appeal received by the BA on 25 July 2022 Appeal start date 22 February 2024	Broadholme, Caldecott Road, Lowestoft, Suffolk NR32 3PH	Appeal against refusal to grant permission for works to trees in a Conservation Areas: T9: Sycamore - remove and replace with Silver Birch. T12&T13: Sycamores - remove.	Delegated decision 15 July 2022 LPA statement submitted - 4 April 2024 Hearing scheduled 8 October 2024.
BA/2023/0004/UNAUP2 APP/E9505/C/23/3322890 and APP/E9505/C/23/3322949	Jeanette Southgate and Mr R Hollocks	Appeals received by the BA on 24 and 26 May 2023 Appeals start dates 27 and 29 June 2023	Berney Arms Inn	Appeal against enforcement notice - occupation of caravan	Committee decision 31 March 2023 LPA Statements submitted 9 August and 11 August 2023
BA/2023/0309/FUL APP/E9505/W/23/3333375	Mr and Mrs R Baldwin	Appeal received by the BA on 29 January 2023 Appeal start date 25 March 2024	Barns at The Street Farm, Hardley Steet, Hardley	Appeal against refusal of planning permission – Change of use of two barns to holiday lets.	Delegated decision 9 October 2023 LPA Statement submitted 26 April 2024 Appeal Dismissed 29 October 2024

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2024/0061/HOUSEH APP/E9505/D/24/3346992	Rachel Parker	Appeal received by the BA on 25 June 2024 Start date not yet confirmed	Bureside 6 Skinners Lane Wroxham	Appeal against refusal of planning permission - Replace single glazed timber windows & doors with double glazed UPVC	Delegated decision 7 May 2024 Fast track householder appeal so no LPA Statement submitted.
BA/2023/0291/TPOA APP/TPO/E9505/9846	Mr J Calver	Appeal received by the BA on 23 August 2023 Appeal start date 2 July 2024	River Green Yarmouth Road Thorpe St Andrew	Appeal against refusal to grant permission for works to TPO tree: T1: Horse Chestnut - Reduce primary stems by approximately 6m & reduce limb at 5.5m.	Delegated decision 11 August 2023 Fast track appeal so no LPA Statement required. Site Visit date TBC
BA/2024/0003/HHAPP	Mr P Albon	Appeal received by the BA on 8 August 2024 Appeal start date 10 September 2024	Hill Crest, The Hill, Shipmeadow	Horizontal cladding attached to exterior wall surfaces of dwelling (retrospective)	Delegated decision 10 May 2024
BA/2024/0092/FUL	Mr P Albon	Appeal received by the BA on 16 October 2024	Hill Crest, The Hill, Shipmeadow	Erection of storage barn (retrospective)	Delegated decision 10 May 2024

Author: Steve Kenny

Date of report: 18 October 2024

Background papers: BA appeal and application files

Planning Committee

08 November 2024

Agenda item number 15

Decisions made by officers under delegated powers

Report by Head of Planning

Summary

This report sets out the delegated decisions made by officers on planning applications from 30 September 2024 to 25 October 2024 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Barton Turf and Irstead Parish Council	BA/2024/0272/HOUSEH	Shoals Cottage The Shoal Irstead Norfolk NR12 8XS	Mr & Mrs Bob Parks	Construction of a two storey garage with a dormer window to the side. The building is to replace a previous garage that has been demolished.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Coltishall Parish Council	BA/2024/0289/HOUSEH	Orchard Hill 10 Wroxham Road Coltishall Norfolk NR12 7EA	Sue Ames and Andy Barrett	Replacement pool building & associated works	Approve Subject to Conditions
Coltishall Parish Council	BA/2024/0265/HOUSEH	Marlpit House Belough Green Lane Coltishall Norfolk NR12 7AJ	Mr Adam Walters	New vehicular entrance and driveway to existing dwelling. Formalising of entrance with hedging, gates and fence.	Approve Subject to Conditions
Fritton With St Olaves Parish Council	BA/2024/0299/HOUSEH	Millbeck Priory Road St Olaves Fritton and St Olaves Norfolk NR31 9HQ	Mr R Burton	Single storey garage extension	Approve Subject to Conditions
Horning Parish Council	BA/2024/0325/FUL	23 Bureside Estate Crabbetts Marsh Horning Norfolk NR12 8JP	David, Brigit, Erica, William Chisholm	Erection of a new boat shelter and replace 30.2m of quay heading and slipway to include plastic piling.	Approve Subject to Conditions
Horning Parish Council	BA/2024/0276/FUL	Horning Hall Hall Lane Horning Norfolk NR12 8NJ	Mr Richard Marshall	Replacement of 85.5m of timber quay heading with timber piling, capping and waling. New and replacement of 86m2 of timber decking.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Horning Parish Council	BA/2024/0301/HOUSEH	6 Bureside Estate High Waters Crabbetts Marsh Horning Norfolk NR12 8JP	Cook	Like for like replacement of timber quay heading of approx 33 metres and replace existing 1200mm wide decking directly behind quay heading.	Approve Subject to Conditions
Horning Parish Council	BA/2024/0311/HOUSEH	Cedar Wood 92 Lower Street Horning Norfolk NR12 8PF	Mr R Swann	Like for like replacement of 33m of quay-heading	Approve Subject to Conditions
Horning Parish Council	BA/2024/0318/HOUSEH	Somerville Ropes Hill Horning Norfolk NR12 8PA	Mr Powell	Proposed Cart lodge to provide undercover parking and general household storage	Approve Subject to Conditions
Horning Parish Council	BA/2024/0286/HOUSEH	Bureside Estate Plot 28A Crabbetts Marsh Horning Norfolk NR12 8JP	Mr Jeremy Stattersfield	Proposed renovation of boathouse and shed to single boathouse with work room behind.	Approve Subject to Conditions
Mettingham Parish Council	BA/2024/0225/FUL	Land and Buildings adjacent The Long House Low Road Mettingham Suffolk NR35 1TS	Mr Sebastian Clarke And Mrs Lauren McKaig	Conversion and change of use of an existing agricultural building to use class E and associated works to accommodate Beauty Treatment rooms.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Mettingham Parish Council	BA/2024/0049/HOUSEH	The Long House Low Road Mettingham Suffolk NR35 1TS	Mr And Mrs Sebastian & Lauren Clarke And McKaig	2 x two-storey rear extensions, including first-floor external terrace, replace conservatory with single storey side extension, pitched roof over flat roof, new front porch, and solar panels.	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2024/0221/FUL	Ivy House Farm Ivy Lane Lowestoft Suffolk NR33 8HY	Mr Neil Sage	Erection of day room in connection with the existing stables and barn	Approve Subject to Conditions
Somerton Parish Council	BA/2024/0195/FUL	Land Between The Firs Staithe Road and Benjys House New Road Track West Somerton Somerton Norfolk	Mr Michael Ives	Change of use of agricultural field for the grazing of horses and erection of stable building	Approve Subject to Conditions
Thorpe St Andrew Town Council	BA/2024/0291/LBC	12 Manor House Yarmouth Road Thorpe St Andrew Norfolk NR7 0EF	Mr Jeremy Clarke	Remove chimney, replace roof tiles and roof windows. Alterations to boundary with Walpole House.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Thorpe St Andrew Town Council	BA/2024/0292/LBC	Walpole House 16 Yarmouth Road Thorpe St Andrew Norfolk NR7 0EF	Mr Jeremy Clarke	Alterations to lantern & window	Approve Subject to Conditions
Thurne Parish Council	BA/2024/0074/COND	Hedera House The Street Thurne Norfolk NR29 3AP	Mr Benjamin Hunt	Use of alternative construction and finishing materials, variation of conditions 1 and 2 of permission BA/2020/0284/REM	Refuse
Trowse With Newton Parish Council	BA/2024/0187/FUL	The Workshop Whitlingham Lane Trowse Norfolk NR14 8TR	Mrs Kate Villalgorido	Solar array and associated inverter shed	Approve Subject to Conditions
Woodbastwick Parish Council	BA/2024/0298/HOUSEH	Amber Lodge Broad Road Ranworth Norfolk NR13 6HS	Mr James Hurrell	Removal of two timber sheds and small greenhouse. Construction of Summerhouse/store	Approve Subject to Conditions

Tree Preservation Orders confirmed by officers under delegated powers

Parish	Address	Reference number	Description
Chedgrave Parish Council	Toplight, 21A Church Close, Chedgrave, Norfolk, NR14 6NH	BA/2024/0009/TPO	Trees [T1] Weeping Willow

Parish	Address	Reference number	Description
			[T2] Weeping Willow [T3] Oak [T4] Oak
Ditchingham Parish Council	Land Adjacent To Chestnuts, Falcon Lane, Ditchingham, Norfolk, NR35 2JG	BA/2024/0010/TPO	Tree [T1] Horse Chestnut
Ellingham and Kirby Cane Parish Council	Mill Orchard, Old Station Lane, Ellingham, Norfolk, NR35 2EX	BA/2024/0011/TPO	Tree [T1] White Willow

Author: Ruth Sainsbury

Date of report: 28 October 2024