

**Broads Plan 2017 for adoption**

Report by Director of Planning and Resources and Strategy and Projects Officer

**Summary:** The Broads Plan is the strategic management plan for the Broads. The current Plan was adopted in May 2011, and its review was identified as a Strategic Priority for the Broads Authority in 2015. It was anticipated that the revised Plan would be adopted in March 2017 and cover the period 2017 to 2022.

The Authority consulted on the first draft Broads Plan 2017 in early 2016 and the revised draft Plan in Autumn 2016 and made changes to the draft plans as appropriate. Sustainability Appraisal and Habitats Regulations Assessment of the draft plans were also published for consultation and amended as appropriate.

The Navigation Committee considered the Navigation and Recreation sections of the final draft Plan on 23 February 2017, and minor changes were made in response to Members' feedback.

**Recommendations:**

- (i) The consultation responses received to the revised draft Broads Plan 2017 are noted;
- (ii) The Broads Plan 2017 is adopted.

**1 Broads Plan review process**

- 1.1 The Broads Authority is required to review the Broads Plan, the strategic management plan for the Broads, at least once in every five years and make changes as appropriate. The existing Broads Plan was adopted in May 2011.
- 1.2 The Broads Plan is a plan for the Broads, not just for the Broads Authority. As such, while the Authority is responsible for its production, its successful delivery depends on a shared vision and commitment to partnership working, and on the best use of shared resources. The involvement of partners, key stakeholders and local communities is also a key part of the Plan review process.
- 1.3 The review of the current Broads Plan began in 2015, and included a Broads Authority and Navigation Committee Member Workshop on 7 October. This was followed by workshops with the Broads Forum on 5 November and the Broads Local Access Forum on 9 December. Focused sessions were also held with the Broadland Catchment Partnership, Broads Conservation Partnership and Broads Climate Partnership. Information from the four Stakeholder Surveys undertaken on behalf of the Authority in 2015 also helped to inform the Plan.

- 1.4 The first draft Broads Plan 2017 was approved by the Authority in January 2016 and published for consultation from 15 February to 8 April 2016. Responses were assessed and appropriate changes made to the draft Plan. Members considered the revised draft Plan in September 2016, and a second stage consultation took place from 17 October to 30 December 2016.
- 1.5 Over 600 groups, organisations and individuals were notified of the Broads Plan review and invited to comment. The draft plans were discussed at meetings of the Authority, Navigation Committee, Broads Local Access Forum and Broads Forum. Consultation details were published on the Authority's website, in the press and in Authority publications. Consultation documents were also made available at Broads Authority information centres and at District Council offices and libraries in the Broads area.
- 1.6 A wide range of individuals and organisations (including Parish Councils and adjoining District Councils) responded to the public consultation on the two draft plans. A schedule of responses to the latest consultation is at Appendix B.
- 1.7 Following the second consultation, a final Plan has been prepared (Appendix A). The Navigation and Recreation sections were considered by the Navigation Committee on 23 February 2017 and minor amendments made in response to Members' comments.

## **2 Sustainability Appraisal and Habitats Regulation Assessment**

- 2.1 At each stage of its review, the Broads Plan has been accompanied by Sustainability Appraisal to assess any significant environmental, economic or social impacts of the Plan's implementation. The appraisal of the revised draft Broads Plan found that the majority of actions show either 'no significant effect' or 'positive effects', with a small number showing 'unknown impacts'. A Habitats Regulation Assessment (HRA) was also carried out to assess the impacts of the Plan on conservation sites designated under the European Birds and Habitats Directives, and on sites designated under the Ramsar Convention. This concluded that the revised draft Plan had no 'likely significant effects', subject to modifications that have now been made to the final Plan.

## **3 Content of the Broads Plan**

- 3.1 The final Broads Plan 2017 presented to Members at this meeting has evolved considerably since the first draft in February 2016. It contains priorities for action over the life of the Plan, taking account of representations received, factual updates and changing circumstances.
- 3.2 The Plan is structured under 8 themes:
  - A. Managing water resources and flood risk:
  - B. Sustaining landscapes for biodiversity and agriculture
  - C. Maintaining and enhancing the navigation
  - D. Conserving landscape character and the historic environment

- E. Building 'climate smart' communities
- F. Offering distinctive recreational experiences
- G. Raising awareness and understanding
- H. Connecting and inspiring people

3.3 Each themed section provides context, a long-term aim and short-term strategic actions with key outputs, lead and delivery partners, resources and indicators.

#### **4. Next steps**

4.1 The adopted Broads Plan 2017 will be published on the Authority's website. Progress in implementing partnership actions will be reported to the Authority on a six-monthly basis. Updates will also be made available to Plan partners and to the Broads Forum, and published on the Authority's website.

4.2 On adoption, the Plan has immediate implementation. Assuming the Plan is adopted at today's meeting, we anticipate a formal launch will take place in April/May.

#### **5. Recommendation**

Members are asked to adopt the Broads Plan 2017.

Background papers:	Committee Reports – September 2016 and January 2016
Author:	Andrea Long and Maria Conti
Date of report:	7 March 2017
Appendix A:	Final Broads Plan 2017
Appendix B:	Schedule of comments on the revised draft Broads Plan 2017
Appendix C:	Sustainability Appraisal, revised draft Broads Plan 2017

<http://www.broads-authority.gov.uk/broads-authority/committees/broads-authority/broads-authority-24-march-2017>

# Broads Plan 2017

Partnership strategy  
for the Norfolk and Suffolk Broads

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FINAL DRAFT 8/3/17  
To Comms (Design) 1/3/17  
To BA 24/3/17



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# 1 Introduction

## About the Broads

### Broads National Park

In this Plan, we are adopting the use of the term 'Broads National Park'. The Broads has an equivalent status to a National Park under the National Parks and Access to the Countryside Act 1949. The Broads Authority shares the same two purposes as the English, Welsh and Scottish<sup>1</sup> National Parks. In addition, it has a third purpose relating to the interests of navigation (see section 1.2). As such, it is defined under a different Act of Parliament to the other Parks, and has been referred to as a 'member of the National Park family'.

In 2015, the Broads Authority resolved to brand the area as the 'Broads National Park'. This has been done for marketing related purposes, to promote more clearly the area's national park credentials and special qualities<sup>2</sup>.

### Profile of the area

The Broads National Park is renowned as the UK's premier wetland and an important inland waterway. It is a proud member of National Parks UK, the umbrella body for the fifteen national parks in England, Wales and Scotland, known collectively as 'Britain's Breathing Spaces' – echoing the words of the late Norfolk naturalist Ted Ellis, who described the Broads as a 'breathing space for the cure of souls'.

A distinctive and globally important landscape, the Broads has been formed and nurtured by its inhabitants since at least Roman times. The Broads executive area (Map 1) covers around 303km<sup>2</sup> in Norfolk and North Suffolk. Its boundaries are drawn tightly around the floodplains and lower reaches of three main rivers – the Bure, Yare and Waveney – and their tributaries, the Thurne, Ant, Wensum and Chet. The Broads is the basin at the bottom end of the much larger Broadland Rivers Catchment (Map 1), with water flowing through or under it and out into the North Sea.

Home to around 6,350 people, the Broads nestles between the city of Norwich to the west and the coastal resorts of Great Yarmouth and Lowestoft to the east, with a short coastal strip at Winterton and a relict tidal estuary at Breydon Water. This low-lying, mainly open and undeveloped landscape is a rich patchwork of interconnected habitats including rivers, shallow lakes ('broads'), fen, reed bed, drained marshland, wet woodland, saltmarsh, intertidal mudflats and sand dunes.

Each habitat has its own special characteristics and is home to a wealth of species, many rare and some unique to the Broads within the UK. The importance of the area is borne out by a range of international, national and local designations in recognition of its landscape, nature conservation and cultural features. Water, not surprisingly, is the vital element linking everything together in this wetland landscape, and its careful and integrated management is critical.

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<sup>1</sup> The Scottish National Parks have two additional purposes; namely, to promote sustainable use of the natural resources of the area, and to promote sustainable economic and social development of the area's communities.

<sup>2</sup> There is a point of distinction between the Broads Authority and National Park Authorities to which the so-called Sandford Principle applies (section 11A(2) of the National Parks and Access to the Countryside Act 1949 and section 9(6) of the National Parks (Scotland) Act 2000). In some circumstances, greater weight is to be attached to the conservation purpose. It does not apply in the Broads.

## Origins and history of the Broads

*"On the evidence now available, they (the broads) are, beyond reasonable doubt, the flooded sites of former great peat pits, made in the natural fenland in medieval times".*

JM Lambert, JN Jennings and CT Smith in 'The Broads', EA Ellis, 1965

The natural, cultural and built features of what has become one of the most beautiful and treasured of Britain's landscapes have been shaped and nurtured over centuries by the way peat diggers, traders and merchants, reed and sedge cutters, thatchers, farmers and fishermen have lived and worked. The story of the Broads began in the Middle Ages. By the 12<sup>th</sup> century, much of east Norfolk had been cleared of its woodland for fuel and building materials. Over the following 350 years, peat digging (or turf cutting) was a major industry. As sea levels rose, the peat diggings were eventually abandoned and left to flood, creating the shallow stretches of water known as 'broads'.

Varying in size from tiny, isolated lakes to large expanses of open water, the broads became part of an extensive network for communications and commerce, transporting goods such as fuel, building materials including reed for thatch, and livestock and their products, especially wool. Villages and settlements commonly grew up around a parish staithe (landing stage), riverside common, ferry or bridge, making the most of the water environment.

The advent of the railways in the mid-19th century, and motor vehicles in the 20th century, brought most river-borne commerce to an end. In its place, the Broads waterways became increasingly accessible as a popular tourist destination for boating holidays, with more than 200km of navigable, lock-free rivers and open water bodies to be explored and enjoyed. Today, more than seven million people a year visit the Broads, supporting thousands of jobs and having an impact of around £600m<sup>3</sup> for the local economy. Recreation and tourism, the marine industry, farming and land management all continue to play an important role in maintaining and enhancing this unique, much loved landscape.

Map 1: Broads Authority executive area and (inset) Broadland Rivers Catchment (INSERT) *note size of Broads executive area and catchment (c.3200km<sup>2</sup>)*

## Valuing our natural resources

The Earth's store of natural resources - water, air, soil, geology and all living things - provides a wide range of beneficial goods, services and values, sometimes referred to as *ecosystem services*. This includes provisions such as food, fibre, fresh water and energy, and services such as clean air regulation, carbon storage and flood regulation. As important are the cultural values we get from nature, from recreation, inspiration and learning to jobs, community development and a sense of place. These services are supported by other natural functions such as photosynthesis, soil formation, vegetation growth and water cycling, underpinned by biodiversity.

The Broads is like a vast mosaic; lose one fragment and its overall integrity will be flawed. In looking after it for present and future generations, we must seek to balance what is needed for a healthy, functioning natural ecosystem with the fair and sustainable use of the many benefits we get from it. Rather than focusing on single or favourable interests (for example, food production, flood protection, economic

<sup>3</sup> Data refers to the Broads executive area and surrounding 'area of tourism influence'.

benefit), possibly at the expense of others, we should demonstrate a 'better, bigger, more and joined'<sup>4</sup> approach and manage this precious ecosystem as a dynamic, complex, interconnected and interdependent whole.

Putting a value on ecosystems and their services is highly complex, and not something we have attempted to do in this Broads Plan. However, the UK Government's emerging 25-year Environment Plan<sup>5</sup> highlights the need to get better at including environmental and societal costs, benefits and trade-offs in policy, investment and planning decisions. For example, as well as rewarding businesses for productive and sustainable land use, those that exploit natural resources should incorporate any external adverse costs to the natural environment and to society (such as chemical pollution in a watercourse, or loss of a public green space) within their own business costs, reducing the public cost of dealing with these impacts. As a member of the UK family of national parks and global network of protected landscapes, the Broads National Park has a significant role to play as a model and advocate of healthy, sustainable living.

One major challenge for this easterly, low-lying freshwater wetland is likely to come from sea level rise and the projected more rapid changes to the climate, especially in terms of managing water resources and flood risk. Another is how Britain's decision to leave the European Union may affect what happens at a local level, particularly in relation to farmland, habitats and species currently protected through European environmental and land management legislation. Other significant changes in global, national and regional economies, leisure and tourism patterns, food and energy policy, and the growth in demand for housing and infrastructure in the East of England, will also create challenges and opportunities for the Broads' landscape, wildlife and people.

Of course we cannot predict exactly what this area will look like in 50 or 100 years' time. However, if we can understand and respond now to the likely changes ahead, we can help build a future that maintains the Broads as a special, distinctive and much loved place.

**Diagram 1: Ecosystem services in the Broads** (visualisation to be added in final plan)

*As part of the global network of protected landscapes, the Broads has a vital role in demonstrating how wetland resources can be managed sustainably for people and wildlife. The illustration below brings together the Broads ecosystems and the valuable services they provide.*

Footnote: More information about the natural and cultural features of the Broads landscape may be found in the [National Character Area profile: 80. The Broads](#), Natural England, 2015 and in the Broads Landscape Character Assessment, BA, 2017 (update)

### **About the Broads Authority**

The Broads Authority is a statutory body with very similar responsibilities to those of the English, Welsh and Scottish National Park Authorities<sup>6</sup>. It is the local planning authority, and a harbour and navigation authority. The distinctive shape of the Broads executive area (Map 1) comes from its boundary being drawn tightly around the flood plains and lower reaches of the main rivers (Bure, Yare and Waveney) and their tributaries (Thurne, Ant, Wensum and Chet).

The Authority has a duty to manage the Broads for the following three purposes:

<sup>4</sup> Making Space for Nature, Defra, 2010.

<sup>5</sup> 25-year Plan for the Environment, Defra (draft).

<sup>6</sup> The Broads Authority was established under the Norfolk and Suffolk Broads Act 1988. Further provisions for the management of the navigation area were made through the Broads Authority Act 2009.



- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
- Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
- Protecting the interests of navigation.

In practice, how much weight is given by the Authority to any of the purposes will depend upon the particular circumstances under consideration. In its commitment to integrated management, the Authority and its Broads Plan partners will always look for the potential win-win solution, rather than setting the different purposes at odds with each other.

In managing the area, the Authority must also have regard to:

- the national importance of the Broads as an area of natural beauty and one which affords opportunities for open-air recreation; T
- the desirability of protecting the natural resources of the Broads from damage; and T
- the needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads. T

The Authority also has the duty to maintain the navigation area for the purposes of navigation to such standard as appears to it to be reasonably required, and take such steps to improve and develop it as it thinks fit. It may carry out works, and do other things in relation to any adjacent waters in or over which it has sufficient rights or interest, for the improvement of navigation on those waters.

### **About the Broads Plan**

#### A partnership plan

The Broads Plan is the most important integrated strategy for the Broads. It sets out a long-term vision for the area, and shorter-term actions for the benefit of the environment, local communities and visitors. As a high level, overarching document, it draws together and guides a wide range of partnership plans, programmes and policies relevant to the area. The Broads Plan is reviewed and updated on a regular basis, and this Plan covers the period 2017-2022.

A priority in the Government's *Vision for the English National Parks and the Broads*<sup>7</sup> is to work in partnership to make the best use of shared knowledge, efforts and resources. The Broads Plan is a plan for the Broads, not just for the Broads Authority: While the Authority is responsible for producing, championing and monitoring the Plan, many organisations and local interest, amenity and community groups are involved in its implementation. Lead and joint delivery partners are shown in the priority actions tables (Section 3), and a summary of their roles and responsibilities is in Appendix A.

#### Funding and resources

<sup>7</sup> English National Parks and the Broads: UK Government Vision and Circular, Defra, 2010.

Since 2010, there have been substantial funding cuts to Government funded bodies working in the Broads, including the Broads Authority, Environment Agency, Natural England and local councils. The economic squeeze is also affecting local businesses and the voluntary sector, particularly those relying on public sector funding or contracts. There is also great uncertainty about the implications of Britain's decision to leave the European Union, following the Referendum in June 2016.

While aspirations are high, Broads Plan partners must be realistic within this economic and political framework. We will have to make focused and sometimes difficult choices about priorities for funding, and joint working will be more and more important. We will continue to foster our good track record of drawing in additional resources, for example through external grants, private sponsorship and visitor giving schemes.

As the body responsible for managing the Broads, the Broads Authority receives a Government funded National Park Grant. Some financial stability has been created by the awarding of a four-year grant settlement of £3.24m from 2016/17. The Authority also receives navigation income funded by boat toll payers (£3.09m in 2016/17). In the past three years, this income has come under pressure. While the number of private boats has been relatively static, there has been a continuing decline in the hire boat fleet. The number of weekly hire motor cruisers fell from 904 in 2011 to 789 in 2016, and the forecast is for further reductions. This is due partly to investment in new, larger boats and the retirement from the fleet of older, smaller vessels.

Significant external funding applications in this Plan period include a £2.6m bid to the Heritage Lottery Fund for the Broads Landscape Partnership Scheme, with a total programme value of £4.5m, and CANAPE, an EU bid with European partners for a Broads spend of €1.4m to implement the Hickling Vision. £4m has already been awarded from the HLF and EU LIFE funds towards the Hoveton Wetland Restoration Project.

The Broads Authority is also a member of the UK's National Parks Partnership, an initiative launched in 2016 to enable closer links between businesses and the Parks for commercial and practical benefits. Resources are about people too, of course, and a practical and invaluable asset for the Broads is the dedicated band of volunteers who provide practical support through a range of local organisations and community groups.

As a high level strategy, the Broads Plan does not include detailed costings. This information is in the guidance level strategies and operational programmes of the partners implementing the Plan.

Map 2: Broads Landscape Partnership area (INSERT)

#### Assessment and monitoring

This plan is subject to **Sustainability Appraisal (SA)**, to assess any significant environmental, economic and social impacts of its implementation. The appraisal found that the majority of actions in the Plan show either 'no significant effect' or 'positive effects', with a small number showing 'unknown impacts'. A **Habitats Regulations Assessment (HRA)** is also carried out, to assess the impacts of the Plan on conservation sites designated under the European Birds and Habitats Directives, and on sites designated under the Ramsar Convention (an international treaty for the conservation and sustainable use of wetlands). This concluded that the Plan had no 'likely significant effects', subject to modifications that have been made to the final Plan.

The Broads Authority will produce six-monthly progress reports on all actions in the Broads Plan. As a living document, we will also report changes and new actions as we go through the Plan period. These updates will be reported to full Authority meetings (which are open to the public) and published on the Authority's website. The updates will also go to Plan partners, and to the Broads Forum, whose membership represents a wide range of local interest, user and amenity groups in the area.

Indicators are shown against individual actions in the Plan. In some cases, we refer to monitoring measures contained in linked plans and programmes (see Appendix B). We also have a small set of overarching 'State of the Park' indicators (Appendix C). These help us to assess changes in the Broads over time, and they will be updated and reported in line with the Broads Plan 5-year review cycle.

### Broads Local Plan

As the local planning authority, the Broads Authority is responsible for setting spatial planning policies for the Broads executive area. The policies support the Vision for the Broads and aspirations of the Broads Plan. They are used in determining planning applications, and providing guidance on development and land use. As a number of the adopted policies are now out of date, or no longer in line with national planning policy, the Authority is reviewing them all and preparing a new Broads Local Plan. This is scheduled for adoption in 2018, and will take us up to 2036. The existing policies remain in effect until the new Local Plan is adopted.

The special qualities of the Broads can also be influenced by development in adjoining areas, particularly given its narrow boundary and low-lying, open landscape. Under the Localism Act<sup>8</sup>, the Authority and its neighbouring planning authorities, county councils and public bodies have a 'duty to cooperate' to make the most of cross-boundary strategic planning matters such as housing, transport, open space, and demands on water and other resources.

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<sup>8</sup> Localism Act, Department for Communities and Local Government, 2011.

## 2 Vision and principles

### Long-term vision

The Vision for the Broads National Park (Table 1) recognises the abundant benefits we get from a healthy, functioning natural environment. It is based on Defra's 2010 *Vision for the English Natural Parks and the Broads* and updates the Vision for the Broads in the last Broads Plan (2011).

Table 1: Vision Statement

#### **Vision for the Broads National Park to 2030**

The natural environment and the beneficial goods, services and cultural values it provides, from food and energy to landscape character and recreation, are in good condition, are used fairly and sustainably, and are valued by society. In particular, the precious nature of clean, fresh water as a fundamental resource is understood and respected by all.

The past and present importance of the waterways for navigation, biodiversity and recreation is recognised and cherished, and the asset is protected, maintained and enhanced. Wildlife flourishes and habitats are maintained, restored, expanded and linked effectively to other ecological networks. Land and water are managed in an integrated way, with local and landscape scale management creating resilience and enabling flexible approaches to meet changing ecological, economic and social needs.

This living, working, 'big skies' landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances experience and enjoy it as a place of escape, adventure, enjoyment, work, learning and tranquillity, and as a source of national pride and identity. Sustainable living can be seen in action and there is a buoyant rural economy. Local communities are taking an active part in decisions about their future and are known for having been pivotal in the transformation to a low carbon, 'climate-smart' society.

The Broads National Park will be forever recognised as fundamental to our prosperity and to our mental and physical health and wellbeing. It will be forever treasured as a place that provides a "breathing space for the cure of souls".

### Fundamental principles

We use three fundamental principles to help guide the development and implementation of the Broads Plan. The first is based on the definition of the Precautionary Approach in the Rio Declaration on Environment and Development, 1992. The second recognises the need for integrated, long term management, and the third underlines the importance of informed, partnership working.

**Principle 1:** Where there are likely threats of serious or irreversible damage to the environment, as a precaution, cost-effective measures are taken to prevent environmental degradation in the absence of full scientific certainty of the outcome of such threats.

Such precautionary action is based on assessment of the costs and benefits of action, taking into account both the proportionality between the costs and benefits and the degree of certainty in their calculation, and transparency in decision making. Gaps in knowledge are addressed by research and, where feasible, precautionary measures taken while such knowledge is outstanding.

**Principle 2:** We seek to understand and respect the complexity and biological limits of our ecosystems, and conserve their structures to maintain their health and productivity. Management is at a local scale, while recognizing the direct or indirect effects on wider, interconnected ecosystems and the public goods and services they provide. We manage for long-term, multiple benefits, not just for short-term or single interest gains.

**Principle 3:** We plan and work in partnership to make the best use of shared knowledge and resources and to avoid duplication of effort. People are involved from an early stage, and throughout, in decisions that may interest or affect them. Decisions are supported with robust evidence, including scientific and local knowledge, innovation and best practice.

### 3 Priority partnership actions 2017-2022

This section sets out guiding actions for the five-year period of this plan. It is not a comprehensive list of all the work to be carried out in the Broads, including many routine operations. Rather, it addresses key strategic issues that partners have identified and are able to commit time and resources to over the life of the Plan. See Appendices A and B for details of partners, links and abbreviations in the following tables.

Themes	Headline aspirations
A. Managing water resources and flood risk	<b>Aspiration 1</b> Improve water capture and efficient water use across the Broadland Rivers Catchment, and develop a longer-term integrated flood risk management strategy for the Broads and interrelated coastal frontage
B. Sustaining landscapes for biodiversity and agriculture	<b>Aspiration 2</b> Protect, conserve and enhance water quality and land and habitat condition to benefit priority species, recognising natural environmental change and retaining a thriving and sustainable agricultural industry
C. Maintaining and enhancing the navigation	<b>Aspiration 3</b> Apply a catchment-scale approach to reduce sediment input and the sediment backlog, and sustainably reuse or dispose of dredged material <b>Aspiration 4</b> Maintain a safe, open navigation and reduce pressures on busy or vulnerable areas
D. Conserving landscape character and the historic environment	<b>Aspiration 5</b> Improve understanding, protection, conservation and enhancement of the Broads landscape character and distinctive built, cultural, archaeological and geological assets
E. Building climate-smart communities	<b>Aspiration 6</b> Build the awareness and adaptive capacity of local communities to the challenges of climate change and sea level rise
F. Offering distinctive recreational experiences	<b>Aspiration 7</b> Provide opportunities for distinctive recreational experiences in harmony with the special qualities of the area
G. Raising awareness and understanding	<b>Aspiration 8</b> Strengthen and promote key messages and tourism offer in keeping with the area's status, special qualities, history and traditions
H. Connecting and inspiring people	<b>Aspiration 9</b> Facilitate development growth within and adjacent to the Broads, while avoiding adverse impacts on the area's special qualities <b>Aspiration 10</b> Strengthen connections between a wide audience, particularly local communities and young people, and the Broads environment

## A. Managing water resources and flood risk

### Context

The groundwater, rivers and shallow lakes, or 'broads', in the Broadland Rivers Catchment are an essential water source for people, wildlife and landscapes. Adequate water levels, and water directed to the right places, are primary to the healthy condition and functioning of our wetland habitats, navigable waterways, farming and other water dependent businesses, and for providing public drinking water and water for irrigation. Water management and land use practices in the whole catchment, most of which lies outside the Broads Authority's executive area, have an impact on the Broads, which forms the basin at the bottom of the catchment. Recognising the importance of building a more integrated approach to managing our water resources, the Broadland Catchment Partnership was formed in 2012, with a shared vision and plan of action for the whole catchment.

More than half the rivers in the catchment have been physically modified, often as a result of historic flood defence, land drainage or milling activities. While this has provided some social, economic and environmental benefits, it has adversely affected water dependent habitats and increased downstream flood risk in some areas, with water in the catchment ultimately flowing through, or under, the low-lying (at or below sea level) Broads and out to sea. Predicted drier summers, wetter winters and more intense periods of rainfall will affect surface water levels and the seasonal variability in river flows and groundwater resources. Water levels in some cases are too high for agriculture or too low for wildlife and amenity; periods of drought, such as that in early 2012, can create significant problems for water availability. Abstraction of water for domestic and agricultural use has risen in recent decades, and will be impacted further by a changing climate and by significant development growth and regeneration around the Broads.

Flooding is a natural and sometimes beneficial process within a floodplain, and the control of water has been a major influence on the form of the Broads landscape for many hundreds of years. However, in the wrong places or at the wrong times, flood water can damage property, infrastructure, habitats and farmland, and cause distress to people and wildlife. Around 95% of the Broads executive area is at some risk of flooding, which includes more than 2000 properties and almost 30,000 hectares of farmland and mainly freshwater habitats. Sea level rise, and the predicted more rapid changes to the climate, pose enormous challenges to the future of this easterly, low-lying and predominantly freshwater wetland. Higher sea levels along the north-east Norfolk and north Suffolk coast bring an increased risk of sea defences being overtopped or breached. This can also hold back water trying to drain from the rivers, causing flooding to natural and built resources. Even if the river defences protect land from flooding, a combination of particular weather conditions, and high tides causing a surge in the North Sea, can push salt water higher up the rivers and into the surrounding wetland.

The Environment Agency manages flood risk from the main rivers, estuary and the sea, and is responsible for river and tidal flood defences. Norfolk and Suffolk County Councils are the Lead Local Flood Authorities, managing flood risk from surface water, ordinary watercourses and groundwater. Water and sewerage companies manage the risk of flooding to water supply and sewerage facilities and the risk to others from the failure of their infrastructure, and Internal Drainage Boards manage land drainage in lowland areas. These organisations also have a role to play in encouraging communities to participate in flood risk management at their local level.

Currently, flood and coastal risk management in the eastern half of Norfolk incorporates three separate major flood defence systems: The Broads (tidal and fluvial), Eccles to Winterton (coastal), and Great Yarmouth (tidal). In recent years, millions of pounds have been spent on maintaining and improving these defences in line with the individual

strategies for these areas. The strategies were all initiated over 20 years ago and, while those for Eccles to Winterton and for Great Yarmouth have been reviewed, the principles remain the same; that is, to hold the existing defence lines and to improve the defences where appropriate.

Our focus now is to look more closely at the relationship between the three strategies, and identify the best longer-term, integrated approach to flood and coastal risk management for the whole of Broadland. For the Broads, the current intention is to seek to retain the mainly freshwater conditions for as long as practicable, with research being focused on what this would require. In January 2014, the Broads Authority resolved that: "(Tidal) surges pose a critical threat for both Broads' communities and the protection of the very precious freshwater ecology that makes the Broads so special. We recognise the considerable amount of investment made in flood protection and stress the importance of preventing salt water and saline intrusion." We would need to assess this ambition as part of an integrated approach for the wider area. This will be linked to climate change scenarios, with a shared vision that takes account of environmental, financial, technical, social and political considerations, and planned actions that help prepare for change and create benefits for the people and environment of Broadland.

### Long-term aim

The precious nature and value of water is respected by all, and there is a unified and fair approach to its management and use. We have met the challenging targets to improve water quality, water supply and flood protection through widespread understanding, positive action and good practice at catchment and local scale. Rivers function more naturally and the catchment supports a diversity of healthy habitats and species. Water dependent wildlife is thriving and able to move around freely. Managers of land and water resources are using environmentally, economically and socially sustainable practices and are working together to provide multiple benefits for wildlife and people. Longer-term decisions to address the impacts of climate change and sea level rise are informed by robust evidence and wide ranging debate on the most appropriate management options: Primarily, whether to find ways that allow natural processes to direct change, or to seek to retain a predominantly freshwater system; and the levels of human intervention and expenditure to adapt important assets to new regimes. Importantly, the Broads will remain a special area, retaining its wildlife and heritage importance and continuing to offer extensive recreation, employment and other socio-economic opportunities.

**Aspiration 1** Improve water capture and efficient water use across the Broadland Rivers Catchment, and develop a longer-term integrated flood risk management strategy for the Broads and interrelated coastal frontage

Focus: Improving water capture, efficient water use and 'water smart' user awareness in the catchment to help build resilience to future change				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
1.1	Promote and implement best practice water capture and water use at a community level, and facilitate a 'whole farm' water	Water efficiency measures (incl. increasing domestic water metering, practical support and incentive schemes) and planning policy for water efficiency measures in new development, in place and promoted to domestic and business water users [AW, ESW, non-domestic water retail companies, LPAs]	Partners	Water company business plan targets



	management approach across the Broadland Rivers Catchment	On-site (and where feasible, low cost) water capital infrastructure promoted and in place, incl. rainwater harvesting/water recycling, irrigation reservoirs, efficient irrigation systems; water retention and infiltration measures in place, incl. constructed wetlands, field bunds, tramline disruption and management [BCP, AW, ESW, county FWAGs]	Funded schemes (WSF, CSF), water capital grants	WSF targets, CSF water capital grant data, RDPE reporting measures
1.2	Promote and implement relevant catchment measures to manage water resources and respond to periods of water shortage and scarcity (incl. water abstraction controls, water transfer and trading, water infrastructure improvements)	Sustainable water abstraction licencing policies in place throughout Broadland, as outlined in Broadland Catchment Abstraction Management Strategy [EA]	CAMS + EA Abstraction Licencing Strategies	CAMS indicators of resource availability, WFD hydrology status
		Water Resource Management Plans, Drought Plans and Water Industry National Environment Programme action plans implemented where applicable in the Broadland Rivers Catchment [AW, ESW, EA]	AW/ ESW (AMP7), EA (Area Drought Plans)	AW/ESW targets, EA action plan targets
<b>Focus: Managing flood risk and developing longer-term strategic response</b>				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
1.3	Maintain current coastal, tidal and fluvial flood risk management strategies relevant to the Broads, Great Yarmouth and interrelated coastal frontage, and prepare a longer-term, integrated, strategic approach	Detailed short-term strategies evolved for Eccles to Winterton, and Winterton to Lowestoft Ness, that support Shoreline Management Plan (SMP) and Broads flood risk management needs [EA, CPE]; Broadland Flood Alleviation Project maintenance phase completed in line with agreed schedule [EA/BESL]	EA/ BESL, CPE; partner resources required	SMP targets, BFAP schedule targets to 2021
		Updated Flood Risk Supplementary Planning Document adopted [BA, EA, NCC]; Strategic Flood Risk Assessment completed for the Broads [LPAs, EA, NCC]	Partners	# planning apps approved contrary to EA flood risk advice (BA)
		Updated and expanded flood risk research and modelling commissioned, carried out and published (arising from high level review of integrated coastal frontage flood defences, tidal barriers and river floodwalls <sup>9</sup> ), incl. risk and impact assessments of natural floodplain restoration and saline incursion [EA, Broads Climate Partnership, academic institutions]	EA and partners to seek joint resources	Outline action plan by end 2017; 6-monthly review reporting

<sup>9</sup> Flood Management High Level Review for the Norfolk Broads, Eccles to Winterton and Great Yarmouth Tidal Walls, CH2M, 2016.

		Medium to long-term integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage developed through evidence building (informed by SFRA and HRA) and widespread stakeholder engagement [EA, IDBs, LAs, Broads Climate Partnership]	EA; partner resources required	To be agreed
1.4	Investigate, plan and promote schemes to hold back or divert flood water, moving from retrospective to proactive approaches	Surface water flooding mitigation measures and advice promoted and implemented through county Surface Water Management Plans (SWMPs); strong development management policy and guidance made available on installing, upgrading and retrofitting sustainable urban, highways and rural drainage [NCC, SCC, IDBs, LPAs]	NCC, SCC (SWMPs)	Area SWMP targets
		Flood risk management mapping, feasibility studies and project proposals developed in upper Broadland catchment; site projects implemented (e.g. reconnecting rivers with floodplain in non-tidal areas, re-meandering river channels) [EA, IDBs, BCP, landowners]	Funded schemes (EA Grant in Aid, CS, CFMP)	To be agreed

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## B. Sustaining landscapes for biodiversity and agriculture

### Context

The Broads is one of Europe's finest and most important wetlands for nature conservation. Its rich mosaic of habitats comprises, among other things, saltmarshes, intertidal mudflats, shallow lakes, fens, drained marshland, wet woodland, relict estuary and coastal dunes. Twenty-eight sites covering a total of more than 7500 hectares are nationally designated as Sites of Special Scientific Interest (SSSIs). Most of these sites are of international importance for their habitats and wildlife as the Broads Special Area of Conservation (SAC) and the Broadland Special Protection Area (SPA). An area of the wetland is also designated as a Wetland of International Importance under the Ramsar Convention<sup>10</sup>. One third of the SSSIs are also National Nature Reserves.

The focus of *Biodiversity 2020*, the national strategy for England's wildlife and ecosystem services, is on halting the overall loss of biodiversity, supporting healthy well-functioning ecosystems, and establishing coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. While global conventions and national legislation provide an existing framework for the protection of water, biodiversity and geodiversity, it is not yet clear what leaving the European Union may mean for nature in the UK, in particular for sites and species currently protected and restored through European environmental legislation and funding (e.g. Common Agricultural Policy, Habitats and Birds Directives, and Water Framework Directive).

Farming and land management play an important role in maintaining and enhancing our ecosystems and the services they provide, from food, fibre and renewable energy (such as biomass and anaerobic digestion) to biodiversity, local landscape character and employment. The local agriculture is primarily a mix of livestock grazing and some arable cropping, with grassland being the dominant feature in the floodplain. Globalisation, new legislation and management expectations are putting pressure on farming businesses, and many have to diversify to survive. Agricultural support in recent years has moved away from food production subsidies to supporting landscape and species management and wider public benefits from the local land in agricultural production. Reed and sedge cutting remains a traditional local and sustainable industry, supporting biodiversity, landscape character and cultural heritage. The local product is in great demand, and more commercial reed and sedge beds need to be brought into sustainable management. Improvements in funding, the availability and training of labour, and affordable housing are also key factors in sustaining this industry.

Good quality water is defined as clear, low in nutrients and free of harmful substances. It is characterised by a rich diversity of aquatic plants and supports healthy populations of fish, invertebrates and water birds. The Broads restoration programme has been active for over 30 years. It leads the UK in developing and studying lake restoration projects to recreate clear water conditions with healthy aquatic plant growth that provides habitat for wildlife. However, despite significant improvements in water quality in recent decades, monitoring in 2013 showed that all Broads' water bodies and river reaches, and more than 90% of rivers in the Broads catchment, were failing European Water Framework Directive targets. At times, some groundwater and river sources exceed drinking water standards for nitrate and pesticides.

Water quality continues to be affected by diffuse pollution (primarily phosphorus and nitrogen from domestic waste water and farmland) and by erosion causing sediment release. Other contributory factors are physical modification of water courses, dissolved oxygen and fish populations, coastal saline drainage water and salt tides, and

<sup>10</sup> The Ramsar Convention is an international treaty for the conservation and sustainable use of wetlands. It is also known as the Convention on Wetlands.

competing or over demand for water use. Voluntary actions in recent decades, such as environmentally sensitive farming, sustainable drainage systems, and environmentally friendly boating practices, should continue to help improve our water quality. We know that water and water-related habitats have a tendency to change over relatively short periods of time, and are seeking to better understand their ecological and hydrological functioning so we can put the best management regimes in place.

The Broads is a UK priority wetland area<sup>11</sup> with the largest expanse (around 75%) of species-rich calcareous fen in lowland Britain. Most fen sites are designated for nature conservation, and around 60% are owned or managed by conservation organisations. The Fen Ecological Survey (2010) showed clear evidence of loss, fragmentation and decline in some areas, and enhancement of large areas through agri-environment support. The Broads Land Management Service has recently been established to offer support to landowners and site managers, and targeted restoration projects and management regimes are helping to retain priority fens as open landscapes. The Broads has the most extensive tract of wet woodland (particularly alder carr) within Eastern England. It is of international significance and, where not designated, may be at risk from drainage, and from loss due to development. Around 40 million tonnes of carbon are stored by the wet woodland and fen peat habitats, and they will continue to capture and store carbon under appropriate water level and land management conditions.

Grazing marsh covers around 40% of the Broads. Some areas attract large and internationally important numbers of breeding and non-breeding birds, and there is a substantial area of internationally important dyke communities. The marshes provide a third of East Anglia's cattle grazing land, and local farmers and graziers rely on environmental land management support to optimise profit and protect the habitats. Threats to these habitats include loss to arable reversion and land drainage, partly due to the lack of long-term agri-environment schemes, development, water level regimes, flooding, drought, salt tides, and invasive species. There are more than 11,000 recorded species in the Broads. This includes 26% of all UK BAP priority species and 17% of all nationally notable or scarce species. 66 species are restricted entirely to the Broads or rarely seen elsewhere in Britain. Iconic species include the bittern, marsh harrier, otter, fen orchid, Norfolk hawker dragonfly and the entire UK populations of the swallowtail butterfly, dotted footman moth and holly-leaved naiad. Some species are in decline or on the brink of survival. Many species, including Broads' specialists, face challenges from increases in seasonal variability in river levels and depleted groundwater resources, salinity from land drainage and tidal flooding, nutrient enrichment and pollution of the waterways, habitat loss and fragmentation, and increasing threats from invasive non-native species. Species recovery and translocation programmes can take substantial time and resources, as can biosecurity measures. Some gains have been made in the increased populations of wintering water birds around Breydon, fen raft spider, otter, bittern, crane and marsh harrier, and in the control of invasive species such as floating pennywort and American mink, but much more needs to be done.

### **Long-term aim**

Biodiversity is understood, recorded, protected and enhanced in keeping with the status of the Broads as a globally important wetland, and within recognised limits of natural or inevitable environmental change. Sustainable land and water management and agri-environment practices support well-functioning ecosystems that provide multiple public benefits; this includes flourishing wildlife, food and fibre, fresh water supply, carbon storage, energy, pollination, disease and pest regulation, landscape character and recreation. Management of habitats and species is approached on a catchment, whole landscape scale. Opportunities are pursued to buffer, connect, create and recreate habitat areas to establish more, bigger, better and more joined up ecological networks and increase resilience and adaptation to change by habitats, species and society. Priority species and their specific water and land management needs are understood, recorded and managed to maintain and enhance species of conservation

<sup>11</sup> UK BAP priority species and habitats were those identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).

concern and halt biodiversity decline and loss. Invasive non-native species are under control and eradicated where possible. Robust and integrated soil and water management is recognised as vital for agriculture, water quantity and quality, and for reducing greenhouse gas emissions. The importance of the food supply chain is embraced and the need for a profitable agriculture sector to maintain biodiversity is recognised. Well-informed evidence and monitoring guides our understanding and decision making in all aspects of natural resource management.

**Aspiration 2** Protect, conserve and enhance water quality and land and habitat condition to benefit priority species, recognising natural environmental change and retaining a thriving and sustainable agricultural industry

Focus: Restoring, maintaining and enhancing water quality to achieve good ecological status/potential				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
2.1	Carry out lake restoration, maintenance and enhancement works, incl. bio-manipulation; use monitoring evidence to trial and implement further innovative lake restoration techniques	In-lake restoration, maintenance and enhancement works scoped, in development and carried out at priority sites in accordance with Broads Lake Restoration Strategy <sup>12</sup> and Broads Lake Review <sup>13</sup> , incl.: (a) Hoveton Wetland Restoration Project [NE]; (b) Hickling Enhancement Project [BA, NWT]; (c) Review and forward plan for Upton Broad and Barton Broad [BA, NWT]	(a) External funding secured (b) Partners; additional resources required; (c) Partners	SSSI site condition targets, EA statutory monitoring data, total area (ha) under restoration
		Pre- and post-work monitoring undertaken of Hoveton, Trinity and Hickling lake condition status, and evidence being used to trial and implement further innovative restoration techniques as part of Lake Restoration Action Plan [NE, BA, EA, ESW] and Diffuse Water Pollution Plans [NE, EA]	Partners	Broads Lake Restoration Strategy and Diffuse Water Pollution Plan targets

<sup>12</sup> Lake Restoration Strategy for the Broads, Broads Authority, 2008.

<sup>13</sup> Broads Lake Review, Broads Authority, 2013.

2.2	Promote and implement measures to reduce point and diffuse pollution into the floodplain and water courses, commensurate with EU/national water and habitat targets and with sustainable farming	Tailored environmental land and water management measures and support (incl. payments) taken up by land managers (through Countryside Stewardship (CS), Catchment Sensitive Farming (CSF), Campaign for Farmed Environment (CFE), Water Sensitive Farming (WSF), water company schemes , other externally funded project initiatives, etc.) [ <b>BCP</b> coordination]	BCP partners; funded schemes (CS, CSF, WSF, CFE); additional resources required	CS/WSF targets, CSF water capital grant targets, WFD/SSSI/SAC/ Nature 2000 targets
		Point and diffuse pollution reduction measures undertaken through Diffuse Water Pollution Plans and Asset Management Plans [ <b>NE, EA, AW, ESW</b> ]; infrastructure promoted, trialled and implemented (e.g. phosphate stripping from Water Recycling Centres, constructed wetlands and reed beds, bio-beds, combined sewer overflow works); measures taken up by businesses and communities (e.g. septic tank maintenance, first time rural sewerage); saline water into Brograve drainage investigated and remedial works in place [ <b>NE, EA, AW, ESW, IDBs</b> ]	Partners	# first time rural sewerage schemes in catchment (AW), # CSO pollution events in catchment (EA/AW)
<b>Focus: Managing existing fen, reed bed, wet grassland and wet woodland, in accordance with priorities and principles in Broads Biodiversity and Water Strategy</b>				
Ref	Strategic action	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
2.3	Maintain and enhance existing areas of priority fen, reed bed, grazing marsh and wet woodland through tailored site management agreements / prescriptions and support services to site managers	Water management control measures implemented and advice and support made available and taken up by land managers, incl. Halvergate Fleet and Muckfleet schemes [ <b>IDBs, NE, BA, RSPB, ESW, landowners</b> ]; innovative work on management of catch dykes developed and implemented [ <b>NE</b> ]	Partners; Grant in Aid + additional resources required	% priority habitat in CS, SSSI condition assessment targets
		Tailored fen and reed bed stewardship agreements, management prescriptions and best practice in place at priority sites, applying site-specific techniques, incl. grazing, commercial reed and sedge cutting for thatch, long-rotation conservation cutting, conversion of cut material to biomass and soil improvers, and turf ponding [ <b>BBP</b> coordination, delivered through Broads LMS, BRASCA, landowners]	Funded schemes (CS, CSF), external grants, statutory partners	Area (ha) under management agreement

		Tailored grazing marsh stewardship agreements, management prescriptions and best practice in place at priority sites (commensurate with Broads NCA description and agri-environment schemes), applying site-specific techniques, incl. grazing livestock at suitable densities and timings, foot drain creation, rush control and appropriately timed hay-silage cutting [BBG coordination delivered through Broads LMS, BRASCA, landowners]	Funded schemes (CS), IDBs, additional resources required	Area (ha) under management agreement
		Nature conservation activities implemented under Broads Landscape Partnership Scheme Programme 5: Natural Landscapes [Broads LPS Board and delivery partners]	HLF LPS funded secured	Broads LPS target data for HLF
2.4	Define, implement and monitor management regimes for priority species and invasive non-native species	Targeted species recovery/ support programmes implemented, incl. research and species translocation action where appropriate (e.g. fen raft spider, fen orchid, lesser whirlpool ramshorn snail, grass-wrack pondweed) [BBP, Highways England]	Conservation grants in place; additional resources required	Distribution of breeding wader populations, # new sites for bittern and swallowtail, priority INNS removed/ controlled to manageable background level
		Invasive non-native species (INNS) monitoring regimes and awareness campaigns in place; data made available on present/potential threats and biosecurity plans/ control programmes in place where threats are highest (e.g. mink, Floating Pennywort) [NNNSI]		
<b>Focus: Extending and creating new areas of high biodiversity value habitat, habitat networks and buffer zones within the Broads catchment</b>				
Ref	Strategic action	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
2.5	Create 'bigger, better and more joined up' areas of priority habitat by identifying opportunities and developing site-specific plans for new habitat areas, connections, buffer zones and pollinator networks	Potential/opportunistic areas of new priority habitat, wildlife corridors and extended/new field buffer strips identified and added to existing mapping; tailored on-site measures, advice and support made available to and taken up by landowners/managers, particularly in identified high value areas [BBP coordination, delivered through Broads Land Mgt Service, BCP, NCP, landowners/managers]	Partners	# investment plans completed (e.g. econets mapping), # landowners involved with Broads Land Mgt Service

		Integrated, landscape-scale initiatives developed and implemented, incl. NWT/SWT Living Landscapes projects in Suffolk Broads, Upper Thurne, Bure and Ant, RSPB Broads Futurescapes and LIFE Little Tern projects [NBP, BCP, other partners]; Recreational pressure mitigation and management strategies in place to extend and protect biodiversity value of sites [NBP, NCP, NSPG]	Partner resources + secured external funding	Individual project delivery targets
2.6	Improve partnership coordination and communication of Broads biodiversity monitoring and research efforts, linked to national biodiversity network	Through research and monitoring, impacts of habitat management and manipulation techniques determined and findings coordinated/shared. Priority research areas: Fen ecology and water levels and quality; Prynnesium ecology and mitigation of impact on fish; Pollutant inputs; Impacts of drought, flooding and salinity (e.g. UCL salinity study); Creating markets for fen materials; Impacts of connectivity, stressors and their interaction on freshwater habitats [ <b>BBP</b> as research coordinator/facilitator, BA, EA, NERC Hydroscape]	University, conservation and research grants	# published papers/ research reports
		Community-based research and monitoring activities implemented under Broads Landscape Partnership Scheme Programme 1: Interpreting the Landscape and Programme 3: Learning and Future Skills [ <b>Broads LPS Board</b> and delivery partners]	HLF LPS funded secured	Broads LPS target data for HLF



## C. Maintaining and enhancing the navigation

### Context

The Broads is an extensive and varied inland waterway system, offering 200km of boating on lock-free, meandering tidal rivers. The Broads Authority's executive area (Map 1) comprises approximately 1974ha of water space and 63 permanently open water bodies, covering 843 ha. Many of these water bodies are 'broads' in the traditional sense, having been formed from peat diggings, while others are of more recent or different origins, such as at Whitlingham County Park, which was developed on the site of a gravel quarry. Some broads have public navigation rights, other have more limited access, generally for environmental or land ownership reasons, while some others are landlocked and inaccessible to craft. The navigation area reaches from the quiet headwaters of the rivers Bure, Ant and Waveney to the bustling urban centre of Norwich and the coastal resorts of Great Yarmouth and Lowestoft.

As the harbour and navigation authority, the Broads Authority is responsible for maintaining the navigation area. Its powers include health and safety provisions, dredging, management of vegetation, clearance of wrecks and other hazards, maintaining the network of free 24-hour moorings and providing a ranger service. It also has a duty to sign and mark the waterways. Sediment management guidelines, agreed cutting prescriptions, water space management plans and environmental standard operating procedures all help to maintain the navigation, while also protecting and conserving the unique and important water plant communities, and providing refuge and food for fish and birds.

Dredging is carried out to provide reasonable depths for safe navigation, and to help restore degraded or shallowing water bodies. It also helps improve water quality by removing excess nutrients in the mud, reducing turbidity and creating depth for aquatic plants to flourish and stabilise the bed, and by providing greater capacity for water storage. Dredging the waterways and disposing of dredged material is the largest navigation maintenance cost to the Authority. The current budgeted target to remove 50,000m<sup>3</sup> of material per year, twice the estimated sediment input, is making a positive but limited impact on the backlog in the system. .

River bank erosion is a key sediment source, caused by wind, tidal action and boat induced waves and feral geese. Land use and soil and vegetation type on riverbanks and uplands are also contributory factors, with headwaters contributing around 50% of sediment inputs. A whole catchment approach to sediment management is being used to reduce the amount of sediment entering the system from higher up the Broadland Rivers Catchment, as well as removing it from the Broads waterways. Finding ways to dispose of dredged material is a constant challenge. Many historically available sediment disposal sites are protected under European environmental legislation, and opportunities for using adjacent land have been very limited in recent years.

We will continue to seek sustainable and innovative approaches to managing dredged material, taking account of its value for agriculture, habitat creation and flood protection, and reusing it beneficially wherever possible. Considerable advances were made through the recent EU-funded PRISMA<sup>14</sup> project. This supported the trialling of sustainable dredging techniques, pioneering methods for the reuse of dredged material in island and habitat recreation schemes, and investment in new dredging plant and equipment. Building on this success, the Authority and its partners are pursuing external funding to carry out more projects with multiple benefits for navigation,

<sup>14</sup> PRISMA: Promoting Integrated Sediment Management project, 2011-14

conservation and recreation.

Thriving aquatic plants are part of a healthy ecosystem, and certain species are protected under the EU Habitats Directive and the Wildlife and Countryside Act 1981 (as amended). Recent years have seen increasing plant abundance in the Broadland rivers, particularly in the upper reaches, in smaller isolated broads and in sites away from the navigable system; plants in the larger broads connected to the river system are typically slower to respond to improving water quality. In a connected waterways network like the Broads, the cost and effort of tackling the spread of certain aquatic invasive non-native species, such as floating pennywort and the 'killer shrimp' (*Dikerogammarus villosus*), is a huge and ongoing challenge. Practical work tends to be focused on preventing the arrival of new species, and on controlling established species that have significant impacts on the use of navigational and recreational waterways or the conservation interest of key sites.

Opening up new areas of navigable water space may help to reduce potential conflicts between different user groups, improve safety, and ease pressure on busy areas. Opportunities to do this have been very limited in recent years, tempered by voluntary restrictions to certain areas of the water space that provide key refuges for wildlife, by other environmental or land ownership issues, and by a lack of resources. However, an audit of existing and potential new navigation water space is planned, and schemes and agreements will be developed where opportunities arise.

Safe, responsible behaviour on the waterways, and the technical safety of boats, are managed day-to-day through the Authority's Ranger Service. The Rangers are supported by byelaws, codes of conduct and good practice, including public events such as Super Safety Days and the 'Wear It' lifejacket campaign. Safety standards on the waterways are high, although speeding, and people falling while getting on and off boats, are commonly reported problems. The Authority, emergency services and Coastguard work closely together to respond to incidents. Local policing partnerships also promote a proactive approach to reducing marine crime, such as the theft of outboard motors.

#### **Long-term aim**

The historic and present importance of the Broads' waterways for navigation, biodiversity and recreation is recognised and valued. The navigation and associated riverside facilities and infrastructure are maintained and enhanced, offering opportunities for people of all ages and abilities to access and enjoy the water space. The variety and intensity of waterborne activities across the system are managed carefully to maximise safe enjoyment, minimise conflict between different users, and ease pressure on busy or vulnerable areas. Opportunities to expand and extend the navigable water space are pursued, consistent with nature conservation interests and water resource management. Sediment is managed to provide necessary depths for boating, with dredged material reused or disposed of in environmentally and economically sustainable ways. Sediment loss from agricultural land and bank erosion is minimal, with sustainable natural and constructed solutions used to protect the more vulnerable stretches of waterways. Bankside vegetation and water plants are managed in ways that keep waterways open to navigation, do not impact on the ecological or archaeological integrity of sites, and provide for appropriate recreation. Restrictions on navigation due to bridges is minimised and mitigated wherever possible.

**Aspiration 3** Apply a catchment-scale approach to reduce sediment input and the sediment backlog, and sustainably reuse or dispose of dredged material

**Focus: Reducing sediment input to the Broads system and accelerating sediment removal**

Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
3.1	Implement dredging regimes in accordance with defined waterways specifications, and seek resources/legislation to accelerate the removal of sediment in the Broads system	Annual dredging programme implemented in accordance with defined waterways specifications and agreed targets <b>[BA]</b>	BA	Vol. sediment removed (min 50,000m <sup>3</sup> pa); % compliance with waterways specs
		Additional resources in place to support sustainable sediment management; appropriate inland waterways legislation and good practice for dredging and disposal processes developed, in place and shared <b>[BA, AINA, MMO]</b>	Additional resources sought	Secured additional funding, up-to-date legislation and guidance
3.2	Implement plans and good practice guidance to reduce soil erosion into the waterways, manage areas lost or vulnerable to erosion, and dispose of dredged material in sustainable and beneficial ways	Best practice land management techniques to reduce erosion promoted and in place, e.g. increased cover crops, buffers and sustainable drainage, riparian fencing, soil organic improvements, soil compaction reduction <b>[NE, EA, BCP, NRT, county FWAGs]</b> ; up-to-date environmental good practice guidance promoted to recreational users <b>[AINA, BA, BC, NSBA]</b>	Funded schemes (CS, CSF, CFE, WSF), partners	SSSI condition assessments, WFD EC status, CFE records
		Stretches of lost or eroded river bank/island identified and prioritised for restoration; land protection, creation and restoration strategies in place, using innovative sediment reuse techniques where possible <b>[BA as lead/facilitator, partners]</b> . Key project: Formal partnership agreement and feasibility study/work plan in place for long-term management of River Chet (true left bank) to maintain access to navigation and Wherryman's Way <b>[BA, NCC, SNC, EA, NE]</b>	Partners; additional resources required	Condition status of Chet true left bank; other targets to be agreed
		Strategic approach taken to identify sustainable options for additional dredging disposal sites/capacity as part of Broads-wide network, also seeking environmental gains, and appropriate permissions and resources secured <b>[BA]</b>	BA; additional resources required	BA annual operations data

**Aspiration 4** Maintain a safe, open navigation and reduce pressures on busy or vulnerable areas

**Focus: Maintaining, extending and expanding navigable water space for recreation, consistent with conservation interests and flood risk management**

Ref	Strategic action	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
4.1	Maintain existing navigation water space and develop appropriate opportunities to expand or extend access for various types of craft	Audit of existing and potential new navigation water space completed; schemes and agreements developed to enhance water space access, consistent with nature conservation interests and flood risk management; access to closed broads dealt with on basis of current legal advice, and opportunities created to negotiate increased access [BA, landowners]	Partners	Broads IAS action plan targets
		Increased use of River Yare for commercial transport promoted, with waterways specifications adopted and implemented as required [BA, Norwich CC, GYBC]	Partners	To be agreed
		Network Rail Delivery Plan developed for refurbishment/replacement of Somerleyton and Reedham swing bridges, including secured funding and agreed design and mitigation measures [NR, BA]	Network Rail CP6 Delivery Plan	NR CP6 Delivery Plan schedule met

**Focus: Maintaining and improving management of aquatic plants and riverside trees and scrub**

Ref	Strategic action	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
4.2	Carry out appropriate aquatic plant cutting and tree and scrub management programmes and seek resources to increase operational targets	Annual tree and scrub management regimes carried out in accordance with agreed navigation, nature conservation and other criteria, using priority mapping; improved level of operations in place through BA Area Ranger Team strategies for partnership working [BA, community groups, landowners]; annual regimes for aquatic plant cutting in navigation channels carried out in accordance with agreed criteria [BA]	BA; additional resources required	Length riverbank & navigation channels meeting agreed criteria, annual plant monitoring data

**Focus: Maintaining and promoting safe behaviour on the waterways**

Ref	Strategic action	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
4.3	Implement, promote and monitor measures to maintain and improve safety and security for the navigation	Boat safety measures in operation, incl. up-to-date Safety Management System and Boat Safety Scheme; Hire Boat Code part 2 transferred to local licence conditions; Temporal or spatial zoning agreements/ protocols and pilot schemes in effect as	BA	BSS compliance/ PMSC external audit (safety levels within

	and boats	required for water sport activities and events, incl. water skiing, wakeboarding, power boat racing and competitive rowing [BA]		ALARP region)
		Navigation patrolling maintained; recreational user safety and security promotional events and guidance made available; up-to-date navigation infrastructure inspection and maintenance regimes in place and completed to agreed annual schedules [BA, NC, SC, NWSF]	BA, NC, SC	NPA (BA) indicators and targets

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## D. Conserving landscape character and the historic environment

### Context

The low-lying, interconnected wetland habitats of the Broads follow the edges of level, open marshland and valleys drained by three principal rivers and their tributaries. This is a living and working landscape, influenced over thousands of years by patterns of human existence. The Broads Landscape Character Assessment<sup>15</sup> summarises the physical processes that have shaped and moulded the landscape we see today. It identifies 13 distinct landscape types, from coastal dunes and tidal estuary to peat fen, carr woodland and settlement fringe. Within these, there are 31 individual character areas, each one with a unique combination of landscape features and elements.

The shallow lakes we know as 'broads' are manmade, originating as medieval peat diggings for fuel, making the Broads one of England's most extensive industrial monuments. A long history of controlled drainage is evident from the drainage mills, raised and embanked rivers, and dykes. The location and pattern of villages and settlements have been dictated largely by historic social and economic need, with groupings often round a parish staithe<sup>16</sup>, riverside common, ferry or bridge, with isolated churches on the surrounding uplands.

The significant built heritage value of the Broads is recognised in the designation of 25 Conservation Areas and the scheduling of 14 Ancient Monuments and more than 270 Listed Buildings. Much has been achieved to protect, conserve and enhance key historic and cultural assets, and the number of Listed Buildings at risk was reduced by 50% between 2011 and 2015. However, there is still gradual erosion in the condition, quality and distinctiveness of the built environment, and 10% of listed buildings are still identified as being at risk. Among the most vulnerable assets are more than 70 drainage mills, an iconic and visible feature in the flat landscape. Many of these structures are isolated, inaccessible and in a deteriorating condition. The evolving Local List of Heritage Assets, and the preparation of individual mill action plans, is providing important evidence for action. This information has already helped to secure £2.6m development funding from the Heritage Lottery Fund for the 'Water, Mills and Marshes' Landscape Partnership Scheme (LPS), which will support a range of local heritage projects. Ongoing support is also needed to preserve, restore and use historic Broads' craft, including the trading and pleasure wherries. The LPS will add to the ongoing efforts of local groups and trusts who work hard to maintain the heritage fleet. A recent update on the history, type and rights of staithe, another local waterways feature, will be used to help guide planning policy and heritage design.

Other important aspects of the area's heritage are also in danger of being lost if not recognised, protected and supported. The Broads has been identified by Historic England as a site of Exceptional Waterlogged Archaeology, but many of its archaeological features remain hidden and vulnerable to changes in water levels, development and other land use pressures. Heritage craft industries such as reed and sedge cutting, thatching and millwrighting remain a small but important part of life and landscape management in the Broads but are struggling to survive, as are other local traditions, crafts and cultures.

The geodiversity of the Broads is an understated aspect of its natural heritage. There are five nationally designated sites (covering Pleistocene geology and active coastal processes), but many other identified sites of interest lack designation and hence protection at County level. Drying out of wetland and oxidation of peat can lead to loss of finite environmental and archaeological archives as well as release of stored carbon. Other risks include coastal protection work that alters the dynamics of marine erosion and sediment transport, and the wider impacts of climate change.

<sup>15</sup> Broads Landscape Character Assessment, Broads Authority, 2017 (update).

<sup>16</sup> A staithe is land adjacent to a waterway that local inhabitants are entitled to use to moor boats and load and unload goods.

A sense of tranquillity, dark skies and wildness gives the area much of its character and appeal. Visual disturbance and noise and light pollution, from both within and outside the Broads, can have an undesirable impact. Tranquillity mapping by the Campaign to Protect Rural England places most of the Broads at the 'most tranquil' end of the spectrum. The Broads Authority's own dark skies survey in 2015/16 showed that parts of the Broads have 'intrinsic dark skies', the darkest areas being Hickling and Geldeston, making the Broads eligible for Dark Sky accreditation. Measures to protect and enhance tranquillity, dark skies and wildness are being encouraged through planning policy and design guidance, and through initiatives such as reducing boat engine noise, zoning activities like water skiing and power boat racing, and undergrounding overhead electricity distribution cables. Having said that, it is recognised that it is the bustling activity in some areas of concentrated holiday or leisure development, such as Wroxham and Potter Heigham, which gives these areas their particular character and supports the local economy and communities.

**Long-term aim**

The Broads is maintained as a dynamic, unique and special landscape with its own sense of place and historic significance. The key physical, historic and cultural elements of landscape character are recognised, understood, retained, reinforced and actively managed, while allowing the landscape to continue to evolve and reflect the interactions between people and nature. Traditional and heritage industries such as boat building, agriculture, thatching and millwrighting thrive and wider local traditions, skills, crafts and oral cultures are maintained, recorded and celebrated. Archaeological sites and historic built and cultural assets are recorded, protected and enhanced, halting further degradation and loss and contributing to the integrity of the landscape. The built environment continues to reflect the activities of people living and working in the Broads, embracing traditional and innovative design compatible with the local landscape character and with the needs of social and economic stability and growth. The Earth heritage features of the Broads are recognised and protected and people understand the evolution of our environment over deep time. The sense of tranquillity, wildness and dark skies is protected and enhanced for people to enjoy. At the same time, the bustling nature of some areas is supported and enhanced, in keeping with the overall character of the Broads and the needs of its communities.

**Aspiration 5** Improve understanding, protection, conservation and enhancement of the Broads landscape character and distinctive built, cultural, archaeological and geological assets

Focus: Protecting, conserving and enhancing the distinctive landscape character and historic assets of the Broads				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
5.1	Prepare and implement bespoke management plans for identified 'at risk' and locally important heritage assets	Comprehensive Heritage at Risk Register and Broads Local List of heritage assets in place; thematic surveys of local assets for inclusion on National List carried out [HE, BA, parish councils]; Management plans and planning guidance in place for 'at risk' Broads Local List assets, incl. drainage mills and riverside chalets, rolled out to all Broads HAR assets [BA, HE, NCP, mill trusts, asset owners/ developers]	Partner funding; HE/BA heritage team advisors	# new asset groups added to Local and National Lists, # completed asset mgt plans in place for 'at risk' assets

		Built heritage activities implemented under Broads Landscape Partnership Scheme Programme 3: Learning and Future Skills and Programme 4: Historic Landscapes [ <b>Broads LPS Board</b> and LPS delivery partners]	HLF LPS funding secured	Broads LPS target data for HLF
5.2	Produce, update and promote local landscape conservation action plans, appraisals and enhancement schemes	Broads Landscape Conservation Action Plan produced and informing Broads Landscape Partnership Scheme, development management and updating of the Broads Landscape Character Assessment [ <b>Broads LPS Board, BA</b> ]	HLF LPS funding secured	Broads LPS target data for HLF
		Up-to-date Conservation Area designations and guidance in place; 'villagescape' enhancement plans (e.g. neighbourhood plans, village design statements) identified and developed where appropriate [ <b>BA, LAs, parish councils</b> ]	Partners	Complete set of Conservation Area designations
5.3	Develop measures to investigate, record and protect local built and cultural features, archaeology and potential hidden heritage (incl. waterlogged assets, waterways history, settlement patterns, WWII remains)	Investigation and interpretation activities implemented under Broads Landscape Partnership Scheme Programmes 1: Interpreting the Landscape, 3: Learning and Future Skills, 4: Historic Landscapes, and 5B: Natural Landscapes [ <b>Broads LPS Board</b> and LPS delivery partners]	HLF LPS funding secured	Broads LPS target data for HLF
		Evidence base and policy developed to improve understanding and protection of the Broads' exceptional waterlogged archaeology; Management plan developed [ <b>BA, NCC, SCC, HE, NGP</b> ]	Partner resources; additional resources required	Increased evidence base, published management plan
5.4	Implement and promote measures to conserve and enhance local geodiversity sites and assets across identified work areas in Norfolk Geodiversity Action Plan	Conservation of five geological SSSIs supported [ <b>NE</b> ]; Priority designation programme for candidate Norfolk County Geodiversity Site in the Broads funded and taken forward [ <b>NGP</b> ]; Literature and web-based information produced and promoted, focusing on links between environmental history and climate change, and between local settlement and geological resources [ <b>NGP</b> ]	Partners	Norfolk GAP action plan targets
<b>Focus: Developing and supporting land management skills and local heritage industries</b>				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
5.5	Expand the longer-term resource of land management and heritage construction and maintenance skills training and qualifications	Activities implemented under Broads Landscape Partnership Scheme Programme 3A: Heritage Construction Skills Training and Programme, and 4: Historic Landscapes, and scope developed for longer-term provision of training and apprenticeship opportunities [ <b>Broads LPS Board</b> and LPS delivery partners, Construction Industry Training Board]; Vocational skills training and work	HLF LPS funding in place; HLF partners, BA, CITB,	Broads LPS target data for HLF, # trainees and work experience participants in



		experience opportunities made available [ <b>BEEN, FE providers</b> incl. Norwich City/ Easton and Otley/ Lowestoft/ Great Yarmouth colleges, BA]	BEEN partners & FE providers, BIS/BEIS	target schemes
		Advice and practical support made available to local reed and sedge cutters, including equipment, contracts and training initiatives [ <b>BA, BRASCA</b> ]		BRASCA Action Plan targets
<b>Focus: Reducing the adverse impacts of visual intrusion, noise pollution and light pollution within and adjacent to the Broads to help maintain tranquillity</b>				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
5.6	Build on measures to reduce the impacts on the Broads of visual intrusion and noise and light pollution, and pursue potential for dark sky place status	Scheduled Broads undergrounding wires programme implemented (Share Marshes, Horsefen Marshes 2017/18, South Walsham 2018/19, Cantley by 2020); Applications developed for Beccles Marshes, Share Marshes, Potter Heigham (for delivery 2018/19) [ <b>Ofgem/UK Power Networks, BA</b> ]	OFGEM	Individual scheme schedules and targets
		Broads dark sky mapping assessment and monitoring in place, and application progressed/achieved for Dark Sky Place accreditation for the Broads [ <b>BA</b> ]		

## E. Building 'climate-smart' communities

### **Context**

The predicted impacts of sea level rise and climate change pose considerable challenges to the future of the Broads' special qualities, and to its local communities and visitors. Based on probable climate projections, over the coming 50 years the Broads is likely to see hotter, drier summers, slightly wetter and warmer winters, streams and the sea getting warmer, increasing mean water levels, more extremes in the intensity and frequency of rainfall and storms, and possibly heatwaves and drought.

Depending on how much our climate changes, impacts are likely to include variations in the distribution of habitats and species, with some net loss of native biodiversity and increasing pressure from invasive non-native species; changes in the visual landscape character, including damage or loss of archaeological and built heritage features; and damage to property and infrastructure. We may also see greater pressures on water resources; changes in agriculture patterns and production; changes to siltation rates and patterns; stimulated plant growth that will require greater management; and changes in tourism patterns and visitor numbers. This will create new challenges and opportunities for land management and use, and strong planning policy will play a key role in supporting ongoing sustainable development in the Broads and wider area.

Minimising the scale of climate change (mitigation) and coping with the inevitable changes that are already coming (adaptation) are closely intertwined.

The emphasis in recent years has perhaps been on mitigation measures, such as carbon reduction planning, which try to ensure the limits of change do not become unacceptable. This does not mean that adaptation planning can be left alone, and we also need to improve our understanding and develop realistic and acceptable management options for the future. We will need to consider how our management decisions may affect our natural ecosystems and the services they provide for people and wildlife, such as flood regulation, clean air, food, energy, fresh water (including drinking water), carbon capture, employment, and health and wellbeing.

In 2016, the Broads Climate Partnership prepared a Climate Adaptation Plan for the Broads<sup>17</sup> and submitted it to Defra as part of the UK National Adaptation Programme. The Plan's main focus is on developing longer-term options for managing water resources and flood risk (also see Section 3A: Managing Water Resources and Flood Risk). In wider terms, the plan proposes the development of an informed and proactive 'climate-smart' approach within our Broads communities. This is about supporting local residents, businesses and visitors to understand the likely changes and impacts ahead, what is being done in response and, importantly, what they can do themselves to reduce greenhouse gas emissions, become more resilient and adaptive to future change and help build a greener economy. Climate-smart' planning also aims to involve people more fully in wide-ranging discussion and decisions about the longer-term future for the communities, landscapes and wildlife of the Broads.

### **Long-term aim**

'Climate smart' planning and action is helping to retain the beauty and value of the Broads as a special place of high quality landscape, wildlife and heritage that provides people with opportunities for recreation, learning, wellbeing, employment and economic sustainability. Local communities are prepared for and resilient to change. Experience of longer-term planning for change is being shared more widely and frequently to support everyone, particularly those more vulnerable and less able to adapt

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<sup>17</sup> Broads Climate Adaptation Plan, Broads Authority, 2016.

quickly or easily. Land, buildings, infrastructure, services and working practices are modified to cope with the impacts of sea level rise and changing regimes, including more frequent and more intense weather conditions and changing water levels, and sustainable management of land and water resources is commonplace. Local renewable energy generation is high, using methods that fit into the Broads landscape, and energy efficiency measures and low carbon options are widely chosen. Research is focused on innovative ways to save energy and benefit the local economy.

**Aspiration 6** Build the awareness and adaptive capacity of local communities to the challenges of climate change and sea level rise

Focus: Building and sharing concerns, knowledge and practical community level responses to climate change and sea level rise				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
6.1	Develop and promote tailored 'climate-smart' mitigation and adaptation measures, guidance and support to local communities	Broads °Community initiative developed and promoted; interpretation programme developed to raise awareness and promote practical adaptation measures for communities within the Broads and other protected areas; adaptation options included with public strategies/appraisals [ <b>Broads Climate Partnership</b> ]	Broads Climate Partnership; resources required	Pilot project by 2018; potential roll out in phased programme 2018-20
		Community Resilience Strategies for Norfolk and Suffolk in place and promoted, evolving into becoming more 'climate smart' [ <b>NRF, SRF, BA</b> ]	LA resources with external funding	# Community Resilience Strategies in place
		Increased provision and promotion of facilities, schemes and incentives that encourage the use of low energy/environmentally friendly schemes through the Green Tourism Business Scheme, The GreenBlue, and green product marketing [ <b>LAs, BA, BT, WCOs, LEP</b> ]	Partners and business initiatives	Increase in green tourism certification take up
6.2	Commission and coordinate research to inform management approaches to decrease carbon emissions and increase carbon sequestration in the Broads	Research completed and information promoted to raise awareness of the value of well managed peatland ecosystems as carbon sinks, and the impacts of poor water and land management on the ability of peatlands to capture carbon [ <b>BA, BCP, BBP</b> ]	Academic R&D grants	
		Research and development carried out on renewable energy generation techniques appropriate to the Broads; enhanced, up-to-date information on renewable energy generation options produced and published [ <b>LAs, UEA</b> ]	Partner and academic R&D grants	kW net increase in renewable energy (BA planning permissions)

## F. Offering distinctive recreational experiences

### Context

The Broads is a member of National Parks UK. More than seven million people a year visit the area to enjoy a range of outdoor activities from boating, walking, angling and cycling to wildlife watching, photography, and visiting historic and cultural assets such as mills and churches. The area has more than 200km of inland navigable, lock-free waterways and 303km of public rights of way, including three county long distance trails and part of the national England Coast Path trail. The surrounding Norfolk and Suffolk coast, and urban centres that include Norwich, Great Yarmouth and Lowestoft, also provide opportunities for open access and recreation.

There are more than 11,000 licensed boats using the Broads, most privately owned, in all shapes and sizes from small canoes and rowing boats to large motor cruisers and commercial passenger vessels. The hire boat industry, while experiencing a gradual decline in boat numbers since 2010, remains a significant part of the Broads economy. Diversification and improvements in environmental and quality standards, largely in response to changes in traditional holiday patterns and visitor needs, have been crucial to its ongoing survival. Over the past five years, there has been an increasing trend within both hire and private fleets towards bigger boats, particularly motor boats. Conversely, canoeing and rowing are increasingly popular, with the BA boat census recording a rise in small boat movements of around 60% since 2010. Sailing for pleasure, including competitive racing, has been part of the way of life in the Broads since the 19<sup>th</sup> century, and remains integral to the landscape. These activities are in keeping with the philosophy of quiet recreation, and they rely on good access to and onto the water, shore side facilities, and an emphasis on attracting young and new users to waterways activities.

Angling is another major contributor to the local and regional economy, and the Broads offers some of the best coarse fishing in England. Key areas of management focus in the Broads Angling Strategy (2013) are fisheries management and ecology, access to the water's edge, information and environmental education, and urban fishery development. Taking the strategy forward will, however, require new sources of funding and strong partnership working between the Environment Agency, Broads Angling Strategy Group and other interests. Wildfowling and other field sports also make a contribution to recreation, conservation and land management in the Broads.

Land-based recreation ranges from the passive, such as simply sitting at a riverside viewing point admiring the view, to more active pursuits such as cycling, horse riding or visiting local amenities and sites of interest. Recent visitor surveys confirm that walking is extremely popular, and the area benefits from circular and short walks to from long distance trails including the Angles Way, Weavers Way and Wherryman's Way. Recent additions to the Norfolk/England Coast Path have brought a National Trail to the Broads for the first time. Significant reductions in local authority budgets in recent years are, however, having an impact on rights of way and footpath maintenance programmes.

The appeal of the local wildlife, notably birds, is seen as highly relevant to boosting visitor demand throughout the year, and access to core areas is provided by a range of organisations and individuals. There is always a need to resolve the potential conflict between visitor activity that could damage fragile habitats or disturb wildlife, and opportunities to access and appreciate these special places. In terms of wider access, a lack of visibility of the water and wetland to land-based visitors sometimes means they do not experience the true essence of the Broads, and the rivers and extensive drainage channels can mean long diversions to reach crossing points such as bridges and ferries.

Proposals to improve access to and around the Broads, linked to destination points, services and sustainable transport, were identified following an audit of existing resources. Implementing potential projects to upgrade and extend moorings and land access often depends on gaining realistic landowner agreements, and on having

sufficient resources, both to carry out the projects and maintain the overall network in the longer term. In terms of transport, the majority of visitors to the Broads still arrive by car. In some areas, particularly 'honeypot' sites that attract a lot of people, this can increase seasonal traffic congestion and demand for parking, and create a contradictory impression to visitors who expect the Broads to be tranquil. Access, transport and local plans identify the need to promote investment in public transport improvements, including passenger transport, walking and cycling facilities, seasonal road and water bus services and boats between rail stations, town centres, tourist attractions, and moorings, and bespoke provisions such as a Broads Hopper bus service.

**Long-term aim**

The value of the Broads as a place for escape, adventure, enjoyment, inspiration and reflection for people of all ages and abilities is recognised and treasured. The area continues to offer a wide range of high quality, distinctive and memorable activities and events on water and on land, in suitable locations and in harmony with the special status and qualities of the Broads National Park and its communities. The long-standing tradition of boating remains integral to the Broads recreational offer, alongside other popular pursuits of angling, walking, cycling and experiencing the rich natural and cultural assets of this wetland landscape. Year-round tourism is managed at environmentally and socially sustainable levels, contributing to a thriving local economy and secure employment base and meeting green tourism business standards. Physical access on land and between land and water is managed sensitively to maximise the social, educational and health benefits of open space to all, while ensuring the resource itself is not degraded. Where possible, improvements have been made to the network, connectivity and use of access routes, linked to visitor destination points and sustainable transport.

**Aspiration 7** Provide opportunities for distinctive recreational experiences in harmony with the special qualities of the area

<b>Focus: Maintaining and enhancing the integrated physical access network to and around the Broads and between land and water, linked to visitor facilities</b>				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
7.1	Develop and implement schemes to upgrade and improve the network of access points and routes (where adverse effects can be prevented), linked to visitor facilities and including easier access for people with mobility and sensory needs	Updated audit completed on land access to Broads viewpoints (access from moorings to facilities, services and public transport links, and across rivers and to/alongside water, access for people with mobility and sensory needs); projects to improve/create access developed and implemented [BA, NCC, SCC, RWSP]	Partners; additional resources required	Broads IAS targets, NCC ROWIP targets
		Improved and new small craft launch facilities in place, linked to craft hire points and published trails [BA, boat hire operators]; existing BA 24-hour free mooring network maintained and new moorings/ stopping points (incl. wild/quiet moorings and commercial moorings) in place at priority locations [BA]	BA; additional resources required	BA maintenance & repair /10-yr repiling targets / Broads IAS targets

		County Cycling and Walking Action Plans and initiatives implemented; new /upgraded priority cycle routes and cycle hire provision schemes developed (incl. Three Rivers Way cycle route and Norfolk Trails) [NCC, SCC, BA, RSPB/SE]; improved, safe circular horse riding routes identified, implemented and promoted through County Rights of Way Improvement Plans (ROWIPs) and Broads Integrated Access Strategy (IAS) [NCC, BA]	Partners & partnership schemes	NCC ROWIP targets, coastal path sections completed by 2020, Broads IAS targets,
		River Wensum Strategy (RWS) implemented to improve access and facilities to and alongside river (incl. new moorings, small craft launch facilities and footpath improvements linking Norfolk Trails through Norwich to the Broads) [Norwich CC, BA, EA]		RWS action plan targets
		Physical access projects implemented under Broads Landscape Partnership Scheme Programme 2: Exploring the Landscape, incl. landscape/mills trail and access improvements to Weavers Way and Wherryman's Way [Broads LPS Board and LPS delivery partners]	LPS partners; HLF funding secured	Broads LPS target data for HLF
7.2	Implement measures to improve the network provision of riverside facilities, incl. refuse and recycling services, electric power points, water and pump out	Working agreements established and improved strategic network of refuse and recycling facilities in place across the Broads [BA, LAs, local industry]; network of solar and electric boat charging points maintained and extended [BA]		
<b>Focus: Coordinating and implementing a year-round programme of activities relating to Broads themes, products and places</b>				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
7.3	Maintain, develop and promote a coordinated and year-round programme of activities (taking measures to prevent any adverse impacts)	Broads presence promoted through annual and year-round programme of events, incl. Broads Outdoor Festival, Outdoors in the Broads, Walkability, Royal Norfolk Show, community festivals and seasonal events [BT, BA, DMOs, NGOs]	Partners; additional resources required	# and spread of events; visitor attendance at targeted events
		Water-based opportunities promoted to land-based recreational users (incl. boat trips and day boat hire) and vice versa (incl. walking and cycling offer); high profile wildlife experience/ cultural heritage/dark skies itineraries, events and packages created and promoted, linking into nearby coastal, city and town visitor offers [BT, BA, HBOs, TBs, WCOs, LAs, NGOs]	Partners, New Anglia LEP	Boat trip numbers; boat movements (BA census), #new itineraries/packages

		Recreational activities implemented under (a) Broads Landscape Partnership Scheme Programmes 1-6, in particular 'Gateways to the Broads' and 'Going the Extra Mile' [Broads LPS Board and LPS delivery partners] and (b) Hoveton Wetland Restoration Project [NE]	(a) HLF funding secured; (b) funding secured	Broads LPS target data for HLF; Hoveton project targets
7.4	Implement Broads Angling Strategy action plan through partnership working and securing of additional resources	Secured additional resources and partnership agreements for angling in place and Broads Angling Strategy Action Plan implemented [EA, BAT, BASG, community groups]	EA; additional resources required	Broads Angling Strategy targets

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## G. Raising awareness and understanding

### Context

Tourism is a major product in the local economy of the Broads National Park and wider economy of the East of England, bringing in nearly £600m a year and supporting more than 7200 jobs (full-time equivalent). The attractions of the Broads also recognise the significant appeal of the surrounding area. This includes the historic city of Norwich, the bustling market towns of Beccles and Bungay in the Southern Broads, the popular seaside resorts of Great Yarmouth and Lowestoft, and the sweeping stretches of the North Norfolk coast, part of which is designated as an Area of Outstanding Natural Beauty.

The Tourism Strategy for the Broads<sup>18</sup> focuses on activities that help develop, manage and promote high quality, year round sustainable tourism, with consequent benefits for local communities and conservation. The strategy's main objectives are to raise awareness of the Broads as a unique wetland National Park, based on its waterways, heritage, landscape and wildlife; to strengthen the variety, quality and distinctiveness of the tourism offer and generate visits throughout the year; and to stimulate the manage the flow of visitors around the Broads, encouraging exploration and environmentally friendly tourism.

During this Broads Plan period, cuts in public sector budgets will continue to impact on support for tourism marketing, management and infrastructure. Stronger engagement and partnership working between local authorities, tourism-related businesses and private sector agencies will be vital in supporting the tourism industry. Recognised issues include a lack of adequate visitor facilities in some areas; inconsistent quality of accommodation and catering; and labour, skills and volunteer shortages. Opportunities include private sector interest in sponsorship, and a growing public interest in special interest or 'experience' events and itineraries, particularly focused around wildlife and cultural heritage. The primary target markets for the Broads include domestic visitors on short breaks, couples and families on longer holidays, and day visits by local residents and coastal holidaymakers. There is also forecast growth in other markets in the UK and further afield, such as young independent travellers, groups, people with special needs, and overseas visitors, particularly from near European countries like the Netherlands and Germany.

Consistent and coordinated messages about the area help to strengthen visitor understanding, awareness and enjoyment, both before and during their visit. This prompted the Broads Authority's resolution, in 2015, to brand the area as the 'Broads National Park', to promote more clearly the area's National Parks UK membership credentials and special qualities. As noted earlier in this plan, this decision does not change the Authority's statutory purposes, or the legislation for the management of the Broads, in any way. While the Broads may mean different things to different people, it is hoped that this unifying brand and key messages will help create an overall feeling about the area that captures its essence and value, places it in peoples' minds, and makes them want to be part of it and care for it.

### Long-term aim

The Broads is recognised and celebrated locally, nationally and internationally as a distinctive member of the UK National Parks family, as an extensive, lock-free inland waterway and as one of Europe's finest and most important lowland wetlands. Local tourism businesses take a proactive and coordinated approach to marketing the area within its wider regional, national and international setting. They work together to maintain high quality and environmentally sustainable standards and contribute to visitor awareness of and enthusiasm for the Broads' waterways, heritage, landscapes and wildlife. Clear, consistent and high quality information is readily available in a range of

<sup>18</sup> Tourism Strategy and Destination Marketing Management Plan for the Broads (2016-20)



formats and styles to help visitors and local people from all walks of life and of all ages and abilities to understand, respect, enjoy and benefit from the special qualities of the area. The natural, built and cultural heritage and traditions that reflect the character of the Broads are recognised, understood, documented and promoted through a variety of means that make it accessible to all.

**Aspiration 8** Strengthen and promote key messages and tourism offer in keeping with the area's status, special qualities, history and traditions

<b>Focus: Improving and promoting integrated multimedia information and interpretation to attract visitors and assist them during their visit</b>				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
8.1	Develop integrated, multimedia communications to boost local community and visitor awareness and appreciation of the special qualities of the Broads National Park	Updated, comprehensive visitor destination website (Enjoy the Broads) in place, linked to destination websites at local to international level; integrated, multimedia destination marketing campaigns and events carried out featuring Norfolk, Suffolk, East Anglia, UK waterways and UK National Parks; Broads National Park brand guidelines produced and made available [BA, BT, DMOs, BMF, NA LEP]	Partners; additional resources required	Broads Tourism Strategy 2016-20 indicators, BA social media metrics, survey data
		Cultural and natural heritage interpretation activities implemented under (a) Broads LPS programme 1: Interpreting the Landscape [Broads LPS Board and LPS delivery partners] and (b) Hoveton Wetland Restoration Project [NE]	(a) HLF funding secured; (b) funding secured	(a) Broads LPS target data for HLF; (b) Hoveton restoration project targets
8.2	Maintain and upgrade the range and provision of multimedia and 'point of need' visitor information and interpretation	Broads information presence maintained at visitor centres and hubs, incl. yacht stations, TICs, gateways and key sites; Visitor newspaper, trail/location maps, interactive tools, creative projects (e.g. drama, film) produced and made available; Wifi in place at BA yacht stations and information centres; Availability and range of information on easy access in the Broads improved [BT, BA, LAs, DMOs, TBs, RSPB, NWT, SWT, Broads LPS Board and LPS delivery partners]	Partners	BA visitor centre usage, print distribution numbers, social media metrics
<b>Focus: Supporting high quality, environmental standards in local tourism and strengthening tourism staff resources and skills</b>				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators

8.3	Implement industry-based measures to strengthen the quality and distinctiveness of the Broads tourism offer, including careers and skills training	Systems in place to assess and guide quality and environmental sustainability standards and local distinctiveness in local tourism provision, incl. quality assurance certification/ award schemes and visitor feedback sites [BA, BT, TBs, NA LEP]	Grant funding via BT Marketing Plan, partner funding, NA LEP	Visitor feedback survey data, # quality/ certification schemes in place
		Tailored tourism staff training programmes and events made available through hire boat operators and tourism businesses; initiatives developed and made available to young people wishing to pursue tourism-related careers [DMOs, BT, TBs, BHBF, NA LEP, BA]	Business resources, NA LEP	Visitor feedback survey data, # training courses / # young people entering industry

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## H. Connecting and inspiring people

### Context

The Broads executive area straddles parts of six district authority areas: Broadland, South Norfolk, North Norfolk, Great Yarmouth, Norwich and Waveney. The Broads Authority is the local planning authority in the Broads, while the district councils retain all other local authority powers and responsibilities. Norfolk County Council and Suffolk County Council are the county planning authorities for their respective part of the Broads, with responsibilities that include minerals and waste planning.

Regeneration, new development and diversification are essential in helping to sustain and strengthen the social and economic vitality of an area. In the Broads, the Authority uses spatial planning policies to help preserve and improve the quality of the built environment, while also protecting and enhancing the area's natural resources, wildlife, waterways, landscape character and historic environment. Planning must also be responsive to changes in development growth, climate change, population growth and mobility, agriculture and land use, technology, the economy and wider governance, including the impacts of the UK's departure from European Union.

The ongoing squeeze in public sector finances, and the sluggish recovery of the national economy, is impacting on the Broads as elsewhere. Agriculture, tourism and the leisure marine industry, all significant contributors to the local economy, will have to continue to diversify and change their practices to survive, with implications for the use and management of land and buildings. The Broads is close to urban areas identified as growth locations within Eastern England<sup>19</sup>, including Norwich, Great Yarmouth and Lowestoft, all key gateways to the Broads. The Greater Norwich Joint Core Strategy allocates 33,000 new homes within the Norwich Policy Area between 2008 and 2026. Some of the key development sites, such as Rackheath, are very close to the Broads executive boundary. The planned development and regeneration will help to attract and retain business investment, contribute towards local services and infrastructure improvements, and support a higher quality of life. However, growth at this scale is not without environmental impact; the Broads is a valuable asset in terms of providing green infrastructure, enhancing the wider area and helping to manage and divert visitor pressures.

Around 6,350 people live within the Broads. Housing supply tends to be fairly static, with average house prices considerably higher than in many other parts of Norfolk and Suffolk and a high degree of second home ownership and holiday accommodation. As a result, new permanent housing is at a premium and young and newly formed households, particularly those working in low wage industries, often cannot afford to buy on the local housing market. Local planning authority partners have been working on developing policies and projects that support housing need in appropriate locations, with each authority setting its housing targets. The Strategic Housing Market Assessment for Central Norfolk (as at 2016) has calculated that 320 new dwellings are needed for the whole of the Broads executive area by 2036, and this is being addressed through the emerging Broads Local Plan.

The Vision for English National Parks and the Broads<sup>20</sup> encourages the National Parks family to support people from all walks of life, ages and abilities to experience and enjoy these special landscapes at first hand. Often a lack of physical or cultural access, information or simply motivation means that local people feel disconnected from the countryside on their doorstep. Creating, providing and promoting accessible, informative and inspirational opportunities for recreation, learning, health and wellbeing can

<sup>19</sup> Strategic Economic Plan, New Anglia LEP, 2014.

<sup>20</sup> Vision and Circular for English National Parks and the Broads, Defra, 2010.

motivate people to 'go the extra mile' and reconnect, or perhaps connect for the first time, with all that the Broads has to offer.

The Broads National Park is a wonderful outdoor resource for environmental education and outreach, as a 'classroom without walls'. Raising awareness and understanding, particularly among young people, is a key focus in the Government's 8-Point Plan for England's National Parks (2016). While a long-term aim is that the Broads will be 'a source of enjoyment, learning and personal development for every child in Norfolk and Suffolk during their school career'<sup>21</sup>, the Authority and its education partners have been focusing very limited resources where they are likely to have most impact, particularly for young people who might otherwise not have a chance to experience the Broads. The Broads Education Strategy<sup>22</sup> identifies the need to increase resources and expand education and outreach in the Broads. This will build on established school-based activities and wider outreach, and link into a range of new projects for young people being developed through the Broads Landscape Partnership Scheme.

### Long-term aim

Strong planning frameworks and cross-boundary cooperation between local authorities provide vibrant opportunities for economic, social and environmental sustainability, regeneration and diversification in ways that continue to protect and enhance the distinctive character and assets of the Broads and support thriving local communities. People from all walks of life and all ages and abilities, particularly young people, disadvantaged people and people with disabilities, have opportunities to connect or reconnect with the Broads on their doorstep and 'go the extra mile' for recreation, learning, and physical and mental health and wellbeing. Mainstream and extra-curricular educational opportunities make use of the area's natural and cultural assets and inspire and motivate young people as part of lifelong learning. People feel actively involved in making decisions about the future of the Broads, and local communities, businesses and visitors are able to contribute in practical ways to the management and enjoyment of the area. Volunteering provides beneficial opportunities for enjoyment, wellbeing and enhancing life skills and is recognised as a valuable resource in caring for the Broads.

**Aspiration 9** Facilitate development growth within and adjacent to the Broads, while avoiding adverse impacts on the area's special qualities

### Focus: Supporting sustainable spatial development through planning policy and cross-boundary cooperation

Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
9.1	Update and adopt Broads spatial planning policies and site specific allocations to support local business, housing need, community facilities and transport	(i) Broads Local Plan to 2036 prepared and adopted by 2018, including agreed site allocations and response to Broads Objectively Assessed Housing Need, and supported by planning pre-application service [BA]; (ii) Formal consultation framework, protocol and guidance completed by 2018 and in use by prescribed local 'duty to cooperate' bodies [LPAs]	(i) BA (ii) LPAs	NPA planning targets, Duty to Cooperate framework principles

<sup>21</sup> Vision for the Broads, Broads Plan, Broads Authority, 2011

<sup>22</sup> Broads Education Strategy 2017-22, Broads Authority, 2017

	choices, and to ensure development occurs within environmental limits	Appropriate priority locations for improved broadband and mobile phone coverage identified and promoted to influence national network improvement programmes [NCC, SCC, BT]	Partnership schemes (Better Broadband for Norfolk/ Suffolk)	BBFN and BBFS programme targets
9.2	Develop comprehensive approach to enhancing sites that are strategically important for their heritage or green infrastructure value	Comprehensive site masterplans and funding bids developed to support proposals for strategic sites with a significant built, cultural, natural heritage or community green infrastructure value, e.g. How Hill, Whitlingham Country Park, Hoveton Riverside Park [BA, LPAs, HHT, WCT]	Partners, additional resources required	Individual site plan targets to be developed

**Aspiration 10** Strengthen connections between a wide audience, particularly local communities and young people, and the Broads environment

**Focus: Developing motivational, participatory activities to connect local communities and visitors with the Broads environment**

Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
10.1	Widen the range of active and entry level/ taster initiatives that promote physical and mental health and wellbeing, based in the Broads' natural environment	'Try it out' activities implemented through: (a) Broads Landscape Partnership Scheme Programmes 1-6, incl. 'Gateways to the Broads' and 'Go the Extra Mile' [Broads LPS Board and LPS delivery partners]; (b) community and business-led initiatives, e.g. Paddle for a Pound, Fishing for Life [Local community/amenity groups and businesses]	(a) HLF funding secured; (b) Local groups and businesses	Broads LPS target data for HLF
		Community health and wellbeing initiatives using the Broads natural environment as a resource in place and actively promoted, e.g. Be Well in the Wild [SCC], Active in Nature [RSPB/SE], Green Gym [TCV], Green Care in the Parks [NPE] and other local initiatives [local authorities, businesses, academic institutions]	Partners, additional resources required	# events and participants, NHS wellness statistics (to be determined)
10.2	Offer a flexible range of practical volunteering programmes, events and training, and establish a	More flexible and diverse range of volunteering opportunities and associated skills training/ leadership schemes made available; succession plan in place to maintain longer-term volunteering resource [BA, RSPB, NWT, SWT, VN, TCV, local groups]	Partners	NPA (BA) volunteer numbers and £ value

	longer-term succession strategy	Volunteering opportunities implemented under Broads Landscape Partnership Scheme Programme 3D: Broads Young Rangers and 3E: People Engagement [ <b>Broads LPS Board</b> and LPS delivery partners]	HLF funding secured	Broads LPS target data for HLF
10.3	Increase the scope for partnership fundraising and other income generation initiatives to support Broads-themed projects	Income generation sources supported and promoted, incl. corporate sponsorship, National Park Partnership initiatives, Love the Broads visitor giving scheme, retail sales [ <b>BA, Broads Trust, BT, NPE, NA LEP, trusts and charitable bodies</b> ]	Partners	Love the Broads income/ # business sign ups; new income generation
<b>Focus: Offering inspiring learning opportunities for young people, including those from disadvantaged backgrounds</b>				
Ref	Strategic actions	Key outputs by 2022 / [lead delivery and reporting partners]	Resources	Indicators
10.4	Improve the capacity of the Broads Environmental Education Network (BEEN) to develop and run educational programmes and events for local schoolchildren	Enhanced range of environmental education schemes, activities and resource tools produced and promoted to local schools, incl. updated, extended sets of Broads Curriculum materials, teacher training and teacher conferences [ <b>BEEN partners</b> ]	BEEN + education partners	# participants in target schemes
		Schools-based educational opportunities implemented under Broads Landscape Partnership Scheme Programmes [ <b>Broads LPS Board</b> and LPS delivery partners]	HLF funding secured	Broads LPS target data for HLF
		Opportunities developed for external funding, sponsorship, trained volunteer supervisors and other means to boost capacity to run/support outreach educational activities [ <b>BA, BEEN</b> ]	Partners	Level of new funding/ trained manpower resource in place
10.5	Develop and run motivational outreach activities and award schemes for young people, including those from disadvantaged backgrounds, focusing on life and work skills training and practical experience	(a) Annual outreach programmes, initiatives and motivational incentives in place, incl. John Muir Award programme, Forest Schools, Broads Discovery Days; training programmes for partners established and implemented [ <b>BEEN</b> and other educational partners]; (b) Scope for outreach/award schemes (e.g. National Citizen Service) and apprenticeship schemes/Apprenticeship Levy developed through partnerships, incl. Broads LPS [ <b>BA, Broads LPS Board and LPS delivery partners</b> ]	Partners, NCS Trust	# participants in target schemes, participant feedback
		Youth engagement activities implemented under Broads Landscape Partnership Scheme Programmes 3B & 3C: Learning and Future Skills [ <b>Broads LPS Board</b> and LPS delivery partners]	HLF funding secured	Broads LPS target data for HLF

## Broads Plan partners

Many organisations, groups and individuals contribute to the planning and implementation of actions in the Broads Plan, including those listed below. This is not an exhaustive list, and numerous others help to care for the Broads.

**Anglian Water** is a landowner and provides a water supply to much of the Broadland catchment and sewerage services throughout the catchment.

The **Broadland Catchment Partnership** aims to improve the water environment and provide wider benefits for people and nature through a coordinated catchment-based approach. The BCP is co-hosted by the Broads Authority and Norfolk Rivers Trust. Partners include Anglian Water, Environment Agency, Essex & Suffolk Water, NFU, Natural England, Norfolk County Council, Norfolk FWAG, Norfolk Wildlife Trust, River Waveney Trust, RSPB, Rivers Trust, Suffolk County Council, Suffolk FWAG, Suffolk Wildlife Trust, UEA and Water Management Alliance.

The **Broads Authority** has a statutory duty to conserve the natural and cultural heritage of the Broads, promote its understanding and enjoyment, and protect the interests of navigation. It is the local planning authority and a harbour and navigation authority. (Also see section 1.2)

The **Broads Biodiversity Partnership** seeks to improve biodiversity through a coordinated approach. The group is hosted by the Broads Authority. Partners include Norfolk Wildlife Trust, Suffolk Wildlife Trust, RSPB, Butterfly Conservation, Dragonfly Society, Anglian Water, Environment Agency, Essex & Suffolk Water, Natural England, Norfolk County Council, River Waveney Trust, Suffolk County Council, UEA and Water Management Alliance.

The **Broads Climate Partnership** is a high-level forum to coordinate debate about climate change and sea level rise issues and options for the Broads. Its members include the Broads Authority, Environment Agency, Natural England, National Farmers Union, local authorities and the University of East Anglia.

The **Broads Environmental Education Network (BEEN)** involves around 40 organisations such as education bodies, charities, businesses and visitor attractions, all with a common goal to improve people's understanding of the Broads. It supports the development of 'Broads Curriculum' online education resources for schools.

The **Broads Forum** acts as a reference group for advice and comment on strategic aims and objectives for the Broads. It promotes closer liaison and understanding between various bodies and organisations with an interest in the Broads and its wider catchment. (See membership list below).

The **Broads Land Management Service** is a 'one stop shop' where conservation bodies working in the Broads can offer advice to landowners through agricultural advisors and services. Partners include the Broads Authority, Natural England, Norfolk FWAG, RSPB and the local Wildlife Trusts.

The **Broads Local Access Forum** is a semi-independent body established under the Countryside and Rights of Way Act. It advises the Broads Authority on improving and promoting public access to land within the Broads and adjacent parts of Norfolk and Suffolk.

**Broads Tourism** acts as a forum for local tourism businesses. It aims to promote the Broads as a high quality, 'green' visitor destination through quality standards, staff training and clear, coordinated messages that define the area's status and special qualities.

**District Councils:** The Broads Executive Area straddles six District Council areas: **Broadland, Great Yarmouth, North Norfolk, Norwich, South Norfolk** and **Waveney**. The councils provide a range of community services including housing, planning, and waste collection and recycling. The coastal councils are also coastal erosion risk management authorities.

Within the Broads area, the **Environment Agency** is responsible for water quality and resources, fisheries, conservation and ecology, and for the regulation of major industry, including waste, and the treatment of contaminated land. It is also responsible for managing flood risk from main rivers, reservoirs, estuaries and the sea.

**Essex & Suffolk Water** is a landowner, and supplies water to parts of the south and east of the Broads catchment.

The **Greater Norwich Development Partnership** involves Broadland, Norwich and South Norfolk councils working together on a Joint Core Strategy

(JCS), setting out a long-term vision and development objectives for the area. The Broads Authority executive area extends into the JCS area and must be regarded in that strategy.

**Historic England** is a public body offering expert advice on heritage issues and promoting the wider conservation of the historic environment. English Heritage, as a new independent charity, oversees the National Heritage Collection of historic properties.

**Internal Drainage Boards** are independent public bodies responsible for managing water levels in low-lying areas. As the district land drainage authorities, IDBs supervise land drainage and flood defence works on ordinary watercourses.

**Lead Local Flood Authorities** manage the risk of flooding from surface water, groundwater and ordinary watercourses and lead on community recovery. Norfolk County Council and Suffolk County Council are LLFAs.

The **National Farmers Union** champions British farming and provides professional representation and services to its farmer and grower members. 'Why Farming Matters to the Broads' sets out an NFU vision to support and encourage a sustainable future for the Broads.

The **National Trust** is a charity working to preserve and protect historic places and spaces. It is one of the UK's largest landowners and owner of a large number of heritage properties, including historic houses and gardens, industrial monuments, and social history sites.

**Natural England** aims to enhance England's wildlife and landscapes and maximise the benefits they bring to the public. It focuses on agri-environment land management, habitat and landscape conservation, coastal public access and National Trails, and conservation designation.

**New Anglia Local Enterprise Partnership** works with businesses and public sector partners to help grow jobs in Norfolk and Suffolk. The two counties are global leaders in life sciences, food and agriculture and the 'all energy' sector. The LEP is also the Government's Green Economy Pathfinder leader.

The **Norfolk Biodiversity Partnership** has a shared vision for the conservation, enhancement and restoration of the county's biological diversity.

The **Norfolk Coast Partnership** and the **Suffolk Coast & Heaths AONB Partnership** are designated as outstanding landscapes whose distinctive character

and natural beauty are so precious that it is in the nation's interest to safeguard them. Part of the Norfolk Coast AONB overlaps with the Broads Authority executive area.

**Norfolk County Council** and **Suffolk County Council** are responsible for a wide range of public services in their respective counties including social care, public safety, roads and transport, education, environment and waste management. As highway authorities, their responsibilities include public rights of way for the Broads.

**The Norfolk Geodiversity Partnership** records, conserves and promotes appreciation of the county's geological and geomorphological diversity, through the Norfolk Geodiversity Action Plan.

**Norfolk Wildlife Trust** and **Suffolk Wildlife Trust** are charities working to protect and enhance county wildlife and wild places including reserves, and promote environmental education. Norfolk Wildlife Trust is the oldest Wildlife Trust in the country.

**Parish councils:** There are 91 parish councils partly within the Broads Authority executive area. They are the level of government closest to the community, representing local interests, delivering services to meet local needs and working to improve community life and wellbeing.

The **RSPB** is Europe's largest nature conservation charity. It works across the UK to protect special places for wildlife, save species from extinction and create opportunities for people to experience and help protect wildlife and nature. It does this through its network of nature reserves, land management on third party sites, promoting environmentally policies and principles, and environmental campaigns and education.

The **Whitlingham Charitable Trust** was set up in 1988 to manage Whitlingham Country Park as an open place where the public can enjoy quiet pursuits in a rural environment. The Broads Authority has responsibility for the day-to-day management of the Park and the Flint Barn visitor centre. Norfolk County Council manages the water space and the Outdoor Education Centre.

**Wild Anglia Local Nature Partnership** aims to enhance the natural environment of Norfolk and Suffolk through effective partnership working with business and communities.



**The following interests are represented  
on the Broads Forum**

([www.broads-authority.gov.uk/  
broads-authority/committees/broads-forum](http://www.broads-authority.gov.uk/broads-authority/committees/broads-forum))

Association of Inland Drainage Authorities  
Barton Turf Adventure Centre  
British Association for Shooting and Conservation  
British Rowing  
British Water Ski Federation  
Broads Angling Strategy Group  
Broads Hire Boat Federation  
Broads Local Access Forum  
Broads Reed and Sedge Cutters Association  
Broads Society  
Broads Tourism  
Canoe England  
Country Landowners Association  
East Anglian Waterways Association  
Eastern Region Rowing Council  
Eastern Rivers Ski Club  
Easton College  
Friends of the Earth  
Horstead Centre  
How Hill Trust  
Inland Waterways Association  
Museum of the Broads  
Nancy Oldfield Trust  
National Farmers Union  
National Trust  
Norfolk and Suffolk Boating Association  
Norfolk Archaeological Trust  
Norfolk Association of Local Councils  
Norfolk Heritage Fleet Trust  
Norfolk Schools Sailing Association  
Norfolk Wherry Trust  
Norfolk Wildlife Trust  
Norfolk Windmills Trust  
Oulton Broad Sports Centre  
Oulton Broad Users Enterprise

Ramblers Association  
Royal Yachting Association  
RSPB  
Sport England  
Suffolk Association of Local Councils  
Suffolk Wildlife Trust  
Sustrans  
The Conservation Volunteers  
Visit East Anglia  
Visit Norfolk  
Visit Norwich  
Where to go in North Norfolk  
Wherry Yacht Charter Charitable Trust  
Yare Users Association

## Abbreviations and links used in actions tables

AINA	Association of Inland Navigation Authorities
ALARP	'As low as reasonably practicable', used in risk management safety systems
AONB	Area of Outstanding Natural Beauty
AW	Anglian Water
BA	Broads Authority
BASG	Broads Angling Strategy Group
BAT	Broads Angling Trust
BBP	Broads Biodiversity Partnership
BC	British Canoeing
BCP	Broadland Catchment Partnership
BEEN	Broads Environmental Education Network
BEIS	Dept. for Business, Energy & Industrial Strategy
BESL	Broadland Environmental Services Ltd
BHBF	Broads Hire Boat Federation
BIS	Dept. for Business, Innovation & Skills
BMF	British Marine Federation
BRASCA	Broads Reed and Sedge Cutters Association
Broads IAS	Broads Integrated Access Strategy
Broads LPS	Broads Landscape Partnership Scheme
BT	Broads Tourism
CAMS	Catchment Abstraction Management Strategy
CFE	Campaign for the Farmed Environment
CFMP	Catchment Flood Management Plan
CPE	Coastal Partnership East
CS	Countryside Stewardship
CSF	Catchment Sensitive Farming
DMO	Destination Management Organisation
EA	Environment Agency
ESW	Essex & Suffolk Water
FE	Further Education
FWAG	Farming & Wildlife Advisory Group
GYBC	Great Yarmouth Borough Council
HBO	Hire Boat Operators
HE	Historic England
HHT	How Hill Trust
HLF	Heritage Lottery Fund
IDB	Internal Drainage Board
LA/LPA	Local Authority / Local Planning Authority
MMO	Marine Management Organisation
NA LEP	New Anglia Local Enterprise Partnership
NBIS	Norfolk Biodiversity Information Service
NC / SC	Norfolk Constabulary / Suffolk Constabulary
NCC	Norfolk County Council
NCS	National Citizen Service
NE	Natural England
NCP	Norfolk Coast Partnership
NGO	Non-Governmental Organisation
NGP	Norfolk Geodiversity Partnership
NNNSI	Norfolk Non-Native Species Initiative
Norwich CC	Norwich City Council
NP/NPA	National Park / National Park Authority
NPE	National Parks England
NR	Network Rail

NRF / SRF	Norfolk Resilience Forum / Suffolk Resilience Forum
NRT	Norfolk Rivers Trust
NSBA	Norfolk and Suffolk Boating Association
NSPG	Norfolk Strategic Planners Group
NWSF	Norfolk Water Safety Forum
NWT	Norfolk Wildlife Trust
RDPE	Rural Development Programme for England
RWSP	River Wensum Strategy Partnership
SAC	Special Area of Conservation
SCC	Suffolk County Council
SE	Sport England
SFRA	Strategic Flood Risk Assessment
SMP	Shoreline Management Plan
SNC	South Norfolk Council
SSSI	Site of Special Scientific Interest
SWMP	Surface Water Management Plan
SWT	Suffolk Wildlife Trust
TBs	Tourism businesses
TCV	The Conservation Volunteers
UEA	University of East Anglia
VN	Voluntary Norfolk
WCO	Wildlife, heritage and conservation bodies
WCT	Whitlingham Charitable Trust
WFD	Water Framework Directive
WSF	Water Sensitive Farming

Links – to be added

FINAL

FINAL DRAFT

## State of the Park monitoring

State of the Park data provides a snapshot of change in a protected area over time. The 15 indicator sets below will help inform the planning, implementation and review of the Broads Plan and related plans, programmes and policies. We also have the advantage of the detailed Broads National Character Area profile<sup>23</sup>, which encompasses almost all of the Broads Authority executive area as well as a wider area of influence. Natural England's aim is to refresh the NCA periodically as new information becomes available to them.

Ref	Indicators (for Broads executive area unless otherwise stated)	Current status	*Date	*Trend	Data source
1	(a) % length of water courses with 'high' or 'good' ecological status; (b) % of water courses with 'moderate' ecological status	Data awaited	2016	Data awaited	Natural England (MEOPL)**
2	(a) % of SSSI Land in 'favourable' condition (b) % of SSSI Land in 'unfavourable but recovering' condition	(a) 63% (b) 28%	2016	88% in 'favourable or recovering' condition	Natural England (MEOPL)**
3	Extent of (Section 41) priority habitat: (a) % in BA Executive Area; (b) % in NCA	a) 59.2% b) 35.6%	2016	Data awaited	Natural England
4	Priority species: (a) Swallowtail butterfly: Observed number at 9 transect sites; (b) Booming bittern: Observed min/ max number	(a) 92 (b) 17/22	2016	(a) 76 (b) 20/25	UK Butterfly Monitoring Scheme (Norfolk)
5	Invasive species: Number of mink trapped (Norfolk Mink Project): (a) Bure, (b) Wensum, (c) Waveney, (d) Yare	(a) 8 (b) 11 (c) 0 (d) 13	2016	(a) 30 (b) 5 (c) 0 (d) 21	Norfolk Mink Project
6	Navigation: Depth of rivers and water bodies (% non-compliance with agreed specifications)	Data awaited GIS 2017	Feb 2017	April 2014 30.20%	Broads Authority
7	Light pollution and dark skies: Extent of area in (a) two darkest categories and (b) two brightest categories (nanowatts/cm <sup>2</sup> /sr)	(a) 64.6% (b) 0.2%	2016	No comparative data	Campaign to Protect Rural England
8	(a) Number of Listed Buildings 'at risk' conserved [and total number of LBs 'at risk']; (b) Number of Scheduled Monuments 'at high or medium risk' conserved [and total number of SMs 'at high or medium risk']	(a) 3 [26] (b) 1 [1]	3-year average to 2016	(2011/12 only) (a) 7 [37] (b) 0 [4]	Historic England, Broads Authority
9	Tourism sector (Broads Area of Influence): (a) Visitor numbers; (b) Visitor direct spend (c) Economic impact; (d) Jobs dependent	(a) 7.4m; (b) £431m; (c) £584m; (d) 7245	2015	(a) 7.3m; (b) 289m; (c) 469m; (d) 4881	Scarborough Tourism Economic Activity Monitor

<sup>23</sup> Natural Character Area profile: 80. The Broads, Natural England, 2015

10	New media: (a) BA corporate website: Users [% new visitors]; (b) 'Enjoy the Broads' visitor website: Users [% new visitors]; (c) Facebook metrics (awaited)	(a) 153,739 [61.4%] (b) 180,584 [80.1%] (c) awaited	1 year to Feb 2017	Comparative data awaited	Broads Authority
11	% schools within 5m buffer using the Broads for 'Learning Outside the Classroom' experiences at least once a year	New indicator	n/a	No comparative data	Broads Authority
12	Registered boats on the Broads: (a) Hire motor craft (b) Hire sailing/rowing craft and houseboats; (c) Private motor craft; (d) Private sailing/rowing craft and houseboats	Total: 11,946 (a) 1145 (b) 310 (c) 7826 (d) 2665	Nov 2016	Total: 12,526 (a) 1274; (b) 311; (c) 7941; (d) 3,000	Broads Authority
13	Physical access network: (a) Total length of footpaths and other rights of way; % that were easy to use by the public; (b) Length of frontage provided for public short-term/overnight mooring owned/ operated by BA	(a) 344km; 75%; (b) 7279.3m	2015/16	(a) 336km; 87%; (b) 7825m	Broads Authority, Norfolk County Council, Suffolk County Council
14	Value of volunteer days organised or supported by the BA	£185,250	2015/16	No comparative data	Broads Authority
15	BA planning permissions: (a) Number of new dwellings, incl. new affordable housing; (b) Net change in business floor space (m <sup>2</sup> )	(a) +1 (b) -20m <sup>2</sup>	2015/16	2011-16 total net change: (a) +206 (b) +1620.42m <sup>2</sup>	Broads Authority
16	Renewable energy: Additional kW of generating power (BA planning permissions)	+130.65	2015-16	2011-16 total net change: +1206.65kW	Broads Authority

\*Unless other indicated, **Date** refers to a single year, and **Trend** shows available data in 2011/12, when the last Broads Plan was implemented. \*\*Monitoring Environmental Outcomes in Protected Landscapes

## Revised Draft Broads Plan 2017 - Responses

### General comment

#### Beccles Town Council

Beccles Town Council generally agreed that the plan was excellent.

**Broads Authority response:** The Council's support is welcomed.

### General comment

#### British Association for Shooting and Conservation

There are six British Association for Shooting and Conservation (BASC) affiliated clubs in the Broads area and dozens of BASC affiliated clubs and syndicates with game shooting interests. There are also hundreds of BASC members carrying out a range of shooting and conservation activities, including deer management and pigeon control. Our members undertake wetlands management and other conservation work on the land over which they shoot, actively participating in Environmental Stewardship schemes and working closely with Natural England and non-government organisations such as the RSPB and the Wildlife Trust. BASC recognises the importance of the wetland environment in the Broads and the need to balance different user needs. BASC recommends that the plan be revised to include text that recognises shooting as a traditional and integral part of life in the Broads, with much to contribute in terms of providing conservation benefits, increased activity and improvements to people's wellbeing.

**Broads Authority response:** Comments noted. Text revised to refer to the contribution to conservation and land management made by activities such as wildfowling and field sports.

### General comment

#### Broads Angling Strategy Group

The meeting [BASG 23rd Nov 16] learnt more about why the EA cannot lead on the creation of an updated Broads Angling Strategy and what is needed to resolve this in the coming year. I'm happy that the Broads Plan now reflects this and the need to develop and secure other resources.

**Broads Authority response:** Comments noted.

### General comment

#### Broads Reed and Sedge Cutters Association

A very disappointing plan with more of the same old promises and hopes. The usual reference to "Local communities are taking an active part in decisions about their future" whereas the reality is the complete opposite. The Broads Forum's terms of reference include "To promote two-way communication and closer liaison and understanding between the Authority and the various bodies and organisations which have an interest in the Broads and its wider catchment area" and "active part in decisions about their future". It is fact that 2 of the 4 Broads Forum meetings were cancelled in 2016 and the meetings are no longer "two-way discussions" but have become Broads Authority officers' information / lecture events. There remains little emphasis in the Plan on improving the Broads water quality and clarity which would contribute enormously towards preventing the ongoing loss of reed swamp and reed fringes as well as reducing the rate of sedimentation. (Clear water exists in only 5 of the 63 broads, a poor record after so many years of 'improvements'). There is little input and co operation from Natural England and the Environment Agency. It took Brasca nearly 2 years to get the Environment Agency to commit to producing annual catchment water quality reports for the Broads. No mention of anything to address the damage to reed fringes by the ever increasing greylag geese population. The Broads floodplains are not functioning as natural floodplains should so it pointless to pretend they are or to suggest they are becoming so. The Plan fails to address this by ignoring the need to establish the percentage of effective floodplain in each catchment. How can we address flooding concerns when the Broads floodplains are not managed to be naturally functioning? We still have many reed and sedge beds which have no natural

water flow from the rivers and broads owing to connecting dykes/water courses being deliberately sealed off. Several sites continue to suffer from poor water flow and stagnation and these blocked water courses also prevent the free movement of fish. A "longer term integrated flood risk management strategy for the Broads and coast" may sound a laudable proposal but where is the accountability? Without any effective democratic representation and diminishing accountability, can the present administration in the Broads Authority be relied upon or trusted to work with and listen to the local population and Broads interest groups on such an important matter? The Broads Climate Partnership remains an almost secret body who meetings are not open to the public and the meetings minutes are not available on the Broads Authority website. The Broads Plan should have been based on a 'State of the Broads/Condition Survey' carried out by an independent organisation. This would have provided more facts as to what has improved and what has not improved in the Broads. Despite some efforts to reintroduce true sustainable management to the Broads reed and sedge beds i.e. traditional reed and sedge cutting, much of the fens remain either neglected or subject to "money management". This is the term used locally to describe fen management which does not have any sustainability goals but minimum input to qualify for public funding such as Higher Level Stewardship payments. An independent condition survey would establish that, on many sites, this funding has not worked and in particular for certain nesting bird species. There remains no proper recording or monitoring of nesting birds on the majority of Broads fen sites. The Broads Plan 2017 is a "more of the same" document and will not lead to any major changes or improvements especially for the younger generation seeking to live and work in the area.

**Broads Authority response:** Comments noted. With reference to the Broads Forum, on which BRASCA is represented: Arrangements for the Forum were reviewed in 2013 and a number of changes made to the representation, chairing of the meeting and terms of reference. In 2015, when Forum members were asked to comment on the new arrangements, the BRASCA rep stated that it was more democratic under the new format. It is incumbent on Forum members to actively participate in producing, suggesting and presenting agenda items, if the Forum is to be effective and member-led; otherwise, if there is no specific business proposed, the Chairman may choose to cancel it. Some members have actively sought to prepare items but there has been varying degrees of take up.

The Broads Plan is a plan for the Broads, not just for the Broads Authority, and therefore the governance arrangements of the Authority (as one delivery partner among many) is not a key determining factor for the Plan content or actions.

Aspirations 1 and 2 take an integrated and comprehensive approach to water management. BRASCA's comments are of a scrutineer nature and do not include any specific actions to address the issues raised. The focus of Aspiration 2 and suggested actions address some of the issues raised in relation to the floodplains and fen survey. A Geese management action plan, and hydrology research, are in progress. The long-term flood risk management strategy will be led by the Environment Agency. At the recent meeting of the Broads Forum (which the BRASCA rep attended), the Broads Authority CEO specifically indicated that the BA was not the appropriate lead partner and that there was a key role for elected politicians in this process. To date there have been varying degrees of interest shown, and perhaps BRASCA could use its resources positively to raise the profile with elected councillors.

If BRASCA were to define a specific project with identified targets, funding and delivery partner for the independent research it believes is necessary, this could be incorporated into the Plan.

#### **General comment**

##### **Castle, Mr M (Norfolk County Councillor)**

I would like any [Norfolk] County Council response to highlight the priority we and the LEP give to the dualling of the A47 Acle Straight between Yarmouth and Acle and the benefits that that will have for the economy of the Yarmouth/Lowestoft sub-region, road safety and better connectivity generally. It will not in any way disadvantage or mar the beauty of the Broads landscape - as the narrow strip of grazing land between the road and the Yarmouth - Norwich rail line lends itself perfectly to being a transport corridor affording scope for both road and rail improvements.



**Broads Authority response:** Comments noted. The Preferred Option of the Broads Local Plan (recently subject to public consultation) contains policy PODM24 which reflects the BA approach to the issue of the dualling of the Acle Straight. The policy sets out the issues that any Highways England scheme would need to address, which is consistent with the approach that HE would be required to take.

**General comment**

**Environment Agency**

I am pleased to note that a number of our comments have been incorporated in to the revised draft. As mentioned in previous submissions the plan is well structured, and the focus on actions and indicators of progress is welcome. The plan identifies the shorter term actions that will help deliver the duties of the Authority whilst explaining about the longer term uncertainty posed by a changing climate. The focus on partnership action and planning together is of fundamental importance to ensure that all partners and those with an interest in Broadland feel engaged and involved in decision making. It is also essential to ensure we realise efficiencies by working together through some of the challenging decisions regarding the future management of the area.

**Broads Authority response:** Comments noted.

**General comment**

**Essex & Suffolk Water**

It is now much clearer how the strategic actions and key outputs fit into the themes and headline aspirations.

**Broads Authority response:** Comment noted.

**General comment**

**Essex & Suffolk Water**

We recognise that many of our specific comments and suggestions on the first draft have been incorporated in this revised draft. Essex & Suffolk Water (ESW) is fully supportive of the Plan.

**Broads Authority response:** Comments noted and ESW's support welcomed.

**General comment**

**Forestry Commission**

I wish to make a few comments with regard to the status of wet woodland within the Broads and how that may be reflected in the Broads Plan 2017. The Norfolk Biodiversity Action Plan for Wet Woodlands states ; ' East Anglia is noted in the national context for the concentration of wet woodlands'. It goes on to state ; ' Wet woodland in both the Broads and that found on valley fen/mires is a European priority feature under the Conservation (Natural Habitat) Regulations 1994 and has been listed as a feature in both the Broads SAC and Norfolk Valley Fens SAC'. The importance of wet woodland in the Broads is thus widely acknowledged and it is therefore important to reflect this in the Broads Plan.

**Broads Authority response:** Comments noted. We have included wet woodland as an identified habitat (action 2.3).

**General comment**

**Great Yarmouth Borough Council**

Great Yarmouth Borough Council is supportive of the generality of the Plan, and has no objections to the content as drafted.

**Broads Authority response:** Comments noted.

**General comment****Historic England**

The Broads are a unique landscape which exist through a combination of natural circumstance and human intervention. The area supports a unique water-focused environment with an historic environment that spans early human activity in the Mesolithic Period to contemporary use of village greens and staithe by local communities and visitors. The Broads benefits from a variety of historic features that reflect the way of life of local people for centuries from the Roman roads, village staithe and greens that originate in Saxon riverside settlements, the manmade broads themselves, ecclesiastical buildings including listed Medieval churches and scheduled ruins and buildings that reflect the agricultural and water-focused activities of the area with barns, mills and pumping stations. Many of these areas are designated as one of the Broads' twenty-five conservation areas or one of the many structures are either nationally listed or included within the authority's comprehensive list of local structures. We are pleased to note that the Revised Draft Plan 2017 acknowledges the wide variety of elements that make up the historic environment. You have broadly taken on board the suggestions that we offered in April 2016, in response to the consultation of the Broads Plan (letter addressed to Maria Conti, dated 07 April 2016). The revised plan is clear and contains a positive strategy for the conservation of the historic environment and the wider natural environment to which it is intrinsically linked within the Broads area. As a statutory body tasked with conservation of the historic environment we must stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that the plan is successful in the forthcoming submission to the secretary of state.

**Broads Authority response:** Comments noted.

**General comment****Natural England**

Natural England welcomes and supports the production of the Revised Draft Broads Plan 2017. We welcome that reference has been made in the Plan to protect, maintain and enhance biodiversity and geodiversity. We maintain that a distinction should be made between the site hierarchy of European (i.e. Special Areas of Conservation 9SACs), Special Protection Areas (SPAs), Ramsar sites), national (i.e. Site of Special Scientific Interest (SSSIs)) and local (e.g. Local Wildlife Sites (LWS)) sites. This should then outline that any proposal which would adversely affect a European site, or cause significant harm to a SSSI will not normally be granted permission. It should also set out criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity and geodiversity.

**Broads Authority response:** Comments noted. Additional text has been added to Section B context.

**General comment****NFU East Anglia**

The NFU represents around 47,000 farm businesses in England and Wales. In addition we have 40,000 countryside members with an interest in farming and the countryside. The NFU represents over 900 farm businesses in the wider Broadland catchment areas of Norfolk and Suffolk. We are pleased to have this opportunity to comment on the final draft of the revised Broads Plan. The NFU thanks the Authority for the inclusive way in which this final draft of the plan has been developed over the course of the last year. Through earlier formal and informal consultation it has been possible to react in an iterative way to the evolving draft plan and ensure that the farming and related industries have maintained their rightful prominence in highlighting their importance to the social economic and environmental performance of the Broads. The consultation lead officer, Maria Conti, is to be complemented on the conduct of this process.

**Broads Authority response:** Comments noted.

**General comment****Norfolk and Suffolk Boating Association**

We are grateful to the Authority for taking account of some of the comments we made in response to the first draft Broads Plan 2017. We welcome the inclusion of clearer and better defined Indicators against the Strategic Actions. However, in many places these are cross references to other documents. To be useful and accessible to all, the Broads Plan should, as far as possible, be a complete document in itself and the measures to be used to judge outcomes should be clear to the reader, not dependent on a search through a large number of related documents. Similarly, Indicators expressed in terms of “agreed criteria” or “agreed targets” are imprecise and liable to redefinition.

**Broads Authority response:** Comments noted. We are looking at the indicators in the final Plan (including state of park indicators). While we understand your point, in a high level strategy like this it can be difficult to identify precise measures that cover everything under a particular action; including the full sets of indicators from all the relevant sub-level strategies and programmes delivering the Plan actions would become somewhat unwieldy.

### **General comment**

#### **Norfolk Coast Partnership**

The AONB is included in a table of abbreviations in Appendix B that are used in the actions tables but does not appear in the actions tables. Although it is difficult to identify with specific outcomes in the tables, I suggest that the most relevant strategic actions in the tables with which the Norfolk Coast Partnership can support and assist within the area where the designations overlap, which reflect objectives, policies and actions within the AONB Management Plan, are as follows: 2.5, 5.1, 5.3, 5.4, 5.6, 6.1

**Broads Authority response:** Comments noted. Norfolk Coast Partnership's support in delivering the Plan is recognised and welcomed.

### **General comment**

#### **Norfolk Coast Partnership**

The overlap in designated areas between the Broads and the Norfolk Coast Area of Outstanding Natural Beauty is recognised in appendix A. The following comments are intended to assist in consistency and coordination of plans for the two designated areas for the relatively small area of overlap in the Horsey area.

**Broads Authority response:** Comments noted.

### **General comment**

#### **Norfolk Constabulary**

Beyond the consultation report we previously submitted to inform the first draft Broads Plan, we have no further comment to make.

**Broads Authority response:** Comment noted.

### **General comment**

#### **Norfolk County Council**

The County Council welcomes the opportunity to comment on the above Plan. The County Council has not commented on all the aspirations set out in the consultation document, but has instead concentrated on responding to the key strategic issues effecting the Authority in respect of its infrastructure delivery role and delivery of Green Infrastructure.

**Broads Authority response:** Comments noted.

### **General comment**

#### **Norfolk Wildlife Trust**

We have made detailed comments at earlier stages with regard to establishing the scope and format of the plan and we are pleased to see that a well evidenced and coherent plan is now emerging. The majority of our current comments relate more to the detail of aspirations and outputs, particularly with regard to references to NWT in the Partnership Actions section.

**Broads Authority response:** Comments noted.

### General comment

#### Norwich & District Wildfowling Association

Shooting and conservation in the Broads area: Alongside the NDWA, there are 5 other BASC affiliated wildfowling clubs in the Broads area and dozens of BASC affiliated clubs and syndicates with game shooting interests. There are also hundreds of BASC members carrying out a range of shooting and conservation activities, including deer management and pigeon control. The NDWA undertake wetlands management and other conservation work on the land over which they shoot, actively participating in Environmental Stewardship schemes and working closely with Natural England and non-government organisations such as the RSPB and the Wildlife Trust. For example, we have placed many Mallard Nest Tube boxes over the land in which we shoot, with great success over the past 2 years. The NDWA recognises the importance of the wetland environment in the Broads and the need to balance different user needs. The NDWA would like to back the proposals below from the British Association for Shooting and Conservation (BASC). BASC will be creating their own response to the Broads plan also. BASC recommends that the plan be revised to include text that recognises shooting as a traditional and integral part of life in the Broads, with much to contribute in terms of providing conservation benefits, increased recreational activity and improvements to people's wellbeing.

**Broads Authority response:** Comments noted.

### General comment

#### RSPB

Seeing the plan in the most recent draft I feel it represents where partner organisations want to get to - so well done to you.

**Broads Authority response:** Comments noted. RSPB's support for the Plan is welcomed.

### General comment

#### RSPB

The RSPB is supportive of the approach being taken to the plan production and is pleased to see that suggestions for improvement from the draft plan consultation have been incorporated. We consider the revised draft to be a much stronger document. Whilst encouraged by the revised plan, we have a number of comments to make; these are set out in detail in Appendix 1. Electronic copies of relevant reports that have been referenced are provided alongside this letter.

**Broads Authority response:** Please note BA responses to RSPB's comments on individual sections of the plan.

### General comment

#### Somerton Parish Council

Somerton Parish Council notes that there has been an almost complete lack of local community response in the Broads plan consultation process to date. We view that the Broads Authority remains an unelected, city based organisation with no provision for any effective local voice or representation. The aims and visions contained in the revised draft have our general support. However, it is disappointing to note that there continues to be no effective process to improve the water quality in the Broads system. Visitors and locals will not see any improvement with facilities especially refuse collection and keeping some public footpaths open during the summer months. Housing provision for young locals remains a dream. The local community will not see any improvements without changes to the existing governance. Local people consider they are not represented to reflect their interests with committees dominated by mostly retired individuals who can afford to attend day time meetings. Working people and those caring for families/children are excluded from the process since they are unable to attend day time gatherings.

**Broads Authority response:** All Parish Councils were consulted on the draft versions of the Plan. Following a suggestion from the Chairman of Somerton Parish Council, councils were reminded of the consultation dates and asked how they wish to be consulted in the future. However, the level of response from Town and Parish Councils is intermittent. Only Somerton PC have mentioned the Governance arrangements and meeting timings in the Broads as a specific barrier to responding to consultations. Support for the general aims and vision of the Plan is welcomed. The remainder of the comments are not requesting specific changes to the Plan, and so are not dealt with here.

### **General comment**

#### **Waveney District Council**

We do not have any comment to make on the document at this time. However, if there are any particular issues that you wish to discuss please do not hesitate to contact a member of the Planning Policy Team in the future.

**Broads Authority response:** Comment noted.

### **General comment**

#### **Woodbastwick Parish Council**

My parish have read the plan and have expressed the concern that the plan is heavily weighted in favour of water borne traffic, particularly tourist water borne traffic, and that there is little in the plan to support local residents, cyclists and walkers.

**Broads Authority response:** Aspiration 7 specifically refers to the physical access network, and 7.1 includes key actions for the benefit of cyclists and walkers, whether they be locals or visitors. Aspiration 9 is very much community focused. Please contact us if you would like more information.

### **Introduction 1.1**

#### **RSPB**

The Broads: The RSPB is supportive of the context setting for The Broads, however, it would be useful to have references to the supporting information underpinning the statements e.g. the Broads Biodiversity Audit, source for historic context etc. In the first paragraph, should “system” or something similar be added after “navigation”? Should the second sentence of the second paragraph read “The Broads Authority’s executive area”? The second paragraph recognises the Broads as part of the wider Broads Rivers Catchment. In order to provide context to the scale of the Broads it may be helpful to confirm the size of the Broadland Rivers Catchment: 3200km<sup>2</sup> as set out in the Catchment Plan. The different habitat types of the Broads are outlined in paragraph two. It is recommended that a distinction be made between fens and reedbed as they represent different communities; this would be consistent with Aspiration 2 (Ref 2.3, p.21).

**Broads Authority response:** Comments noted and appropriate amendments made to text.

### **Introduction 1.1**

#### **RSPB**

Valuing our natural capital: Natural Capital also includes the health and well being benefits that are derived from enjoying the environment. There has been much research on this topic and the benefits are significant. However, this is not captured in the current statement. This could be developed around the “simply admiring the view” statement in the first paragraph.

**Broads Authority response:** Comments noted and text amended.

### **Introduction 1.2**

#### **Inland Waterways Association**

Broads Authority: This now appears a little better balanced, although there is not much to give locals any comfort that their interest as the occupants has much status.

**Broads Authority response:** We are not sure what the IWA is referring to here; this section sets out the Authority's statutory purposes as defined in the Broads Act, which apply to local communities and visitors alike.

### Introduction 1.2

#### Inland Waterways Association

Long Term Aims: National Park Status: Inland Waterways Association was pleased to support the Broads Authority's move towards becoming a 'member of the national parks family' whilst retaining its special and individual status as protector of navigation interests with equal weight, not following national parks who adhere to the Sandford Principle. IWA is therefore happy to see that this update of the plan, subject to the ongoing legal challenge, will not pursue its long term ambition as stated in the Broads Plan 2011 to seek primary legislation.

**Broads Authority response:** Comments noted.

### Introduction 1.2

#### NFU East Anglia

As the drafting process has for the most part adopted the suggestions we have made along the way we would reiterate some of the fundamental issues and themes of concern. The NFU supports the Authority's aspirations in regard to National Park status: it is not necessary to seek further primary legislation to formally change the Broads in a manner that puts it on a par with other National Parks and we endorse the continuation of equality between the principle purposes and what they must have regard to. We would never support the adoption of the Sandford Principle in the Broads. It is however entirely appropriate to use 'National Park' branding to further promote the Broads.

**Broads Authority response:** Comments noted.

### Introduction 1.2

#### Norfolk and Suffolk Boating Association

Paragraph 5: In the interest of accuracy, we feel that "The Broads has equivalent status to a National Park under the National Parks and Access to the Countryside Act 1949." should read "The Broads has similar status to that enjoyed by a National Park designated under the National Parks and Access to the Countryside Act 1949."

**Broads Authority response:** Your comments are noted; however, the wording "The Broads has equivalent status to a National Park"... (rather than "similar status") is approved by Defra and is used in our communications, including the branding strategy.

### Introduction 1.3

#### NFU East Anglia

The draft plan's statements on Landscape and Cultural Heritage, Biodiversity and Agriculture and Land Management are all interlinked and can be supported by NFU members. It needs to be recognised that much of the efforts to achieve these aims is outside the purview of the Authority itself and achieving these aims, as the plan itself acknowledges, relies on the activities of individual parties. This includes the farming community, which is working to deliver these aims, and it must be acknowledged that the primary driver in doing this successfully is that individual farming businesses maintain profitability.

**Broads Authority response:** Comments noted.

### Introduction 1.3

#### Great Yarmouth Borough Council

The Borough Council is keen to engage further with the £2.6m Heritage Lottery Partnership 'Broads Landscape Partnership Scheme'.

**Broads Authority response:** Comments noted. The Council's engagement in the Broads LPS is welcomed.

**Introduction 1.3****Natural England**

We advise that in the final paragraph on page 10, reference should be made to 'Appendix C' rather than 'Appendix B'.

**Broads Authority response:** Comment noted and text amended.

**Introduction 1.3****Norfolk Wildlife Trust**

Page 10: Assessment and Monitoring of Broads Plan: Assessment and Monitoring of the Broads Plan is an important issue and it would be useful to describe how this will happen in more detail in this section. As this is a partnership plan it is important that partners are included in assessment of the progress of actions and that monitoring reports are accessible to partners. This could be done through circulation of the Partnership Action tables. With regard to public presentation of assessment of actions this could be achieved through regular reports to the Broads Forum, as is suggested. It would be sensible for assessments to be broadly coded green, amber and red, or a similar signalling system, accompanied by a short written assessment. In order to do this it would be good to have clearer indicators and targets for each action, although these often may need to refer to other documents/strategies.

**Broads Authority response:** Comments noted. Clarification about our monitoring processes is given in section 1.3.

**Introduction 1.4****Great Yarmouth Borough Council**

The Borough Council looks forward to continuing the good working relationship with the Broads Authority in relation to the respective Local Plan production, and the range of strategic matters under the planning 'Duty to Cooperate'.

**Broads Authority response:** Comments noted. The Council's support is welcomed.

**Vision and Principles 2.1****Essex & Suffolk Water**

There appears to be an unnecessary carriage return within the penultimate paragraph of the 'Vision for the Broads...' box on p.12 - 'decisions about.....their future....'.

**Broads Authority response:** Comment noted.

**Vision and principles 2.1****Inland Waterways Association**

Table 1 now seems more relevant to the integrated purpose of the Broads.

**Broads Authority response:** Comment noted.

**Vision and principles 2.1****Norfolk and Suffolk Boating Association**

Paragraph 4: We welcome the vision "Local communities are taking an active part in decisions about their future...". In order for this to happen we believe that changes will be required in the composition and constitution of the Authority. We note and regret that no actions to give effect to this are listed in the Plan.

**Broads Authority response:** The constitution of the Broads Authority is set out in the Norfolk and Suffolk Broads Act 1988 (as amended) and the Broads Authority Act 2009. Any amendment would require a full legal process. At present, the Government has not indicated an appetite to revisit the content of any of the Broads Acts and would be unlikely to support any attempts by the Authority or other bodies to do so. The previous coalition government investigated the potential for direct elections for the members of the National Park family and announced that trials would take place in the Peak District and the New Forest. However, this never came to fruition and the idea

is not a priority for the current Government. Should the opportunity arise in future to revisit the Authority's constitution, this would be one of a range of options that could be considered.

**Vision and principles 2.1****Norfolk Coast Partnership**

I support the vision in section 2.1 and the three fundamental principles for management (precautionary approach, manage sustainably and engage, learn and act together) in section 2.2, which are consistent with the vision and principles contained within the AONB Management Plan 2014-19.

**Broads Authority response:** Comments noted.

**Vision and principles 2.1****RSPB**

Long-term vision: It is suggested that "And finally" be removed from the final para. This is about achieving the legacy of all the work to manage the Broads yet it currently sounds like an afterthought.

**Broads Authority response:** Comment noted and text amended.

**Vision and principles 2.1****Suffolk Wildlife Trust**

We support the Long-term Vision (section 2.1) of the draft Broads Plan.

**Broads Authority response:** Comment noted.

**Vision and Principles 2.2****Natural England**

In the third paragraph on Table 1, page 12, there is a return that needs to be removed to make the paragraph 'whole'.

**Broads Authority response:** Comment noted.

**Vision and Principles 2.2****Environment Agency**

The adoption of the fundamental principles in section 2.2 is welcome. It provides the reader with a clear view of how the Broads Authority has arrived at this point, and how decisions will be guided throughout the plan period.

**Broads Authority response:** Comments noted.

**Vision and principles 2.2****Inland Waterways Association**

Precautionary Approach: In addition to recognising the need to work within cost/benefit and decision making transparency criteria, IWA believes it important to maintain a balance across the Broads three purposes. IWA still considers this could be usefully added to the paragraph on the precautionary principle.

**Broads Authority response:** Minor changes have been made to sections 1.2 and 2.2 for clarification. The Broads Act requires the Authority to manage the Broads for three purposes, without any one of those purposes having any greater statutory significance than any other. It is in that sense that some of the Authority's documents refer to the three purposes as having 'equal weight'. In practice, how much weight is given by the Authority to any of the statutory purposes will depend upon the particular circumstances under consideration. In its commitment to integrated management, the Authority will always look for the potential win-win solution, rather than setting its different functions at odds with each other.



**Vision and principles 2.2****NFU East Anglia**

The draft plan uses the same wording as the 2011 plan on the precautionary principle. The NFU believes that any application of the precautionary principle needs to be based on the best evidence available. This is important, first in assessing the degree of likelihood of perceived threats, and second in then quantifying the threats and the necessary mitigation. We are pleased to see that the final draft has addressed our concerns in this regard by incorporating additional wording around proportionality and certainty of calculating costs and benefits.

**Broads Authority response:** Comments noted.

**Vision and principles 2.2****Norfolk and Suffolk Boating Association**

Paragraph 3: Similarly, we welcome the stated intention to “Involve people from an early stage, and throughout, in making decisions that affect them.”

**Broads Authority response:** Comment noted.

**Vision and principles 2.2****Norfolk Coast Partnership**

I support the vision in section 2.1 and the three fundamental principles for management (precautionary approach, manage sustainably and engage, learn and act together) in section 2.2, which are consistent with the vision and principles contained within the AONB Management Plan 2014-19.

**Broads Authority response:** Comments noted.

**Vision and principles 2.2****Norfolk Wildlife Trust**

We support the views of RSPB as expressed in their submission with regard to the precautionary principle and cost benefit analysis.

**Broads Authority response:** Comments noted.

**Vision and principles 2.2****RSPB**

Fundamental principles: The RSPB is supportive of the principles that have been used to guide the development of the draft Broads Plan 2017. It should be noted that principles 1 & 2 are intrinsically enshrined within the Habitat Regulations and will be effectively evaluated through the accompanying Habitats Regulations Assessment. A caveat to the ‘Fundamental Principles’ text is recommended stating that the cost-benefit analyses undertaken in the application of the precautionary principle should not be limited to economic assessment (as per document Page 4 of 8

“Communication from the [EC] Commission on the precautionary principle (2000)), and that the ultimate test in the case of Natura 2000 sites is no adverse effect on site integrity, irrespective of the outcome of any assessment of the benefits and costs of action or lack of action.

**Broads Authority response:** Comments noted. Our interpretation of the precautionary approach regarding 'costs and benefits' is intended to cover economic, environmental and social factors.

**Vision and principles 2.2****Suffolk Wildlife Trust**

We support the Fundamental Principles (section 2.2) of the draft Broads Plan.

**Broads Authority response:** Comment noted.

#### **Priority partnership actions 2017-22**

##### **Suffolk Wildlife Trust**

We also support the themes identified for Priority Partnership Actions (2017-2022), in particular themes A (Managing water resources and flood risk); B (Sustaining landscapes for biodiversity and agriculture); D (Conserving landscape character and the historic environment); E (Building climate-smart communities); G (Raising awareness and understanding) and H (Supporting, connecting and inspiring people).

**Broads Authority response:** Comment noted.

#### **Aspiration 1**

##### **Anglian Water**

The Broads Authority area is an area of water stress, It is therefore recommended that the Local Plan requires optional water efficiency requirement in order for this aspiration to be met. We support the reference to the Water Resource Management Plan. We will be preparing a business plan in the next year which will identify the need for further investment to accommodate growth within the Anglian Water region. Local Plan growth targets and the timing of sites will be a key source of information to inform our business plan. At the appropriate stage we will be consulting on this document.

**Broads Authority response:** Comments noted.

#### **Aspiration 1**

##### **Great Yarmouth Borough Council**

The Borough Council looks forward to continuing working with the Broads Authority on addressing flood, coastal erosion and related matters.

**Broads Authority response:** Comments noted. The Council's support is welcomed.

#### **Aspiration 1**

##### **Inland Waterways Association**

Aspiration 1 needs to be done within the maintenance of navigation the Broads has to equally protect. EA has been woefully bad at ensuring they carry out 'rewilding' within the law on a number of rivers with navigation rights elsewhere, and has even failed to consult with its own internal Navigation team on occasion. As above the Broads Authority must ensure this does not happen here. BA needs to act on Aspiration 1 as a navigation authority and push back on EA's approach. It is very unlikely EA's navigation officers will be involved from EA, although they have much to offer.

**Broads Authority response:** Comments noted.

#### **Aspiration 1**

##### **NFU East Anglia**

As noted, we are pleased that our previous comments have largely been incorporated into this final draft. However we do still believe that the section on 'Managing water resources and flood risk' could be further strengthened to highlight farming's vital role in maintaining the economy and landscape of the Broads, and therefore the importance of farming maintaining a fair share through abstraction of the available water supply. The statement on the long-term aim does include reference to a 'fair approach' but then fails to include specific reference to farming, and we request that this is rectified.

**Broads Authority response:** Reference is made in the context (first para) to the primary need for water for farming and other water dependent businesses, and the importance of farming is further referenced under Aspiration 2.

**Aspiration 1 (context)**

**Essex & Suffolk Water**

We welcome the reference to 'providing public drinking water' in the context section under Theme A on p.15. We would suggest inserting the word 'spring' or 'early' before 'in 2012', when referring to the 'drought' of that year in the second bullet point of the Context table on p.15. The first part of 2012 was very dry, but the second half extremely wet.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 1 (long term aim)**

**Environment Agency**

I welcome the approach outlined in the section long-term aim for water resources and flood risk management, acknowledging the desire to use evidence to support actions and good practice at catchment and local scales. I also support the longer term decision making to address the impact of climate change informed by “robust evidence”.

**Broads Authority response:** Comments noted.

**Aspiration 1.1**

**Environment Agency**

I would suggest that an updated water cycle study (WCS) for the Broads area should be considered and mentioned in the plan. A WCS would provide the evidence base to confidently identify water quality and water efficiency measures.

**Broads Authority response:** This is being addressed through the emerging Broads Local Plan.

**Aspiration 1.1**

**Essex & Suffolk Water**

In the Table on p.16, ref. 1.1, the first key output bullet point, there is a reference to promoting water efficiency measures 'to domestic and business water users'. We would reiterate the point, made in response to the first draft, that with non-domestic competition coming into the water industry on 1st April 2017, Essex & Suffolk Water (ESW) (and Anglian Water) as 'wholesale' businesses will no longer have a remit to deliver water efficiency to non-domestic customers: after this date our remit will be domestic only. All ESW and AW business water customers will be transferred to a new water retail company, e.g. 'Wave' or 'Castle'. It is likely to be these new water retail businesses that will include water efficiency in their offering to business water customers. We therefore suggest adding 'non-domestic water retail companies' or a suitable abbreviation thereof, to the brackets within the key outputs section and the resources section.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 1.1**

**RSPB**

It is unclear why there are no examples of “water efficiency measures” outlined that should be promoted through local policy. Several measures are set out for land management, but it would be helpful to highlight that, for example, rainwater & grey water harvesting should be included in new development, along with robust Sustainable Urban Drainage Systems (SUDS) that help manage water given the water stress of the area. If well designed, SUDS can deliver other benefits as well (e.g. biodiversity, flood storage, health & wellbeing). Good examples of how development can be well planned to manage water and deliver multiple benefits is outlined in the RSPB/WWT report ‘Sustainable drainage systems: maximising the potential for people and wildlife – A guide for local authorities and developers’ (available at

[https://www.rspb.org.uk/Images/SuDS\\_report\\_final\\_tcm9-338064.pdf](https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf)). It is also unclear how developers are included within this process. They are not highlighted as partners, but will be essential to the delivery of such measures in new developments. Consideration must be given to building positive links with this group to build support for such policy requirements.

**Broads Authority response:** These comments are more appropriate for the emerging Broads Local Plan, and will be noted for that consultation process.

**Aspiration 1.2****Anglian Water**

It is important to note that Anglian Water does not abstract water from the Broads Authority area.

**Broads Authority response:** Comment noted. Actions under 1.2 are at a catchment scale.

**Aspiration 1.2****Environment Agency**

I would suggest that an updated water cycle study (WCS) for the Broads area should be considered and mentioned in the plan. A WCS would provide the evidence base to confidently identify water quality and water efficiency measures.

**Broads Authority response:** This is being addressed through the emerging Broads Local Plan.

**Aspiration 1.2****Essex & Suffolk Water**

We welcome the references in section 1.2 of the table on p.16 to CAMS, WRMP and Drought Plans as the statutory vehicles for managing water resources. We would welcome the addition of the Water Industry National Environment Programme (WINEP) in the second key outputs line, alongside the references to Water Resource Management Plans and Drought Plans.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 1.2****RSPB**

The strategic action appears to be promoting measures that build resilience into the Broads to manage water requirements. It is suggested that "...allowing The Broads to be more resilient to future change" be included after the examples provided. Given the importance of a resilient system for the Broads, it would seem appropriate that the Broads Authority is listed as a reporting partner, as they will have responsibility for ensuring actions are delivered and that the most appropriate decisions on long term management of the Broads is taken by the other Section 28G Authorities.

**Broads Authority response:** We have added "to help build resilience to future change" in the 'focus' section before actions 1.1 and 1.2, and will reference the BA specifically as part of the Broads Climate Partnership. As the body responsible for producing and championing the Plan, the Authority will monitor all the actions in the Plan. The importance of promoting measures to build a resilient system rests with many bodies, including the BA. However saying the BA "will have responsibility" denotes we have formal legislative or scrutinising powers and this is not the case here - the responsibilities for legislative control rest with others and we would expect them to be reporting, rather than our taking over or duplicating their role.

**Aspiration 1.3****Ash, Mr J (BA Member)**

Include word tidal - 'Maintain current coastal, tidal and fluvial flood risk.

**Broads Authority response:** Comment noted and text amended.

**Aspiration 1.3****Environment Agency**

The strategic action to maintain and update coastal and fluvial flood risk management is welcomed. This should be underpinned by a Strategic Flood Risk Assessment (SFRA). We note that the importance of a SFRA is recorded on page 40 of the local plan for the Broads – preferred options consultation. An updated SFRA should be based on the latest hydraulic modelling account for climate change allowances and consider surface water management. Information regarding climate change can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. I would encourage co-operation with other LPAs when developing a new SFRA to ensure an integrated approach to mitigating flood risk. Ongoing work and maintenance is required to keep communities safe from flooding. Developer contributions and partnership funding should be sought where applicable. Information regarding partnership funding is available at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/549093/Funding\\_for\\_Flood\\_and\\_Coastal\\_Erosion\\_in\\_England\\_Sep\\_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/549093/Funding_for_Flood_and_Coastal_Erosion_in_England_Sep_2016.pdf)

**Broads Authority response:** Comments noted.

**Aspiration 1.3****Great Yarmouth Borough Council**

3rd bullet point: The Borough Council looks forward to continuing involvement in the Broads Climate Partnership. 4th bullet point: While the Borough Council (identified here as a Lead Delivery Partners) is in agreement in principle with the aspiration for '(post-2012) integrated Broads and inter-related coastal frontage flood risk strategy agreed/in place', it reserves judgement on the practicality and detail of achieving this. The Council would not wish integration with the Broads to hinder progress on coastal issues, and the content of strategy will, of course, need to be carefully considered in light of all the various complex issues involved.

**Broads Authority response:** Comments noted. Inclusive consultation and strong partnership working will be essential to taking actions forward.

**Aspiration 1.3****Norfolk Wildlife Trust**

We are pleased to see the commitment to working with EA and others over an integrated flood risk strategy, as was highlighted at the recent climate change event at Carrow Road. However there continues to be limited progress on projects aimed at restoring natural floodplain and there needs to be a strong focus on planning and promoting these schemes. We suggest that BA is listed as a partner in the output section and that the authority takes the lead on bringing other partners together to plan approaches and projects and to seek new areas of funding, other than agri-environment schemes.

**Broads Authority response:** The Authority is a partner in the Broads Climate Partnership, but we will make this more explicit. We have added a reference to restoration of natural floodplains as part of the research and modelling work that needs to be carried out.

**Aspiration 1.3****RSPB**

A partnership plan: Under the funding para (p.10, third full para) other funding bids are mentioned. There will be aspirational amounts of money that these projects will bring to the Broads. Whilst they may not yet be secured, it would indicate some scale of the ambition planned for the 2017-2020 plan period.

**Broads Authority response:** Comments noted.

**Aspiration 1.3****RSPB**

As part of the Broadland Flood Alleviation Project, the options being delivered will have an impact on the Broads and it would seem sensible that the Broads Authority would have a role to ensure that the best options are taken forward. Whilst the Broads Plan is not a plan for the Broads Authority, it is still the plan author and will have responsibility for ensuring the plan is delivered through regular progress monitoring.

**Broads Authority response:** Comments noted. The Authority is a member of the Broads Climate Partnership, and will work closely with partners to take these actions forward, and will monitor progress of this and all other actions in the Plan.

### **Aspiration 1.3**

#### **RSPB**

The Broads Plan is supposed to be informed by an Environmental Report. It is assumed that this is actually the accompanying Sustainability Appraisal. It would be good if this could be confirmed and, if so, the terminology reviewed for consistency.

It remains unclear how progress will be monitored. The current Broads Plan has a website and some updates are included for each objective. However, there do not appear to be clear targets against which progress is checked, or to confirm that progress is on target. Whilst indicators of progress will be helpful, it will be important to demonstrate success at the end of the plan period or to evaluate any outputs that could not be delivered during the plan period. Given the partnership nature of the plan ensuring transparency in governance of the plan and its progress will be important. With respect to Biodiversity targets, the RSPB notes that more detailed measures are in part set out in the "Biodiversity & Water Strategy 2013" and suggests that this be refreshed to ensure it remains compatible with the revised Broads Plan and that it provides a mechanism to record more specific projects that will be delivered through the plan period. This will also allow additional knowledge gathered since the strategy was written to be collated into one place. It is noted that there will be 6-monthly reports on progress. It is not clear how the results will be shared. This is important for the Broads Plan given its delivery is highly dependent on action delivered by partners. It is suggested that at least annually an update report on progress be presented to the Broads Forum where all interests will be represented. Collectively there should be consideration of, overall, what "good" looks like at the end of the plan period to be able to say how successfully it has been delivered. The role of various groups to have oversight of key outputs of the plan should also be considered. For example, is there a role for the Broads Biodiversity Group or Broadland Catchment Partnership to review actions based around a refreshed Biodiversity & Water Strategy? It is expected that at a high level, the Broads Authority operates a Red-Amber-Green assessment of actions within the Broads, although it is not clear where such information is publically available. The RSPB operates such a system to track progress on its objectives (annual and 5 year management plan targets). It is anticipated that other partners will also operate similar progress report systems. This monitoring would appear useful to help with the Broads Plan review progress. If this information would be helpful to the Broads Authority there will need to be an agreed mechanism in place unless such a mechanism is already deemed to exist. We would be happy to discuss this further.

**Broads Authority response:** The SA (and the HRA) perform the function of the Environmental Report. The Broads Plan standalone website will no longer be supported; instead, six monthly reporting will be to the Broads Authority, with the information sent to delivery partners, key groups and published on our website. Some refining of indicators, including state of park indicators, has taken place. The Biodiversity and Water Strategy is due for review in 2018-19, and comments on the process and content will be welcomed at that time.

### **Aspiration 1.4**

#### **Anglian Water**

The reference to SuDS in 1.4 is welcomed. Anglian Water strongly recommends that there is inclusion of a Broads area wide policy regarding SuDS in the Local Plan.

**Broads Authority response:** Comment noted.

**Aspiration 1.4****Broads Angling Strategy Group**

Broads Angling Strategy Group has with the Environment Agency looked at the potential short term solutions to saline incursion by the use of temporary curtains across high risk dykes. Could this also be reflected within section 1.4?

**Broads Authority response:** We have not included a specific reference to this in the plan, but any action can be reflected in progress reporting.

**Aspiration 1.4****Environment Agency**

I am pleased to see that watercourse improvements are included in this section as previous damage to the form and function of many of our rivers reduces their ability to support a thriving ecology. There is a balance to be had when managing our rivers but it is encouraging that watercourse and floodplain improvements are mentioned in this section as many of the measures can have natural flood risk benefits for downstream communities.

**Broads Authority response:** Comments noted.

**Aspiration 1.4****Great Yarmouth Borough Council**

While the Borough Council (identified here as a reporting partner) is in agreement in principle with the aspiration to 'Investigate, plan and promote schemes to hold back or divert flood water, moving from retrospective to proactive approaches', it reserves judgement on the wisdom and practicality of any specific measures that may be put forward. These will, of course, need to be carefully considered in light of all the various complex issues involved.

**Broads Authority response:** Comments noted.

**Aspiration 1.4****Norfolk Wildlife Trust**

We are pleased to see the commitment to working with EA and others over an integrated flood risk strategy, as was highlighted at the recent climate change event at Carrow Road. However there continues to be limited progress on projects aimed at restoring natural floodplain and there needs to be a strong focus on planning and promoting these schemes. We suggest that BA is listed as a partner in the output section and that the authority takes the lead on bringing other partners together to plan approaches and projects and to seek new areas of funding, other than agri-environment schemes.

**Broads Authority response:**

**Aspiration 2 (context)****Natural England**

On page 18, final paragraph, the sentence beginning 'Water quality continues to... and competing demands for water use.' is hard to understand and follow, and could do with some additional punctuation to make it clearer. Similarly, the final sentence on the first paragraph on page 19, would benefit from additional punctuation to make its meaning clearer. On page 19, second paragraph, reference is made to '...UK Priority Species...' without explaining what these are, or means. Perhaps a footnote at the bottom of the page could help and include reference to the underpinning legislation.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 2 (context)****Norfolk Wildlife Trust**

In our view there should also be a reference here to boat use/navigation being a contributor to poor water quality (pollution, paint, sediment disturbance etc.). We are unclear what the Broads Land Management Service is – some clarification would be useful

**Broads Authority response:** Comments noted. Boat use/navigation is included within "competing or over demand for water use". We have added an explanation about the Broads Land Management Service in Appendix A.

### **Aspiration 2 (context)**

#### **RSPB**

The first bullet point highlights a range of habitats that the Broads supports. Reedbed is an important feature and should be mentioned separately to fens. It is also unclear what "other coastal formations" means in a Broads context (e.g. estuary, sand dunes). Given the limited number of possibilities that this could include it is suggested these all be stated for clarity.

The second paragraph mentions that renewable energy has a role in enhancing and managing the Broads ecosystems. It is unclear what forms of energy production are being considered and how they could be claimed to "manage and enhance" ecosystems. Clearly renewable energy in the right location has a role to play in helping manage carbon emissions, but this does not appear the context for this paragraph. This should be clarified.

Sentence five of bullet point three needs attention to ensure it clear. It is read as: "Water quality continues to be affected by diffuse pollution (primarily phosphorus and nitrogen from domestic waste water and farmland), erosion causing sediment release, physical modification of water courses, low dissolved oxygen and fish populations, coastal saline drainage water, salt tides and competing demands for water use."

**Broads Authority response:** Comments noted and amendments made to text.

### **Aspiration 2 (context)**

#### **Forestry Commission**

Section 2 B Context on page 19 of the Broads Plan, fourth paragraph states 'The Broads is a UK priority wetland area, with the largest expanse (around 75%) of species-rich calcareous fen in lowland Britain.' Perhaps the percentage of the national wet woodland resource in the Broads area should be added to that paragraph. If that percentage cannot be estimated it remains important to place wet woodland in the context of the landscape for biodiversity in the Broads.

**Broads Authority response:** Comments noted. We have included wet woodland as an identified habitat (context, action 2.3).

### **Aspiration 2 (long term aim)**

#### **Inland Waterways Association**

Biodiversity: The Broads are significantly affected by, and created in many cases by human intervention. As heavily modified water bodies, good ecological potential should be the aim over this plan period - no less and no more. We continue to criticise EA for its focus on WFD, without getting proper input from other organisations with at least equal responsibility and influence over water bodies. EA has been observed by navigation authorities combining actions and requirements to achieve directive outcomes without getting any input from them, leading to unrealistic and unachievable plans. These situations appear to have arisen as EA has failed to conduct consultations properly or in time. The Broads Authority will need to check carefully to ensure EA does not do the same with its plans in this section.

**Broads Authority response:** Comments noted.

### **Aspiration 2.1**

#### **Environment Agency**

I suggest that the reference to EA statutory monitoring be changed to EA statutory monitoring data as this fits better within the indicators (targets) column.

**Broads Authority response:** Comment noted and text amended.



**Aspiration 2.1****Essex & Suffolk Water**

We note the reference to Essex & Suffolk Water under section 2.1 of the table on p.20, presumably in relation to the planned mud pumping on the Trinity Broads. This reference line is fine.

**Broads Authority response:** Comment noted.

**Aspiration 2.1****Norfolk Wildlife Trust**

In our view, the Hickling Enhancement Project should also be referenced in the dredging section as one of the main drivers is the need to dispose of dredged material. NWT resources for Hickling enhancement are in-kind, rather than monetary. We are unclear why Barton and Upton Broad are included in the key outputs, as we are not aware of major future enhancement programmes being planned for these Broads. We assume that this just refers to a review of past projects, as the wording seems to suggest.

**Broads Authority response:** Comments noted. The Hickling Enhancement Project is part of the overall dredging programme; however, the drivers for the project and specifically the CANAPE bid are much wider, and as such the project as a whole fits better under Aspiration 2 in the Plan.

**Aspiration 2.2****Anglian Water**

Reference is made to waste water treatment works, these are now called Water Recycling Centres. It is suggested that the text is changed so that the correct terminology is used.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 2.2****Environment Agency**

Promote and implement measures to reduce point and diffuse pollution into flood plain and water courses. Whilst I support this strategic action, the influence of development on water quality should also be considered. This is referred to on page 33 of the local plan for the Broads – preferred options consultation. This will assist in meeting the requirements of the Water Frame Directive through contributing to maintaining water quality.

**Broads Authority response:** Comments noted.

**Aspiration 2.2****Norfolk Wildlife Trust**

Reference should also be made to promotion of sustainable boat use, to minimise pollution from this source.

**Broads Authority response:** We support the promotion of environmentally friendly initiatives in recreation - see actions 4.3, 6.1 and 7.2 in the plan.

**Aspiration 2.3****Forestry Commission**

Similarly in Aspiration 2.3 on page 21 under 'Strategic action' it state 'Maintain existing areas of priority fen, reed bed and wet grassland'. While accepting that some open habitats in the Broads area have experienced encroachment of Willow there are nevertheless very large areas of diverse wet woodland that should have equal status as areas of priority habitat and must be maintained as such.

**Broads Authority response:** Comments noted. We have included wet woodland as an identified habitat (action 2.3).

**Aspiration 2.4**

**Essex & Suffolk Water**

We are pleased to see the inclusion of projects related to the control of threats from invasive non-native species on p22 in section 2.4.

**Broads Authority response:** Comment noted.

**Aspiration 2.5****Ash, Mr J (BA Member)**

In resources include SWT.

**Broads Authority response:** Comment noted and text amended.

**Aspiration 2.5****Broadland District Council**

Reference made to 'Extending and creating new areas of high biodiversity value habitat , habitat networks..' and ' the need for 'Recreational pressure mitigation and management strategies in place to extend and protect biodiversity value of sites' in para 2.4 page 22 is noted and welcomed.

**Broads Authority response:** Comments noted.

**Aspiration 2.5****Norfolk Coast Partnership**

[Suggestion from Norfolk Coast Partnership to be included in action table to support and assist the action.]

**Broads Authority response:** Comment noted and table amended.

**Aspiration 2.5****Norfolk Wildlife Trust**

We are pleased to see reference made to Wildlife Trust Living Landscape projects as this will be where we will focus our work the Broads during the next 5 years.

**Broads Authority response:** Comment noted.

**Aspiration 2.5****North Walsham and Dilham Canal Trust**

Long term aims: The two previous aims regarding the re-building of Honing Lock and raising the water level above Honing Lock will require the building of a replacement spillway (possibly incorporating a fish ladder) at Honing. This, in conjunction with the sokes, would enable mitigation measures providing a faster flow of water than the canal, hence maintaining the stream biodiversity, as has been applied on the Upper Canal.

**Broads Authority response:** Comments noted.

**Aspiration 2.5****RSPB**

Broads Futurescapes is continuing but there is no longer a Broads Futurescape 2 being taken forward by the RSPB. The '2' should be removed.

**Broads Authority response:** Comment noted and text amended.

**Aspiration 2.5**

**RSPB**

Just a couple of changes that need to be made to the Broads Plan as a result of changes to RSPB projects. First one is on page 22, entry 2.5, middle box. Just need to remove the number '2' after Broads Futurescape. Due to the burden of projects we have taken our submissions out of the RSPB national proposal, but our Futurescapes initiative/aspirations still hold.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 2.6****RSPB**

Given the amount of research that is planned to be carried out during the plan period, would it be possible for the Broads Authority to host a research seminar/workshop to allow the information to be disseminated in addition to papers alone?

**Broads Authority response:** Comment noted.

**Aspiration 3****Beccles Town Council**

Beccles Town Council considered the draft plan at its meeting on 6 December 2016. There was one comment regarding aspiration number 3 'Navigation – managing the waterways and dredging'. It was reported at the meeting that there were a lot of fallen trees towards Geldeston which were impeding navigation.

**Broads Authority response:** Comments noted. Trees restricting the navigation are removed as soon as possible, and where encroaching into the river are dealt with on a priority basis during the winter period.

**Aspiration 3****Inland Waterways Association**

The long term aim is positive and works. However the aspiration continues to seem relatively limited considering the contribution the navigation can also make. The potential of environmentally friendly transport, potential provision of water borne housing, and working to reduce the carbon footprint of the Broads water leisure sector could all deliver. These also need to be included in other aspirations.

**Broads Authority response:** Comments noted and these aspirations are reflected in the Broads Plan and emerging Broads Local Plan. The Authority is also planning to investigate the issue of floating houses.

**Aspiration 3 and 4****North Walsham and Dilham Canal Trust**

The areas that the Trust would look for support from the Broads Authority:

The Trust is seeking a closer relationship with the Broads Authority. The current project to restore the North Walsham & Dilham Canal began in 2000 spearheaded by the East Anglian Waterways Association (EAWA). It was felt that the project needed to be taken closer to the people of North Norfolk, so in 2008 the newly formed North Walsham and Dilham Canal Trust took over the day to day running of the project, but remains closely linked with the EAWA. The Trust seeks to have a similar working link with the Broads Authority. We have seen the results from the nationally recognised work, that the Upper Canal restoration would have met many of the Broads Plan Aspirations, recognising and valuing the importance of the waterway for navigation, biodiversity, recreation and protection of industrial archaeological structures. However the substantial length of the North Walsham & Dilham Canal that lies within the Broads Authority boundary is crucially at the entrance to the Canal. With this section of the Canal being allowed to become un-navigable, rightful access to the Canal in future by the owners of the upper Canal will be seriously compromised.

The owners of the stretch of Canal between Wayford Bridge and Ebridge have made no effort to keep the Canal navigable, despite active Acts of Parliament which oblige them so to do. As the 4.4km of Canal is at risk, we need the backing of the Broads Authority which is a Statutory Body and a Navigation Authority. Towards this aim, we would like the restoration and regeneration of the Canal to be integrated into the Broads Plan as this meets the aspiration to the Opening up of new areas of water space. (C – Maintaining and enhancing the navigation, P24 Draft Broads Plan 2017), and develop appropriate opportunities to expand or extend access for various types of craft. Audit of existing and potential new navigation water space completed; schemes and agreements developed to enhance water space access, consistent with nature conservation interests and flood risk management (Aspiration 4 – Maintain a safe, open navigation and reduce pressure on vulnerable areas, p26 Draft Broads Plan 2017).  
**Broads Authority response:** Comments noted. Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 3 (context)****Natural England**

On page 24, final bullet point, amend the first sentence so that the text reads '...the Wildlife and Countryside Act 1981 (as amended)...'.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 3 (context)****North Walsham and Dilham Canal Trust**

Short term aims: The Trust would like the Broads Authority to actively seek the clearance of the fallen trees and detritus in the tidally influenced lower Canal section between Wayford Bridge and Honing Lock. (The Trust volunteers are equipped for this type of work and are available to help with this task.)

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 3 (context)****North Walsham and Dilham Canal Trust**

Long term aims: Re-opening of the old footpath between Honing Lock and Dee Bridge, thus linking the Common Access areas below and above the lock, and enabling further links between footpaths 7, 13, 22 (Honing Parish) and the Weavers Way.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 3.1****Essex & Suffolk Water**

There appears to be a typo in the second key output bullet point in section 3.1 on p.25.

**Broads Authority response:** Comment noted and text amended.

**Aspiration 3.1****Norfolk and Suffolk Boating Association**

We recommend that the Indicator used to measure progress against the annual dredging programme should be the proportion of the waterway that meets the defined waterways specification, not the volume of sediment removed. It is important that the right sediment is removed and that is not assessed purely by the volume extracted.

**Broads Authority response:** Comment noted. The depth of rivers and water bodies in compliance with agreed specifications (% of total area) is a State of the Park indicator. The volume of sediment removed is an output indicator for the Authority's annual dredging programme.

### **Aspiration 3.1**

#### **RSPB**

Any proposed dredging has the potential to adversely affect protected areas, for example, changes to flow can affect erosion rates. Whilst dredging may be acceptable, its requirements will need to carefully demonstrate that any environmental harm will be avoided. The RSPB supports the recommendation in the HRA that an up to date sediment management strategy be developed that has been assented by Natural England. This would ensure that any dredging is undertaken in a fully coordinated manner and that it is governed by best practice. It is unclear what is meant/intended by the use of “seek resources /legislation to accelerate removal of sediment in the Broads system.” It is a concern that this could be taken to mean a weakening of the legislation in place to ensure the best areas of habitat and wildlife are protected. This would be at odds with Page 6 of 8 the supporting text set out in the context and long term aim sections. This statement needs elaborating to better understand the intention of this strategic action.

**Broads Authority response:** Comments noted. We note the Broads Plan HRA recommendation to update the HRA for the sediment management strategy, but are confident that we maintain best practice in programming and carrying out dredging works and will continue to do so.

### **Aspiration 3.2**

#### **Norfolk and Suffolk Boating Association**

Paragraph 2: We would hope that the Key Project on the Chet would have had some concrete achievement by the end of the plan period – not just have a feasibility study / work plan in place.

Paragraph 3: We recommend that the indicator for identification of dredging disposal sites should be the total available capacity in m3 together with the number of available disposal sites.

**Broads Authority response:** Para 2: The BA has programmed dredging operations over the next five years, involving bank strengthening. Para 3: It is not possible to quantify the total number or capacity of available sites at any given time, as this can constantly vary, due to changes in land use, times of year, landowner permissions, project timetables (e.g. flood protection works), etc. However, we are always seeking opportunities for dredging disposal.

### **Aspiration 3.2**

#### **RSPB**

It is suggested that the first sentence of key output 1 be amended for clarity to: “Best practice land management techniques are promoted and implemented to reduce erosion e.g...” It is unclear why the Environment Agency is not listed as a reporting party (and possible lead) on the measures needed to reduce erosion. They have a duty to limit sediment inputs into water courses and actively regulate on this issue, as highlighted in ‘Guidance on soil management standards for farmers’:

- “The Environment Agency has a responsibility to protect the quality of soil and has produced Think soils - a soil assessment to avoid erosion and runoff.
- The Environment Agency is also responsible for regulating the spreading of waste materials on land, which are often used to help increase organic matter in soil.”

It is suggested that the list of responsible bodies for this action be updated.

**Broads Authority response:** Comments noted and text amended.

### **Aspiration 4**

#### **Inland Waterways Association**

Innovations such as low wash hull designs or retrofits to reduce bank erosion should also be suggested to hire boat companies, since these also reduce fuel consumption. The Broads is a very small area and importing innovation by transfer from another use or sector is a low cost way of getting it. Lower impact wash vessels will reduce one

aspect of the root cause of erosion. The Broads Authority's response to our comment on windage and tree and scrub maintenance was that they did not have the funds or authority to return the area to the traditionally open and underdeveloped landscape for which the Broads is famous. However by retaining this in aspirations, it can be used both to ease the navigation of traditional and low impact sailing vessels, and encourage others to help manage vegetation so that the rivers, broads and their environs are not sheltered by trees and scrub to the detriment of the traditional broads sailing craft. It is good to see this included in 4.2 focus.

**Broads Authority response:** Comments noted. We would certainly encourage the industry to further development and use low wash hulls/retrofits.

#### **Aspiration 4**

##### **Norfolk Wildlife Trust**

We recognise the importance of navigation to many Broads' users. However, we are pleased to see that Aspiration 4 makes clear reference for the need for this to be consistent with conservation interests. As set out above [3.2 comment], in our view, the Hickling Enhancement Project should be referenced in this section, as one of the main drivers of that project is the need to dispose of dredged material.

**Broads Authority response:** See response to NWT representation made under Aspiration 2.

#### **Aspiration 4**

##### **North Walsham and Dilham Canal Trust**

Short term aims: The Trust would like the East Ruston Branch to be highlighted as a possible venue for smaller craft, bringing trade to the village and its pub.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

#### **Aspiration 4.1**

##### **Environment Agency**

I welcome the approach to balance the aim of developing appropriate opportunities to expand or extend access for various types of craft, consistent with the nature conservation and flood risk management interests. It is important that any plans or projects do not adversely affect the overall aims of the Water Framework Directive. This includes no planned actions that could lead to deterioration in the ecological status of water bodies and no action that may prevent the attainment of good ecological status or potential by 2027 unless suitably mitigated.

**Broads Authority response:** Comments noted.

#### **Aspiration 4.1**

##### **Norfolk and Suffolk Boating Association**

Paragraph 1: We suggest that "opportunities taken to negotiate" would be better phrased as "opportunities created to negotiate".

**Broads Authority response:** Comment noted.

#### **Aspiration 4.1**

##### **Norfolk Wildlife Trust**

In our view, a wider view should be taken on impacts of new access to water space on wildlife than ensuring that impacts on Natura 2000 sites are avoided. This should aim to ensure that quiet and less frequented areas remain within all Broads systems and that expansion of moorings is considered in this light.

**Broads Authority response:** Any new access proposals would be subject to appropriate assessment.

#### **Aspiration 4.2**

**Norfolk Wildlife Trust**

It is critical that any plant cutting is appropriate and takes place in accordance with the HRA and with assent from Natural England. With regard to this action should include clarification, in some locations, amongst water users of the extent of navigation channels.

**Broads Authority response:** Comments noted.

**Aspiration 4.2****RSPB**

It is suggested that the strategic action be amended to read “Carry out appropriate aquatic plant cutting and tree and scrub clearance programmes...” This suggestion is made to emphasise the need for the activity to be undertaken in accordance with an agreed cutting strategy that has received assent from Natural England. Habitats Regulations Assessments must be completed for any Natura 2000 site where water plant cutting is being proposed to demonstrate that adverse effects on integrity of the sites will be avoided.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 5****Inland Waterways Association**

We include again our consultation response: To improve conservation and enhancement of the Broads landscape character and distinctive built, cultural and archaeological assets IWA would look to the Broads Authority to support the heritage fleet of boats on the broads and to support restoration of the North Walsham and Dilham canal. This does not seem to be recorded in feedback on the last consultation, and appears in the context but not in any focus actions.

**Broads Authority response:** Action 5.5 includes action through the Broads Landscape Partnership Scheme to support heritage industries. Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 5 (context)****Natural England**

On page 28, final bullet point, substitute 'human' for 'man-made' in the first sentence.

**Broads Authority response:** Comment noted and text amended.

**Aspiration 5 (context)****Norfolk and Suffolk Boating Association**

Bullet point 2: Reference is made to the need for ongoing support to preserve, restore and use historic Broads craft but we can see no specific actions identified within the detail of the Plan. Indeed, the recently announced swingeing tolls increases for certain historic craft runs counter to this objective.

**Broads Authority response:** A number of historic restoration activities are identified in the Broads Landscape Partnership Scheme, and trusts and charities are doing valuable work to maintain historic craft. Aspiration 10 refers to boosting resources to support local projects, and the preservation, restoration and use of historic craft would be a good theme.

**Aspiration 5.1****Norfolk Coast Partnership**

[Suggestion from Norfolk Coast Partnership to be included in action table to support and assist the action.]

**Broads Authority response:** Comment noted.

**Aspiration 5.3**

**Norfolk Coast Partnership**

[Suggestion from Norfolk Coast Partnership to be included in action table to support and assist the action.]

**Broads Authority response:** Comment noted.

**Aspiration 5.3**

**North Walsham and Dilham Canal Trust**

Long term aims: Rebuilding of Honing Lock - Honing Lock is an important industrial artefact. Unique, in that it is the only canal lock within the B.A. executive area, and, as such provides an ideal restoration project. As well as its use for navigational purposes, a working lock could become an important educational resource and a distinct recreational attraction for gongoozlers. This could also offer opportunities under the Heritage Construction Skills Training Programme (as successfully being developed by the Grantham Canal Heritage Initiative and the Canal and River Trust on the four Woolsthorpe Locks) for volunteers, Young Rangers and employment.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 5.4**

**Norfolk Coast Partnership**

[Suggestion from Norfolk Coast Partnership to be included in action table to support and assist the action.]

**Broads Authority response:** Comment noted.

**Aspiration 5.4**

**Norfolk Coast Partnership**

[Suggestion from Norfolk Coast Partnership to be included in action table to support and assist the action.]

**Broads Authority response:**

**Aspiration 5.5**

**Ash, Mr J (BA Member)**

Include IBTC (International Boatbuilding and Training College) in key outputs and resources.

**Broads Authority response:** Comment noted.

**Aspiration 5.5**

**Broadland District Council**

We believe this is an important focus for ensuring that the right skills are available within the Broads area into the future and that opportunities are given to local people to fulfil local need.

**Broads Authority response:** Comments noted.



**Aspiration 5.5****North Walsham and Dilham Canal Trust**

Long term aims: Rebuilding of Honing Lock - Honing Lock is an important industrial artefact. Unique, in that it is the only canal lock within the B.A. executive area, and, as such provides an ideal restoration project. As well as its use for navigational purposes, a working lock could become an important educational resource and a distinct recreational attraction for gongoozlers. This could also offer opportunities under the Heritage Construction Skills Training Programme (as successfully being developed by the Grantham Canal Heritage Initiative and the Canal and River Trust on the four Woolsthorpe Locks) for volunteers, Young Rangers and employment.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 5.6****Norfolk Coast Partnership**

[Suggestion from Norfolk Coast Partnership to be included in action table to support and assist the action.]

**Broads Authority response:** Comment noted.

**Aspiration 6 (long term aims)****NFU East Anglia**

Responding to climate change will require a careful balance of intervention and allowing natural processes. In the context of the Broads the NFU supports an approach which seeks to retain the status quo of a predominantly freshwater system and we are encouraged that this is promoted in the plan's long-term aims.

**Broads Authority response:** Comments noted.

**Aspiration 6.1****Broadland District Council**

We fully support initiatives that increase awareness amongst residents and businesses with a view to reducing energy consumption. Schemes must be easy to access, practical, realistic and affordable for both homeowners and business owners.

**Broads Authority response:** Comments noted.

**Aspiration 6.1****Environment Agency**

I welcome this aspiration and the strategic action to develop and promote tailored climate smart mitigation and adaptation measures which would be guided by the output from any updated SFRA and water cycle studies.

**Broads Authority response:** Comments noted.

**Aspiration 6.1****Norfolk Coast Partnership**

[Suggestion from Norfolk Coast Partnership to be included in action table to support and assist the action.]

**Broads Authority response:** Comment noted.

**Aspiration 6.2****RSPB**

Unfortunately the RSPB is no longer involved with the current funding bid to research carbon capture in peatlands. In view of the changes that have taken place with this output it is suggested that the Broadland Catchment Partnership would be best placed as the lead delivery body.

**Broads Authority response:** Comment noted and text amended. The BA will lead on this action, with the Broadland Catchment Partnership supporting.

#### **Aspiration 7**

##### **British Association for Shooting and Conservation**

The British Association for Shooting and Conservation (BASC) recommends under 'Aspiration 7' a new section 7.5 as follows: Strategic actions: Promote shooting opportunities in the Broads, the value of shooting as a recreational resource. Key outputs: Establish links to local shooting clubs and individuals. Promote shooting opportunities such as wildfowling, game shooting, deer stalking and pigeon shooting. Resources: BASC and BASC affiliated clubs and syndicates. Indicators: Number of people taking part in shooting in the Broads. Reference: PACEC (2014) The Value of Shooting: The economic, environmental and social benefits of shooting sports in the UK, PACEC, Cambridge.

**Broads Authority response:** Your comments are noted. It is unlikely that the Broads Authority would promote specific shooting activities, businesses or clubs. However, BASC could perhaps make links with Broads Tourism, which has a wider promotional remit for the promotion of recreational activities in the Broads.

#### **Aspiration 7**

##### **Norfolk Coast Partnership**

Also, although I can't identify an appropriate specific strategic action under Aspiration 7 (Provide opportunities for distinctive recreational experiences in harmony with the special qualities of the area) we are engaged in work to manage the recreational impacts and maximise community benefits of people coming to see the grey seals at Horsey, which may also be relevant.

**Broads Authority response:** Comment noted.

#### **Aspiration 7**

##### **North Walsham and Dilham Canal Trust**

Raising the water level above Honing Lock, to bring a wider water corridor linking the Broads Authority waters with those of the Upper Canal at Ebridge - thus providing an open water corridor for wildlife, encouraging fish spawning and opening the waters to navigational users, public and disabled access.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

#### **Aspiration 7**

##### **North Walsham and Dilham Canal Trust**

Long term aims: The two previous aims regarding the re-building of Honing Lock and raising the water level above Honing Lock will require the building of a replacement spillway (possibly incorporating a fish ladder) at Honing. This, in conjunction with the sokes, would enable mitigation measures providing a faster flow of water than the canal, hence maintaining the stream biodiversity, as has been applied on the Upper Canal.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

#### **Aspiration 7 (context)**

**Norfolk County Council**

The GI team acknowledge that comments made on an earlier draft have been incorporated in to this document. However the GI team believe that one section still needs clarification. Under section F. Offering distinctive recreational experiences, paragraph 3 states “Walking is a particularly popular activity, but is threatened by significant reductions in local authority rights of way and footpath maintenance budgets”. The GI team do not think this reflects the true situation and would suggest that this needs some clarification. The Broads Authority area is well provisioned with long-distance trails, which include Angles Way, Weaver’s Way, and Wherryman’s Way.

There have been two recent additions to this with the establishment of Stretch 2 of the Norfolk/England Coast Path, bringing a National Trail to the Broads for the first time. Partnership between Norfolk County Council and the BA has led to Department for Transport capital funding for the creation of Three River’s Way phase 1 between Wroxham and Horning. All these represent significant investments. In addition to this capital investment, Norfolk County Council has secured revenue investment through Coastal Communities Fund for the provision of promotional events in the BA area and the establishment of promoted circular walks. A significant proportion of the public rights of way network in the BA Area is subject to a cutting contract. The BA used to work in partnership with Norfolk County Council to provide additional cutting for c. 300 miles of paths. The decision to end that provision was made by the BA. This has left a large hole in the maintenance provision that has been difficult to fill with reducing resources in Norfolk County Council.

**Broads Authority response:** Comments noted. We refer to long distance trails in the context (first para) but will emphasise it in para 3. The Broads Authority used to provide additional cutting for free, but like the NCC it has seen significant reductions in its resources and is unable to continue this provision. However, it is committed to working with Norfolk Trails and Norfolk Highways to prioritise cutting regimes.

**Aspiration 7 (context)****North Walsham and Dilham Canal Trust**

Short term aims: - The installation of Canoe portaging opportunities at Honing Lock, and the clearance of the area below the lock for the turning of small craft’.  
- Working with the Broads Angling Strategy Group, community groups and groups supporting people with disabilities to enhance their waterside and boating opportunities by providing disability friendly fishing platforms, wheely-boat access, a suitable head of water and fish ladders where possible (proposed in plan for a new spillway at Honing Lock).

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 7 (context)****RSPB**

The RSPB supports the HRA recommendation that the term ‘balance’ be replaced with ‘resolve’.

**Broads Authority response:** Comment noted and text amended.

**Aspiration 7 (context)****Suffolk Wildlife Trust**

Whilst we are also broadly supportive of theme F (Offering distinctive recreational experiences), we agree with the text in the ‘Context’ section regarding the need to balance the potential conflict between visitor activity which could damage fragile habitats or disturb wildlife with the provision of opportunities to access such places and appreciate their intrinsic value. As set out in the fundamental principles of the plan, a precautionary approach must be taken in such situations to ensure that there are no adverse impacts on biodiversity.

**Broads Authority response:** Comment noted.

**Aspiration 7 (focus)**

**North Walsham and Dilham Canal Trust**

Short term aims: Re-opening of the old footpath between Honing Lock and Dee Bridge, thus linking the Common Access areas below and above the lock, and enabling further links between footpaths 7, 13, 22 (Honing Parish) and the Weavers Way.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 7 (long term aim)****Norfolk Wildlife Trust**

Long term aim for recreation: It would be good for there to be reference to the need for recreational provision to help cater for predictions of population growth. This could be accompanied by an aim to provide further recreational space with low ecological value, in order to help deal with increased numbers of visitors.

**Broads Authority response:** Comments are more appropriate to the Broads Local Plan; reference to recreational need and provision will be made (as required) in that Plan.

**Aspiration 7.1****Broadland District Council**

We suggest that consideration must be given to sustainably maintaining the existing network to a high quality level before developing new schemes. We are concerned about the long-term implications on resources to properly maintain any new access facilities.

**Broads Authority response:** Comments noted. Although you may have done so already, we will pass the Council's comments to our Planning Policy Officer, who is preparing the Broads Local Plan.

**Aspiration 7.1****Great Yarmouth Borough Council**

3rd bullet point: Attention is drawn to the potential value of engaging with the Great Yarmouth Cycle Forum (hosted by the Borough Council) in ensuring opportunities for inter-connections/links and loops are maximised.

**Broads Authority response:** Comment noted.

**Aspiration 7.1****Norfolk Wildlife Trust**

We appreciate difficulties in resolving access at Cockshoot Broad but it does appear that the situation at that location conflicts with the Strategic Aim of 7.1. With regard to outputs we would like to explore the potential for new moorings at Upton Marshes near the pumping station. NWT could potentially contribute resources in relation to interpretation etc.

**Broads Authority response:** The Broads Authority is in discussion with NWT about this opportunity.

**Aspiration 7.1****North Walsham and Dilham Canal Trust**

Long term aims: Rebuilding of Honing Lock - Honing Lock is an important industrial artefact. Unique, in that it is the only canal lock within the B.A. executive area, and, as such provides an ideal restoration project. As well as its use for navigational purposes, a working lock could become an important educational resource and a distinct

recreational attraction for gongoozlers. This could also offer opportunities under the Heritage Construction Skills Training Programme (as successfully being developed by the Grantham Canal Heritage Initiative and the Canal and River Trust on the four Woolsthorpe Locks) for volunteers, Young Rangers and employment.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 7.2****Broadland District Council**

(Addition to comment on aspiration 7.1) Similarly improvements in riverside facilities should be carefully planned and the potential for charged services explored thoroughly before implementation.

**Broads Authority response:** Comments noted. Although you may have done so already, we will pass the Council's comments to our Planning Policy Officer, who is preparing the Broads Local Plan.

**Aspiration 7.2****Inland Waterways Association**

Some useful progress is being made on reinstating and improving services for boaters, and could be included in this focus 7.2. We welcome your aspiration to create range of new moorings/stopping places (including wild/quiet moorings) in priority locations and maintain the existing network but are concerned that over recent years there has been a loss of casual moorings due to flood defence work. We believe that where casual moorings are lost due to flood defence work it is imperative that these are replaced. There is a need for a wider range of moorings at locations that give access to historic attractions and facilities as well as secluded areas. We support the aspiration to improve small craft launch points and improve existing launch facilities but believe this must include secure parking facilities for towing vehicles and trailers. We were pleased to see some inclusion of mains electric power outlets and recharging facilities for electric boats, and low- carbon provision of power for leisure services on board moored boats, avoiding generator or main engine use in the future.

**Broads Authority response:** Comments noted. Erosion protection piling no longer required for flood protection purposes and removed had no formal status as moorings, and there is no obligation to replace these casual moorings. However the Broads Integrated Access Strategy prioritises mooring provision at locations where there are gaps in the network, and where they provide access to visitor destination points. The IAS also prioritises provision of launching facilities where there is adequate car /trailer parking.

**Aspiration 7.3****Broadland District Council**

We suggest that more use is made of technology/multimedia in promoting activities and events.

**Broads Authority response:** Comment noted. This is a strong focus under Aspiration 8 of the Plan.

**Aspiration 7.3****Great Yarmouth Borough Council**

Attention is drawn to the potential of engaging with the Great Yarmouth Tourism and Business Improvement District to promote some of these aims and projects.

**Broads Authority response:** Comment noted.

**Aspiration 7.3****RSPB**

The RSPB supports the HRA recommendation that additional text be included in the strategic objective to ensure risks to the natural environment are avoided.

**Broads Authority response:** Comment noted and text amended.

#### **Aspiration 7.5**

##### **Norwich & District Wildfowlers Association**

BASC recommends under “Aspiration 7” a new section 7.5 as follows: Strategic actions: Promote shooting opportunities in the Broads, the value of shooting as a recreational resource. Key outputs: Establish links to local shooting clubs and individuals. Promote shooting opportunities such as wildfowling, game shooting, deer stalking and pigeon shooting. Resources: BASC and BASC affiliated clubs & syndicates. Indicators: Number of people taking part in shooting in the Broads. References: PACEC (2014) The Value of Shooting: The economic, environmental and social benefits of shooting sports in the UK. PACEC, Cambridge.

**Broads Authority response:** Comments noted.

#### **Aspiration 8**

##### **Great Yarmouth Borough Council**

The Borough Council accepts the focus on supporting Broads tourism and promoting the Broads’ distinctive identity. There is, though, also potential for exploiting its proximity to the sea, both in terms of a destination area with a wider variety of experiences and facilities, and for the potential of drawing visits from some of the millions who come annually to Great Yarmouth and the other resorts in the Borough (and elsewhere).

**Broads Authority response:** Comments noted.

#### **Aspiration 8**

##### **North Walsham and Dilham Canal Trust**

Short term aims: The Trust would like the East Ruston Branch to be highlighted as a possible venue for smaller craft, bringing trade to the village and its pub.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

#### **Aspiration 8 (context)**

##### **Natural England**

On page 37, in the footnote, delete the erroneous bracket at the end of the sentence.

**Broads Authority response:** This footnote has been removed from the final version of the Plan.

#### **Aspiration 8 (context)**

##### **Norfolk and Suffolk Boating Association**

We commented on this section in the previous draft but our comment was misreported. We believe that, in the interests of accuracy, this bullet should read “The Broads has similar status to a National Park designated under the National Parks and Access to the Countryside Act 1949 but, in addition to the National Parks’ two purposes of conservation and promoting enjoyment, the Broads Authority has a third purpose of protecting the interests of navigation. As such it was established under a different Act of Parliament to the National Parks and has been known as a ‘member of the National Park family’. In 2015, the Broads Authority voted to brand the area as the ‘Broads National Park’ for marketing purposes.”

**Broads Authority response:** Your comments are noted; however, the wording "The Broads has equivalent status to a National Park"... (rather than "similar status") is approved by Defra and is used in our communications, including the branding strategy.

#### **Aspiration 8.1**

##### **Broadland District Council**

Improved presence and links on the Visit Norfolk website and linked marketing would be beneficial. Keeping local authorities engaged with tourism developments also important as added value could be achieved. We also feel it will be vitally important for the BA to raise its profile and accessibility to residents to discuss issues they may have and things that matter to them. Local authorities could also play a role in supporting the Broads Plan message through communities.

**Broads Authority response:** Comments noted.

**Aspiration 8.2****Broadland District Council**

Pleased to see improvements in multimedia as an action. The Broads National Park should lobby for investment to ensure broadband and 4G connectivity across the area is improved for visitors.

**Broads Authority response:** Comments noted. The Authority supports the 'Better Broadband' initiatives led by Norfolk and Suffolk County Councils (see Broads Plan action 9.1)

**Aspiration 8.2****Norfolk and Suffolk Boating Association**

We note with some concern that the "Result" listed under 9.1.2 in the first draft of the Plan (viz: "Yacht Stations maintained at Great Yarmouth and Norwich.") does not appear in the revised draft. We believe that the Plan should state a clear intention of maintaining the Yacht Stations and their associated facilities at Great Yarmouth, Norwich, Beccles and Oulton Broad. Similarly the Ranger presence at Reedham Quay should be maintained.

**Broads Authority response:** Maintenance of the yacht stations is included with action 8.2.

**Aspiration 8.2****Norfolk Wildlife Trust**

We are happy that NWT is listed as a lead partner in this action, as we have already renewed interpretation at Ranworth and will be improving visitor facilities at Hickling for Spring 2017.

**Broads Authority response:** Comments noted.

**Aspiration 8.3****Broadland District Council**

Use and promotion of the new Apprenticeship levy should be explored for Broads based businesses. Access to funding for training support should be improved in the National Park.

**Broads Authority response:** Comments noted.

**Aspiration 9****Norfolk County Council**

The County Council welcomes the inclusion of the references to sustainable development and reference could also be made that new housing and other development will be expected to contribute towards improving local services and infrastructure (such as transport, education; library provision, fire hydrant provision, open space etc.) through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via a s106 agreement / s278 agreement); or use of a planning condition/s.

**Broads Authority response:** Comments noted and context amended. These points are also addressed in the emerging Broads Local Plan.

### **Aspiration 9**

#### **RSPB**

The Aspiration should in the first instance “avoid” adverse impacts on the area’s special qualities. This is necessary as the term “minimise” implies that some adverse effects will be acceptable, but this would not be the case with the process set out in the Habitats Regulations. Mitigation measures could be implemented to minimise impacts to such a level that an adverse effect on site integrity is avoided but this is different to how the Aspiration is currently worded.

**Broads Authority response:** Comments noted and text amended.

### **Aspiration 9 (summary of current issues)**

#### **Great Yarmouth Borough Council**

1st bullet point: As currently drafted, the statement ‘Looking ahead the Broads faces challenges from planned new development and regeneration outside the executive area’ reads as unduly pessimistic and defensive. The Borough Council considers there are opportunities for the Broads, as well as challenges, from new development outside of the executive boundary. These could include accommodation for visitors to the Broads; facilities to encourage visiting boats; footpath and cycle links; accommodation of housing or business needs that might otherwise require or create pressure for unwelcome development in the Broads; (and as mentioned later in relation to green infrastructure) environmental enhancements (which might be provided either directly with development, or funded through it); etc.

2nd bullet point: The Broads contribution to quality of life in a wider area is touched on in this section. It would be good to add recognition that quality of life of an area can be an important attractor for businesses, and in this way the Broads makes a contribution to economic growth in the wider area.

**Broads Authority response:** Comments noted and text amended.

### **Aspiration 9 (summary of current issues)**

#### **Norfolk Wildlife Trust**

Summary of current issues: It would be useful for reference to be made to the large amount of new housing planned immediately adjacent to the Broads Executive Area, in order to put in context the number of houses in the Broads, in relation to the expected increased numbers of people that need to be connected with and inspired.

**Broads Authority response:** Comments noted and text amended.

### **Aspiration 9.1**

#### **Environment Agency**

An updated SFRA will support and guide site allocation. Pre-development advice can assist the delivery of development on specified sites, we note the option to make pre-application advice available. We are able to support this through our own charged for pre-development advice service.

**Broads Authority response:** Comments noted.

### **Aspiration 9.1**

#### **Great Yarmouth Borough Council**

2nd bullet point: The Borough Council supports the key output regarding identifying and promoting priority locations for improved broadband and mobile telephone coverage.



**Broads Authority response:** Comment noted.

### **Aspiration 9.1**

#### **Norfolk Wildlife Trust**

We appreciate that these actions refers to the Broads Local Plan. However, in our view clear reference should be made to mitigating the impacts of further recreational use in the Broads, owing to increased housing in Norfolk and adjacent counties. It would be useful to include a reference to the report on Visitor Surveys on European Sites that was carried out in 2015/16 on behalf of Norfolk local authorities, under the auspices of the Norfolk Biodiversity Partnership. Actions should include the need for green infrastructure provision on development sites, along with mechanisms for minimising impacts on designated nature conservation sites, within the Broads National Park. This could include an aspiration for exploring the potential to create new “country park(s)” on the fringes of the Broads.

**Broads Authority response:** Comments are more appropriate for the Broads Local Plan, rather than the Broads Plan; we will pass on your comments to the Planning Policy Officer.

### **Aspiration 9.1**

#### **RSPB**

The RSPB supports the development of strong local policy to ensure new development is sustainable and delivers net gains for the environment (e.g. paragraphs 109 and 118 of the National Planning Policy Framework (NPPF) makes this a requirement for developments or plans). Whilst the RSPB agrees that this should be delivered through the Broads Local Plan, it is disappointing that mention of a mechanism to provide biodiversity enhancement through development has been removed from the Broads Plan to account for all habitat and species impacts.

Living within environmental limits is an intrinsic requirement of sustainable development, important for biodiversity in its own right and also for the health and wellbeing of communities. It is recommended that the following text be added to the Strategic action: “...and ensure development occurs within environmental limits.” Such a statement would accord with the conclusions of the ‘Planning Naturally’ (2013) report produced by the RSPB, RTPI and CIEEM (available at: [http://www.cieem.net/data/files/Resource\\_Library/News/Planning\\_Naturally.pdf](http://www.cieem.net/data/files/Resource_Library/News/Planning_Naturally.pdf)). This report states that “...planning for biodiversity should be integral to every part of the planning process...” (p.2).

To secure such an approach within the Local Plan it is recommended that a strategy is developed that sets out clear design practices to guide the inclusion of biodiversity and green space enhancement within new development. The Exeter Residential Design Supplementary Planning Document (SPD) (available at: <https://exeter.gov.uk/planning-services/planning-policy/supplementary-planning-documents/residential-design-guide-spd/>) is an excellent example of how development and the environment can be integrated. Core principles of this SPD are:

Sustainable Design (e.g. maximise the potential for biodiversity and green infrastructure);

- Integrated landscape design (e.g. planting);

- Integrated biodiversity (e.g. the design and layout of new residential development will protect and enhance biodiversity on the site, and enhance connections between ecological features within and across the site. Existing areas and features of biodiversity value should be incorporated into the design and layout and wherever reasonably possible enhanced);

- Making connections (e.g. good pedestrian, cycle and public transport links);

-Services (e.g. service corridors identified at the start of the design process to avoid conflicts between existing and proposed trees).

- Energy and drainage (e.g. Sustainable Urban Drainage Systems (SUDS) must be integrated into the layout at the start of the design process).

Whilst acknowledging that the scale and type of development in the Broads differs from many Local Authorities, ensuring good design principles is still important and potentially more so given the importance for the Broads for habitats and wildlife and their links to tourism and health and wellbeing. The requirement that such a document be produced should be included in the first key output after “planning pre-application service.”

**Broads Authority response:** Comments noted. Text has been amended to refer to "environmental limits" under action 9.1. The Broad Local Plan is the appropriate mechanism to deal with biodiversity enhancements through development.

**Aspiration 9.2****Environment Agency**

I support the comprehensive approach to enhancing sites and the importance placed on green infrastructure.

**Broads Authority response:** Comments noted.

**Aspiration 9.2****Norfolk Wildlife Trust**

We appreciate that these actions refers to the Broads Local Plan. However, in our view clear reference should be made to mitigating the impacts of further recreational use in the Broads, owing to increased housing in Norfolk and adjacent counties. It would be useful to include a reference to the report on Visitor Surveys on European Sites that was carried out in 2015/16 on behalf of Norfolk local authorities, under the auspices of the Norfolk Biodiversity Partnership. Actions should include the need for green infrastructure provision on development sites, along with mechanisms for minimising impacts on designated nature conservation sites, within the Broads National Park. This could include an aspiration for exploring the potential to create new "country park(s)" on the fringes of the Broads.

**Broads Authority response:** Comments noted.

**Aspiration 10****Broads Angling Strategy Group**

Broads Angling Strategy Group has formed a partnership with Easton College and their Fishery Diploma students. This will create a sustainable set of angling coaches for the Norwich and Broadland area, to develop new youngsters into Angling. Could this be reflected in section 10?

**Broads Authority response:** Comments noted. We have added a reference to Fishing for Life as an example of a 'try it out' activity in action 10.1.

**Aspiration 10****Inland Waterways Association**

Aspiration10 would still benefit from having added to it: 'and its unique navigations'.

**Broads Authority response:** Comment noted. In this context, the navigation is assumed as part of the Broads environment.

**Aspiration 10.1****Broadland District Council**

Key to this is listening to what visitors and residents actually want. Should very much be led by, and with those that live and work in the Broads area. Real and sustained communications across all organisations with an interest in the Broads need to be improved.

**Broads Authority response:** Comments noted.

**Aspiration 10.1****RSPB**

Just a couple of changes that need to be made to the Broads Plan as a result of changes to RSPB projects. Second one is on page 42, entry 10.1, second box. Can you remove the Wild Heart of the Broads, RSPB entry? We have just been through an investment appraisal process which has identified that our Wild Heart project would not achieve a return on investment so the project has stopped. We will endeavour to fund the higher priority actions independently.

**Broads Authority response:** Comments noted and text amended.

**Aspiration 10.1****RSPB**

Unfortunately the RSPB has had to stop developing the Wild heart of the Broads project and this project should be removed from the plan.

**Broads Authority response:** Comment noted and text amended.

**Aspiration 10.2****Broadland District Council**

Key to this is listening to what visitors and residents actually want. Should very much be led by, and with those that live and work in the Broads area. Real and sustained communications across all organisations with an interest in the Broads need to be improved.

**Broads Authority response:** Comments noted.

**Aspiration 10.2****North Walsham and Dilham Canal Trust**

Long term aims: Rebuilding of Honing Lock - Honing Lock is an important industrial artefact. Unique, in that it is the only canal lock within the B.A. executive area, and, as such provides an ideal restoration project. As well as its use for navigational purposes, a working lock could become an important educational resource and a distinct recreational attraction for gongoozlers. This could also offer opportunities under the Heritage Construction Skills Training Programme (as successfully being developed by the Grantham Canal Heritage Initiative and the Canal and River Trust on the four Woolsthorpe Locks) for volunteers, Young Rangers and employment.

**Broads Authority response:** Under action 4.1, and through the Broads Integrated Access Strategy, we will be developing opportunities to expand or extend navigable water space, including North Walsham and Dilham Canal.

**Aspiration 10.4****Great Yarmouth Borough Council**

The Borough Council supports these measures 'offering inspiring opportunities for young people, including those from disadvantaged backgrounds', and is keen to understand the involvement of schools in Great Yarmouth in them.

**Broads Authority response:** Comments noted. More information on education and outreach is in the Broads Education Strategy 2017-22, to be implemented in April 2017.

**Aspiration 10.5****Broadland District Council**

Schemes could also be developed with The Princes Trust and Duke of Edinburgh Awards that could add real value to supporting employment in the Broads and have the potential to attract those from disadvantaged backgrounds.

**Broads Authority response:** Comments noted.

**Aspiration 10.5****Great Yarmouth Borough Council**

The Borough Council supports these measures 'offering inspiring opportunities for young people, including those from disadvantaged backgrounds', and is keen to understand the involvement of schools in Great Yarmouth in them.

**Broads Authority response:** Comments noted. More information on education and outreach is in the Broads Education Strategy 2017-22, to be implemented in April 2017.

**Appendix B****Norfolk Coast Partnership**

If you wish to, therefore, I would be happy for the Norfolk Coast Partnership to be recognised as partners in these actions, although I suggest that the abbreviation used in the action tables and Appendix B should be NCP.

**Broads Authority response:** Comments noted and amendments made to text.

### Appendix C

#### Environment Agency

There is still some work required to agree the indicators that will be used in the State of the Park monitoring. It would be useful to understand the mechanism for collating this information and frequency of production of any reports at an early stage so that we can assess our ability to make this information available in the required format. In our last submission I mentioned that we would be able to provide annual updates of the ecological status of Broadland water bodies. We are now be moving to three yearly status updates post 2016 although the data used to derive the annual status will still be collected and available in its raw format. If this is likely to cause a problem, I would urge you to contact me at your earliest convenience.

**Broads Authority response:** EA's support is noted. The State of the Park indicator set will be further developed.

#### Habitats Regulations Assessment

##### Abrehart Ecology Ltd

On the HRA - page 38, there is mention of Desmoulins Whorl Snail but not of Little Whirlpool Ramshorn Snail *Anisus vorticulus* - added to SAC in 2011. If it can be included that would be great.

**Broads Authority response:** Comment noted and HRA text will be amended.

#### Habitats Regulations Assessment

##### Broadland District Council

Furthermore, para 1.22 of the HRA for the Broads Plan 2017 which acknowledges that 'the Tourism Plan should be subject to Habitats Regulation Assessment irrespective of its non-statutory nature' is in line with previous comments submitted by the council.

**Broads Authority response:** Comments noted. The Sustainable Tourism Strategy has been subject to its own HRA.

#### Habitats Regulations Assessment

##### Natural England

Natural England is satisfied that the Habitats Regulations Assessment (HRA) provides a detailed and comprehensive assessment of the likely significant effects of the Plan on European sites and meets the requirements of the Conservation (Habitats & Species) Regulations 2010 as amended. Natural England agrees with the conclusion of the HRA, made in Section 4: Conclusions that, provided the recommended modifications (in Appendix 4) are made in full, the Plan is unlikely to have a significant effect on European sites and hence an Appropriate Assessment (AA) is not required at this time. This conclusion has been made largely on the basis that the proposals within the Plan are high level and do not provide any quantifiable details on location, scale, extent or type of project. As acknowledged in the HRA, we reiterate that it is critical that any subsequent projects (and potentially lower-tier plans) have regard to the recommendations of this Plan HRA and are themselves assessed through the HRA process as necessary.

**Broads Authority response:** Comments noted. As you note, the more detailed projects arising from the high level Broads Plan objectives will be assessed through the HRA process as necessary.

## Habitats Regulations Assessment

### RSPB

Having reviewed the accompanying Habitats Regulations Assessment (HRA), we note the conclusion of “no likely significant effect” subject to some additional amendments to text in the following sections: ‘The Broads Plan’, 1.3, 3.1, 3.2, 4.2, 7 (context & long term aim), 7.1, 7.2, 7.3. We support the recommendations set out in Appendix 4 of the HRA. In addition, we note the repeated recognition that project level HRA will be required (as identified for Sections 1.2, 4.1, 5.1-5.4, 5.6, 7.4, 9.1, 10.1, 10.3 of HRA Appendix 4). We recommend that this point be included in the

‘Assessment and Monitoring’ section of the plan (p.10) to ensure the position is made clear about project requirements during the plan period.

**Broads Authority response:** Comments noted and text amended.

## Sustainability Appraisal

### Historic England

We have carefully reviewed the Sustainability Report and are satisfied that the methodology within it allows a full and proper consideration of any impact to the historic environment and that this has carried through to the Local Plan document itself.

**Broads Authority response:** Comments noted.

## Sustainability Appraisal

### Natural England

We are satisfied that the methodology and baseline information used to inform the appraisal appears to meet the requirements of the Strategic Environment Assessment (SEA) Directive [2001/42/EC] and associated guidance. The environmental interest within our remit appear to be covered within the Sustainability Appraisal (SA) objectives.

We note there remains an 'uncertain impact' on the SA objective to protect and enhance the natural environment including biodiversity and geodiversity (ENV3) under:

- Aspiration 3: 3.3 Removing sediment from the Broads system and accelerating sediment removal; and
- 10.1 and 10.4 of Aspiration 10: Strengthen connections between a wide audience, particularly local communities and young people, and the Broads environment.

Also there remains 'uncertain impact' on the SA objective to conserve and enhance the quality and local distinctiveness of landscapes and towns/villages (ENV4) under:

- 6.1 of Aspiration 6: Building the awareness and adaptive capacity of local communities to the challenges of climate change and sea level rise; and
- 9.2 of Aspiration 9: Facilitate the sustainable development growth within and adjacent to the Broads, while minimising adverse impacts on the area's special qualities.

Hopefully these uncertainties will be addressed at the more detailed project level in due course, once more information becomes available.

**Broads Authority response:** Comments noted. As you note, the more detailed projects arising from the high level Broads Plan objectives will be subject to the sustainability appraisal process as necessary.

## Sustainability Appraisal

### RSPB

The phrase “unacceptable adverse impacts” should be reviewed. Adverse is used to denote a harmful or unfavourable action. It is unclear how such actions could be considered acceptable within a protected landscape. We recommend amending to “adverse impacts” or reviewing to ensure the intended meaning is made clear.

**Broads Authority response:** The wording used is consistent with the Sustainability Appraisal for the Broads Local Plan and, as it relates to landscape impacts, is considered to be appropriate.