



**Broads Authority**  
**Local Plan for the Broads**  
**Sustainability Appraisal Adoption Statement**

**1. Overview**

- 1.1 The Broads Authority (BA) adopted the Local Plan for the Broads (LP) its meeting on 17 May 2019. In accordance with Regulation 16(3) and (4) of the SEA Regulations, the Council has produced this sustainability appraisal (SA) adoption statement. It describes:
- how the SA process has influenced the progression of the LP
  - how environmental considerations and consultation responses have been taken into account during its preparation
  - outlines the reasons for choosing the preferred strategy in light of other reasonable alternatives
  - sets out measures that will be used to monitor the effects of the LP
- 1.2 Full details are set out in the Submission SA, which was submitted with the LP to the Secretary of State for Communities and Local Government in March 2018 and the Modifications SA which was consulted on early 2019. There are also accompanying Appendices which SA the changes to the Local Plan required through the Inspector's Report.

**2. Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) background**

- 2.1 Sustainability appraisals (SAs) are a requirement of the Planning and Compulsory Purchase Act 2004 and Strategic Environmental Assessments (SEAs) are required by European Directive EC/2001/42 (SEA Directive). This was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes July 2004. Central government guidance (ODPM, 2005) has merged these processes to allow for a single joint appraisal to be carried out; therefore the Sites Specifics SA incorporates the SEA.
- 2.2 The SEA Regulations requires local planning authorities to carry out formal strategic environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. The SEA process ensures that opportunities for public involvement are provided and the significant environmental effects arising from policies, plans and programmes are predicted, evaluated, mitigated and monitored.
- 2.3 The National Planning Policy Framework (NPPF) requires a SA (SA) of local development documents (Local Plans), which incorporates the requirements of the SEA Directive but broadens this to also include social and economic considerations. The purpose of SA is to systematically appraise the social, environmental and economic effects of the

strategies and policies in a local development document from the outset of the preparation process. This will ensure that decisions are made that accord with the principle of sustainable development.

- 2.4 Throughout the remainder of this statement, reference to SA encompasses the requirements of a merged SA/SEA.

### 3. SA process

- 3.1 The Broads LP identifies, designates and safeguards land for a particular use, and sets out policies to be used when determining planning applications.
- 3.2 The progressive stages of the SA have been prepared by Planning Policy Officers from the BA with input from other relevant services of the BA.
- 3.3 The SA comprised a number of stages.
- The production of a **scoping report**, which examined sustainability issues in the borough. The issues identified were used to produce a sustainability appraisal framework against which the plan could be measured. The scoping report was published for consultation in October 2014.
  - The appraisal of the **Issues and Options** document, the results of which are presented within the SA report. The consultation period ran from 15 February to 4pm on 8 April 2016.
  - The appraisal of the **Preferred Options** of the plan. The consultation ran from 5 December 2016 to 3 February 2017.
  - The appraisal of the **Publication version** of the plan. The consultation ran from 9 November 2017 to 12 January 2018.
  - The appraisal of the **main modifications** to the plan proposed in January 2019 during the Examination in Public.
- 3.4 At each stage the vision, objectives and policy content of the LP were assessed against a framework of sustainability objectives. The objectives covered social, environmental and economic issues reflecting national, regional and local issues as well as environmental considerations set out in the SEA guidance. Table 1 summarises the key sustainability issues.

#### **Table 1: Key sustainability issues/SWOT analysis**

##### **Strengths**

- Extensive, diverse and very highly valued landscape, habitats, flora, fauna and cultural and heritage assets.
- A unique wetland and low-lying area and status equivalent to a National Park.
- Formal nature conservation designations of the Broads and many areas within it provide relatively high levels of policy protection or conservation.
- A short undeveloped stretch of coastline.
- High levels of tranquillity through much of the Broads; in particular, a sense of remoteness in some parts despite these being located close to concentrations of housing and industry.

- Attractive environment, providing the basis for most of the Broads' economy and recreation for residents and visitors.
- Britain's largest protected wetland and fourth largest inland waterway, with the status equivalent to a National Park
- High level of interaction with the surrounding area, with complementary provision of facilities and opportunities. For example, employment and development opportunities, community facilities, etc. in surrounding districts, towns and in Norwich also serve Broads' residents, while the Broads provides recreational and business opportunities to those from the wider area.
- Thriving hire boat industry contributing to the local economy.
- Many organisations and individuals caring for or promoting the value of various aspects of the Broads.
- Importance of the Broads for the identity and recreation of a much wider area.
- The age profile of the area shows more older-aged persons than the surrounding area. Older people are often motivated, educated and experienced and play an important role in the community.
- Substantial, engaged community of private boat owners.
- Local boating clubs and classes that enable local people (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors
- Only few ( or localised) visual impacts from development outside the area of the Broads.
- Many heritage assets including conservation areas and drainage mills.
- The international significance of the paleo-archaeological remains within the Broads and the unusually well preserved organic remains.
- A wealth of archaeological deposits that are not well represented elsewhere within the country

### **Weaknesses**

- Some of the protected habitats in less than optimal condition and/or vulnerable to change as a result of, for example, fragmentation, inappropriate land management and pressure from nearby development.
- Some areas of fen and some lakes in decline.
- Almost the whole of the Broads area subject to, or at risk of, flooding.
- High levels of listed buildings and other heritage assets at risk, and particular problems in finding compatible and beneficial uses that could help secure the restoration and maintenance of heritage assets such as wind pumps/drainage mills.
- Continuing (though declining) problems of water quality in the rivers. Ground water quality problems.
- Difficulty of modernising and adapting existing buildings and uses, and accommodating new ones, due to flood prone nature of the area.
- Decline in traditional industries such as millwrights and reed and sedge cutters.
- High reliance on tourism which can leave the economy vulnerable and mean a loss of resilience as a result of changes to the holiday/recreational patterns.
- Car dependence of local communities and businesses and fragmentation of settlements.
- Depleted local community and/or visitor facilities, often through displacement by higher value activities (principally housing).
- Tensions and perceptions of incompatibility between interests of conservation, recreation, tourism, navigation and local communities, and between local interests and the national value of the Broads.
- The ageing population could lead to imbalance in the community.
- Lack of housing that is affordable resulting in some people having to commute to places of work.
- Deficiencies of moorings in some places to meet the needs of various waterspace users.

- Increasing pressures for land use change around areas of settlement.
- Resourcing difficulties for organisations that help to manage the environmental assets.
- Reliance on agricultural subsidies to promote land management for nature conservation.

### **Opportunities**

- Climate change:
  - Likely impacts that may create opportunities such as changes in flora, fauna and landscape, patterns of recreation and changes in agriculture and its practices.
  - Adaptation through erecting, raising and strengthening flood defences, realignment in more flood prone locations to make more space for water and linking wildlife habitats to provide resilience.
  - Evolving low carbon lifestyles, construction and patterns of land use and settlement.
- Maintaining the recovery and improvement of water quality achieved over the last few decades by long term and ongoing action across a range of agencies.
- Potential to put in place environmental and recreational management measures as part of the implementation of major housing and employment growth outside but close to the Broads area.
- To connect wetland habitats on a landscape scale, to enhance and buffer biodiversity rich areas.
- Potential for revival in the use of the area's rivers and railways for freight and passenger traffic.
- Changes in patterns of recreation and expectations of visitors, including impacts of earlier major decline in hire boat fleet and growth of private boat ownership; higher expectation of facilities for leisure plots, holiday chalets and other accommodation.
- Potential for complementary and mutually supportive actions and benefits across environmental, recreational, navigation, and local community issues.
- Provision of jobs, facilities, services and homes for local residents through the development plans of constituent Local Authorities.
- The status of the Broads as equivalent to a National Park – held in high regard at a local and national level.
- Training opportunities for traditional skills and crafts.
- Encouraging sustainability through the design of buildings as well as innovative designs, new technologies and building in resilience.
- Opportunities to encourage both local residents and visitors to join one of the many boating clubs, take part in organised events, go on formal sailing courses and gain recognised Royal Yachting Association (RYA) qualifications.
- To Improve awareness of general public and residents of the special qualities of the Broads
- Major highway improvements and the benefits to the community and economy they could bring.
- Flat land favouring healthy travel modes.
- More home based working lessening carbon impacts but retaining wealth in the locality.

### **Threats**

- Climate change - likely impacts that may be threats:
  - Increased frequency and severity of all sources of flooding
  - Increased risk of coastal inundation
  - Changes in water quality and quantity
  - Increased frequency and severity of saline incursion into fresh water systems
  - Changes in flora, fauna and landscape
  - Changes in patterns of recreation
  - Changes in agriculture and its practices
- Redundancy/degradation of infrastructure and material assets
- Erosion of the special character of the area's landscape and built heritage through:
  - Loss of archaeology built/landscape and cultural heritage assets.

- Saline intrusion.
- Coastal erosion.
- Incremental 'suburbanisation' and other changes, including through domestic and holiday home extensions/enlargements and paraphernalia:
  - Metalling of unmade tracks;
  - 'Horsiculture' – proliferation of pony paddocks, stables, Manéges, etc.;
  - Road, rail and navigation improvements/changes;
  - Proliferation of advertisements.
- Potential landscape and economic effects of change, including that driven by market changes (e.g. food prices, bio-fuel).
- Changes in patterns of recreation, including impacts of earlier major decline in hire boat fleet and growth of private boat ownership; higher expectation of facilities for leisure plots, holiday chalets and other accommodation.
- Declining boatyard and boatbuilding industry.
- Loss of local and traditional skills.
- Pinch-points at bridges, no passing places and low levels of infrastructure allied to industry / business and even residential could limit potential for more use of water.
- Major housing and employment growth planned for nearby areas, and associated potential impacts such as:
  - Water quality and quantity loss arising from effluent input and supply extraction.
  - Increased recreational pressure, on both visitor 'honeypots' and remoter, more tranquil and sensitive localities.
  - Traffic growth.
- Passing of the economies, practices and ways of life that generated and sustained those landscapes.
- Unsympathetic design, construction and alterations.
- Loss of local community and/or visitor facilities, often through displacement by higher value activities (principally housing).
- High house prices in the rural areas could affect the willingness of some to train in traditional skills such as reed and sedge cutting as they would need to commute.
- Recent and likely future cuts in budgets and consequent challenges organisations face in light of reduced funds.
- Palaeo-environmental and organic archaeological remains are especially vulnerable and significant in the Broads.
- Potential damage to protected wildlife sites through activities in the Broads and more development in the wider area.
- Major highway improvements and the threat to the special qualities of the Broads that could result.
- Further loss of moorings.
- Vulnerability of subsidised public transport services within the Broads Authority Executive Area (bus and rail).
- Drying out of wetland and oxidation of peat, leading to loss of finite environmental and archaeological archives as well as release of stored carbon.
- Coastal protection work, which may alter the dynamics of marine erosion and sediment transport.

#### **4. How sustainability and environmental considerations have been integrated into the LP, and how the environmental report has been taken into account**

- 4.1 The SA identified the key sustainability issues in table 1 above. The LP has been progressed to address these sustainability issues. The LP integrates sustainability and

environmental issues in the following key ways.

	Key Sustainability Issue	How integrated into the LP
<b>Strengths</b>	Natural Environment	This is an important issue that is well reflected throughout the LP.
	Tranquillity	A key element to the Upper Thurne and Trinity policies. Amenity and Light Pollution policy.
	Landscape	This is an important issue that is well reflected throughout the LP.
	Motivated residents	The motivated residents have helped shape the LP through the consultation stages.
	Recreation	Examples include protecting Horning Sailing Club (HOR5), protecting the sports ground at Ditchingham Maltings (DIT2) and the promotion of recreation activities at Whitlingham Country Park (WH1).
	Complimentary provision of facilities and opportunities	Obvious examples include the provision of land for cemetery and sports field uses in Acle.
	Heritage and archaeology	This is an important issue that is well reflected throughout the LP

<b>Weaknesses</b>	Habitat fragmentation	The LP seeks to connect habitats and protect/promote green infrastructure. There are other projects, outside of planning, that seek to improve connectivity.
	Designated areas not in favourable condition or in decline	The LP seeks to connect/protect habitats and protect/promote green infrastructure. The HRA has confirmed that there will be negative effect on designated sites as a result of the LP. Other projects, outside of planning, seek to improve designated areas.
	Car dependency	Allocations for larger development are for mixed uses and are close to towns/Norwich with provision of facilities and services within walking distance and with good access to public transport.
	Depleted local community and/or visitor facilities	Various policies address this issue. For example the Acle policies allocate land for playing fields and cemetery uses and GTY1 seeks the reuse or enhancement of the existing facilities at Marina Quays. There are policies that guide any provision of such facilities in the LP.
	Flood risk	This is an important issue that is well reflected throughout the LP.

	Water quality	This is an important issue that is well reflected throughout the LP.
	Heritage at risk	The most obvious example is the Drainage Mills policy. The LP has a heritage/historic environment section.
	Conservation versus economy versus tourism versus social	According to the SA and HRA, the LP, in general, balances these needs. Indeed the purposes of the Broads encompass balancing these needs.
	Lack of moorings	The policy seeks the provision of visitor moorings if commercial moorings/marinas created. There is a policy that guides schemes for moorings. The Authority is aware of the need to provide moorings and there are other projects outside of planning that seek to do this.
	Lack of affordable housing	There are some allocations in the LP for larger housing schemes that will trigger the need to consider affordable housing. There is an affordable housing policy that reduces the normal threshold.
	Increasing pressures for area around settlements and land	There is a settlement fringe policy that seeks to protect harm to landscape character. There are development boundaries and housing is directed to these areas.

<b>Opportunities</b>	Climate change	Flood risk is an important issue that is well reflected throughout the LP. Allocations for larger development are for mixed uses and are close to towns/Norwich with provision of facilities and services within walking distance and with good access to public transport. There is a climate change checklist policy and policy on renewable energy.
	Habitat connections	The LP seeks to connect habitats and protect/promote green infrastructure. There are other projects, outside of planning, that seek to improve connectivity.
	Changes in patterns of recreation and expectations of visitors	The LP seeks to address tourism. The LP seeks to maintain and protect the tranquillity of the Upper Thurne and Trinities. Policy also seeks to promote a new walking, cycling and horse link which could prove popular with visitors.
	Potentially for complementary and mutually supportive actions	Obvious examples include the provision of land for cemetery and sports field uses in Acle.

	Maintaining the recovery and improvement of water quality achieved over the last few decades	This is an important issue that is well reflected throughout the LP.
	Potential benefits from nearby growth.	Not addressed in the LP.
	Major highway projects	Transport, roads and A47 policy in the LP.

<b>Threats</b>	Climate change	Flood risk is an important issue that is well reflected throughout the LP. Allocations for larger development are for mixed uses and are close to towns/Norwich with provision of facilities and services within walking distance and with good access to public transport. There is a climate change checklist policy and policy on renewable energy.
	Nearby major housing and employment growth	Not addressed in the LP. Projects outside of the SLP process seek to consider this issue further.
	Erosion of the special character of the area's landscape and built heritage	This is an important issue that is well reflected throughout the LP.
	Loss of local community and/or visitor facilities	The Localism Act does provide opportunities for the community. Open space, Local Green Space and community facilities are protected in the Local Plan.
	Potential landscape and economic effects of change (e.g. energy crops)	Whilst the LP allocated some areas for change, landscape is a key element throughout the LP (although energy crops are not addressed specifically).
	Changes in patterns of recreation	The LP seeks to address tourism. The LP seeks to maintain and protect the tranquillity of the Upper Thurne and Trinities. Policy also seeks to promote a new walking, cycling and horse link which could prove popular with visitors.
	Displacement of uses	The Localism Act does provide opportunities for the community. Open space and community facilities are protected in the Local Plan.
	The network of riverside visitor and navigation facilities is weakened in some parts of the area	The LP does address Residential Moorings, moorings and boatyards. Other projects outside of planning also seek to improve access to the water.
	Aged rail bridges	The LP does not address the rail bridges. This is being addressed through discussions with Network Rail.

Declining funds for agricultural programmes that support Broads' conservation.	Not addressed in the LP.
Archaeology and paleo environment	Policies address archaeology and the peat policy address paleo environment.
Peat is at risk	Policies seek to protect peat soils.
Public transport	Policy seeks to direct residential development to areas with access to public transport. Policy seeks to protect the rail stations. Policies set requirements for travel plans.

## **5. How the consultation findings have been taken into account**

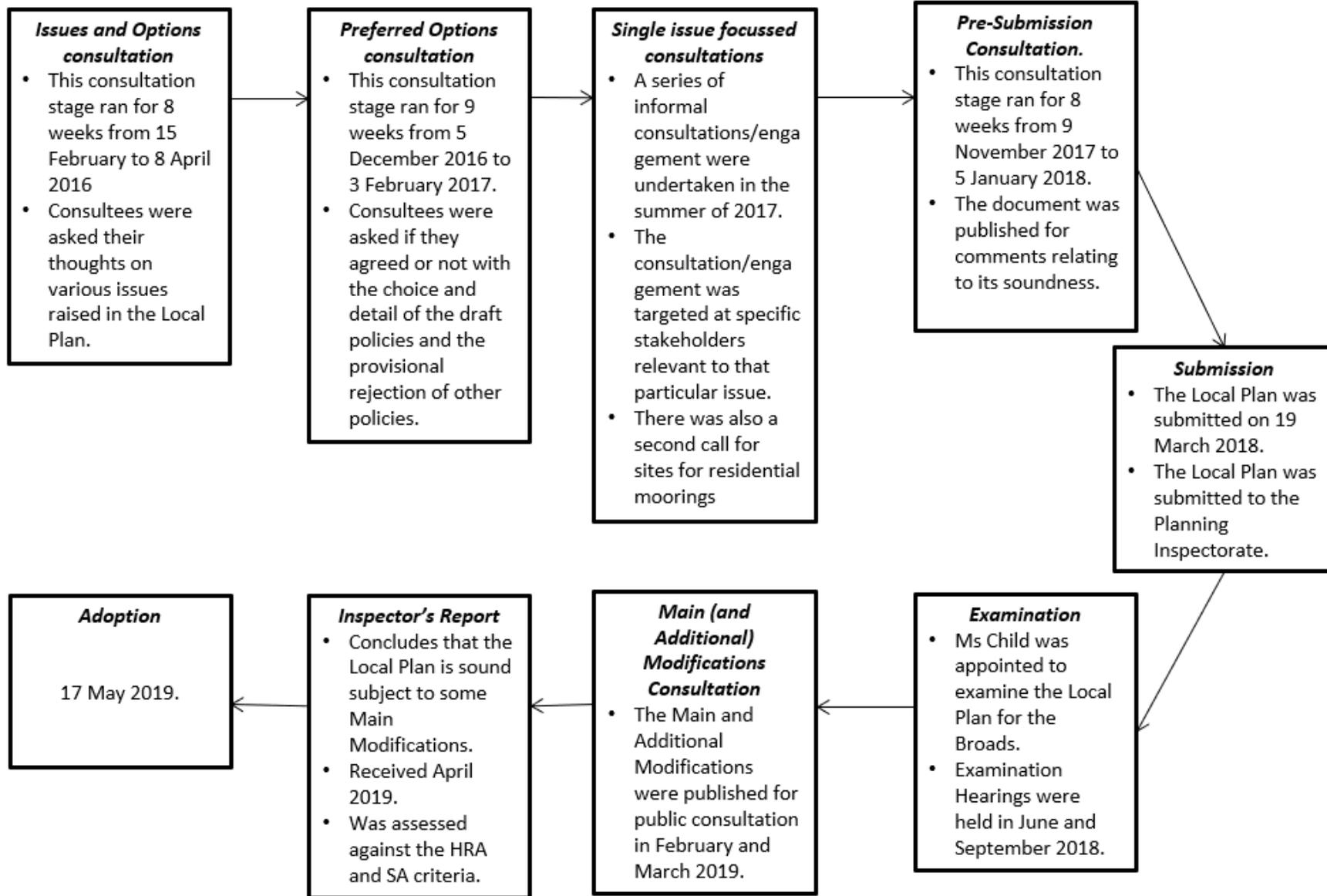
- 5.1 The following sections explain how the SA consultation responses have been taken into account.
- 5.2 Preparation of the SA for the LP was an iterative process informing policy formulation at every stage. There have been three stages of formal consultation in total. Consultation has been undertaken in accordance with Article 6 of the SEA Directive, the SEA Regulations, the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and the BA's adopted Statement of Community Involvement (2014).
- 5.3 Throughout the process, three key bodies are required to be consulted – the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency). All consultees on the consultation database have also been given the opportunity to comment. Comments have shaped the appraisal and have been fed into the assessment of options, draft options, pre-submission policies and the formulation of the LP itself up to and the examination stage.
- 5.4 Work on the LP began in 2014/2015. The following diagram summarises the key stages in the development of the plan and SA, the timetable and the opportunities for comment during the process. At each stage the LP was revisited to ensure that representations received could be addressed, as appropriate.
- 5.5 A Sustainability Appraisal was produced at the following stages.
- Issues and Options stage: Appraised the issues and options.
  - Preferred Options Consultation: Appraised the Preferred Options Local Plan – first appraisal of draft details policy wording.
  - Pre-Submission Consultation: Appraised the final draft policies.
  - Main Modifications: The Main Modifications were assessed and the Submission SA tables amended or created if there was a new policy.
  - Inspector's Report: The changes to the Modifications were assessed and this is called the Final SA.
- 5.6 The LP Consultation Statement (March 2018) describes how the Authority has

undertaken community participation and involvement in the preparation of the plan and identified where changes were made during redrafting to the LP as a result of representations received for the following stages:

- Scoping (2014)
- Issues and Options (2016)
- Preferred Options (2016)
- Pre-Submission (2017)

Table 2 Key stages in the development of the Local Plan

**Local Plan for the Broads – the Process to date.**



5.7 These documents are available to view on the Authority's website [www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-local-plan-for-the-broads-2018/local-plan-examination-library-march-2018](http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-local-plan-for-the-broads-2018/local-plan-examination-library-march-2018)

**6. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with**

6.1 The SA process was integral to the Local Plan preparation, commencing with the production of the SA scoping report. This involved identifying the sustainability issues and objectives, as well as identifying relevant baseline information and indicators.

6.2 The LP went through distinct iterations. At each stage the LP was tested against the SA framework so that the economic, environmental and social implications of different policy options could be taken into consideration. The LP was developed and modified, as appropriate, in line with the findings of the SA and in line with the comments received from consultees regarding the iterations of the SA, the scoping report and the draft versions on the plan.

6.3 The Preferred Options and the Pre Submission SA set out the reasons why the policy options were selected, in light of other reasonable alternatives dealt with. Further justification is provided in the text within the adopted version of the plan, and within the BA's responses to representations received at submission and examination stage. These documents can be viewed on the BA's website at: [www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-local-plan-for-the-broads-2018/local-plan-examination-library-march-2018](http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/examination-of-the-local-plan-for-the-broads-2018/local-plan-examination-library-march-2018)

**7. Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan**

7.1 The BA will monitor the significant environmental effects of the implementation of the plan through the monitoring framework set out in the Adopted LP. The monitoring results will be reported in the BA's annual monitoring report, and in other specialist reports where required.

**8. Further information**

8.1 A full copy of the Final Sustainability Appraisal can be found here: <https://www.broads-authority.gov.uk/planning/planning-policies/development>