

Broads Plan 2011 (revised draft) – Schedule of Consultation Responses

Consultation on the revised draft of the Broads Plan 2011 took place from 28 February to 8 April 2011. All comments received, together with the Broads Authority’s response, are set out below. For more information, email broadsplan@broads-authority.gov.uk.

<p>Anglian Water (Planning Liaison)</p>	<p>Thank you for the opportunity to comment on the revised draft. I am pleased to see my comments relating to Q2 & 5 have been noted and with regard to Q4 - the text has been amended to reflect my previous comments.</p>
<p>BA response</p>	<p>Comments noted. No changes to plan.</p>
<p>Broadland District Council</p>	<p>The District Council does not wish to make any representations on the revised draft. However, it is noted that the Appropriate Assessment on the document is a little out-of-date. In section 4.3 “other relevant plans or programmes”, reference is made to the draft Regional Spatial Strategy – East of England Plan though the East of England Plan was adopted in May 2008. In addition, the section makes reference to objectives of the RSS but does not take account of specific policies; for example, presumably the policies setting out levels of housing development should be taken into consideration for their “in combination” effects with elements of the strategy that promote visitors to the Broads. Other development plan documents that have been produced should also be taken into consideration.</p>
<p>BA response</p>	<p>Comments noted. Factual amendments have been made to the Appropriate Assessment.</p>
<p>Broads Reed & Sedge Cutters Assoc</p>	<p>We welcome the revised plan and especially the reference to reed and sedge cutting being the most sustainable form of fen management. The information contained in 4.3.2 Reed and Sedge Cutting (Page 27) is clear and precise. Our Association is pleased that the Authority has initiated a ‘Reed & Sedge Cutting Action Plan’ ref: AL3.2 (page 30). We hope the Authority’s ambition to manage the Broads in a sustainable way, to promote low carbon initiatives and to “work together to tackle the challenges ahead” will prompt a fresh approach to how the fens should be managed in the future.</p> <p>Our only concern is with 4.2 Biodiversity, 4.2.3 Water Quality and Resource and the reference on page 21 that “none of the 13 broads monitored for the EU Water Framework Directive purposes meet the minimum target of ‘good’ overall ecological status/potential., with four broads classified as ‘poor’ and one as ‘bad’” With only one of the 27 river reaches monitored achieving the target ecological classification of ‘good’ there is perhaps a need to widen the mechanisms for delivery with strategic objective BD3 on page 24. Could we suggest a comparison with other wetlands</p>

	<p>in the EU that have similar uses to the Broads to try to establish if different practices or methods have been adopted which have benefited water quality. This may well be outside the current concerns of land management, groundwater resources and salinity.</p> <p>Finally, we hope the desire to “engage with local people” will lead to a better understanding of the needs and wishes for those who live and work in the Broads.</p>
BA response	Comments noted. More explanatory text on Water Framework Directive classification has been added to section 2.2 (water quality and resource).

Brundall Parish Council	<p>1. The Broads Authority is to be commended for reviewing and updating, on a regular basis, its long-term strategy for The Broads and for packing so much detail into 50 pages.</p> <p>2. The Broads are a significant feature of Brundall in terms of the landscape and the River Yare, the boatyards and holiday accommodation, the local population and economy generally. Given the current economic climate, it is a matter of regret that there is no strategic objective, in the landscape and cultural heritage section, about actions to support current local businesses in the Broads to ensure their long term survival and growth.</p> <p>3. The Parish Council would be willing to be involved, in various initiatives promoted by The Broads Authority over the next 5 years as part of the implementation of the Broads Plan, subject to clarification as to the Council’s responsibilities and the availability of the required skills and resources locally.</p> <p>4. The Parish Clerk and I will be attending the Planning Parish Forum at the Broads Authority on 6 April 2011 and at which we will hopefully learn more about the role of Parish Councils, in relation to the implementation of the Broads Plan.</p>
BA response	Comments noted and support welcomed. There are a number of objectives in the plan, supported by spatial planning policy, aimed at promoting sustainable growth in local Broads industries, e.g. farming and land management, heritage skills (e.g. reed and sedge cutting, thatching, boat building), and recreation and tourism provision.

Bungay Town Council	Bungay Town Council has considered the consultation document and support the proposals.
BA response	Comments noted. No changes to plan.

Campaign for National Parks	The Campaign for National Parks (CNP) is grateful for the opportunity to comment on the draft Broads Authority management plan. CNP is the national charity that campaigns to protect and promote National Parks for the benefit
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and enjoyment of all.

We commented on the first draft plan and are pleased to see that many of our concerns from the first draft have been addressed. We welcome the approach taken in the plan of identifying targets against each strategic objective, as this will lead to a plan by which the delivery of the Authority and its partners can be monitored carefully. Some further explanation of the priority status flag would be helpful. Does this mean that targets without a flag may not happen? Overall, we consider that it is a very comprehensive plan, which is particularly strong on the pressing and potentially controversial issue of climate change and how to address it. We think it is very important that the Broads Authority shows leadership in this area – particularly in terms of relationships with local communities and visitor populations, and implications for the natural environment. There are a few areas where we think that the ambition of the objectives or the targets could usefully be enhanced to ensure that the Authority plays the very best role it can in delivering its vision.

Biodiversity

2011 is likely to be a very important year for biodiversity with the new England Biodiversity Strategy being launched in the summer, along with the Natural Environment White Paper and the Government's response to the 'Making space for Nature' (Lawton) review. There is much expectation on National Parks and the Broads to become exemplars of resilient and coherent ecological networks. CNP thinks that the Authorities charged with managing these areas could play a leading role in this respect – particularly because of their broad based partnerships and understanding of the links between the environment and communities, visitors, businesses, public bodies and the voluntary sector.

We agree with the ambition of the long-term aim as set out in this section of the draft Plan, and with the sound strategic objectives – although there may be a case for reviewing these once the documents mentioned above are available later this year. We do feel, however, that some of the targets are much less ambitious than they could be – and, as they stand, we do not think they will not achieve the long term ambition. For example, the strategic objective outlined in BD5 will be absolutely critical for biodiversity in the Broads, and we would suggest that BD5.2 is given priority status. The habitat creation target for this objective (200ha of wetland habitat by 2020) amounts to only 0.7% of the area of the Broads, and over a very long time scale. The restoration target (400ha of grazing marsh for breeding waders by 2020) is similarly small. We suggest that the ambition of the targets in this section need to be re-examined and upped considerably in order to deliver a step change for biodiversity and show the Broads as an exemplar in this area.

Agriculture and land management

This section needs to make much more explicit the link between agriculture/ land management and the provision of vital ecosystem services. This is an important long term aim that is currently missing. As well as producing food, farmers/ land managers - particularly those in National Parks - should see themselves as providers of a suite of ecosystem services (good quality water, flood risk reduction, biodiversity and wildlife, carbon lock-up, opportunities for recreation etc). The Broads Authority, along with other key partners could play a useful role in helping to make

	<p>economic links between ‘producers’ of ecosystem services and those who benefit from these services. Agri-environment budgets are likely to be under increasing pressure over the next few years. Farmers will need alternative sources of income if they are to continue to provide and improve on delivery of a range of ecosystem services. For example, payments by water companies for catchment management, visitor payback schemes that support countryside access, or carbon off-setting schemes, could offer potential.</p> <p>The Plan could have an additional objective to explore ‘payments for ecosystem services’ (PES) in the context of the Broads’ farming and land management systems, with a suggested target of at least one viable PES scheme in operation within 5 years.</p> <p>Tourism, recreation and access</p> <p>The Vision and Circular for National Parks and the Broads, which has recently been re-affirmed by the new Government in the Uplands Policy Review, identifies the need to promote low carbon transport and travel. CNP has recently worked hard with the Department for Transport to ensure that National Parks can submit joint bids for funding to the Local Sustainability Transport Fund (LTSF) to help to pay for low carbon transport schemes. We consider that the draft management plan could go much further in the area of low carbon transport, which would benefit both visitors and local communities. We welcome the objective in TR3.1 to develop a strategic access plan for the Broads; however, we think that the targets should also include a (short) timescale for completion of this plan and a commitment to achieve its actions. The Authority should be looking to capitalise on new funding opportunities like the LSTF, and really drive forward actions in this area – this would complement and align well with the objectives for climate change mitigation.</p> <p>We hope that these comments are helpful and are happy to follow any of them up with you in more detail. We wish you well in finalising this important document.</p>
BA response	<p>Comments noted. Biodiversity targets (BD5) have been revised upwards. The production of the Integrated Access Strategy (TR3) is a priority and the BA is working with the local Highways Authority on transport issues.</p>
East of England Development Agency	<p>EEDA’s principal role is to improve the East of England region’s economic performance. Our main concern with Development Plan documents is therefore that they will help deliver, and provide the spatial framework for sustainable economic development and regeneration in the East of England and to support the implementation of the Region’s Economic Strategy.</p> <p>In this instance we have no substantive comments to make on the plan.</p>
BA response	<p>Comments noted. No changes to plan.</p>

English Heritage

Thank you for your letter dated 24 February 2011 inviting English Heritage to comment on the revised draft plan for the Broads. The summary of how English Heritage's comments on the previous draft have been considered is helpful and we welcome the changes you have made responding to these.

Since the last consultation new national planning guidance has been published in PPS 5: Planning for the Historic Environment. We have referred to this in our more recent response to the Broads Development Management Policies DPD. PPS5 gives particular emphasis to plans taking a positive and proactive approach to the historic environment within their strategies (policy HE3.1). It promotes enhancement of heritage assets, rather than simply preservation, and special consideration for heritage assets at risk (policies HE3.4 and HE5). The guidance places emphasis on understanding heritage assets (policy HE2) so that proposals for change can be managed without damage their significance. It would be appropriate to refer to PPS5 in section 2.3 summarising changes to national policy, and to reflect these key aspects of the new guidance.

As a general comment, we find the revised plan well presented and accessible, although with some way to go to adequately reflect the significance of the historic environment encapsulated in the Broads. We do not suggest substantial changes in terms of additional text, but hope that the attached recommendations could be accommodated to provide the appropriate referencing and weight to the historic environment, alongside the commitments to protect other environmental assets within the area.

I hope these comments are useful. We would be very pleased to discuss any of the matters we have raised in more detail.

BA response

Comments noted. Reference to PPS5 has been added in Chapter 2.1 'Historic environment and cultural heritage'.

Environment Agency (Eastern)

Thank you for giving us this opportunity to comment on the revised plan ahead of the public consultation. Following internal consultation, these are our comments.

Section 3.1 Introduction (page 8) - Increased flooding could be added to the list of key impacts of sea level rise and climate change.

Section 3.2 Flood Risk Management (page 9) - 4th paragraph. I think this should more accurately refer to the Broadland Rivers Catchment Flood Management Plan (not the Anglian CFMPs).

5th paragraph. I am not sure what the 2nd sentence here is trying to say. I would suggest alternative wording along the following lines: The updated Shoreline Management Plan (SMP) confirms the preferred policy of 'hold the line' for the Eccles to Winterton frontage, but also recommends investigations to explore the viability of alternatives in the event

that this becomes unsustainable in the longer term.

6th paragraph. Under the Flood and Water Management Act 2010, County Councils are designated as Lead Local Flood Authorities required to co-ordinate the countywide management of flood risk from surface water, ordinary watercourse and groundwater. Government announcements made as part of the Comprehensive Spending Review have indicated that greater contributions from communities and businesses will be required and local communities will have to play a greater role in reducing the risk of flooding and coastal erosion.

Section 3.3 Carbon Reduction (page 9) - It will be good to include the results of the carbon audit so that in the near future, an assessment can be made of the effectiveness or progress made with regards to the implementation of the GHG Reduction strategy.

Responding to climate change and sea level rise table (page 12) - We suggest including a key for the Priority status of objectives. (i.e. does a red flag mean high or low priority?)

First box on table. Should read Catchment Flood Management Plan rather than Flood Catchment Management Plan (same error appears twice on page 13 too)

Page 13 within the table. CC4.2 Promote sustainable planning and management of water resources at a regional level. This should really refer to catchment and/or waterbody scale (as well as regional scale). The associated box relating to Mechanisms of Delivery should include EA Catchment Abstraction Management Strategies.

4.1.4 Housing and Development (page 16) - Although in paragraph 3 it is stated that “new housing numbers does not come forward in large numbers within the Broad executive area”, we suggest including a statement that development planning policies in the Broads highlight the need for water efficiency measures.

4.2 Biodiversity (page 24) - Biodiversity table. We are supportive of Objective BD3 and look forward to working with the Broads Authority to implement appropriate measures that will improve the WFD classification status for the Broads and the river reaches.

5.2.1 Tourism, Recreation and Access – Sustainable Tourism (page 42) - This industry generates a lot of waste but there is no mention of how waste will be managed in the Broads (i.e. policies to reduce or recycle waste).

Reiteration of previous comments: Whilst it is appreciated the Broads Authority are neither a collection nor a disposal authority they are in a position to influence good waste management practise amongst the tourist industry and boatyards by embarking on waste prevention campaigns, and reducing litter for instance which is a big problem in the

	<p>summer.</p> <p>Recycling facilities should be readily available to tourists, and be easy to use. These should include 'recycling on the go' facilities in all public places. This will help reduce litter and increase recycling. We would strongly support these initiatives being included.</p> <p>I hope these comments are helpful. We look forward to continuing to work with yourselves and partners to bring about the benefits that this plan will deliver.</p>
<p>BA response</p>	<p>Comments noted and amendments made to plan.</p> <p>Housing and Development: Chapter 2.1 para on 'Landscape character' recognises the need to positively manage potential impacts of infrastructure growth, including water resource demands; this is supported through spatial planning policy.</p> <p>Waste management: The BA is in discussions with District Councils on the issue of improving visitor awareness of existing recycling facilities in the Broads and encouraging their use. This includes increased information given out by hire boat operators, web-based information and signage improvements.</p>
<p>Great Yarmouth Borough Council</p>	<p>Thank you for the opportunity to comment on the latest version of the Broads Plan 2011, received on 28 February, to which I am responding at officer level. Following our Executive Management Team and Corporate Management Board approval of the initial draft version in the summer of 2010, Great Yarmouth Borough Council supports the contents of the revised Plan. We also welcome the continuation of partnership working together, especially in relation to the production of our respective Local Development Frameworks.</p>
<p>BA response</p>	<p>Comments noted. No changes to plan.</p>
<p>Highways Agency</p>	<p>The Highways Agency's remit and responsibility is limited to managing the safe and efficient operation of the strategic road network which within the Broads area is the A47 ("the Acle Straight") and parts of the A12 at Great Yarmouth. It should be noted that the A47 is the only effective strategic access from the west to Great Yarmouth and Lowestoft. Any comments made are therefore limited to those elements that may have a bearing on the trunk road. I have the following comments to make.</p> <p>3 Planning for the Long-Term Future of the Broads in Response to Climate Change and Sea Level Rise</p> <p>3.3. Carbon Reduction</p> <p>Whilst the Highways Agency did not specifically refer to Carbon Reduction matters in its previous consultation response, I would note a number of points in the revised draft. In particular that the Broads Authority has identified a need to take a positive approach to the management of greenhouse gas emissions with actions to reduce carbon</p>

emissions and influence sustainable development in areas such as tourism, land use and management, conservation management, travel and transport.

The SAR states road transport is responsible for the majority of CO₂ emissions in the Broads area at 43% and the majority of this arises from the Acle Straight/A47 and suggests opportunities to work with transport authorities to reduce road transport CO₂ emissions, particularly along the Acle Straight.

Whilst the effect of Plan policies, SAI (to reduce greenhouse gas emissions and vulnerability to climate change impacts) is given a ++score, it is not obvious within the Plan that there is any action specific targeting carbon emissions resulting from the A47. Whilst the Broads Authority may have limited influence, the Highways Agency is happy to explore any opportunities for carbon reduction and one may wish to consider reflecting this within the plan.

3.4 Developing a Climate Change Adaptation Plan for the Broads

The Highways Agency would emphasise the need for the Broads Authority to work with strategic partners in respect to managing the potential for flood risk and ensuring that there is some synergy between individual management strategies. This is particularly important as 95% of the Broads National Park lie within Flood Risk Zone 3 (SAR Map 4) and the trunk roads runs through part of this area.

4. Working in Partnership on the Sustainable Management of the Broads

4.1.5. Tranquillity

It is noted that the strategic objective LC5 is to work with bodies responsible for highways and utilities to minimize the impacts of infrastructure and noise and light pollution in the Broads. In the SAR it is suggested as mitigation that consideration could be given to

- transport related measure under "means to achieve" as the objective states that the BA will work with highways bodies
- include the use of low noise surfacing under "means to achieve", particularly around Acle, where transport noise is threatening tranquillity.

These are not taken up in the Plan and this may be a missed opportunity to improve the sustainability of the Broads. The Highways Agency would be happy to work with the Broads on such initiatives subject to any resource limitations.

4.2 Biodiversity

The Highways Agency has no comments to make on the wording, but to note the effect the trunk road has on the habitat, the unique environment the trunk road corridor runs through as a result of the long term interaction between the road and its surroundings and that appropriate engagement on biodiversity matters should be undertaken with the Highways Agency through the various delivery plans including the Broads Biodiversity Action Plan.

5.2 Tourism, Recreation and Access

The Plan recognises that there is a need for the development of sustainable tourism, encouraging the opportunities for

	<p>non car usage. It however accepts that the majority of visitors to the Broads currently use private cars and this will be a significant challenge and progress is likely to be slow. In line with this statement, Strategic Objective TR3 (Develop a strategic approach to sustainable access in the Broads) is included in the Plan. The Highways Agency welcomes the approach, but notes that the target to develop a Strategic Access Plan has been completed. The Highways Agency is not aware of having any involvement with the plan and would stress in order to be effective, it is essential that strategic partners are involved.</p> <p>Finally, I would draw your attention to a comment made in response to the previous consultation. There are occasions where the trunk road is unavoidably closed due to an incident or maintenance issues. In such circumstances, there is a need to divert traffic via the local highway network, and it would appear apparent that these events need to be managed to ensure the quality and enjoyment of the Broads is not unduly affected. It is suggested that either through the Plan or subsidiary action plans this matter is referenced.</p>
<p>BA response</p>	<p>Comments noted and support welcomed. The Integrated Access Plan is yet to be developed; it is a priority objective (TR3.1) and the Highways Agency and other partners will be fully involved in taking this forward.</p>
<p>Horning Parish Council</p>	<p>Horning Parish Council (HPC) welcomes the opportunity to comment on this consultation paper. Our comments relate principally to parish interest, which are our area of knowledge and concern.</p> <p>The general duty of the Authority is to manage the Broads for the purposes of— (a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads; (b) promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and (c) protecting the interests of navigation.</p> <p>General It would have been helpful to see an update of progress against the Broads plan 2004 which included objectives which were outstanding as well as those achieved to give a sense of the gap between where the BA is and what it intends to achieve.</p> <p>The plan seems to be a mix of the general and the specific – a clearer indication of who will be taking the work forward together with milestones, particularly for the priority objectives would have been helpful.</p> <p>Para 1.4 notes that ‘the successful delivery of the plan depends on a shared vision and commitment to partnership working and on the best use of shared resources’. HPC would have welcomed more detail as to how the BA intends to work towards achieving this vision.</p>

Specific comments

Priorities 2011-15

HPC considers that there is insufficient emphasis throughout the plan on protecting the interests of navigation – one of BA duties. Most visitors to Horning are drawn to the area to watch or participate in waterborne activity. Many residents are also boat owners.

4.1.4 Housing and Development

HPC has particular concerns in respect of planning. For example in Horning on one side of Lower Street planning decisions are made by the BA whilst on the other side they are made by North Norfolk District Council. This situation seems to be anomalous. HPC is aware of decisions taken by the BA which have been the subject of much criticism by parishioners who feel powerless to influence the decision making process. As tax and council tax payers, given the current financial constraints, we feel the question should be raised as to whether value for money is provided by the duplication of a planning department within the BA when Local Authority planning departments could undertake this function. This concern seems to be borne out by the text of para 4.1.4 which acknowledges that 'new housing does not come forward in large numbers in the BA area' and that 'housing supply is relatively static'. Local Authorities and Housing Associations are more likely than BA to have the capability to develop affordable housing solutions for local people.

4.1.5 Tranquillity

Light pollution is becoming an increasing issue due to excessive night lights on some riverside properties. The Wroxham party boats, whilst contributing to the local economy, shatter the evening tranquillity with music volumes that can be heard over a large distance.

4.1.6 World Heritage Status

HPC questions whether the benefits of achieving World Heritage status outweigh the costs at a time of financial stringency and what benefits would be seen by the local community.

4.2 Biodiversity

Species recording, mapping and surveys are all important areas of work but there seems potential for duplication with work of other bodies e.g. Norfolk Wildlife Trust, Natural England.

4.3 Agriculture and Land Management

AL4– should this be a strategic aim for BA or for other bodies e.g. farming associations?

4.4.6 Navigation safety

HPC would not be opposed to 'voluntary zoning' in principle but would wish to seek assurance of proper local consultation with all relevant bodies before any introduction.

5.1 Promoting Understanding, Enjoyment and Wellbeing

HPC considers there should be a balance between maintaining tranquillity and the emphasis on promoting tourism and Broads 'brand'. Some concern expressed as to the merits of introducing a Broads Outdoor festival at a time of cutbacks.

5.1.3 Final paragraph – support for these projects but question whether this is a key task for the BA – could be undertaken by local historical groups which already exist and have the expertise – again potential for duplication.

5.1.5 Volunteering

Should BA be seeking to expand its own volunteer base or working with existing local groups particularly those dedicated to conservation.

5.1.6 Having a say

HPC made a detailed response to the recent consultation in respect of governance expressing its dissatisfaction with current arrangements and the apparent dissonance with the localism agenda – see comments below.

Q whether the membership of NPAs, both the size and composition, should be changed

Response

HPC has no particular views regarding the size of the membership of the BA. We are concerned to note the proportion of Secretary of State nominees and the lack of parish representation. The figures given at Annex A of the document indicate that other than Northumberland, 75% of the membership of NPA Boards is local. This is not the case with the BA and in our view militates against local democratic accountability. This is a matter of general concern and particularly in the area of planning issues.

Whilst not specifically mentioned in the consultation paper HPC is aware that currently BA funding is split with 65% from the National Parks grant and 35% raised from tolls i.e. water users. We understand that following the reduction in the National Parks grant it is planned that 55% of funding will come from this grant and 45% from tolls. The BA has a third function of 'protecting the interests of navigation'. In view of the change in funding streams it would seem appropriate to consider increasing the Board representation of those who pay the tolls.

Q whether the selection process for all categories of members of NPAs can be improved

	<p>Response See comments above re parish representation. We are unclear as to how local authority representatives are nominated and whether they represent wards within the BA boundaries. Again there is an issue of direct accountability to the local electorate.</p> <p>Q whether the current membership and structure of consultative committees, groups and forums can be strengthened so as to better achieve 'Big Society' benefits</p> <p>Response HPC questions whether the current terms of reference for the Broads Forum are appropriate to enable the forum to properly fulfil its consultative role and exercise meaningful influence on decisions made by the BA. Parish forums and parish pop in events provide an opportunity for two way communication but are not seen by parishioners as an opportunity to influence the strategy, direction or decision making of the BA. HPC is not aware whether BA Board members are in attendance to participate in discussion or hear local views.</p> <p>5.2.3 Access and Service provision We note there is no mention of the upkeep of staithes and or of additional 24 hour moorings. The moorings at Horning are very congested at peak periods and consideration should be given to additional mooring space where possible.</p>
BA response	<p>Comments noted.</p> <p>The Broads Plan is a plan for the Broads, not just for the Broads Authority - see Introduction 'Delivering and financing the plan'. We agree that coordinated partnership working is vital to gain agreement, maximise resources and avoid duplication of effort. Key delivery partners, mechanisms and targets are shown in each objectives table.</p> <p>The draft objective on a World Heritage status bid has been deleted as the Authority was unsuccessful in its bid for inclusion on the UK Tentative List.</p> <p>Staithes will be included in the emerging list of local heritage assets (see objective LC3); mooring enhancements are addressed through the Mooring Strategy (see objective TR2).</p> <p>The results of the Government consultation on the governance of National Parks and the Broads Authority is expected to be announced in early-mid summer.</p> <p>The Council's comments regarding a specific planning permission are dealt with under a mechanism separate to this Broads Plan review process.</p>
Irvine, Mr Alan	<p>I set out below some brief comments for your consideration on the 2011 plan.</p> <ol style="list-style-type: none"> 1. There is support for the plan and the management plan approach that is set out. 2. There is support for the statement within section 2 " Context for the Plan" and in particular for the recognition

	<p>for the need to support and develop British farming but that within the context of the Broads the support must be on a premise of being environmentally sustainable.</p> <p>3. It is pleasing to note the recognition in section 4.3 of the "severe pressure on farming businesses" as a result of inter alia globalisation, new legislation and management expectations.</p> <p>4. It is hoped however that some consideration be given to not only retaining a viable and profitable agricultural industry as stated at ALI but to supporting growth or expansion of established agricultural businesses.</p> <p>5. It is considered important that the plan includes the potential for growth and expansion based of course upon the premise that any such change is environmentally sustainable.</p> <p>6. There are for example sectors of the agricultural industry such as sheep and cattle that are doing well at present whilst others such as pigs and chickens that are doing less well. Retention of an existing pig or chicken enterprise may only be possible if the business expands to enjoy economies of scale or similar and the plan should reflect such a position.</p>
BA response	Comments noted. No changes to plan.

<p>Loddon Parish Council</p>	<p>The following are the observations of Loddon Parish Council.</p> <p>The Plan begins on page 1 by stating that the Broads Authority “has a duty to maintain the navigation area...to such standard...as...reasonably required ...and take such steps to improve and develop it as it thinks fit” (our italics). It then goes on throughout the rest of its 48 pages to be a tad confusing as to how it hopes and aspires to maintain this from 2011 and beyond.</p> <p>It says there are 5 year objectives, 20 year objectives and a 20 year vision, but does not actually categorise or list in the Plan what each of these will include, and then warns that funding from DEFRA and other agencies will be cut from its present level by a third by 2014/5 due to government spending reviews. The Plan thus seems to hint that these objectives and vision may never come off through this future lack of finance, and, instead, the Broads Authority will have to look at more internal funding from, for example, higher levels of river tax tolls, and volunteers taking over some aspects of (at present paid) Broads Authority work such as weed clearing and river rangers.</p> <p>Although the Broads Plan does flag up what it sees as priorities, these seem us to boil down to ensuring and maintaining appropriate habitats for the Broad’s wading birds. To us, the entire content of the Plan, in the form in which it has been put out for consultation, is much more heavily weighted towards landscape and wildlife – both very important and worthy of consideration - than it is to the needs of humans living, working and, in most cases, dependent for income from, the Broads area. This lopsidedness of the Broads Plan would appear to be borne out by the fact that 10 sections of it contain the Broads Authority’s plans and strategies for the management of climate change,</p>
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flooding, carbon reduction, landscape, biodiversity, agriculture, land and navigation area (i.e the broads and rivers) but has only 2 sections on promoting and understanding the needs of tourism (on which places like Loddon are highly reliant), recreation and access. The whole Broads Plan, it appears to us, would appear to be a 'tick box' for the (already submitted) Broads' application for World Heritage Site status, rather than a more down to earth serious look at, and acknowledgement of, the future long term needs of the people already here. The Broads Authority must accept NOW that we are never going to be Galapagos Mark 2!

Although the Plan (grudgingly) admits that people and other animals do actually live and exist within the Broads area, its main priorities imply that these tend to be regarded as necessary nuisances to be tolerated (as long as they do not disturb the flora and fauna), but that life for the Broads Authority would be far rosier and less of a hassle if the whole Broads area was just one large, uninhabited, salt marsh.

The Plan makes much fuss about climate change and carbon reduction and then immediately apologises that it cannot do much about it. It states that the North Sea will rise by 37cm and that this will have a knock on effect throughout the Broads river systems which will cost lots of money to rectify or contain. It then dithers on what to do about the problem as it is "unsure about seeking the status quo on a predominantly freshwater system with high levels of human intervention and large and continued expenditure, or whether to allow natural processes to direct change with less human intervention and thus concentrating on adaption"(section 3.6). So, goodbye recently introduced otters, swallowtail butterflies etc. Goodbye sedge warblers and kingfishers, and goodbye to most of the flora and fauna of the Broads that we have at present and which gives the Broads its unique character. All, it seems to us as a Council, without too much of a fight.

The Plan states that there is a Biodiversity Plan for the Broads, but does not really convince that it is 100% behind maintaining (or seeking) the status quo.

There are some daft, obvious, comments scattered throughout the Plan, e.g , "Water plays a part in so much of the Broads" (section 3.2) (how about ALL of it!), but the Plan has at least confirmed that the Broads Authority has a Strategic Risk Assessment to identify those areas it sees as most in danger of flooding (although these are not listed in the Plan – probably didn't want to upset the World Heritage Site status panel). We had to telephone the Broads Authority ourselves to find out that Loddon is in Flood Zone 3b The Functional Flood Plain, although with climate change this could well increase to Flood Zone 3a High Probability of Flooding. We were told that the nearest current Flood Zone 3a to us at present is the area covering from Reedham across the river to the Thurlton area, not too far away. It would have been helpful if this information could have been included in the Plan, not just for us, but for other Councils as well.

The Broads Plan 2011 does not identify its future priority areas for dredging, riverbank repairs, weed cutting etc, but Broad Sheet did give details of such work done over the last year, most of which seems to have been on the northern

Broads.

On angling, the Broads Plan says that there will be a new Broads Fisheries Action Plan introduced in 2011 (section 5.2.2), although no mention is made of what the Broads Authority intend doing to combat the seemingly increasing numbers of people fishing without a permit, as we see at Loddon, or illegitimately using Broads Authority 24 hour moorings to fish from, even when there are Broads Authority notices forbidding them to do so, as at Bramerton Common.

The Plan is also silent on what action, if any, it intends to take to alleviate the problem of permanent, seeming in the main to be long term unemployed, boating 'live aboards' who appear not to abide by the normal navigation requirements and etiquette asked for by the Broads Authority for other users. These 'live aboards' clog up 24 hour moorings for months on end (notably at Thorpe) so that other, visiting, boats are denied access. They appear to be exempt paying river tax as they display no licence stickers, and know exactly what time of the day (or night – with no navigation lights) to travel round the Broads, usually noisily and in convoys, when the river rangers have gone home. We have seen them here in Loddon.

There are general remarks about tourism, and how that strategy should be brought forward. But, we are unclear as to how the Broads Authority can actually ally that to the fact that they are closing/have closed Broads Information centres at both Ranworth and Beccles. Each of them have always been extremely well used by boaters, general visitors and walkers, and have encouraged tourists to filter beyond those two areas to places like Loddon, for example to walk our part of the Wherryman's Way – en route, using our shops and facilities. We do not understand the reasoning behind their closures. We are sure the Broads Information centre at Whitlingham Broad will never have as many visitors as each of these two did, and will be visited only by a narrower range of visitors, mainly, it seems to us, dog walkers from Norwich.

As a Council, we were disappointed that no acknowledgement was made in the Broads Plan 2011 of our tourist information centre here in Loddon, which is run on a voluntary basis in the Old Town Hall, without any apparent Broads Authority support, although situated well within its area of jurisdiction. For years, a dedicated team have been on hand to distribute Broads Authority literature and generally encourage and promote full use of Broads areas and facilities. Perhaps room could be made in the tourism strategy for 2011 to finally give Loddon's tourist office the long overdue recognition it rightly deserves by bringing it in, as has been requested many times without success, under the umbrella of the Broads Authority, thus ensuring its survival and continuing success for future years.

Section 5.2.3 of the Broads Plan stresses that the provision of local services and facilities such as shops, pubs, restaurants, boating supplies, moorings, etc within the Broads area is "dependent upon land access to the water's edge and access between water and land" and, at the current time this is an extremely worrying aspect for Loddon, and one

which we need to urgently bring to the Broads Authority attention.

Being at the far end of the navigable part of the River Chet, Loddon's local businesses are dependent for much of their income from boat users, especially during the summer when both Pyes Mill and Loddon Staithe could be filled with holiday boats.

However, flood defence works carried out by the Broads Authority at the head of the river and the lack of any reasonable dredging and reed clearing, together with work done at Hardley Flood, are now severely impacting on the rest of the river by drastically reducing water levels along its entire length, all the way to Loddon. Boatyard owners tell us horror stories of how these water levels are now far lower than what they were even a year ago, so much so that their ability to carry out their normal day to day boatyard work is becoming more and more restricted.

For example, lifting boats in and out of the river could, up until about a year ago, have been done at any time of the day. Now, boat lifting has to be carefully arranged to coincide with high tides, and then the level of water in the Chet is still too low to do it properly. Boat drafts are sometimes too much for the depth of the water, and one boatyard owner told us that he once had to wait 3 weeks before he could safely return one of his boats to the water. The speed of the tide has slowed down drastically to what it was, to the extent that most days it has been impossible to tell whether the tide in the Chet is coming in or going out.

A boatyard owner told us that he is having a new slipway built, but has had to revise drastically the depth and length of it to accommodate the increasingly lower levels of water, and this is costing him so much in excess of what he had anticipated, or budgeted for, that he is seriously considering the feasibility of the future of his business.

All boatyard owners told us that owners of larger boats are now extremely reluctant and fearful of coming down the Chet in case they get stuck.

This is worrying enough, but now other businesses in Loddon are also extremely worried about what the future holds for them. We carried out a survey of the local shops, restaurants and pubs over the last two days. You will be interested in our findings:

The survey asked the question "How might this [the River Chet ceasing to be navigable] effect your business? The replies were as follows:-

Very Considerably

Rosy Lee Tea Rooms
Loddon Coop
Church Plain Community Shop

	<p>Select Meats Kings Head pub Robinsons Restaurant Loddon Garden and Seed Centre White Horse pub Dilraj Restaurant Loddon Kebab and Pizza Bridge Stores</p> <p>Significantly</p> <p>Lims Fish and Chips Chedgrave House Bed and Breakfast Angel pub</p> <p>Slightly</p> <p>Loddon Post Office Happy Buddha take away</p> <p>Boots Chemist also say they will be greatly affected.</p> <p>You will see that our survey concludes that the majority of businesses in Loddon will be detrimentally affected if we lose the Chet as a navigable waterway to all but very small shallow draft boats and we urge the Broads Authority to urgently bring forward any future thinking on the state of the River Chet. Something must be done NOW. If the Chet goes, then the future of Loddon as a viable asset to the Broads National Park goes with it.</p> <p>Finally, the Broads Plan 2011 as a booklet is well laid out and presented, but as a blueprint for its priorities for the Broads Authority for 2011 and beyond, we are of the opinion that it needs to seriously rethink its overall strategies, concentrating much more on the needs of people, inhabitants and businesses within the Broads area, and much less on how it perceives itself, or indeed wishes to be perceived, as a player on the world stage.</p>
BA response	<p>Comments noted.</p> <p>Sections 2.4 ‘Management of the Navigation Area’ and 3.2 ‘Tourism, Recreation and Access’ contain objectives and actions for navigation maintenance and enhancements, together with associated recreational and access provision. Each section under the three key themes sets out a long-term aim and 5-year objectives and actions. Aspirations to deliver the plan will be high but must be set within the current and future economic context, for both the Authority and its delivery partners, who will continue to seek external funding opportunities to boost core funding. Volunteers are, and will continue to be, an important and valuable asset to the Authority and its partners.</p> <p>The topic areas in the plan - managing landscape and cultural heritage, biodiversity, agriculture and land management,</p>

navigation, promoting understanding, and tourism, recreation and access, as well as the overarching theme of responding to climate change and sea level rise, encompass all aspects of life in the Broads and the need to work for the benefit of both nature and people.

The bid for World Heritage Status has not progressed and this draft objective has been deleted.

The Broads Plan is not the appropriate mechanism for detailed flood zone mapping; this information may be obtained through the Environment Agency or by contacting the Authority's Planning team.

Details of navigation works are contained in the Sediment Management Strategy Action Plan and annual works programmes. Links to documents and information related to objectives in the Broads Plan will be provided in the e-version of the plan, to be made available on the Authority's website, or by contacting the Authority's Operations Directorate.

The Broads Fisheries Action Plan is produced by the Environment Agency with support from the Authority. The document is currently being updated to focus on current relevant issues, including conflict management issues. The Authority's Rangers carry out regular inspections of moorings and request that anglers leave if they are fishing in the restricted period. This will continue although it is not possible to maintain a continuous presence at individual moorings.

The issue of residential moorings and 'live-a-boards' is addressed through planning policy. The Development Management Policies DPD is currently undergoing examination by a Government appointed Planning Inspector (see DPD draft policy DP25).

Following the significant reduction in National Park Grant from 2011/12, the Authority made the difficult decision to reduce its direct management of the information centres at Beccles, Potter Heigham and Ranworth; however it is committed to working with partners to see how visitor information can continue to be provided at these and other locations in the Broads, as well as through electronic media.

A priority objective in the Plan is the development of an integrated access strategy that will encompass the sort of issues mentioned in your response.

The Authority is meeting with local boatyard owners, Environment Agency, Norfolk County Council, Natural England and BESL to discuss the functioning of Hardley Flood, which may be adversely affecting channel depths in the River Chet, to consider development of a partnership project to repair or replace the weir at the entrance to Hardley Flood. The Authority is committed to maintaining the River Chet as a navigable channel and has been requesting the EA to produce proposals for flood risk management in the Chet. We understand the EA will be consulting on this matter in summer 2011 and proposals are likely to include the removal of deteriorating piling on the south bank of the river. The Authority will programme further dredging in the Chet when the EA has confirmed its timescale for flood risk management works and piling removal.

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We welcome the opportunity to contribute to the evolving Broads Plan, and are pleased to note your incorporation of our earlier comments on the previous draft (our letter of 3 September 2010). We have a few minor comments to add on this latest iteration:

Page 11 – 2nd paragraph ‘concentrates on adapting’ rather than ‘of

Page 16 – I don’t think it’s correct to say that the councils are ‘constituents’ of the Broads Authority – could this be substituted for ‘neighbouring’?

Page 20 – end of 4th paragraph – reword to say ‘condition targets are achieved and maintained’

Page 24 – lead and key partners for BD2 on County Wildlife Sites should include the Norfolk Biodiversity Partnership which is funding much of the work on surveying new CWS in the Broads

Page 43 – 3rd paragraph - we feel that a caveat should be included on canoeing, given the unsuitability of some sites within the Broads to accommodate this pursuit. The ‘quieter, more hidden reaches of the system inaccessible to larger craft’ are very often the most vulnerable locations in terms of wildlife disturbance, and should not be promoted.

Appropriate Assessment Report

Our comments here echo much of our response to the Broads Authority’s Development Control Policies DPD Appropriate Assessment, which appears to have used the same template.

Page 3, introduction – it is incorrect to state that there are no offshore marine sites designated at present. 10 marine SACs and two marine SPAs in England were submitted to Defra in June 2010 and now have full European legal protection

Page 5 – the list of sites should include Ramsar sites which, according to the Government guidance, should be treated in the same way as European sites for the Appropriate Assessment process

Page 6 – surprised by the inclusion of this map, which is out of date (English Nature 2004, with the Broads SAC as a candidate site), and does not indicate Great Yarmouth North Denes SPA. It should also include Ramsar sites. It would be more helpful to indicate the individual sites with a numbering system.

Page 7 - the list of component SSSIs is incomplete and should include Trinity Broads SSSI

Much of the uncertainty surrounding the potential of the Broads Plan 2011 to have a Likely Significant Effect on European sites arises from the impacts of visitor disturbance consequent upon the Broads Plan’s stated aim of increasing numbers of visitors to the area. This is being addressed in part by the visitor disturbance work undertaken in response to the findings of the Appropriate Assessment for the joint Core Strategy, and we are pleased to note the Broads Authority’s active involvement in this work.

BA response	Comments noted and minor amendments made to plan. Factual amendments have been made to the Appropriate Assessment.
Neatishead Parish Council	Neatishead Parish Council supports the plan and has no changes to suggest.
BA response	Comments noted. No changes to plan.
Norfolk County Council	<p>Norfolk County Council supports the overarching objectives of the document, which are consistent with the sustainable aims and objectives of the Core Strategy and Proposed Development Management Policies. Specific comments are made below.</p> <p>Strategic Planning Comments The following comments were made in response to the previous consultation July 2010. They have not been addressed in the Revised Broads Plan, and therefore it is necessary to reiterate these at this stage:</p> <p>The ‘Context for the Plan’ (chapter 2) should more clearly recognise the inter-relationship and role of the Broads within its immediate surroundings. The Broads Authority area sits within an area that is growing and/or is in need of significant regeneration. One of the important "contexts" for the Broads is that it abuts, even penetrates, the important urban centres of Norwich, Great Yarmouth and Lowestoft. The Broads is one of the great strengths in Norfolk (and north east Suffolk) to attract and retain investment and support a high quality of life. Clearer and explicit recognition of these strengths and opportunities, and the role the Broads plays as an asset for the wider area, will set the context for management that maximises the benefits and manages any resulting threats. This should also be reinforced in section 4.1.1 (Housing and Development).</p> <p>In addition to recognising this strategic role in the sub-region, setting the local context would be useful to help the Plan recognise the importance of linking with green infrastructure projects in the wider area - to enhance biodiversity, to provide 2-way sustainable access, and to help manage and divert visitor pressures.</p> <p>Economic Development Comments Section 4.3.1 (Agriculture) states that there should be a focus on ‘promoting local produce to local markets’. This should also include promotion to the wider UK market.</p> <p>Section 5.2.1 (Sustainable Tourism) should include a change of wording from ‘Tourism benefits hire boat operators ‘... to ‘Tourism is a major supplier of custom for hire boat businesses...’ in order to reflect just how much tourism</p>

	<p>benefits these businesses.</p> <p>Section 5.2 (Tourism, Recreation and Access) does not strongly address the issue of skills. Encouraging skills training is addressed under objective TR2; however some context should be added to 5.2 explaining the skills related to the Broads tourism industry. This would be helpful to understand how great a priority this is for boosting the local economy.</p> <p>Section 4.1.1 (Housing and Development) places emphasis on protecting existing employment opportunities however, there is no mention of encouraging new business growth, and possible ways of accommodating this. For example there could be a need to upgrade the existing infrastructure should the boat hire industry continue to grow.</p>
<p>BA response</p>	<p>Comments noted. The context of the Broads within its urban surrounds and growth opportunities is noted in section 2.1 'Development and housing'.</p>

<p>Norfolk and Suffolk Boating Assoc</p>	<p>The Norfolk and Suffolk Boating Association (NSBA) exists to serve, protect and promote the interests of private users of pleasure craft on the Norfolk and Suffolk Broads. It has 1,185 individual members and 50 affiliated clubs and associations, altogether representing the majority of those who use private craft on the Broads. NSBA is pleased to note that the revised draft Broads Plan 2011 (hereafter 'the revised draft plan') contains a number of points advocated by NSBA in its response to the draft plan of 2010.</p> <p>Vision for the Broads to 2030 With two exceptions, NSBA is in broad agreement with the Vision in Table 3 in section 2.4, although it would have avoided emotive, subjective terms like 'wonderful' and 'magical'. The first exception is that the Vision in Table 3 fails to accord recognition to the public, legal right of navigation. The words 'the importance of the waterways for navigation ... is recognised, protected and enhanced' in the third bullet command NSBA's support, but they fail to express recognition of that fundamental right. NSBA considers that there should be added at the end of the third bullet point: 'and the public, legal right of navigation is recognised, respected and enhanced'. Second, while NSBA is committed to enabling children to enjoy and learn from the Broads (and many of its member clubs participate actively in doing so via their voluntary activities), NSBA doubts that it is a necessary and achievable part of the vision for 2030 that the Broads should be a source of learning etc for every child in Norfolk and Suffolk, eg a child in Terrington St Clement or Newmarket, during his or her school career.</p> <p>National Park Status NSBA disagrees with the objective in section 2.5 that by 2030 the Broads will be a National Park. The onus of</p>
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persuasion is on the proponents of such an idea. Given what National Park status would entail, NSBA remains strongly opposed to the Broads becoming a National Park. It has yet to hear a convincing argument in favour of the Broads having that status. Section 2.5 consists effectively of an extract from the minutes of the Broads Authority's meeting on 14 May 2010. No reason for the members' support appears in those minutes. Without amendment to the National Parks and Access to the Countryside Act 1949 (which would require the expense of primary legislation) so as to guarantee protection of the public, legal right of navigation, becoming a National Park would be a retrograde and unacceptable step. The Broads are unique. What is more appropriate than the current unique status of not being a National Park but part of the family of National Parks?

If the Broads Authority wishes to become a National Park, contrary to the wishes of its toll payers, the answer may be to transfer its navigation function to a separate authority, thereby enabling the Broads Authority with its remaining functions to become a National Park. Indeed, quite independently of the 'National Park argument', the notion of a separate navigation authority for the Broads is becoming increasingly attractive to toll payers who perceive a clear bias on the Broads Authority's part against navigational interests and are angry about the rise in the shared costs charged to the navigation. The enactment of the Public Bodies Bill, which is currently in passage through Parliament, coupled with existing primary legislation, would provide a vehicle to achieve this notion.

Priorities for 2011-15

NSBA is most concerned that, apart from the reference to facilities available for boats (surprisingly included under the sustainable management priority), navigational matters, particularly the dredging backlog (which has increased from 1.12m³ to 1.17m³ since the draft Broads Plan in 2010) and the transfer of Breydon Water and the Lower Bure, do not feature in the list of key priorities in section 2.6 of the revised draft plan. Both have major implications not simply for navigation itself but also for the sustainability of the local economy. Despite the Authority's increased reliance on toll income for its survival, the list of key priorities is skewed towards the Authority's two statutory functions other than the protection of navigation. NSBA's concerns in this respect have been heightened by the balance of the revised draft plan and by the list of key public agencies listed in section 2.6. That list includes the RSPB and the Wildlife Trusts. If those bodies are public agencies, then so are the Royal Yachting Association and NSBA but they are not included in the list.

NSBA's list of priorities is set out later in this document.

Flood Risk Management

NSBA considers that as a means to achieve strategic objective CC3 on p 13 the Broads Authority should champion the commissioning by the Environment Agency of a feasibility study of the proposal to protect the Broads from the sea by a North Sea barrier. This means should be added to CC 3. Such a barrier would not only provide protection for the largely freshwater hinterland of the Broads but it would also create opportunities for housing, recreation, tourism and other economic benefits for the area. Although coastal protection strategy is a function of the Environment Agency, and although the Agency's present policy (May 2010) is to hold the line for the Eccles to Winterton Beach Road policy

unit in the Kelling to Lowestoft Ness Shore Management Plan for at least 50 years (and conditionally for 50-100 years), the fundamental nature of the proposal merits detailed evaluation at an early stage of strategic planning for contingencies in the latter half of the present century. Planning for such contingencies must be timely. Radical solutions, such as the above proposal, may be required and may take decades to achieve. The Authority has an important part to play in championing the long-term protection of the Broads from the sea.

In respect of the last paragraph of section 3.2, NSBA points out that the Flood and Water Management Bill 2009 was enacted in 2010 as the Flood and Water Management Act 2010, and that as a matter of accuracy a Lead Local Flood Authority must develop, maintain, apply and monitor a local flood risk management strategy for its area, and that for this purpose 'local flood risk' means flood risk from surface runoff, groundwater and ordinary watercourse.

Landscape and Cultural Heritage

LC2 on pp 18-19 (identification and promotion of distinctive landscape areas etc) seems far removed from front-line work. The need for this strategic objective and its associated means to achieve, particularly when the Authority's National Parks grant has been reduced, is not demonstrated in the consultation paper.

NSBA is sceptical of the whole valley management approach. Unless it can be shown that this approach will generate benefits by means of streamlining (thus reducing the cost of) the Authority's management and administration processes and/or producing significant improvements in decision-making, it represents an unnecessary additional source of costs to both the Authority and its partners. Those costs will inevitably increase five-fold if the 'approach' is rolled out to the other river valleys. The Ant Valley pilot is widely regarded as no more than a 'talking shop' lacking clear objectives. Meetings certainly keep many BA staff away from their work-stations and the need for the additional expenditure involved is questionable. For many years, it has been argued that the Broads is a complete wetland system, and should be managed as such. This initiative appears to be a deviation from that 'good practice', which achieves nothing except duplication and confusion.

NSBA is pleased to note that the revised draft plan recognises the importance to the cultural heritage of the Broads of preserving, restoring and using historic craft, and that this is denoted as a priority in LC3.4. It is concerned, however, that the lead in this respect is described more loosely than for other entries in the various list of objectives and that no mechanisms for delivery are prescribed in respect of it. The vagueness of LC3.4 in these respects is not conducive to its achievement.

LC3: NSBA strongly supports LC3.5 (support heritage and cultural skills training and employment in traditional Broads industries).

Biodiversity

NSBA regrets that the opportunity has not been taken in section 4.2 to demonstrate a vision to carry out further flagship projects of the scale of the Grazing Marshes and the Barton Clearwater 2000 projects. It considers that there is scope for similar action to be taken elsewhere (e.g. Hickling or Hoveton Great Broad) resulting in significant benefits which deliver against all three of the Authority's objectives.

NSBA is pleased to note BD6.1 in respect of the eradication of non-native invasive species and, in view of the urgency of the matter, that this eradication has been given priority status.

Management of the Navigation Area

NSBA agrees with what is said under this heading (section 4.4) in the revised draft plan, subject to the following comments or provisos. The points below have in common the protection of the public, legal right of navigation. With reference to sediment management, NSBA makes the following comments. There have been some major improvements to the condition of the navigable Broads, especially in terms of the restoration of Barton Broad completed in 2001, but, despite the efforts of the Authority, the depth of the navigable Broads has overall decreased in the last 10 years. Grounding by the many sailing craft is not infrequent at any time on Hickling Broad or the upper reaches of the River Ant or River Thurne. In particular, the detrimental effect of lack of dredging is evident on the most prominent of the Broads long-distance sailing races, the Three Rivers Race. This race attracts entrants nationwide and thus contributes to the local economy. The problems experienced at the 2010 Three Rivers Race as a result of lack of dredging were reported in the national press. Bad publicity about lack of dredging is liable to act as a deterrent to visiting yachtsmen. There is estimated to be a backlog of well over 30 years in dredging at current levels of maintenance. As noted earlier, the estimated backlog has increased from 1.12m³ to 1.17m³ since the draft Broads Plan in 2010. This is not acceptable. A 15% reduction in the backlog is insufficient, even if achievable in the present climate. Without the essential dredging work, the system will gradually become unusable for navigation; the income derived from it by local businesses will dramatically shrink and the wildlife and biodiversity associated with the waterways will reduce.

In respect of NA4.1, NSBA strongly supports the implementation of the Broads Authority Act 2009, s 35 (transfer of responsibility of Breydon Water and Lower Bure to the Authority). Lack of expenditure over the years on those waters (the hub of the Broadland system and a gateway from the sea) is obvious to all. The situation is deplorable, both in terms of navigational safety and of environmental impact. When this transfer is effected, measures will need to be put in place to ensure the continued exemption of Breydon Water from speed regulations imposed for more congested or delicate areas.

Control of tree growth along the rivers is important in the promotion and sustainability of sailing in these areas. In respect of sub-section 4.4.4 and of NA2, NSBA would point out that the powers under the Broads Authority Act 2009, s 39, referred to are not limited to securing the safety of the navigation; they also extend to removing projecting or overhanging trees which significantly obstruct the passage of vessels, including sailing vessels. Control of tree growth along the rivers is important in the promotion and sustainability of sailing in such areas.

The powers just referred to are inadequate where trees are set back from the river bank and do not project or overhang the navigable water. NSBA considers that another means to achieve should be added to NA2, viz that the Authority will exercise the powers at its disposal to ensure that trees along the river corridor do not have an adverse impact on sailing. The problems experienced by the Norwich Frostbites Sailing Club at Whitlingham where the racing course has been adversely affected by the growth of relatively recently planted trees indicate the problems of

unrestricted tree growth along the rivers.

Although the situation is still not satisfactory, NSBA commends the Broads Authority for the steps which it has taken to secure from Network Rail improvements to mitigate the problem of railway bridge malfunctions on the navigation. The active monitoring of the situation should, however, be added to NA5.1.

NSBA is disappointed that no reference is made to the need significantly to increase the air draught (or ideally have swing or lifting bridges) at the Bure (A47) and Yarmouth Vauxhall bridges. Without this, most coastal or overseas craft, as well as the larger locally registered motor cruisers (which pay disproportionately high tolls), cannot cruise the Northern rivers and broads. The strategic objectives need to be amended so as to refer to working in partnership with other bodies to ensure that such accessibility is achieved. The forthcoming restoration of the Vauxhall bridge presents a timely opportunity for something to be done in the above respect in relation to that bridge.

NSBA fully supports the statements in sub-section 4.4.7 about new bridges. They should be incorporated in NA5.

The waterways currently under the control of the British Waterways Board (BWB) and the Environment Agency (EA) receive considerable grant funding from central government. NSBA acknowledges that Defra has provided additional funds to the Broads Authority on an ad hoc basis in recent years for dredging. It considers that, as matter of principle, grant funding from central government for the maintenance of the navigation of the Broads is conceptually identical to BWB and EA and therefore should be made permanent. It should not be the norm that the navigable waterways of the Broads are funded solely by the toll payers. NSBA greatly regrets that the statement (in paragraph 48 of the draft Circular on the National Parks) that Defra would discuss with the Authority whether some additional funding should be incorporated in the Authority's grant baseline for future years did not appear in the final document. NSBA recognises the current climate for public spending but the matter of principle referred to above must continue to be reinforced with the Government. This should be added as a specific action. NA1.3 (seek external funding opportunities to develop sustainable dredging and disposal processes and accelerate removal of backlog) is not adequate to cover this point.

Tourism, Recreation and Access

NSBA considers that in section 5.2 the revised draft plan underrates the problem of the scarcity of 24-hour moorings. With the revival of the hire boat industry focused on the Northern rivers, and the loss of wilderness moorings as a result of the Flood Alleviation Scheme, overnight moorings on the Broads have become woefully inadequate. NSBA considers it essential that an annual target for additional 24-hour moorings appears on the face of the plan.

Of the four yacht stations on the Broads, only that at Great Yarmouth needs to be staffed for safety/navigation reasons. Those who pay the substantial yacht station fees have a reasonable expectation that the facilities will be satisfactory. They are far from being so at those currently operated by Waveney DC at Oulton Broad and Beccles. This is a matter ripe for partnership work between the Authority and the District Council (or its successor management body). The alternative is to close the facilities and leave the two yacht stations as free, unmanned facilities. The yacht station in Norwich has been grossly under-used in recent years. It will remain under-utilised as long as it is notorious for night-time hooliganism taking place there, especially at weekends. Anecdotal evidence indicates that the situation is far worse

than the official figures (presumably reported incidents) reveal. It does not make sense to have a daytime staff presence and no night-time security. NSBA recommends that an added objective should be to assess the need for, and nature of, staffed yacht stations and to deliver in partnership an acceptable, financially viable model for yacht stations.

NSBA is concerned about the meaning of TR1.5. If it refers to monitoring and maintaining the existing zoning and management of water space in respect of powerboat racing and water skiing NSBA is content. Any attempt to introduce further zoning, whether in term of time and space, in respect of the more traditional forms of boating would be strongly resisted by the toll payers. 'Voluntary zoning' (referred to in sub-section 4.4.6) is not normally an acceptable compromise; it leads to expectations which apply such moral pressure as to make the zoning de facto compulsory.

NSBA appreciates the difficulties that may confront proposals that open up new areas of water space for navigation (eg above Geldeston lock) but pressure for space means that examining the opening up of new areas should be a priority under the draft revised plan. It is a far more pressing issue than many identified under the plan. NSBA is disappointed that the issue is not referred to at all in the tables of strategic objectives and is only accorded a brief mention in sub-section 4.4.6.

NSBA questions the revised draft plan's desire (see sub-section 5.2.3, the associated part of the long term aim and TR3.1) to improve access to and from the water. There is a danger that opening up access in the way described will destroy the tranquillity and sense of solitude which lie at the heart of the 'Broads' experience'. NSBA is aware of the need for access but considers that the current level of access goes as far as necessary. The current balance seems right. There is no need for every part of the waterways to be accessible by land. It should be remembered that one of the special features of the Broads' heritage which sets it apart from the Thames, the canal system and many other inland waterways is the lack of tow paths.

Priorities

The revised draft plan contains 88 'means to achieve' the strategic objectives set out in it. This is an ambitious programme for an Authority which claims that its staffing level has been radically reduced. NSBA considers that it is impossible that all of them will be delivered in the anticipated financial conditions in the next 5-7 years. Indeed, it finds it inconceivable that everything could be delivered in that timeframe in the most favourable of economic climates.

Prioritisation is essential. NSBA considers that to prioritise 43 'means to achieve', as the plan does, is insufficiently rigorous. It is fundamental that the prioritisation within the Plan concentrates on the sharp end of the Authority's activities. Some of the means to achieve lie at fringes of the Broads Authority's statutory functions, examples are LCI.1, AL4.1, AL4.2, PE 1.1 and PE1.2 (some of which are given priority status in the revised draft plan). Should an Authority which has been cut to the bone be engaged in fringe activities?

NSBA is puzzled that a plan which identifies 43 priority 'means to achieve', the vast majority of which require funding, states at section 1.4 that 'some difficult choices will need to be made about priorities for funding'.

NSBA considers that the five most important priority areas in terms of actions/means to achieve are (taking on board our comments about them):

sediment management;
transfer of lower Bure/Breydon Water;
flood risk management;
tree and scrub management along river corridor (and not just projecting or overhanging trees);
dealing with invasive non-native species.

NSBA believes the plan should detail how the Authority intends to ensure the priorities adopted achieve popular support from users of the Broads, and, in particular, from those who are directly contributing to Broads Authority revenues through their boat tolls.

General

NSBA believes that the general tone of the document underplays the importance of economic and navigational activity within the man-made environment which is the Broads. NSBA would expect to see more recognition of the importance of all kinds of boating, and sailing in particular, in terms of personal development, leisure opportunities for the local population and enhancement of quality of life.

Section 1.4 of the revised draft plan assumes that boat numbers will continue to hold up. Feedback from individual members and affiliated organisations indicates that the point has been reached, after constant toll increases and at a time of financial stringency, when owners may move their craft to toll free areas elsewhere. This is particularly relevant in the case of large motor cruisers and sailing dinghies. The Broads do not have a monopoly of navigable waterways, marinas and sailing clubs in the region. There are thriving boating centres along the north west Norfolk coast and down the coast from Gorleston, all of which are easily accessible by most toll payers. In addition, for the smaller types of craft there are local inland waters which are not part of the Broads navigation. It should also be remembered that a significant proportion of toll revenue is raised from residents outside the local area; for example, 36% of NSBA members (practically all of whom are toll payers) live outside Norfolk and Suffolk. The likelihood of a move away from the Broads has been increased by the anger of toll payers at the rise in shared costs charged to the navigation and the way in which this has been done.

As currently drafted eight of the 'means to achieve' do not have any form of target and some of the others have imprecise targets. For example 'Increase in no. of overhead ... electricity ... cables undergrounded' (LC5.1) is achieved once the first cable is buried – hardly challenging. NSBA accepts that the outcomes from some of the means to achieve are not easily quantifiable but it believes that the revised draft plan would be significantly improved if every means to achieve had a target (otherwise how can the progress of the plan be monitored in respect of them?) and if those targets which are susceptible to quantification were quantified so that measurement could be applied to identify whether they had been achieved or not.

The achievement of LC3.4 and TR3.3 would be assisted by an indication of the mechanisms for delivery; the relevant boxes are currently blank.

<p>BA response</p>	<p>Comments noted.</p> <p>The NSBA's notion to transfer the navigation function to a separate authority would not be supported by the Broads Authority.</p> <p>Priorities for 2011-15: the text has been revised to clarify priorities for navigation management set out later in the plan (2.4. Management of the Navigation Area).</p> <p>It should be noted that the Broads Plan is a plan for the Broads, not just the Broads Authority, and other organisations will lead on a number of actions in the plan for the beneficial future management of the Broads. Targets and monitoring indicators against specific actions have been further developed; the electronic version of the plan will provide regular updates of progress against objectives.</p> <p>Development of a long-term strategic approach to flood risk management to follow on from BFAP will require assessment of a range of engineering options. The early stages of the Climate Change Adaptation Plan process will examine desired outcomes for the Broads and potential solutions through a full process of partnership and community consultation (objective CC3.2)</p> <p>The Authority has been subject to public sector funding constraints and reduction in Central Government funding. The additional temporary funding from Defra towards the Authority's statutory purpose for navigation was built into its baseline budget by Defra before the additional funding constraints were imposed. NA1.1 has been revised to emphasise the Authority's commitment to seeking sources of additional funding towards management of the navigation area, including potential future funding from Defra.</p> <p>The text and actions relating to bridges have been revised (objective NA5).</p> <p>The Authority will review the Mooring Strategy and mooring provision as part of the preparation of an integrated access strategy (objective TR3.1). The review will consider gaps in current provision and potential sources of increasing this provision.</p> <p>Issues related to yacht station provision and staffing are addressed under objective TR2.3.</p> <p>Opportunities for expansion of water space will be explored (objective TR1.6) but the priority will be to maintain the existing area.</p>
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<p>Norwich City Council (Planning)</p>	<p>Thank you for consulting Norwich City Council on the revised Broads Plan. The feedback on the previous comments we made was also very useful and so thank you for sending this through. We only have two further minor comments to make on the revised Broads Plan which are:</p> <ol style="list-style-type: none"> 1) We welcome strategic objective LC5 to work with partners on development outside of the Broads' executive boundary, and recognising the positive benefits that this growth may bring. We also look forward to working with the Broads Authority on sites within the Broads' executive boundary in the east of Norwich. 2) We also welcome strategic objective NA5 and accompanying paragraph 4.4.7 that looks to mitigation measures when providing new bridges, such as de-masting or lay by moorings. <p>Also we are pleased to see the issues of visitor pressure being considered through the Appropriate Assessment. This</p>
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	<p>matter was raised at the examination of the Joint Core Strategy and so it is good to see further consideration being given to this in subsequent strategies to the Broads Plan. Otherwise we have no further comments on this plan.</p>
BA response	Comments noted. No changes to plan.

<p>Norwich City Council (Natural Areas Officer)</p>	<p>Page 1, section 1.1, paragraph 2, lines 3-4: What is meant by 'livestock and their products, especially wood'? This needs re-phrasing. Line 4: presumably, 'vehicles' refers to 'motor vehicles'. Page 5, section 2.3, first line of quotation by Prof. Sir John Lawton: '...collection of wildlife sites are generally too small...' The 'are' should be an 'is', although he may have actually said it like this. Page 6, section 2.4, table 2, point 3: Is an increase in woodland cover a valid objective for the Broads, bearing in mind the loss of more valuable habitats to increased tree growth? Page 14, section 4.1.1, para 4, lines 6 & 9: Needs consistency in use of lower case or capital 'V' in named river valleys, e.g. in line 6 lower case 'v' is used for Ant, Waveney and Upper Thurne Valleys, but in line 9 capital 'V' is used for Ant Valley. Suggest standardising on capital 'V'. Page 15, section 4.1.3, para 3, line 3: Suggest using a semi-colon after 'archaeological interest' at end of line 2 to avoid starting a sentence with a number (24). Page 20, section 4.2.2, line 3: Suggest avoiding starting a sentence with a number (28). Line 7: use capitals for National Nature Reserve, to be consistent with the other statutory designations mentioned. Page 23, Biodiversity, para 2: Should this begin 'The high conservation value of the Broads...'? Page 25, BD6.2: This should include Norwich City Council and the Norwich Urban Fringe Project as partners. Norwich City Council owns land at Whitlingham, and has organised joint initiatives (especially involving invasive weed control) with the Broads Authority, and the council also carries out invasive weed control along the River Wensum partly to prevent seeds being carried downstream into the Broads. The Norwich Urban Fringe Project works closely with, and is partly funded by, the Broads Authority. Page 26, Agriculture: Could this include a mention of encouraging possible new agricultural innovations that might benefit the area? (Such as water buffalo farming, as advocated by Brain Moss and others?). Page 42, Tourism, Recreation & Access: Could this include a mention of encouraging more 'eco-friendly' powered vessels, such as electric (including solar-powered) instead of petrol or diesel boats? What about, for example, providing recharging points at boat stations? Page 48: Mention Norwich City Council and Norwich Fringe Project in abbreviations list if appropriate.</p>
BA response	<p>Comments noted and minor text revisions made to plan. Woodland cover: the Vision for English National Parks and the Broads emphasises 'the right trees in the right places'. The Broads Plan does not have objectives to increase woodland cover.</p>

'Eco-friendly' boating is encouraged through the Sustainable Tourism Strategy for the Broads and other initiatives such as 'The Green Blue' and electric charging points, and through the promotion of low-impact boating such as sailing, canoeing and rowing.

Norwich Theatre Royal

I am writing to offer Norwich Theatre Royal's endorsement of Strategic Aims TR1, TR2 and TR3. These Aims broadly seek to improve visitor access to, and enjoyment of, the Broads and its rivers.

The Theatre Royal manages the Norwich Playhouse, which sits on the north bank of the Wensum River between the George Street and Duke Street Bridges.

The riverside walkway along the Wensum through Norwich stops at one of these bridges and restarts at the other, forcing visitors to take a detour either through PriceWaterhouseCooper's car park or down through Colegate. Thousands of students of Norwich University College of the Arts are also forced every day between the same alternatives in the absence of a sensible and direct route between college buildings in George Street and Duke Street. The section of the Wensum between these two bridges has a basin in which pleasure boats might turn around, as well as a set of steps down to the river which would provide improved access if there were access to the steps themselves from the land side.

We have, in concert with other interested parties, for some time been seeking to complete the riverside walkway for the benefit of the Broads, the City, its students, residents and visitors.

Adoption of Strategic Aims TR1, TR2, and TR3 and sensible implementation would also contribute to Strategic Aim LC2, which seeks to identify and promote distinctive landscape character areas and deliver integrated project management in liaison with local communities.

BA response

Comments noted. No changes to plan.

Read, Mr Bryan

Thank you for sending me the revised draft plan together with the Authority's comments on my response to the first draft. You have dealt satisfactorily with most of my points and there are only minor points on which I am commenting further.

Page 16. there is a reference to drainage mills – an iconic feature for the Broads landscape
These are covered in LC3 but I would like to see a more specific reference to mills and pumps and the Norfolk Windmills Trust as a key partner. This is an important area now that Norfolk County Council support is being withdrawn from the Norfolk Windmills Trust

Page 26. You rightly suggest that agricultural support has moved away from food production. However, with the current world food situation, it is likely that there will be increasing emphasis on production and we could be faced with another Halvergate situation. The Authority should recognise that it is a possibility and the effect it could have on

	<p>the landscape.</p> <p>Page 29 and 30. The objectives are fine but it is not clear how the Broads Authority can be involved in achieving them. May be a general indication of support for action that others will take is recognised.</p> <p>Page 32 4.4.3 refers to 'bank edging'. There should be a recognition that is important to preserve a satisfactory 'edging' for the isolated moorings which are such an important feature of the upper reaches of the Northern Rivers.</p> <p>Page 37 5.1.2. There should be a reference to the strap line Britain's Magical Waterland in this section about branding.</p> <p>Page 39 5.1.6. There should be a refence to the Broads Forum in this section.</p> <p>Page 41 PE2.2 It is important to emphasise as you are doing in this section the importance of using media technology that is available today and show that the Authority is catering for the new generation and not for those whose nostalgia for the Broads wants everything to stay as it was and for its character to remain frozen in time. TRI.2 probably covers this point adequately.</p> <p>On a minor point of good English, In suggest the first sentence on page 44 be revised. The second part starting ...'or be undertaken' should probably start a fresh sentence.</p> <p>On a general point, I do not think that the plan shows clearly how the objectives are to be achieved. I appreciate that the Authority has a three year rolling business plan but this is not likely to be studied by many. If Broads Plan 2011 could have a short section derived from the 'Means to achieve' section indicating in simple terms what the Authority is actually going to do, the purpose and outcome of the Plan might be more apparent to the general public. This would also counter those who say that it is not a plan at all. Certainly it needs to be clear that this is not the Business Plan.</p>
<p>BA response</p>	<p>Comments noted and minor amendments made to plan. More explanatory text has been added on Broads Plan links with the BA Annual Business Plan and other key documents, plans and programmes; links to these mechanisms will be included in the electronic version of the Broads Plan.</p>
<p>RSPB</p>	<p>Thank you for consulting the RSPB on the revised draft of the Broads Plan and associated documents. We are pleased to note that the recommendations provided in our response dated 13th August 2010 have been incorporated into the revised draft. Whilst the majority of our concerns regarding the previous Broads Plan draft have therefore been addressed, we have concerns regarding the removal of specific targets (outcomes) from the revised draft and consider information within the Appropriate Assessment (AA) to be inaccurate. Our concerns are outlined in full below.</p>

The need to reinstate “Outcomes by 2016”

The RSPB is, for the most part, supportive of the aims, objectives and actions for the different management areas outlined in the draft Broads Plan. In the consultation draft for the period 6th June to 13th August 2010, the RSPB was pleased to see specific targets included (please refer to the annex). These “outcomes” provided clear guidance on what should be achieved within the next 5 years and provided metrics against which the Plan’s success could be judged. Monitoring of the Plan’s objectives is essential, so it is disappointing that specific outcomes have been removed in the revised draft. The removal of specific, measurable targets weakens the ability to monitor the Plan and determine how successful it has been.

As a Section 28G authority the Broads Authority has a duty to further the conservation and enhancement of biodiversity. Section 40 of the NERC Act 2006 and PPS93 also set out duties to conserve, enhance and manage biodiversity wherever it is found. Provision of more specific targets would therefore enable the BA to monitor its progress in meeting its obligations. For example, Objective AL2.3 mentions that farm-based projects should benefit biodiversity, flood and carbon management, but the only target is to develop carbon land management advice. This target does not consider specific increases in pairs of breeding and wintering birds, their range within the Broads, measures to indicate that other flora and fauna have benefitted, or even a target to implement any of the carbon advice.

Objective BD4.2 specifies that the area of fen and drained marsh should be increased, but there are no specific area targets. Without specific targets it is unclear how its success will be determined. The current objective and targets could allow a relatively small gain in species numbers or habitat range to be deemed effective. Its overall contribution to a coherent ecological network could, however, be insignificant, thus the objective should not be deemed successful.

We recognise that the objectives will have to be delivered through partnerships with a range of landowner and interest groups, but the BA has ultimate responsibility for the management of the Broads area and will need to show that its management policies have been effective.

The Appropriate Assessment (AA)

The RSPB is pleased that an AA has now been carried out on the Broads Plan. We broadly agree with the AA conclusions, and accept the conclusions of the Task 2 assessment. We support the need for strategies such as the Broads Sustainable Tourism Strategy Action plan to undergo an AA as soon as possible, as these will outline projects where specific impacts on Natura 2000 sites can be identified. Where impacts are identified measures to mitigate such impacts should be outlined and projects where mitigation will be insufficient to avoid an adverse effect should not be promoted.

Whilst we consider the AA conclusions to be appropriate we have noticed several inaccuracies with the information contained within the document. These include:

A failure to consider Ramsar sites (Breydon Water and Broadland). These sites are important wetland areas and require AA alongside Natura 2000 sites. This is in line with Natural England comments on the AA of the Broads

Authority's Development Management Policies Development Policies Document (DMPDPD) dated 13th January 2011. Upton Broad and Marshes SSSI and Shallam Dyke Marshes, Thurne SSSI being considered to lie outside the Broads Authority's executive boundary (p. 7), despite both SSSIs appearing to be within the Broads Authority boundary. Large parts of the text covering the vulnerabilities of Breydon Water (p. 12) being either inaccurate or out of date. For example:

The RSPB disagrees strongly that Breydon Water is a robust system. The site is sensitive to changes in water levels, siltation and pollution events. A careful balance also needs to be struck between the use of the area for recreation and its conservation objectives, as many of the bird species using the site are sensitive to disturbance.

The water management scheme that is mentioned was completed two years ago.

MAFF has not existed since 2001 when Defra was created.

The flood defence works mentioned were completed 2 years ago. BESL are carrying out ongoing maintenance in accordance with the remainder of their contract with EA.

Whilst future development at Great Yarmouth will have to be assessed in accordance with the Habitats Regulations it must be assumed that this could increase recreational pressure.

The information outlining the vulnerabilities of Great Yarmouth North Denes SPA is not clear (pp.13-14). This site is split between North Denes beach and Winterton Dunes. The RSPB manages the little tern colony at North Denes (by permission of Great Yarmouth Borough Council) and Natural England manage the little tern colony at Winterton. Information in the AA text does not distinguish these two sites clearly.

The omission of the Greater Norwich Development Partnership Green Infrastructure Strategy for consideration under section 4.3 (other relevant plans or projects).

These errors were highlighted in the DMP DPD and should be addressed as soon as possible to ensure the information used to form conclusions within the AA is robust.

If you have any queries, please do not hesitate to contact me. We would be happy to meet to discuss our comments with the Broads Authority should this be deemed necessary.

- 1 As set out in the Wildlife and Countryside Act 1981 (as amended)
- 2 Natural Environment and Rural Communities Act 2006
- 3 ODPM (2005). Planning Policy Statement 9: Biodiversity and Geological Conservation. HMSO.

BA response

Comments noted.

Outcomes have been replaced by targets/indicators against specific actions in the plan. This includes links to sets of targets and indicators within other documents, e.g. Broads BAP, site management plans. The electronic version of the Broads Plan will allow progress against objectives to be monitored and updated.

Reference to the NERC Act has been added in section 2.2 Biodiversity.

A number of factual amendments have been made to the Appropriate Assessment.

<p>Somerton Parish Council</p>	<p>Although welcoming many of the changes in the revised plan it is difficult to comment on future participation and involvement without knowing the outcome of the Government’s consultation of the governance arrangements for the Broads.</p> <p>We again welcome the references made in 5.1.6 – ‘Having a Say’, that “Active community and partnership involvement will also need to be at the heart of project delivery at a local level”, and we hope that this will be implemented without delay. This Parish Council looks forward to the Authority’s decision on our request to modify the existing development boundary which was made several years ago.</p> <p>We have also made several recommendations to improve communication and to encourage community involvement at the Upper Thurne Working Group’ level, however, these suggestions have not been acknowledged to date.</p>
<p>BA response</p>	<p>Comments noted. No changes to plan. The results of the Government consultation on the governance of National Parks and the Broads Authority is expected to be announced in early summer.</p>

<p>South Norfolk Council</p>	<p>(Draft response awaiting Cabinet endorsement)</p> <p>South Norfolk Council supports the general sentiment and thrust of the Broads Plan. Continued joint working on development pressures, water quality and management, flood risk and sustainable tourism will help the continued attractiveness and success of the Broads as a visitor destination and as part of a wider network of important sites - the Brecks, the Broads and the coast. From a South Norfolk perspective the Council feels that greater recognition and mention of partnership schemes e.g. Waveney Valley Project would show the importance of the Broads in a wider context and improve the document.</p> <p>Introduction - Sets out the history, background and purpose of the Broads Authority and the Broads Plan. The Broads Authority acknowledge that significant cuts to the National Park Grant will require difficult choices about priorities for funding.</p> <p>Suggested response: Support general approach but recommend that within the section relating to the Broads Statutory Obligations, there should be mention of S.40 of the Natural Environment and Rural Communities (NERC) Act 2006. This important and far reaching piece of legislation is applicable to all public bodies.</p> <p>Context for the Plan - Sets out the national context (revised national policy statement and circular - includes supporting and developing British farming and sustainable food production, enhance the environment and biodiversity, sustainable green economy resistant to climate change), long term vision for English National Parks and specifically for the Broads, sustainable development, guiding principles (e.g. precautionary principle approach and management approach to be informed by scientific knowledge). The three key priorities for the next five years are</p> <ul style="list-style-type: none"> • Planning for the long-term future of the Broads in response to climate change and sea level rise • Working in partnership on the sustainable management of the Broads
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- Encouraging the sustainable use and enjoyment of the Broads

Suggested response: It is felt that this section could benefit from a recognition that several of the key and guiding principles of Broads Management can be contradictory. Namely the fact that the conservation of many of the cultural, economic and environmental assets of the Broads, may require actions that in themselves may not be seen as truly 'sustainable'. Suggest that the Broads may like to consider including the Marine and Coastguard Agency (MCA) and the Norfolk Biodiversity Partnership as a partners in the 'Priorities for 2011-15 section'.

Planning for the Long Term Future of the Broads in Response to Climate Change and Sea Level Rise - Climate change and sea level rise pose a number of critical threats to the environment, character and functioning of the Broads. The Broads Plan sets out a number of partnership approaches in response to the challenges of

- Flood Risk Management. Rising sea levels will increase the risk of flooding and impact upon social and economic viability. Whilst an SPD flood risk has been prepared the major focus is on preventing coastal incursion via the Shoreline Management Plan and through the Broadland Flood Alleviation Project.
- Carbon Reduction. Broads Authority have Greenhouse Gas Reduction Strategy to reduce emissions and promote sustainable tourism, travel and land management.
- Developing a Climate Change Adaptation Plan for the Broads. The Broads Climate Change Adaptation Plan is being developed to
 - a) Identify and understand impacts and implications. Risk assess impacts and adaptive actions.
 - b) Develop long term landscape scenarios and best adaptation options
 - c) Programme of achievable adaptation measures to enable environmental, social and economic sustainable development
 - d) Monitoring and review
- Other Plans and Strategies for Climate Change. Recognises need for strategic, coordinated action at national, regional, county and local level.

Suggested response: Although there is an inferred consideration of the balance between the continued expenditure of flood protection and allowing natural processes to direct change, not enough is suggested as to the assessment of the economic impact of inundation. It is also felt that the section would benefit by linking to County and National programmes related to expanding areas for the natural environment, more specifically – NWT Large Areas for Wildlife.

Working in Partnership on the Sustainable Management of the Broads – As the title suggests this section sets out a number of areas of partnership working (listed below) along with some monitoring of how to achieve and deliver the objectives.

- Landscape and Cultural Heritage – covering landscape character, geodiversity, historic environment and cultural heritage, housing and development, tranquillity and world heritage status (Note: the Broads bid for world heritage status was unsuccessful)..
- Biodiversity – covering designations, water quality and resources, habitats and species and invasive non-native species.
- Agriculture and Land Management – covering agriculture and reed and sedge cutting.
- Management of the Navigation Area – covering Broads navigation, sediment management, bank erosion, riverside tree and scrub management, aquatic plant management, navigation safety and bridges.

Suggested response: Support the Broads expressed desire to continue to work closely with neighbouring authorities on strategic growth, water quality and housing issues. The Biodiversity section could include mention of the Norfolk Biodiversity Partnership (of which the Broads Authority is a member). It is also suggested that the Broads Authority seeks to more fully integrate their Biodiversity Action Plan with the Habitat and Species Action Plans developed by the Norfolk Biodiversity Partnership. This would enable the work/projects to be seen in a wider context covering things such as large areas for wildlife, species movement in and out of the Broads area and the battle against non-native species.

Encouraging the Sustainable Use and Enjoyment of the Broads – This section sets out how the Broads intends to deliver its statutory responsibility to promote opportunities for the understanding and enjoyment of the Broads special qualities by the public along with some monitoring of how to achieve and deliver the objectives

- Promoting Understanding, Enjoyment and Wellbeing – covering promoting understanding and enjoyment, a Broads ‘brand’, information and interpretation, reaching a wider audience, volunteering and having a say.
- Tourism, Recreation and Access – covering sustainable tourism, recreation and access and service provision.

Suggested response: This section highlights the inherent problem of seeking to balance the tension between promoting tourism and economic development in the Broads at the same time as maintaining a focus on sustainable development. The Council supports the Broads Authorities desire to deliver sustainable tourism that respects the unique and sensitive environment of the area. It is suggested that it would benefit from an increased recognition/examples of the partnerships and multi-agency work that occurs on the ground to the mutual benefit of all those involved e.g. the Waveney Valley Project. Partnership and cooperative working will continue to increase and is an essential element in ensuring that the Broads and its surrounding environments are managed in a long term sustainable manner.

South Norfolk Council would welcome the involvement of the Broads Authority at the strategic level in partnerships which are not within the Broads Executive area but have a proximity to the Broads and who share common aims. For example, the Waveney Valley Project offers the opportunity for developing a strategy which is mutually beneficial to

	<p>partners, but extends well beyond the Broads Authority Executive area. Similarly, South Norfolk Council welcomes the Broads Authority's commitment to work with other local planning authorities on cross boundary issues. Working together will, it is hoped, result in planning decisions that meet the aims and objectives of all the authorities concerned.</p>
<p>BA response</p>	<p>Comments noted. Reference to the NERC Act and integration of the Broads BAP with other biodiversity plans is noted in section 2.2 Biodiversity. It is recognised that detailed issues relating to climate change and sea level rise adaptation and mitigation will need to be addressed through the Climate Change Adaptation Plan consultation and preparation process.</p>
<p>Sport England</p>	<p>Sport England wish to congratulate the Broads Authority on the production of a comprehensive document. Our only representation relates to our previous comment relating to the need to reflect the ongoing management of Water-Skiing and Wakeboarding on the Broads, through the Water ski Review Stakeholder Panel. We note that this has been included within Action NA4.5 of the draft plan (Management of the Navigation Area); therefore we are now fully supportive of the draft plan.</p>
<p>BA response</p>	<p>Comments noted. No changes to plan.</p>
<p>Suffolk County Council</p>	<p>The County Council welcomes the review of the key strategic management plan for the Broads, and supports the 3 key priorities for all partners for the next 5 years 2011-15, namely:</p> <ol style="list-style-type: none"> 1. Planning for the long term future of the Broads in response to climate change and sea level rise 2. Working in partnership on the sustainable management of the Broads 3. Encouraging the sustainable use and enjoyment of the Broads <p>Section 2 Context for the Plan I note that Members of the Broads Authority supported the objective that "By 2030, the Broads will be a national park where the traditional rights of navigation are respected and embraced " (BA14th May 2010). I think it would be helpful to explain the benefits that this would confer over the current arrangements where the Broads Authority is a Special Statutory Authority.</p> <p>Section 3 Planning for the Long –Term future of the Broads I agree that the adoption of the Lawton Report principles is needed to help guide the management of areas such as the Broads at the landscape scale if they are to be resilient in the face of sea level rise and climate change. In order to make this a reality though further efforts will need to be made to develop strong partnerships between a wide range of a private landowners, NGOs and statutory agencies to make this happen. Experience on the Suffolk coast has shown that</p>

	<p>the adoption of a “Total Environment” approach can help achieve this, whereby the DEFRA “family” and local authorities work more closely together to reduce the barriers to achieving sustainable land management solutions.</p> <p>Section 4 Working in Partnership on the Sustainable Management of the Broads (Landscape) Suffolk County Council has considerable expertise in the preparation of Landscape Character Assessments (LCAs) and Historic Landscape Characterisation (HLCs) and will be pleased to support the further development of the Broads LCA. The promotion of the Broads as a key national and international asset through progressing further an application for World Heritage Status is welcomed.</p>
BA response	<p>Comments noted and support welcomed. No changes to plan. Reference to World Heritage status has been removed as the Authority was unsuccessful in its bid for inclusion on the UK Tentative List.</p>

<p>Three Rivers Way Assoc</p>	<p>The Three Rivers Way Association would like to make the following comments on the Revised Draft for Public Consultation on the Broads Plan 2011. We apologise for the late submission of these comments and trust that they can still be considered.</p> <p>The Association acknowledges the responses of the Broads Authority to our earlier submission with reference to the initial consultation document. It is clear that the revised Plan is still a high level plan and contains little detail about ways in which the Aims will be achieved.</p> <p>We suggest that the creation of a Sustainable Travel Plan should be specifically included as part of the Long Term Aim for Tourism, Recreation and Access. In addition, the term Sustainable Access Plan should replace Strategic Access Plan in TR3.1</p> <p>While the objectives in Section 5.2 go some way to incorporate the aspirations of local people and the supporters of our Association with regard to sustainable travel and consequent carbon reduction, we believe that it is essential that the Broads Authority consult widely before formulating the details of the Sustainable Travel Plan. Community groups such as ours should have an involvement in the key debates and decisions which impinge on the ability for us all to make our transport choices. Transport modes on land and water that reduce environmental impact, improve health and support tourism must be supported and encouraged: walking and cycling must be encouraged and the necessary infrastructure provided.</p> <p>The Three Rivers Way Association looks forward to working with the Authority in the development of the detailed activities and projects that will improve sustainable access.</p>
BA response	<p>Comments noted and support welcomed. Section 3.2 'Access and service provision' notes that the integrated access</p>

	strategy (objective TR3.1) will incorporate and coordinate existing Broads access plans and tie into wider sustainable access and transport plans.
Walpole, Mr Ray	<p>Arising out of yesterday's Forum meeting I suggest that 5.2.2 "Recreation" should mention:</p> <ul style="list-style-type: none"> - How flood protection walls are being used to improve the footpath network and enhance angling facilities. - How communities can cooperate to provide new amenities such as the new village green, slipway and extended moorings at Cantley. - How communities can innovate ways of sharing facilities with a wider public as is happening at South Walsham moorings. <p>Is the Plan the best vehicle to raise the prospect of a new Gateway to the Broads: sea-borne visitors? Eastport is looking for business, would they research cruise ships calling to enable their passengers to make day trips to the Broads countryside? Is there scope for HEART to attract sea-going yachts/cruisers to moor at Norwich Yacht Station? The Borthwicks are refurbishing the Ferry Boat in King Street as a back-packer hostel. I think that the derelict boat shed near the Cow Tower could provide another City accessible slipway and restore boat hire so near to the Close. How can we stimulate the communities of Norwich, Lowestoft and Gt.Yarmouth to assist us in promoting the Broads countryside which touches their environs? I was most impressed to learn of what was happening at Nicholas Everitt Park.</p>
BA response	Comments noted. Community involvement in planning and delivering local recreational amenity improvements is noted in section 3.2 'Access and service provision'. Opportunities provided by the Broads' links with its urban surrounds are noted in Section 2.1 'Development and housing' and 3.2 'Sustainable Tourism'.
Waveney District Council	<p>Having reviewed your document and discussed with WDC Planning policy. The proposed plan sits in line with the approach taken in Broads LDF documents. There is also nothing contrary to Waveney's views on sustainable development.</p> <p>In terms of Tourism and Recreation the plan highlights the Sustainable Tourism Strategy as a delivery process which is in line with Waveney DC ambitions for the broads in future years.</p>
BA response	Comments noted. No changes to plan.

20 May 2011