

Table 1: Comments received from those consultation bodies with environmental responsibility

Respondent	Comment	Officer Response	Recommended Change
<p>Environment Agency, Cobholm Road, Ipswich, Suffolk IP3 9JD.</p> <p>Contact: Andrew Hunter Position: Development Planning Officer</p>	<p>Consultation Question 1:</p> <p>Include the following documents in the SA:</p> <ul style="list-style-type: none"> ▪ Broadland Rivers Catchment Flood Management Plan (CFMP) ▪ Broadland Rivers Catchment Abstraction Management Strategy (CAMS) 	<p>The documents suggested by the Environment Agency will be scoped as part of this Reg25 stage for the following reasons:</p> <p>A CFMP is a strategic planning tool through which the Environment Agency will seek to work with other key decision makers within the river catchment to identify and agree policies for sustainable flood risk management. They may be considered as the riverine equivalent of Shoreline Management Plans which perform a similar role for coastal flooding and erosion risk. CFMPs will have implications for infrastructure locations, flood defence standards.</p> <p>The Broadland Rivers CFMP, which is currently in the course of preparation, is concerned with all main watercourses within the catchment boundaries of the Rivers Yare, Bure and Waveney. Following the recently completed scoping stage, we expect the final document, which will contain policies on flood management, to be released later this year. The CFMPs may identify changes to defence standards that will need considering in the planning process, and Strategic Flood Risk Assessment may need to take account for these.</p>	<p>Changes Made</p> <p>Paragraph 20.9 and 20.10 have been added to page 33 of document:</p> <p>20.9 -The Environment Agency produces a number of plans and programmes to address these issues. In particular, the Broadland Rivers Catchment Flood Management Plan (CFMP) and the Broadland Rivers Catchment Abstraction Management Strategy will exert a considerable influence on the Great Yarmouth Borough Council's LDF. The CFMP is a strategic planning tool through which the Authority will work with the Environment Agency and agree policies for sustainable flood risk management within the river catchment. They may be considered as the riverine equivalent of Shoreline Management Plans which perform a similar role for coastal flooding and erosion risk. CFMPs will have implications for infrastructure locations, flood defence standards and flood defence alleviation options</p> <p>20.10 - It is important that the Great Yarmouth LDF addresses the problems arising from the impact of sea level rise and climate change by formulating strong policies against development on the flood plain. In line with Planning Policy Guidance 25: Development and Flood Risk (PPG25) and in partnership with the Environment Agency, Great Yarmouth Borough Council have recently published the Great Yarmouth and Gorleston Strategic Flood Risk Assessment (2006) which sets out the strategic overall assessment of flood risk for the urban area of Great Yarmouth and Gorleston (refer to map 3 below). This document will assist in providing guidance for the formulation of policies in the LDF, advise on flood risk relating to the outer harbour and on the probability of defending the Great Yarmouth and Gorleston area with respect to the major regeneration and URC designation.</p>

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<p>Environment Agency, Cobholm Road, Ipswich, Suffolk IP3 9JD.</p> <p>Contact: Andrew Hunter Position: Development Planning Officer</p> <p><i>Continued...</i></p>	<p>Vulnerability to climate change</p> <p>We are pleased to note the three issues identified in the table following Section 2.9, all of which will be important factors in development in the Urban Regeneration Corporation area but also other locations in the Council's area.</p>	<p>No comments</p>	<p>No Changes Made</p>
	<p>Biodiversity</p> <p>We are in broad agreement with the four issues identified in the table following Section 22.7. We do however feel that these four issues could be captured better with a rewording of the headline objective 'To maintain and enhance biodiversity, flora and fauna'. We feel the objective would be more proactive if reworded as follows:</p> <p><i>'To protect, maintain and enhance the diversity and abundance of species and their habitats to implement a net gain and to avoid habitat fragmentation'.</i></p> <p>The avoidance of habitat fragmentation is important in terms of the protection and conservation of biodiversity features.</p>	<p>English Nature stated (see below) that the four key options were inadequate at protecting the environment and some are inconsistent with the protection afforded European and SSSI sites. We would suggest wording for the key option of the designated sites as 'Protect and enhance areas covered by national and international designations'. English Nature suggested wording for the key option of biodiversity outside of designated sites as 'Protect, enhance and create areas of biodiversity, species and habitats in accordance with their rarity and importance.</p>	<p>Changes Made</p> <p><i>Avoid damage to designated sites, protected species, losses to special areas and maintain, enhance and expand the range of native habitats and species.</i></p>
	<p>Consultation Questions 1 & 2</p> <p>Our earlier letter dated the 11 March, 2005 sets out the Environment Agency's desire to work in partnership with Councils to embed environmental Considerations effectively into the new plans under the LDF system without overburdening either partner. This letter mentioned the availability of data that we can provide to assist with the Sustainability Appraisal process and production of your Environmental Report. The data list information can be found on our website. If you would like us to provide a standard package for the Great Yarmouth Borough area,</p>	<p>Mechanisms for collection of data are to be put in place including suggestions from the Environment Agency.</p>	<p>No Changes Made</p>

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<p>Environment Agency, Cobholm Road, Ipswich, Suffolk IP3 9JD.</p> <p>Contact: Andrew Hunter Position: Development Planning Officer</p> <p><i>Continued....</i></p>	<p>we will be pleased to arrange for a formal request to be made to our GIS Data Unit. Our Ipswich Flood Incident Management Team can also provide information on properties at risk of flooding, incidence of flood watches and warning, and properties affected, where reported to us.</p>		
	<p>We would suggest that a suitable indicator covering the maintenance of the quality, character and local distinctiveness of landscape would be: 'planning permission granted that results in the loss of landscape features identified as being of importance to distinctive character for that area.' This would largely be based on Landscape Character Assessment carried out for the borough's area. Any development that caused the loss of a landscape area featured within the Landscape Character Assessment could presumably be identified and quantified in area size terms.</p> <p>Another useful indicator relating to biodiversity, flora and fauna would be permissions granted for development that would result in the loss of landscape features such as hedges (notably hedges of importance under the Important Hedges Regulations) and copses.</p>	<p>The following indicators have been added to the Scoping Report and greater emphasis has been given to Landscape Character Assessments and neighbouring Landscape Character Assessments (see below).</p> <p>% of total built-up areas falling within conservation areas</p> <p>Area of designated landscapes – AONB, Special Landscape Areas (SLA)</p> <p>Number of Environmental Stewardship Schemes (DEFRA)</p> <p>Number of planning applications refused for reasons due to poor design</p> <p>Planning permissions granted for development that has resulted in the loss of landscape features such as hedges (notably hedges of importance under the Important Hedges Regulations) and copses.</p>	<p>Changes Made</p> <p>On page 43 of the document the final issue and key option (5) has been amended to read as follows:</p> <p>Issue: The landscape and the townscape are potentially vulnerable to unsympathetic new development.</p> <p>Key Option: Ensure developments recognise the need for landscape and townscape conservation and enhancement, including retention of key landscape and townscape features. Ensure further landscape and townscape protection through strong conformity with the Landscape Character Assessment, including neighbouring Landscape Character Assessments, and Conservation Area Appraisals.</p> <p>The indicators adjacent have also been included in the amendments.</p>
	<p>Consultation Question 3</p> <p>We are not aware of any mistakes in the baseline information</p>	<p>No comment</p>	<p>No Changes Made</p>

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<p>Environment Agency, Cobholm Road, Ipswich, Suffolk IP3 9JD.</p> <p>Contact: Andrew Hunter Position: Development Planning Officer</p> <p><i>Continued....</i></p>	<p>Formulating SA Objectives Consultation Question 1</p> <p>We considered the headline objectives capture all the issue relevant to the borough.</p>	<p>No comment</p>	<p>No Changes Made</p>
	<p>Consultation Question 3</p> <p>No comment.</p>	<p>No comment</p>	<p>No Changes Made</p>
	<p>Appendix 1: Analysis of Plans and Programmes</p> <p>With regard to 'PPS1 – Creating Sustainable Communities' we note this document states, under Paragraph 36 that key objectives should include ensuring that developments take account of natural hazards such as flooding. Given this inclusion as a key objective, we consider that it would also be appropriate to add flood risk to the other issues identified under PPS1 relating to the delivery of sustainable development. The purpose of such inclusion would be to highlight the strategic importance placed on flood risk management</p>	<p>Agreed</p>	<p>Changes Made</p>

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<p>English Nature 60 Bracondale. Norwich. Norfolk NR1 2BE</p> <p>Contact: Clive Doarks Position: Conservation Officer (Norfolk)</p> <p>Continued.....</p>	<p>We believe the following documents are relevant; Broads Plan (Broads Authority 2004) Broads Natural Area Profile (Broads Authority and English Nature 1996, reprinted 2001) Shoreline Management Plan (3b) Broads Flood Alleviation Strategy (Environment Agency and BESL) Planning Policy Statement 9 (August 2005) Government Circular – Biodiversity and Geological Conservation – Statutory obligations and their impact on the planning system. Framework for Biodiversity Association of Local Government Ecologists (November 2005) The Broads ESA (Defra 2002) Biodiversity mapping for Norfolk and more specifically the Broads (soon to be published)</p>	<p>Agreed</p>	<p>Changes Made</p>
	<p>Comment on page 12, in the interest of balance while referring to improvement to the A47 it would be reasonable to recognise environmental degradation associated with such a proposal. It would be nice to see a more balanced view of highlighting both the possible benefits and the disbenefits throughout later documents. It would go some way to recognise the obvious tension on this issue.</p>	<p>Agreed</p>	<p>Changes Made</p> <p>The following has been added to (para 6.2) regeneration of the town..... <i>...whilst recognising the environmental degradation associated with such a proposal.</i></p>
	<p>Comment on page 34 first key option, we would strongly suggest the long term view be taken, and go for a blanket replacement of allocated land off of the floodplain. Similar sized areas could be found away from the floodplain. English Nature would be pleased to advise where these might be situated to reduce impacts upon the environment. See also page 66</p>	<p>It is important that formulated policy is in line with the requirements of the Great Yarmouth Strategic Flood Risk Assessment.</p>	<p>Changes Made</p> <p>page 34, first key option and on page 66 has been amended to read as follows:</p> <p>Avoid development in areas that are subject to flooding and replace allocated land if current defences are endorsed strategic in line with the Great Yarmouth Strategic Flood Risk Assessment and advice from the Environment Agency.</p>

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<p>English Nature 60 Bracondale. Norwich. Norfolk NR1 2BE</p> <p>Contact: Clive Doarks Position: Conservation Officer (Norfolk)</p> <p>Continued.....</p>	<p>Comment on page 34 third key option, we would suggest: 'Ensure developments are located so that any impacts on sewerage and drainage systems capacity are fully mitigated against. Ensure techniques to manage surface water drainage in ways that mitigate flood risk ...' See also page 67</p>	<p>Agree</p>	<p>Changes Made</p> <p>page 34, third key option and on page 66 has been amended to read as follows:</p> <p>Ensure developments are located so that any impacts on sewerage or drainage systems capacity are fully mitigated against. Ensure techniques to manage surface water in ways that mitigate flood risk. Ensure that new development will be located, designed and its implementation planned in such a way as to allow for sustainable water conservation measures. Promote public awareness of the need to reduce water consumption.</p>
	<p>Comment on Page 36, 22.3, while acknowledging some sites are more important for biodiversity than others, 'accommodating change' does not sound very sustainable. Biodiversity is as much about dispersed, mobile 'common' species as European wildlife sites – the song thrush and yellow hammer are important in their own right, and for people living in the Borough.</p>	<p>Agreed</p>	<p>Changes Made</p>
	<p>At 22.5 it must be recognised that the CWS series does not cover any part of the Norfolk Broads. We would suggest all parts of the Broads floodplain, except any urban areas is of least CWS standard, and should be recognised accordingly.</p>	<p>Agree</p>	<p>Changes Made</p> <p>The opening sentence to para 22.5 has been amended to read as follows:</p> <p>Following a County Wide Survey by the Norfolk Naturalists Trust¹ some areas have been recognised as County Wildlife Sites (CWS) in the Borough. However, it must be recognised that the CWS series does not cover any part of the Norfolk Broads, however, all parts of the Broads floodplain, except any urban areas will be recognised as CWS standard and protected accordingly. (remainder of the para to be retained)</p>

¹ County Wildlife Site Review (1994)

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<p>English Nature 60 Bracondale. Norwich. Norfolk NR1 2BE</p> <p>Contact: Clive Doarks Position: Conservation Officer (Norfolk)</p> <p>Continued.....</p>	<p>Page 39: the four key options are inadequate at protecting the environment and some are inconsistent with the protection afforded European and SSSI sites. We would suggest wording for the key option of the designated sites as 'Protect and enhance areas covered by national and international designations'. We would suggest wording for the key option of biodiversity outside of designated sites as 'Protect, enhance and create areas of biodiversity, species and habitats in accordance with their rarity and importance. With regard to development, measures to seek alternative solutions, sites or designs to avoid irreversible damage, or failing that, mitigate or compensate habitat loss fully'.</p>	<p>Agreed as in line with current legislation.</p>	<p>Changes Made</p> <p>All five objectives on Page 39 (objectives 1 – 5), Page 78 and page 2 & 3 of Appendix 2 (Biodiversity) have been amended from 'To maintain and enhance biodiversity, flora and fauna' to the following:</p> <p>Avoid damage to designated sites, protected species, losses to special areas and maintain, enhance and expand the range of native habitats and species.</p>
	<p>The further issue here is habitat restoration, many parts of the Borough have been degraded, primarily via intensive agriculture and drainage. Opportunities now exist to enhance such areas through Defra's 'Environmental Stewardship' and the Broads Flood Alleviation Project, however the LDF needs to be conducive to such positive changes. For the Broads Authority's LDF we are providing mapping showing such areas and we would be able to do this for the entire Borough area also.</p>	<p>Agreed</p>	<p>Changes Made</p> <p>A fifth key issue and response to page 39 has been added to read as follows;</p> <p>Objective: Avoid damage to designated sites, protected species, losses to special areas and maintain, enhance and expand the range of native habitats and species. Issue: Many parts of the Borough have been degraded as a result of intensive agricultural drainage Key Option: Protect and restore degraded habitats through Environmental Stewardship and the Broads Flood Alleviation Project.</p>
	<p>Page 46: could you please send us a copy of the Employment land study (2005). Clearly there has been tension over the allocation of employment land and its impact upon undesignated sites of biodiversity value. We do not support allocations anywhere on the floodplain of the Broadland rivers.</p>	<p>Agreed. Copy to be forwarded once in the public domain</p>	<p>No Changes Made</p>

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<p>English Nature 60 Bracondale. Norwich. Norfolk NR1 2BE</p> <p>Contact: Clive Doarks Position: Conservation Officer (Norfolk)</p> <p>Continued.....</p>	<p>Section 22.5 should list all the SSSIs within the European designated sites. Breydon Water SPA/Ramsar also contains part of Halvergate Marshes SSSI</p>	<p>Agreed</p>	<p>Changes Made Paragraph 22.5 has been amended by adding the following under Breydon Water Ramsar & SPA to read as follows:</p> <ul style="list-style-type: none"> • Breydon Water Ramsar & SPA including the following SSSI <ul style="list-style-type: none"> - Halvergate Marshes SSSI <p>Remainder of list to remain in document.</p>
	<p>We believe that the Broads Authority executive area should be marked as being a nationally important designation of environmental importance. We would like the ESA and Broads floodplain (from the Environment Agency website) as this identifies areas of high biodiversity value or potential. Finally the Norfolk Wildlife Trust as part of the Norfolk Biodiversity Partnership has been undertaking a biodiversity mapping exercise for all priority habitats. We understand the map for your Borough area should be finalised shortly.</p>	<p>Agreed</p>	<p>Changes Made An additional para (6.3) has been added to page 12 to read as follows:</p> <p>Adjoining the Plan Area is the Broads Authority's Executive Area. The Norfolk Broads is a series of wetlands of international importance some of which are the best examples of wetland habitat in the world. The area is administered by the Broads Authority which is a Special Statutory Authority, created by the Norfolk and Suffolk Broads Act (1988), whose duties are similar to those of National Parks. Landscape conservation is a primary function of National Park designation and it is therefore essential that the Plan seeks to maintain and enhance the landscape quality of the neighbouring Broads area.</p> <p>Paragraph 22.8 has been added to the biodiversity section to read as follows:</p> <p>The Council are aware that the Norfolk Wildlife Trust as part of the Norfolk Biodiversity Partnership has been undertaking a biodiversity mapping exercise for all priority habitats. Mapping for this exercise is to be finalised shortly. Upon completion, the mapping data, along with Broads Floodplain data (available from the Environment Agency), will be used to formulate site specific development plan policies.</p>

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<p>English Nature 60 Bracondale. Norwich. Norfolk NR1 2BE</p> <p>Contact: Clive Doarks Position: Conservation Officer (Norfolk)</p> <p>Continued.....</p>			<p>Paragraph 22.3 has also been added to read as follows:</p> <p>The Borough of Great Yarmouth adjoins the Plan Area of the Broads Authority's Executive Area. The Broads Authority Area is a nationally important designation of environmental importance. Landscape conservation is a primary function of National Park and it is therefore essential that the LDF seeks to maintain and enhance the landscape quality of the neighbouring Broads Area.</p>
	<p>Under revitalising Town Centres 'improve transport infrastructure' is suitably broad to be acceptable. Even improvements to the A47 are acceptable if it refers to reducing speed, improving lay-bys and the junction at the Great Yarmouth end. More than this and it would be unacceptable. Given this will be an area of tension it might be helpful to clarify current thinking on transport infrastructure, and for English Nature to feedback our opinion. We are sure proposals will range from acceptable to highly contentious.</p>	<p>Agreed. Overall policy approach will be set out in the Core Strategy Preferred Options in line with the Norfolk Local Transport Plan (2006).</p>	<p>Changes Made</p> <p>The following has been added to paragraph 28.4 on page 48 to read as follows: Future look at improving efficient patterns of movement.</p> <p>28.4 The overall objectives of the Local Transport Plan for Norfolk (2006 to 2011) to improve strategic transport links, improve access to main towns, reduce congestion, prevent declarations of Air Quality Management Areas and target pedestrian and cyclist casualties will have been achieved. Improved public transport services and connections between transport modes will have enabled speedier, more convenient travel throughout the Borough and the wider sub-region, allowing people in rural areas and smaller communities to take advantage of the range of jobs and services available in the main centres. There will have been major Investment in a new bridge over the River Yare (the Third River Crossing), helping to relieve congestion, particularly in Great Yarmouth town centre, and provide the missing link between the trunk road and the port. Congestion will have been tackled further by making more efficient use of the road network by junction improvements.</p>

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<p>English Nature 60 Bracondale. Norwich. Norfolk NR1 2BE</p> <p>Contact: Clive Doarks Position: Conservation Officer (Norfolk)</p> <p>Continued.....</p>			<p>A comprehensive and integrated cycle and footpath network will safeguard cyclists and pedestrians, sustain growing use of non-car transport and mitigate increases in carbon dioxide emissions. Great Yarmouth's railway station will also be improved over the coming years, providing better interchange facilities, greater safety and comfort to encourage patronage.</p> <p>28.5 All in all, there will be particularly marked improvements for those making trips on foot, by bicycle or by public transport, for those with a mobility or sensory impairment, and for others who currently experience barriers to social inclusion. Improved access and accessibility will have reduced deprivation and isolation in those areas of need</p>
	<p>Apart from the other detailed comments above we are relatively content with the list of relevant issues, we feel the devil will be in the detail of the allocations and particularly location.</p>	<p>No comment</p>	<p>No changes made</p>
	<p>Page 68 and 69 we are unable to accept the biodiversity section and feel a different approach should be taken</p>	<p>Agree. However, the amendments need to reflect the suggested changes to the issues, objectives and key options given above.</p>	<p>Changes Made and are set out in the supporting document to this table.</p> <p>Please refer to page 13 of this document for amendments made</p>

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<p>English Nature 60 Bracondale. Norwich. Norfolk NR1 2BE</p> <p>Contact: Clive Doarks Position: Conservation Officer (Norfolk)</p> <p>Continued.....</p>	<p>Page 76 Poor Transport links, see above. English Nature's position on 'improvements to the A47' is well known. As we understand it Great Yarmouth's regeneration potential including EastPort is not dependant upon improvements to the road. Indeed there would only be limited job creation on the back of improvements to the road.</p>	<p>Agree. Amendments have been made following early comment.</p>	<p>Changes Made</p>
	<p>Comment on Table 2. We would suggest - Enhance the qualities of the Broads, minimise development and encourage natural functioning floodplain' as a new objective. We believe 'to maintain and enhance biodiversity, flora and fauna' should substituted by two new objectives.</p> <ul style="list-style-type: none"> -Avoid damage to designated sites, protected species and avoid irreversible losses to special areas. -Maintain, enhance and expand the range of native habitats and species. 	<p>Agreed. The amendments have also been carried over to the Core Strategy Preferred Options Document.</p>	<p>Changes Made</p> <p>The biodiversity objective in appendix 3 (table) has been amended to read as follows:</p> <p>Avoid damage to designated sites, protected species, losses to special areas and maintain, enhance and expand the range of native habitats and species.</p> <p>Reason: Agreed comments from English Nature</p> <p>A further biodiversity objective has been added to the table (to read as follows:</p> <p>Enhance the qualities of the Broads, minimise development and encourage a natural functioning floodplain</p>
	<p>To avoid repetition English Nature believes the comments above should be referred also to Appendices 4.</p>	<p>Agree.</p>	<p>Changes Made</p>

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<p>Countryside Agency City House 126-128 Hills Road Cambridge CB2 1PT</p> <p>Contact: Graham King Position: Senior Countryside Adviser</p>	<p>The “National” level of PPPs appears to have been absorbed into the “International” level and it would be helpful to distinguish the two.</p> <p>At the national level, the set of PPGs/PPSs does not appear, when clearly it should. Also missing are the Government’s sustainable development strategy Securing the Future (Defra 2005); the UK Climate Change Programme (Defra 2000); the Energy White Paper Our Energy Future – Creating a Low Carbon Future (DTI 2003) and Defra’s Rural Strategy 2004.</p> <p>At the regional level, you should note that the Regional Economic Strategy appears twice. The second entry related to the superseded first version published in 2001 and should be deleted. The fourth entry refers to Draft Regional Planning Guidance 14. This is mistitled. The correct title is the East of England Plan: Draft revision to the Regional Spatial Strategy for the East of England (RSS14). Reference should be made to the Integrated Regional Strategy Sustainable Futures (EERA 2005)</p> <p>You should also make reference here to the Kelling to Lowestoft Shoreline Management Plan (referred to on page 32) and to The Broads Plan (Broads Authority 2004).</p>	<p>Agreed</p>	<p>Changes made.</p> <p>Refer to page, 5, 6 & 7</p>
	<p>Section 24 – Landscapes and Townscapes – should include reference to The Broads. Of course, the Broads Authority area lies outside the LDF area but a substantial part of it does lie within Great Yarmouth Borough and in terms of landscape the two areas are inextricably linked. This chapter of the report is entitled “Characterisation of the Great Yarmouth Borough” and it would seem that most of the data presented relate to the Borough, rather than the LDF area, and to be consistent so they should in this section. The relationship of the two planning areas should be explained at the beginning of the document</p>	<p>Agree</p>	<p>Changes Made</p> <p>Paragraph (6.3), page 12 has been added to read as follows: Adjoining the Plan Area is the Broads Authority’s Executive Area. The Norfolk Broads is a series of wetlands of international importance some of which are the best examples of wetland habitat in the world. The area is administered by the Broads Authority which is a Special Statutory Authority, created by the Norfolk and Suffolk Broads Act (1988) whose duties are similar to those of National Parks.</p>

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<p>Countryside Agency City House 126-128 Hills Road Cambridge CB2 1PT</p> <p>Contact: Graham King Position: Senior Countryside Adviser</p> <p>Continued.....</p>			<p>Landscape conservation is a primary function of National Park designation and it is therefore essential that the Plan seeks to maintain and enhance the landscape quality of the neighbouring Broads area.</p> <p>Paragraph 22.3 has also been added to read as follows:</p> <p>The Borough of Great Yarmouth adjoins the Plan Area of the Broads Authority's Executive Area. The Broads Authority Area is a nationally important designation of environmental importance. Landscape conservation is a primary function of National Park and it is therefore essential that the LDF seeks to maintain and enhance the landscape quality of the neighbouring Broads Area.</p>
	<p>The section should also note that a small part of the Norfolk Coast AONB lies within the Borough</p>	<p>Agree</p>	<p>New paragraph (24.3) has been added to section 24 to read as follows:</p> <p>The Borough of Great Yarmouth adjoins the Plan Area of the Broads Authority's Executive Area. Landscape conservation is a primary function of National Park and it is therefore essential that the LDF seeks to maintain and enhance the landscape quality of the neighbouring Broads Area. In addition, the Norfolk Coast Area of Outstanding Natural Beauty (AONB) extends eastwards to include sites of Winterton and East of West Somerton within the Borough. Its designation recognises that the natural beauty of the area is of national importance and is worthy of protection. The views of the Norfolk Coast Partnership will be sought in relation to development proposals which may have an adverse impact on designated areas in the Borough.</p>

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<p>Countryside Agency City House 126-128 Hills Road Cambridge CB2 1PT</p> <p>Contact: Graham King Position: Senior Countryside Adviser</p> <p>Continued.....</p>	<p>We welcome the reference to the Draft Great Yarmouth LCA. It would be helpful to refer also to the fact that the Borough lies within 3 Joint Character Areas defined in Countryside Character – Volume 6: East of England (Countryside Agency CA12 1999). These are:</p> <p>79 – North East Norfolk and Flegg 80 – The Broads 82 – Suffolk Coast and Heaths (small part)</p>	<p>Agree. The document will not specifically name the document, but make reference to neighbouring LCA due to changing circumstances.</p>	<p>Changes Made</p> <p>On page 43 of the document the final issue and key option (5) and list of baseline data has been amended to read as follows:</p> <p>Issue: The landscape and the townscape are potentially vulnerable to unsympathetic new development.</p> <p>Key Option: Ensure developments recognise the need for landscape and townscape conservation and enhancement, including retention of key landscape and townscape features. Ensure further landscape and townscape protection through strong conformity with the Landscape Character Assessment, including neighbouring Landscape Character Assessments, and Conservation Area Appraisals.</p>
	<p>We would like to see the Landscape and Townscape issues (at least) on page 52 redrafted and expressed more explicitly in landscape or townscape terms. While implications for landscape or townscape may be inferred from the current list in many cases, there is scope for confusion.</p>	<p>Agree</p>	<p>Changes Made</p> <p>On page 52 and throughout the document the Landscape and Townscape issues have been amended and to read as follows:</p> <p>The number and percentage of new dwellings completed on previously developed land is below the national target, which has resulted in subsequent loss of Greenfield land. Further expansion could adversely affect the unique character and setting of the landscape and townscape.</p> <p>4.1% of homes are long-term empty homes resulting in a depressing effect on the townscape.</p> <p>Poor quality and distinctiveness of the urban environment has undermined attempts to attract inward investment.</p>

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<p>Countryside Agency City House 126-128 Hills Road Cambridge CB2 1PT</p> <p>Contact: Graham King Position: Senior Countryside Adviser</p> <p>Continued.....</p>			<p>The landscape and the townscape are potentially vulnerable to unsympathetic new development</p> <p>The Borough is experiencing shortfalls of formal and informal open space to the detriment of the urban and rural scene.</p>
	<p>We are content that the objectives as listed provide a reasonable basis for the sustainability appraisal. However, there is an important further step yet to be taken. This is to define the sustainability criteria or questions to be asked by which policies will be appraised against each of the sustainability objectives. It is only when the full sustainability appraisal framework has been developed that it will be possible to judge the true scope and likely effectiveness of the proposed appraisal process. We look forward to being able to comment on this next stage of the work.</p>	<p>No comments</p>	<p>No Changes Made</p>