

# **The Lake Lothing (Lowestoft) Third Crossing Order 201[\*]**

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Lake Lothing  
**THIRD  
CROSSING**

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## **Document SCC/LTC/EX/8: Note of the Updated National Planning Policy Framework**

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**Planning Act 2008**

**Infrastructure Planning**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

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Author: Suffolk County Council

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## Abbreviations

DCO	Development Consent Order
DMRB	Design Manual for Roads and Bridges
ES	Environmental Statement
NPPF	National Planning Policy Framework
PINS	Planning Inspectorate
SCC	Suffolk County Council

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## 1 Introduction

- 1.1.1 An application was submitted by Suffolk County Council (“SCC”) (“the Applicant”) to the Secretary of State (through the Planning Inspectorate (“PINS”) for a Development Consent Order (“DCO”) in July 2018. The application seeks development consent to construct, operate and maintain a new bascule bridge highway crossing, which would link the areas north and south of Lake Lothing in Lowestoft, and which is known as the Lake Lothing Third Crossing (or ‘the scheme’).
- 1.1.2 PINS accepted the application for examination on 9 August 2018.
- 1.1.3 Since the application was submitted, the National Planning Policy Framework has been updated and this document seeks to explain how these revisions affect the application documentation.
- 1.1.4 Additionally, the Design Manual for Roads and Bridges (“DMRB”) is in the process of being amended but at present only a small number of revised documents have been issued to date, set out at Appendix 1, which do not affect the reference design.
- 1.1.5 The Applicant maintains a ‘watching brief’ on other Government guidance documents and industry standards and will update the Examining Authority where these may have a material effect on the application.

## 2 National Planning Policy Framework

### 2.1 Introduction

2.1.1 The National Planning Policy Framework (“NPPF”) has been revised and an updated version was published by the Ministry of Housing, Communities and Local Government in July 2018. As with the previous version, the NPPF sets out the Government’s planning policies and how these should be applied; it is a material consideration in planning decisions.

### 2.2 Effect of the revised NPPF on DCO application documents

2.2.1 Overall, the revised NPPF does not significantly change the content of the Application documents and their respective appendices and has led to minor editing changes only.

2.2.2 The Applicant’s technical advisors have assessed the revised NPPF against the methodologies contained within the Environmental Statement and the Transport Assessment and have concluded that no further substantive work needs to be undertaken as a result of any changes.

### 2.3 Documents requiring amendment

2.3.1 The NPPF is quoted extensively throughout DCO documentation, most notably in the Environmental Statement and its appendices, and in the Case for the Scheme. A full list of the documents requiring amendment is set out below in Table 2-1.

*Table 2-1 – Documents requiring amendment*

Document	Document Reference	PINS Reference	Relevant Table
Environmental Statement	6.1	APP-136	2-2
Cultural Heritage Desk Based Assessment – Appendix 9A	6.3	APP-174	2-3
Preliminary Ecological Appraisal – Appendix 11A	6.3	APP-183	2-4
Environmental Desk Study – Appendix 12A	6.3	APP-190	2-5
Ground Investigation Report – Appendix 12B	6.3	APP-192	2-6
Flood Risk Assessment – Appendix 18A	6.3	APP-202	2-7
Habitats Regulation Assessment	6.5	APP-206	2-8
Case for the Scheme	7.1	APP-091	2-9
Transport Assessment	7.2	APP-093	2-10

2.3.2 Set out below in Tables 2-2 to 2-10 are references made to the NPPF in the DCO documents alongside proposed amendments, where applicable, to reflect the revised NPPF.

*Table 2-2 – Amendments relating to the revised NPPF in relation to the Environmental Statement (document reference 6.1 / PINS document reference APP-136)*

Paragraph Reference	Current Text	Amended Text
Para 9.2.2	<i>Heritage assets which are not designated as SMs are protected through the development management process under the TCPA 1990 and the NPPF.</i>	No change required.
Para 9.2.9	<i>The NPPF requires developers to assess Heritage Assets as part of their planning applications and to record assets that cannot be conserved as part of the works. This includes both designated and undesignated assets.</i>	No change required.
Para 9.3.2	<i>The (Heritage) assessment has referenced the NNNPS, NPSP and the NPPF.</i>	No change required.
Para 9.4.18	<i>These sites (locally listed buildings) are not nationally designated, however, they are included on a list of local heritage assets, which means that their conservation as a heritage asset is an objective of the NPPF. These locally listed buildings have been included within the scope of this assessment following consultation with WDC.</i>	No change required.
Section 10.2 Table 10-1	<i>The Planning Practice Guidance provides practical guidance to support the NPPF. The policy document provides guidance to local authorities on consideration of the intrinsic character and beauty of the countryside, including both designated and undesignated landscapes.</i>	No change required.
Para 11.2.22	<i>The National Planning Policy Framework (NPPF) 2012</i>	The substantive text is the same. Text requires change only

Paragraph Reference	Current Text	Amended Text
	<p><i>(DCLG, 2012)</i></p> <p><i>National planning policy on the protection of biodiversity is set out in the NPPF. The NPPF requires that impacts on biodiversity are minimised and projects provide net gains in biodiversity where possible and opportunities to incorporate biodiversity in and around developments should be encouraged.</i></p>	<p>to year of NPPF.</p>
<p>Para 12.2.13</p>	<p><i>National Planning Policy Framework 2012</i></p> <p><i>NPPF (paragraphs 120-122) provides guidance on land contamination issues. These include local policies and decisions that ensure development sites are suitable for use, taking account of ground conditions and pollution arising from previous uses, as well as any proposals for land remediation.</i></p>	<p>The substantive text is the same. Text requires change only to year of NPPF and paragraph numbers of 178-180.</p>
<p>Para 12.2.14</p>	<p><i>Paragraph 120 of the NPPF states that</i></p> <p><i>“To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.”</i></p>	<p>Requires change to:</p> <p><i>Paragraph 179 and 180 of the NPPF states that</i></p> <p><i>“Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner” and that “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the</i></p>

Paragraph Reference	Current Text	Amended Text
		<i>development</i> ".
Para 13.2.12	<i>The NNNPS goes on to state in paragraph 5.193 that developments must be undertaken in accordance with the statutory requirements for noise and that due regard must be given to the relevant sections of the NPSE (Noise Policy Statement for England) and the NPPF.</i>	No change required.
Para 13.2.19	<p><i>The NPPF was published in March 2012 and sets out the following generic guidance relating to noise in paragraph 123, which supports the long term vision of the NPSE...</i></p> <p><i>Planning policies and decisions should aim to:</i></p> <ul style="list-style-type: none"> <li><i>• Avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development;</i></li> <li><i>• Mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;</i></li> <li><i>• Recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and</i></li> <li><i>• Identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."</i></li> </ul>	<p>Requires change to:</p> <p><i>A revised NPPF was published in July 2018 and sets out the following generic guidance relating to noise in paragraph 180, which supports the long-term vision of the NPSE.</i></p> <p><i>"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</i></p> <ol style="list-style-type: none"> <li><i>a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;</i></li> <li><i>b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and</i></li> </ol>

Paragraph Reference	Current Text	Amended Text
		<p><i>c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”</i></p> <p><i>Reference number 60 of the above quotation points to the NPSE.</i></p>
Para 14.2.13	<p><i>This outlines the Government’s ambition to promote a sustainable approach to resource use and management. It sets out waste planning policies, and should be read alongside: the National Planning Policy Framework; the National Waste Management Plan for England and successor policies, guidance or documents.</i></p>	No change required.
Para 14.2.14	<p><i>The National Planning Policy Framework (NPPF) does not include policies for waste management as it defers to the National Waste Management Plan for England (see Paragraph 14.2.15) but does encourage the prudent use of natural resources.</i></p>	The substantive text is the same. Text requires change only to year of NPPF.
Section 15.2 Table 15-1	<p><i>The NPPF was published in March 2012 by the Government. The document streamlines national planning policy into a consolidated set of priorities, replacing most Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) notes. The NPPF sets out 12 core planning principles that should underpin decision taking including the need for the planning system to support the development of infrastructure that meets the country’s needs and responds to the</i></p>	<p>Requires change to:</p> <p><i>A revised NPPF was published in July 2018 by the Government. The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development and therefore has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways; these are economic, environmental and social objectives.</i></p>

Paragraph Reference	Current Text	Amended Text
	<i>opportunities for growth.</i>	
Section 16.2 Table 16-1	<i>Paragraph 3.3 (of the NNNPS) requires that in delivering new schemes, “reasonable opportunities to deliver environmental and social benefits as part of the schemes” should be considered and that environmental and social impacts should be mitigated in line with the principles set out in the National Planning Policy Framework (NPPF) and the Government’s planning guidance.</i>	No change required.
Section 16.2 Table 16-1	<p><i>National Planning Policy Framework (NPPF) (March 2012)</i></p> <p><i>The NPPF was published in March 2012 by the Government. The NPPF sets out 12 core planning principles that should underpin decision taking including proactively supporting sustainable economic development including delivery of the infrastructure that the country needs and responding positively to wider opportunities for growth.</i></p> <p><i>NPPF Paragraph 7 refers to the policy framework providing a three dimensional guideline for achieving sustainable development...</i></p> <p><i>...NPPF Paragraph 21 addresses the need of development to be supported by appropriate local plans especially in infrastructure...</i></p> <p><i>...NPPF paragraph 28 supports a prosperous rural economy through policies that encourage economic growth in rural areas by creating jobs, prosperity and taking a positive</i></p>	<p>Requires change to:</p> <p><i>Revised National Planning Policy Framework (NPPF) (July 2018)</i></p> <p><i>A revised NPPF was published in July 2018 by the Government. The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development and therefore has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways; these are economic, environmental and social objectives. In terms of achieving economic and social objectives the NPPF sets out in Paragraph 8 that the planning system can help “build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types if available in the right paces and at the right time to support growth, innovation and improved productivity; and by identifying and</i></p>

Paragraph Reference	Current Text	Amended Text
	<i>approach to sustainable new development.</i>	<p><i>coordinating the provision of infrastructure” and can “support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”.</i></p> <p><i>...NPPF Paragraphs 80 to 82 address the need of development to be supported by appropriate local plans especially in infrastructure...</i></p> <p><i>...NPPF paragraphs 83 and 84 supports a prosperous rural economy through policies that encourage economic growth in rural areas by creating jobs, prosperity and taking a positive approach to sustainable new development.</i></p>
Para 17.2.12	<i>The NPPF for England was published in March 2012. Sustainability principles are embedded within the framework, which include enhancement of the natural environment and pollution reduction. These principles are a recurrent theme throughout the document. It also refers to the consideration of River Basin Management Plans.</i>	The substantive text is the same. Text requires change only to year of NPPF.
Para 17.2.13	<i>Additionally, it is stated in the NPPF (para. 109) that the planning system should contribute to and enhance the natural environment by “preventing both new and existing</i>	The substantive text is the same. Text requires change only to paragraph number of NPPF to 170.

Paragraph Reference	Current Text	Amended Text
	<i>development from contributing to, being put at unacceptable risk from or being adversely affected by, unacceptable levels of soil, air, water, or noise pollution or land instability”.</i>	
Para 18.2.5	<i>...The NNNPS states that the FRA should be carried out with reference to the guidance from the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG) document. The NPS for Ports (PNPS) provides guidance for assessing flood risk associated with development in ports and acknowledges that whilst development within ports is ‘water-compatible’ and therefore is permitted in high flood risk areas, it is still necessary to undertake a FRA in line with the NPPF.</i>	No change required.
Para 18.2.6	<i>In Paragraph 5.98 of the NNNPS it states:” Where flood risk is a factor in determining an application for development consent, the Secretary of State should be satisfied that, where relevant:</i> <ul style="list-style-type: none"> <li><i>• the application is supported by an appropriate FRA;</i></li> <li><i>• the Sequential Test (see the National Planning Policy Framework) has been applied as part of site selection and, if required, the Exception Test (see the National Planning Policy Framework).”</i></li> </ul>	No change required.
Para 18.2.8	<i>The Paragraphs 99 to 108 of the NPPF outline the development requirements in terms of flood risk and the impact of climate change. The UK Government’s Department for Communities and Local Government PPG ID7 (March</i>	Requires change to: <i>The Paragraphs 148 to 169 of the revised NPPF outline the development requirements in terms of flood risk and the</i>

Paragraph Reference	Current Text	Amended Text
	<p>2014) for Flood Risk and Coastal Change provides additional guidance in the implementation of the NPPF in relation to development and flood risk.</p> <p>NPPF requires developments to be “safe, without increasing flood risk elsewhere” and, where possible to “reduce flood risk overall”. Priority is given to the use of Sustainable Drainage Systems (SuDS) within the NPPF.</p>	<p>impact of climate change. The UK Government’s Ministry for Housing, Communities and Local Government PPG ID7 (March 2014) for Flood Risk and Coastal Change provides additional guidance in the implementation of the NPPF in relation to development and flood risk.</p> <p>NPPF requires developments to be “safe for its lifetime without increasing flood risk elsewhere” and, where possible to “reduce flood risk overall”. Priority is given to the use of Sustainable Drainage Systems (SuDS) within the NPPF.</p>
Para 18.3.15	<p>Table 18-2 compares the magnitude of impact with the flood risk vulnerability of receptors (taken from Table 2 within the NPPF PPG for flood risk and coastal change) to demonstrate when mitigation is required...</p>	<p>No change required as the Planning Practice Guidance, where Table 2 is located, has not been updated to reflect any change (last revised on 6 March 2014).</p>
Para 19.2.5	<p>The National Policy Statement for National Network (NNNPS), January 2015, sets out the need for, and Government policies to deliver, development of nationally significant infrastructure projects on the national road networks in England. The NNNPS works to complement the overall strategic aims of the National Planning Policy Framework (NPPF).</p>	<p>No change required.</p>
Para 19.3.1	<p>The following guidance documents have been considered in this assessment:</p> <p>...DCLG National Planning Policy Framework (2012)...</p>	<p>Reference should now be to 2018 NPPF.</p>

Paragraph Reference	Current Text	Amended Text
Para 19.3.29	<i>The importance of walking and cycling in contributing towards sustainable travel patterns is outlined in the NPPF and the NNNPS, which places focus on the roles that walking and cycling can play as both the main modes of transport or as part of a longer journey by public transport.</i>	No change required as the NPPF still highlights the importance of contributing towards sustainable travel, walking and cycling

Table 2-3 – Amendments relating to the revised NPPF in relation to the Cultural Heritage DBA (Appendix 9A) (document reference 6.3 / PINS document reference APP-174)

Paragraph Reference	Current Text	Amended Text
Para 3.1.1	<i>The requirement for an assessment of heritage is outlined in Policy 128 of the National Planning Policy Framework (NPPF) which outlines the need to identify and assess all heritage assets, their significance and the impact the proposals may have upon them</i>	Substantive text still correct. Change only to NPPF paragraph reference which should now read '189'.
Para 3.1.4	<i>Section 12 of the NPPF sets out policies relating to the conservation and enhancement of the historic environment...</i>	Substantive text still correct. Change only to NPPF section reference which should now read '16'.
Para 3.2.6	<i>Development proposals should seek to retain and re-use existing listed or locally listed buildings unless it can be demonstrated that demolition would produce substantial benefits for the community in accordance with policy guidance set out in Planning Policy Statement 5 (PPS5: since</i>	No change required as this references the Lowestoft Lake Lothing & Outer Harbour Area Action Plan which contains this text and the NPPF replaced PPS5.

Paragraph Reference	Current Text	Amended Text
	<i>superseded by the National Planning Policy Framework, NPPF)...</i>	

*Table 2-4 – Amendments relating to the revised NPPF in relation to the Preliminary Ecological Appraisal (Appendix 11A) (document reference 6.3 / PINS document reference APP-183)*

Paragraph Reference	Current Text	Amended Text
Para 1.4.1	<i>This PEA has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England. ...The National Planning Policy Framework (NPPF) 2012 (DCLG, 2012)...</i>	Only the year of the NPPF reference needs to change to 2018.

*Table 2-5 – Amendments relating to the revised NPPF in relation to the Environmental Desk Study (Appendix 12A) (document reference 6.3 / PINS document reference APP-190)*

Paragraph Reference	Current Text	Amended Text
Section 1.3	<i>Where development is undertaken on land which may be affected by contamination, the National Planning Policy Framework, paragraphs 120 to 122 considers pollution and remediation.</i>	Requires change to the paragraph number references, now 178, 179, 183: <i>Where development is undertaken on land which may be affected by contamination, the National Planning Policy</i>

Paragraph Reference	Current Text	Amended Text
		<i>Framework, paragraphs 178, 179 and 183 considers pollution and remediation.</i>

*Table 2-6 – Amendments relating to the revised NPPF in relation to the Ground Investigation Report (Appendix 12B) (document reference 6.3 / PINS document reference APP-192)*

Paragraph Reference	Current Text	Amended Text
Para 1.4.1	<i>The project was undertaken in the legislative and policy context of: The National Planning Policy Framework (2012)</i>	Only the year of the NPPF reference needs to change to 2018.

*Table 2-7 – Amendments relating to the revised NPPF in relation to the Flood Risk Assessment (Appendix 18A) (document reference 6.3 / PINS document reference APP-202)*

Paragraph Reference	Current Text	Amended Text
Para 1.2.2	<i>More comprehensive guidance regarding the FRA process is provided in the NPPF and PPG, therefore this FRA has been carried out in accordance with the requirements of these documents as well as the NPS for National Networks.</i>	No change required.
Para 1.3.1	<i>The NPPF sets out the framework for planning decisions made by local, regional and national government and the Environment Agency (EA). The NPPF advises that FRAs are</i>	No change required. This text is contained within a footnote of the revised NPPF.

Paragraph Reference	Current Text	Amended Text
	<i>required for all developments in Flood Zones 2, 3a and 3b and for all development sites in Flood Zone 1 that are 1 hectare (ha) or greater...</i>	
Para 4.1.2	<i>The NNNPS recognises that as a result of climate change, the risk of flooding will increase within the lifetime of NSIPs. The NNNPS states that the FRA should be carried out with reference to the guidance from the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG) document. The NNNPS also states that flood risk should not be increased elsewhere as a result of a NSIP development. The NPS for Ports (PNPS) provides guidance for assessing flood risk associated with development in ports and acknowledges that whilst development within ports is 'water-compatible' and therefore is permitted in high flood risk areas, it is still necessary to undertake a FRA in line with the NPPF.</i>	No change required.
Section 4.2	<i>Section on National Planning Policy Framework</i>	No change required as the Planning Practice Guidance has not been updated to reflect any change (last revised on 6 March 2014).
Para 5.1.17	<i>The document considers that essential actions to achieve the preferred approach are as follows: ...Encourage planners to develop policies for new development and regeneration (including commercial sites) to incorporate resilience measures so that the location, layout</i>	No change required as this references the Broadland Rivers Catchment Flood Management Plan which contains this text and the NPPF replaced the Planning Policy Statement.

Paragraph Reference	Current Text	Amended Text
	<i>and design of development can help to reduce flood risk. Planners should prevent inappropriate development in the floodplain using measures set out in Planning Policy Statement 25 (now replaced by the NPPF), and ensure that any new development does not increase the risk to existing development. Any new development or regeneration should provide opportunities to improve the river environment and make space for water”.</i>	
Para 6.1.8	<i>Sea level rise at Lowestoft 120 years in the future was therefore calculated using the following: NPPF Flood risk assessments: climate change allowances...</i>	No change required.
Para 6.1.9	<i>The highest sea level rise was calculated using the climate change allowances given in the NPPF (a rise of 1.54m by 2140) and this value has been used in this assessment as agreed with the EA.</i>	No change required.
Para 6.1.11	<i>It has been agreed with the EA that the Scheme design does not need to mitigate for the impacts predicted by the model for the high risk, low probability H++ event. The climate change scenario representing flood risk in Lowestoft in 2140 (using Table 3 of the NPPF) allowance for sea level rise has been used to inform the design and mitigation of the Scheme.</i>	No change required as the Planning Practice Guidance, where Table 3 is located, has not been updated to reflect any change (last revised on 6 March 2014).
Para 6.1.14	<i>...Table 6-3 compares the magnitude of impact with the flood risk vulnerability of a receptor (taken from Table 2 within the NPPF PPG for flood risk and coastal change) to demonstrate</i>	No change required as the Planning Practice Guidance, where Table 2 is located, has not been updated to reflect

Paragraph Reference	Current Text	Amended Text
	<i>when mitigation is required.</i>	any change (last revised on 6 March 2014).
Para 6.2.4	<i>The NPPF states that an FRA should include an assessment to determine the potential increase in flood risk as a result of an increase in hard surfaces within the red line boundary and the effect of the Scheme on surface water (from rainfall) runoff.</i>	No change required.
Para 6.2.9	<i>In terms of applying climate change allowances to the increase in peak flows (runoff) from the Scheme, the EA guidance recommends that allowances are applied based on the Flood Zone and flood risk vulnerability classification. The Scheme is classified as 'Essential Infrastructure' in accordance with the NPPF PPG and parts of the Scheme boundary are located within Flood Zones 2 and 3 (3a), therefore the EA guidance recommends using the upper end climate change allowance...</i>	No change required as still listed as Essential infrastructure in the Planning Practice Guidance (which has not been updated to reflect any change (last revised on 6 March 2014)).
Para 9.1.1	<i>This FRA has been prepared for the Scheme in line with the NPPF, the PPG and in consultation with the EA...</i>	No change required. The general text for flood and climate change has not changed greatly and the Planning Practice Guidance, where Table 3 is located, has not been updated to reflect any change (last revised on 6 March 2014).
Annex A EA Letter to Michael Wilks dated 05/10/16	<i>We agree with the approach to undertake a baseline and post development run. It is important to ensure that the proposed crossing does not increase flood risk elsewhere and where possible reduces flood risk overall in line with Paragraph 102 of the National Planning Policy Framework (NPPF).</i>	No change required as this reference was correct when the EA letter was written. The guidance in paragraph 102 of the NPPF (2012) is now to be found in paragraph 160 of the NPPF (2018).

Paragraph Reference	Current Text	Amended Text
Annex A EA Letter to Michael Wilks dated 23/11/16	<i>Before we can determine the appropriate climate change allowances it is important to note the text in the National Planning Policy Statement.</i>	No change required as this reference was correct when the EA letter was written. The guidance in paragraph 102 of the NPPF (2012) is now to be found in paragraph 160 of the NPPF (2018).
Annex A EA Letter to Julia Hunt dated 25/05/17	<i>A recent investigation has found that these levels (50% high emissions) can be lower than those provided in the NPPF sea level allowances in Table 3 available on our website here... ...Therefore the tidal sea level allowances within Table 3 of the NPPF on our website were not changed to reflect the UKCP09 model as it was seen to be an underestimated. On this basis it is possible that both the medium and high emissions scenarios tidal allowances are lower than those provided in the NPPF Table 3.</i>	No change required as this reference was correct when the EA letter was written. The guidance in paragraph 102 of the NPPF (2012) is now to be found in paragraph 160 of the NPPF (2018).
Annex A EA Letter to Julia Hunt dated 08/05/18	<i>The Planning Practice Guidance to the National Planning Policy Framework states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.</i>	No change required as this reference was correct when the EA letter was written. The guidance in paragraph 102 of the NPPF (2012) is now to be found in paragraph 160 of the NPPF (2018).
Annex B Para 3.2.6	<i>In line with the recommendation from the EA, the climate change sea level rise has been defined as the worst case scenario following an assessment of five different guidance documents. The guidance documents recommended by the EA were:</i>	No change required as the Planning Practice Guidance, where Table 3 is located, has not been updated to reflect any change (last revised on 6 March 2014).

Paragraph Reference	Current Text	Amended Text
	<i>National Planning Policy Framework (NPPF)-Table 3...</i>	
Annex B Para 3.2.7	<i>... The climate change sea level increase worst case scenario was 1.54m from the NPPF-table 3. This has been applied to the tidal curves representing the present day scenario in order to create tidal curves representing the climate change scenario for each design event.</i>	No change required as the Planning Practice Guidance, where Table 3 is located, has not been updated to reflect any change (last revised on 6 March 2014).
Annex B, Appendix 2 Section 3.10	<i>They (the EA) have recommended a comparison between five different guidance's and the worst case to be considered. The five guidance datasets/tables are: National Planning Policy Framework (NPPF) - Table 3... ...The information for the NPPF – Table 3 and Upper End allowance- Table 5 are available on the internet... ... Following the assessment, the NPPF – Table 3 returned the largest increase. The estimated sea level rise used in the simulation is 1.54m...</i>	No change required as the Planning Practice Guidance, where Table 3 is located, and the EA Guidance, where table 5 is located, has not been updated to reflect any change
Annex B, Appendix 2 Section 4 – Table 13	<i>Climate change Scenario (based on the NPPF-Table 3)</i>	No change required as the Planning Practice Guidance, where Table 3 is located, has not been updated to reflect any change (last revised on 6 March 2014).
Annex B, Appendix 2 Section 5 – Figure A2	<i>Final present day climate change scenario tidal curves (based on NPPF-Table 3 probability scenario)</i>	No change required as the Planning Practice Guidance, where Table 3 is located, has not been updated to reflect any change (last revised on 6 March 2014).

*Table 2-8 – Amendments relating to the revised NPPF in relation to the Habitat Regulations Assessment (document reference 6.5 / PINS document reference APP-206)*

Paragraph Reference	Current Text	Amended Text
Para 2.1.6	<i>Although Ramsar sites are not legislated under European legislation, the National Planning Policy Framework and Planning Practice Guidance consider that they should be afforded the same level of consideration and protection as SACs and SPAs.</i>	No change required.

*Table 2-9 – Amendments relating to the revised NPPF in relation to the Case for the Scheme (document reference 7.1 / PINS document reference APP-091)*

Paragraph Reference	Current Text	Amended Text
Para 1.2.1	<i>Section 8 considers other relevant national and local policy, including the National Planning Policy Framework (“the NPPF”), ...</i>	No change required.
Para 6.1.4	<i>Matters of importance and relevance might include relevant policies in the NPPF and in the local development plan documents, which are covered in section 7 and 8 of this document ...</i>	No change required.
Para 7.3.46	<i>The climate change scenario representing flood risk in Lowestoft in 2140 (using Table 3 of the NPPF) allowance for</i>	No change required as the Planning Practice Guidance, where Table 3 is located, has not been updated to reflect

Paragraph Reference	Current Text	Amended Text
	<i>sea level rise has been used to inform the design and mitigation of the Scheme ...</i>	any change (last revised on 6 March 2014).
Para 8.1.1	<i>The NPPF came into force in March 2012 and sets out the Government’s planning policies and how these are expected to be applied. The onus of the NPPF is to achieve sustainable development in terms of economic, environmental and social aspects. Paragraph 3 of the NPPF states that the framework does not contain specific policies for NSIPs although they are determined in accordance with the PA 2008 and relevant NPSs, as well as “any other matters that are considered both important and relevant (which may include the National Planning Policy Framework)”.</i>	Requires change to: <i>A revised NPPF came into force in July 2018 and sets out the Government’s planning policies for England and how these should be applied. Paragraph 5 of the NPPF states that the framework does not contain specific policies for NSIPs and that they are determined in accordance with the PA 2008 and relevant NPSs for major infrastructure, as well as “any other matters that are relevant (which may include the National Planning Policy Framework)”.</i> The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development and therefore has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways; these are economic, environmental and social objectives. In terms of achieving economic objectives the NPPF sets out in Paragraph 8 that the planning system can help “build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types if available in the right paces and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”.
Para 8.1.2	<i>Paragraph 1.17 of the NNNPS states that the “overall strategic aims of the National Planning Policy Framework</i>	No change required.

Paragraph Reference	Current Text	Amended Text
	<p><i>(NPPF) and the NPS are consistent, however, the two have differing but equally important roles to play". The NPPF goes on to state in paragraph 1.17 that the "NPPF is also likely to be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project". Therefore, the consistency of the Scheme with the overall aims of the NPPF is discussed here. Where the NPS makes reference to NPPF policies these are covered in section 8.1 above and in Appendix A.</i></p>	
<p>Para 8.1.3</p>	<p><i>The first overarching objective set out in the NPPF is to build a strong, competitive economy. Paragraph 19 explains that a key role of the planning system is to do "everything it can to support sustainable economic growth. Therefore significant weight should be placed on the need to support economic growth through the planning system". The Scheme supports the growing role of Lowestoft in the energy sector which through CORE status, Assisted Area and Enterprise Zone status has the capacity to create more jobs and enable further economic growth.</i></p>	<p>Requires change to: <i>Section 6 of the revised NPPF relates to building a strong, competitive economy. Paragraph 80 states that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development". The Scheme seeks to support both local business needs, which were identified through the business survey (refer to paragraphs 4.7.8 and 4.7.9 of this document) and the growing role of Lowestoft in the energy sector which through CORE status, Assisted Area and Enterprise Zone status has the capacity to create more jobs and enable further economic growth.</i></p>
<p>Para 8.1.4</p>	<p><i>One of the NPPF's principles for planning contained in paragraph 17 is that it should proactively drive and support</i></p>	<p>Delete whole paragraph – no longer relevant and Para 162</p>

Paragraph Reference	Current Text	Amended Text
	<p><i>sustainable economic development to deliver infrastructure, amongst other matters. Paragraph 162 states that local planning authorities should work with other authorities and providers to “take account of the need for strategic infrastructure including nationally significant infrastructure within their areas”. The Applicant has closely worked with other authorities and agencies to promote and develop the Scheme, and as such, it is fully meeting this requirement of the NPPF.</i></p>	<p>referred to is in relation to plan-making.</p>
<p>Para 8.1.5</p>	<p><i>The Scheme is supported by the principles and objectives of the NPPF as it would provide critical infrastructure to help deliver economic growth and support the housing growth that is anticipated in Lowestoft over the coming decades.</i></p>	<p>No change required.</p>
<p>Footnote 49</p>	<p><i>In February 2018 the Ministry of Housing, Communities &amp; Local Government issued a draft revised NPPF for consultation. This proposes some updates to the current guidance in the NPPF but the final version has not yet been published. The Applicant will review the final version of the revised NPPF once available and provide any updates as appropriate during Examination.</i></p>	<p>Footnote 49 can be deleted.</p>
<p>Para 8.4.8</p>	<p><i>WDC is currently preparing a new Local Plan for the District (excluding the Broads Authority area). Consultation on the Waveney Final Draft Local Plan ran from Thursday 29 March 2018 to Thursday 24 May 2018. The plan is expected to be</i></p>	<p>Requires change to: <i>WDC is currently preparing a new Local Plan for the District (excluding the Broads Authority area). Consultation on the Waveney Final Draft Local Plan ran from Thursday 29</i></p>

Paragraph Reference	Current Text	Amended Text
	<p><i>submitted for examination in summer 2018. The NPPF, in paragraph 216, states that “from the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:</i></p> <ul style="list-style-type: none"> <li><i>• the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);</i></li> <li><i>• the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and</i></li> <li><i>• the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)”.</i></li> </ul>	<p><i>March 2018 to Thursday 24 May 2018. The plan was submitted for examination in June 2018. The NPPF, in paragraph 48, states that “local planning authorities may also give weight to relevant policies in emerging plans according to:</i></p> <ul style="list-style-type: none"> <li><i>• the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);</i></li> <li><i>• the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and</i></li> <li><i>• the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)”.</i></li> </ul>
Para 8.4.10	<p><i>The emerging plan proposes a similar spatial strategy as set out in the Core Strategy. Emerging Policy WLP1.2 (Presumption in Favour of Sustainable Development) follows the spirit of the NPPF by supporting development proposals that accord with the policies in the Local Plan, and approving them without delay. In acknowledging the weight of emerging policies, the sections below comprise the assessment of the Scheme against the current development plan as well as the relevant emerging policies of the Waveney Final Draft Local</i></p>	No change required.

Paragraph Reference	Current Text	Amended Text
	<i>Plan.</i>	
Appendix A, page 25	<p><i>The NPPF sets out the following at Paragraph 102:</i></p> <p><i>“For the exception test to be passed:</i></p> <ol style="list-style-type: none"> <li><i>1. it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by the Strategic Flood Risk Assessment referenced in the FRA, and;</i></li> <li><i>2. a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall”.</i></li> </ol>	<p>Requires change to:</p> <p><i>The NPPF sets out the following at Paragraph 160:</i></p> <p><i>“For the exception test to be passed it should be demonstrated that:</i></p> <ol style="list-style-type: none"> <li><i>1. the development would provide wider sustainability benefits to the community that outweigh the flood risk; and</i></li> <li><i>2. the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall”.</i></li> </ol>
Appendix A, page 45	<i>The Scheme is not anticipated to create any significant residual impacts that are severe in the context of paragraph 32 of the NPPF.</i>	Substantive text still correct. Change only to NPPF paragraph reference which should now read '109'.
Appendix A	References to the NPPF on pages 9, 19, 28, 32, 43.	All are general comments and a change to the text is therefore not required.

Table 2-10 – Amendments relating to the revised NPPF in relation to the Transport Assessment (document reference 7.2 / PINS document reference APP-093)

Paragraph Reference	Current Text	Amended Text
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Paragraph Reference	Current Text	Amended Text
Para 1.2.4	<p><i>The TA has been prepared in the light of the National Policy Statement for National Networks (NNNPS) 20153, which highlights the need to develop the national road network and sets out the principles of assessment to be followed for NSIP applications, the National Planning Policy Framework (NPPF)4, to the extent relevant, and other national and local standards and guidance as appropriate. Section 2 of this TA shows how the Scheme aligns with the aims and objectives of the NNNPS, and with other relevant plans and policies.</i></p>	<p>No change required.</p>
Para 2.2.4	<p><i>This is reflected in Paragraph 1.19 of the NNNPS which sets out that the NPPF makes clear that it is not intended to contain specific policies for NSIPs and that the NNNPS will assume that function and provide transport policy which guides individual transport schemes brought under it.</i></p>	<p>No change required.</p>
Para 2.2.14	<p><i>NPPF 2012</i></p> <p><i>The NPPF was published in March 2012 and sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the framework is the presumption in favour of sustainable development. The framework has been drafted to reflect the law following the implementation of the Localism Act 2011.</i></p>	<p>Requires change to:</p> <p><i>NPPF 2018</i></p> <p><i>A revised NPPF was published in July 2018 which sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the framework is the presumption in favour of sustainable development.</i></p>

Paragraph Reference	Current Text	Amended Text
Para 2.2.15	<p><i>Paragraph 32 of the NPPF states:</i></p> <p><i>“All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment.”</i></p>	<p>Requires change to:</p> <p><i>Paragraph 111 of the NPPF states:</i></p> <p><i>“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.</i></p>
Para 2.2.16	<p><i>Paragraph 32 also goes on to state:</i></p> <p><i>“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”</i></p>	<p>Requires change to:</p> <p><i>Paragraph 109 also states that:</i></p> <p><i>“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.</i></p>
Para 2.2.17	<p><i>Whilst the Scheme will not in itself generate significant amounts of movement, the Scheme will lead to the re-assignment of existing movements on a large scale, both on the immediate approaches to the Scheme and more widely across the town. It is therefore important to review the impacts of these traffic changes against relevant policies in the NPPF. These include the ‘severe’ test in paragraph 32 of the NPPF for any residual impacts.</i></p>	<p>Substantive text still correct. Change only to NPPF paragraph reference which should now read ‘109’.</p>

Paragraph Reference	Current Text	Amended Text
Para 2.2.18	<i>NPPF is supported by the Planning Practice Guidance of March 2014.</i>	No change required.
Para 2.2.19	<i>In line with the above, the Scheme aligns with the guidance provided in the NPPF. The Scheme does not generate any traffic in its own right; however, it provides alternative options for route choice for strategic and local traffic in Lowestoft and incorporates new infrastructure for sustainable travel modes. The assessment set out in this TA demonstrates that the Scheme has beneficial effects for movements across the town, and residual impacts on the network are not severe.</i>	No change required.
Footnote 8	<i>In February 2018 the Ministry of Housing, Communities &amp; Local Government issued a draft revised NPPF for consultation. This proposes some updates to the current guidance in the NPPF but the final version has not yet been published. The Applicant will review the final version of the revised NPPF once available and provide any updates as appropriate.</i>	Footnote 8 can be deleted.
Para 12.1.1	<i>This Section considers the residual and cumulative impacts and benefits, which are reviewed and described in detail throughout this TA. The cumulative impacts of development are assessed within this TA through the inclusion of the development and infrastructure Uncertainty Log within the SATURN assessment and the resulting operational modelling, as described within Section 6 of this TA, i.e. it</i>	Substantive text still correct. Change only to NPPF paragraph reference which should now read '109'.

Paragraph Reference	Current Text	Amended Text
	<i>forms part of the DM and DS scenarios. As such, the residual cumulative impacts and benefits of the Scheme are considered within the context of the NNNPS and paragraph 32 of the NPPF.</i>	
Para 12.1.6	<i>Overall, the residual cumulative impact of the Scheme is beneficial and therefore cannot be considered to be severe in the context of paragraph 32 of the NPPF.</i>	Substantive text still correct. Change only to NPPF paragraph reference which should now read '109'.

## Appendix 1

*Table A-1 – DMRB Amended Documents*

Document Reference	Title	Date of Issue	Decimal Reference	Replaced By
<b>Standards and Advice Notes withdrawn since October 2018</b>				
GG 000 Aug 2018	Alphanumeric And Volume Contents	Aug 2018	0.1.1	GG 000 Oct 2018
BD 27/86	Materials for the Repair of Concrete Highway Structures	Nov 1986	3.3.2	Nil
CD 360	Use of Compressive Membrane Action in Bridge Decks	Jun 2018	3.4.20	CD 360 (revision 1)
CD 526	Spacing of Road Gullies	Aug 2018	4.2.3	CD 526 (revision 1)
HD 19/15	Road Safety Audit	May 2017	5.2.2	GG 119
HD 36/06	Surfacing Materials for New and Maintenance Construction	Nov 2006	7.5.1	CD 236
<b>Standards and Advice Notes withdrawn since August 2018</b>				
GG 000 Jun 2018	Alphanumeric And Volume Contents	Jun 2018	0.1.1	GG 000 Aug 2018
BD 12/01	Design of Corrugated Steel Buried Structures with Spans Greater than 0.9 Metres and up to 8.0 Metres	Nov 2001	2.2.6	CD 375
HA 102/17	Spacing of Road Gullies	Nov 2017	4.2.3	CD 526
	Impact of Road Schemes on Policies and Plans	Aug 1994	11.3.12	Nil
	Disruption Due to Construction	Jun 1993	11.3.3	Nil
<b>Standards and Advice Notes withdrawn since June 2018</b>				
Index May 2018	Alphanumeric And Volume Contents	May 2018	0.1.1	GG 000 June 2018
GD 1/16	Introduction to the Design Manual for Roads and Bridges	May 2016	0.1.2	GG 101
GD 4/12	Standard for Safety Risk Assessment on the Strategic Road Network	Nov 2012	0.2.3	GG 104
BA 87/04	Management of Corrugated Steel Buried Structures	Nov 2009	3.3.4	CS 460

Document Reference	Title	Date of Issue	Decimal Reference	Replaced By
BD 81/02	Use of Compressive Membrane Action in Bridge Decks	May 2002	3.4.20	CD 360
SH 6/73	Criteria for Traffic Light Signals at Junctions	July 1973	8.1.1	Nil
<b>Standards and Advice Notes withdrawn since May 2018</b>				
Index Feb 2018	Design Manual for Roads and Bridges: Volume Contents Pages and Alpha-Numeric Index	Feb 2018	0.1.1	Index May 2018
BA 42/96	The Design of Integral Bridges [Incorporating Amendment No. 1 dated May 2003]	Nov 1996	1.3.12	Nil
BD 15/92	General Principles for the Design and Construction of Bridges. Use of BS 5400: Part 1: 1988	Dec 1992	1.3.2	Nil
BD 20/92	Bridges Bearings Use of BS 5400:PART 9: 1993	Oct 1992	2.3.1	Nil
BD 30/87	Backfilled Retaining Walls and Bridge Abutments	Aug 1987	2.1	Nil
BD 70/03	Strengthened/Reinforced Soils and Other Fills for Retaining Walls and Bridge Abutments Use of BS 8006: 1995, Incorporating Amendment No. 1 Issue 2 March 1999)	May 2003	2.1.5	Nil
BD 82/00	Design of Buried Rigid Pipes	Aug 2000	2.2.10	Nil
TA76/97	Motorway Control Centres	Feb 1997	9.4.2	Nil
<b>Standards and Advice Notes withdrawn since Feb 2018</b>				
Index Nov 2017	Design Manual for Roads and Bridges: Volume Contents Pages and Alpha-Numeric Index	Nov 2017	0.1.1	Index Feb 2018
BA 53/94	Bracing Systems and the Use of U-Frames In Steel Highway Bridges	Dec 1994	1.3.13	Nil
HD 23/99	General Information	Feb 1999	7.1.1	Nil
HD 35/04	Conservation and the Use of Secondary and Recycled Materials	Nov 2004	7.1.2	Nil
HA 217/08	Alternative Filter Media and	Aug 2008	4.2.4	HD 217/18

Document Reference	Title	Date of Issue	Decimal Reference	Replaced By
	Surface Stabilisation Techniques for Combined Surface and Sub-Surface Drains			
TD 89/08	Use of Passively Safe Signposts, Lighting Columns and Traffic signal Posts to BS EN 12767	May 2008	8.2.2	Nil