

Ref	Name	Organisation	Comment	BA response	Amendments
#1	Laura Mundy	East Suffolk Council	The Literature Review at Appendix 2 does not appear to include the local plans of neighbouring authorities. Whilst there is mention of the relevant authorities in the main body of the text, it may be worth including those plans within Appendix 2 for completeness. The key plans that we are aware of are: <ul style="list-style-type: none"> <li>• Great Yarmouth Local Plan Part 1 (includes Core Strategy 2013-2030). Part 2 currently under preparation;</li> <li>• East Suffolk Council- Waveney Local Plan (2018-2036);</li> <li>• Greater Norwich Local Plan, Submission Version (2021);</li> <li>• Joint Core Strategy for Broadland, South Norfolk and Norwich (2014);</li> <li>• South Norfolk Local Plan Site Allocations Document (2015);</li> <li>• South Norfolk Local Plan Development Management Policies Document (2015);</li> <li>• Broadland District Council Development Management DPD (2015);</li> <li>• Broadland District Council Site Allocations DPD (2016);</li> <li>• North Norfolk District Council Core Strategy and Development Management Policies (2008);</li> <li>• North Norfolk Site Specific Allocations DPD (2011).</li> </ul>	We are of course aware of these documents. A separate piece of work will be assessing them as we produce the policies. We will wait a few months to produce this piece of work as we are aware of the examination into the Greater Norwich Local Plan, the GYBC Local Plan will soon be adopted and the next round of consultation on the NNDC Local Plan is expected by the end of the year.	In future SA, include link to separate piece of work that assesses the Local Plans that are relevant to the Broads in detail.
#2	Laura Mundy	East Suffolk Council	In addition to the Local Plans listed above, there are several other locally specific documents that we have picked up through our scoping exercises that you may want to also consider including in Appendix 2 (see also response to Q3): <ul style="list-style-type: none"> <li>• Norfolk Ambition 'The Community Strategy for Norfolk', 2003-2023 (refreshed in 2008);</li> <li>• Great Yarmouth Local Air Quality Management Review, ongoing;</li> <li>• Great Yarmouth Strategic Flood Risk Assessment, 2017;</li> <li>• Great Yarmouth Landscape Character Assessment, 2008;</li> <li>• Suffolk's Local Transport Plan, 2011-2031;</li> <li>• Transforming Suffolk Community Strategy 2008-2028;</li> <li>• Suffolk Growth Strategy, 2013;</li> <li>• Suffolk's Inclusive Growth Framework – updated Nov 2020;</li> <li>• Suffolk Health and Wellbeing Strategy 2012-2022 (Strategy Refresh 2019-2022);</li> <li>• Suffolk Climate Change Partnership - Suffolk Climate Action Plan 3, 2017;</li> <li>• Suffolk Biodiversity Action Plan, 2012;</li> <li>• Suffolk Flood Risk Management Strategy, March 2016;</li> <li>• Suffolk Minerals and Waste Local Plan, 2020;</li> <li>• Suffolk Historic Landscape Characterisation Map;</li> <li>• East Suffolk Tourism Strategy, 2017-2022;</li> <li>• Suffolk Local Authorities – Air Quality Management and New Development, 2011;</li> <li>• Suffolk Coastal and Waveney SFRA, 2018;</li> <li>• Waveney District Council Water Cycle Study, 2017;</li> <li>• East Suffolk Housing Strategy 2017-23;</li> <li>• Waveney District Council Landscape Character Assessment, 2008;</li> <li>• Environment Agency East Suffolk Abstraction Licencing Strategy, 2020;</li> <li>• Environment Agency Catchment Flood Management Plan East Suffolk (CFMPs), 2009;</li> <li>• Suffolk Shoreline Management Plan – Lowestoft Ness to Felixstowe Landguard Fort (2015);</li> <li>• Kelling to Lowestoft Ness Shoreline Management Plan (SMP) (2012);</li> <li>• Environment Agency River Basin Management Plan for the Anglian River Basin District (2016).</li> </ul>	Noted. We will assess relevant documents in the next version of the SA.	Assess documents as part of the next version of the SA.
#3	Laura Mundy	East Suffolk Council	The list provided on pages 10 & 11 of the draft Scoping Report adequately describes the special qualities of the Broads. You may, however, want to add reference to 'dark skies' against h). Dark skies are picked up as a strength in the SWOT analysis and in the SA framework, therefore including refence here would ensure consistency.	Noted. We will consider this amendment.	Consider adding dark skies to the special qualities.
#4	Laura Mundy	East Suffolk Council	We welcome and the baseline chapter as a comprehensive overview of the existing environmental, economic and social characteristics of the area. You note in the introduction to this section that much of the data is based on the 2011 Census and that future SA reports will take account of the 2021 Census. For clarity, you may also want to note here that many of the census date refers to 'Waveney' which no longer exists as a local authority.	Noted, but the Waveney and Suffolk Coastal data is the only Census data that exists at the moment. It is presumed that the 2021 Census Data will relate to the East Suffolk area and therefore will be included in future Sustainability Appraisals.	No change.
#5	Laura Mundy	East Suffolk Council	Within the Baseline chapter there are references to some documents that do not appear within the Literature Review. These are: <ul style="list-style-type: none"> <li>• Page 19- Reference is made to the Broadland Rivers Catchment Flood Management Plan. However, this is not included in the literature review.</li> <li>• Page 19- Reference is made to the Broadland Rivers Catchment Abstraction Management Strategy. However, this is not included in the literature review.</li> <li>• Pages 4, 5, 9, 12, 19 and 20- Reference is made to the Natural Capital Evidence Compendium for Norfolk and Suffolk (2020). However, this is not included in the literature review.</li> <li>• Pages 22 and 23- Reference is made to the STEAM Report. However, this is not included in the literature review.</li> </ul>	Noted. Will include these in the literature review for the next version of the SA.	Include these documents in the next version of the SA Literature Review.
#6	Laura Mundy	East Suffolk Council	No significant comments on this section, there is however a small typo at the end of t) '-compendium8'.	Noted. That is a footnote reference and should be superscript.	Amend in next version of the SA.
#7	Laura Mundy	East Suffolk Council	The SA Objectives reflect the identified characteristics, baseline data, and SWOT analysis. The following comments relate to the decision-making criteria set out in Appendix 5 of the draft Scoping Report. ENV1 - Could include cycling distance from key services. ENV5 - Could make reference to flood risk, specifically that arising as the result of climate change. ENV7 - Could reference contaminated land. Should consider agricultural land quality. ENV8 - Should consider potential increases in waste production. ENV10 - Could include reference to residential amenity SOC4 - Should also consider specialist housing. SOC6 - Could include cycling distance from key services.	ENV1 - agreed ENV5 - ENV6 covers flood risk adequately ENV7 - agreed ENV8 - consider this is covered adequately in the framework ENV10 - agreed SOC4 - agreed SOC6 - agreed	ENV1 - add cycle distance to decision making questions. ENV5 - no change ENV7 - include contaminated land and agricultural land quality ENV8 - no change ENV10 - add reference to amenity SOC4 - add reference to older persons and specialist housing SOC6 - add cycle distance to decision making questions
#8	Liam Robson	Environment Agency	This is generally adequate. This would benefit from a basic map showing an outline of the of the area boundary, to help with interpretation of other maps shown, such as in appendix 3.	Agreed.	Include map of the area of the Broads in next version of SA.
#9	Liam Robson	Environment Agency	In regards to Appendix 3a – the baseline data shown here is comprehensive but would benefit from explanation of some terms such as 'meeting PSA target' in table 1, and 'wasted peat' in map 4.	Agreed.	Ensure terms are explained in future documents.

#10	Liam Robson	Environment Agency	In regards to Appendix 3a – 'WFD Ecological Status 2013' is mentioned – this sentence needs updating, as 2019 status is available (as in map 7).	Agreed.	Update reference.
#11	Liam Robson	Environment Agency	In regards to Appendix 3a –There is a paragraph mentioning phosphate specifically and this could be updated and have a map too to show that many waterbodies do meet WFD P status.	Agreed.	Update and include map.
#12	Liam Robson	Environment Agency	Appendix 2 is very comprehensive but also need to give consideration to water cycle studies, such as the Greater Norwich WCS which is updated / being updated in 2021.	Noted. We will assess relevant documents in the next version of the SA.	Assess documents as part of the next version of the SA.
#13	Liam Robson	Environment Agency	Please refer to the latest climate change guidance and allowances available on the following link: <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a> This has recently been updated.	Noted	Will include in the literature review section.
#14	Liam Robson	Environment Agency	As you are aware the Environment Agency are working with the Broads Authority to deliver the Broadlands Futures Initiative. This will be an important piece of work in understanding the longer term management of the Broads. We are pleased to note that the BFI will inform the Local Plan as and when the information becomes available.	Noted	No change.
#15	Liam Robson	Environment Agency	As part of the BFI the Environment Agency are reviewing and updating the hydraulic modelling for fluvial, tidal and coastal flooding relevant to the Broads area. This work is underway, but due to the size of the project it is not due to be completed for some time (around the end of 2023). As well as informing the BFI this modelling will update our understanding of flood risk to communities in the Broads and help us identify locations where flood risk management could be improved this includes communities such as Geldeston, Dockeney and Gillingham. Other communities may be identified as part of this modelling.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#16	Liam Robson	Environment Agency	The Environment Agency are also currently working on the following flood risk management projects in the Broads Authority area.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#17	Liam Robson	Environment Agency	<b>Great Yarmouth flood defences Project</b> The Environment Agency is currently delivering the Great Yarmouth flood defences Epoch 2 (2016 –2021) project to refurbish and improve approximately 4km of flood defences and the supporting quayside in the town to help manage the flood risk to around 2000 homes and 700 businesses. Epoch 3 (2021-2026) is at an early stage of business case development. A substantial amount of partnership funding will again need to be secured in order for this project to progress as planned. Partners are beginning work to identify funding sources for Epoch 3 and to identify a sustainable income stream to meet future investment required to manage flood risk to the town.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#18	Liam Robson	Environment Agency	<b>Beccles Flood Risk Management Project</b> We are in the early stages of a project to investigate ways to reduce the number of people and properties at risk of flooding from the River Waveney in Beccles. We have undertaken an 'initial assessment' report which produced a number of potential ways to improve the management of flood risk in Beccles. Options include: Maintaining the existing flood wall but replacing the flood boards with flood gates. Individual Property Flood Resilience (PFR) measures ie. flood doors or barriers, air brick covers. We will be undertaking a number of surveys and additional assessments of the existing defences in Beccles. This along with information from the flooding in December 2020 will help to inform the projects next steps.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#19	Liam Robson	Environment Agency	<b>Bungay Flood Risk Management Project</b> We are in the early stages of a project in Bungay. We are updating our flood risk model of the River Waveney to help improve our understanding of flood risk in Bungay and the surrounding area. This update will use information obtained from the December flood event to make the modelling as representative as possible. This modelling will help inform an 'initial assessment' to explore options to manage the flood risk, working with the community and our partners, such as East Suffolk Council, Suffolk County Council and Norfolk County Council.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#20	Liam Robson	Environment Agency	We are pleased to note that consideration will be given to the need to review the SFRA. Guidance on when to update your SFRA is available on the following link: <a href="https://www.gov.uk/guidance/local-planning-authorities-strategic-flood-risk-assessment#when-to-review-or-update-your-sfra">https://www.gov.uk/guidance/local-planning-authorities-strategic-flood-risk-assessment#when-to-review-or-update-your-sfra</a>	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#21	Liam Robson	Environment Agency	The modelling used to inform the previous SFRA relevant to the Broads Authority area has not been updated since the SFRA's publication. As mentioned above the majority of the models will be updated by the modelling supporting the BFI. Please see the table below for more details. <Table is at Appendix B>	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#22	Liam Robson	Environment Agency	Please note the table above only details the models which cover the Broads Authority area. The previous SFRA covered several LPA districts so more models were used than listed above. Some models outside of the Broads Authority area have been updated since its publication. This will mean other authorities will have new flood risk models available to update the SFRA. Should the SFRA be updated consideration will need to be given to how to do this due to the cross over with other authority areas.	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#23	Liam Robson	Environment Agency	In addition to updated modelling you should also consider the updated climate change allowances and guidance provided in the hyperlink above. Since the SFRA was published our climate change guidance and the allowances for fluvial flooding and sea level rise have been updated. Our modelling does not currently reflect these changes. Therefore there is an option for you to update the SFRA to ensure it considers the latest climate change guidance. However the new climate change allowances will be incorporated in the model updates undertaken as part of the BFI work, so you could wait until the modelling we are undertaking is completed.	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#24	Liam Robson	Environment Agency	In determining whether to update the SFRA it is important to understand if the local plan review will involve changing or updating the current development allocations. This will dictate if an assessment against fluvial, tidal and coastal flood risk is required and therefore if the SFRA should be updated. If allocations are in flood risk areas you are likely to need an updated evidence base to consider the latest climate change. This would need to be updateable in the future so it can consider our new modelling for the Broads and coast once it is complete.	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#25	Liam Robson	Environment Agency	ENV2 In relation to policy ENV2, we would recommend revising as follows: To safeguard a sustainable supply of water, to protect and improve water quality, and to use water efficiently. The addition of the word 'protect' covers the requirements of water framework directive to protect and prevent deterioration.	Agreed.	Change ENV 2 to: To safeguard a sustainable supply of water, to protect and improve water quality, and to use water efficiently

#26	Liam Robson	Environment Agency	ENV 5. It would be good if the document could include the word resilient in this objective. It's similar to the word adapt but it is more consistent with the wording in EA2025 and other government policy which aims to help communities to become more resilient to a changing climate. Suggestion for ENV5 SA Objective wording: To adapt, become resilient and mitigate against the impacts of climate change. The decision criteria question could be: Will the plan help communities become more resilient and adapt to the impacts of climate change?	Agreed.	Change ENV5 to: To adapt, become resilient and mitigate against the impacts of climate change and add Will the allocation/policy/strategic action help communities become more resilient and adapt to the impacts of climate change to the decision making questions.
#27	Liam Robson	Environment Agency	ENV6 – The decision making criteria are a little muddled and repetitive please see ideas below. <input checked="" type="checkbox"/> Bullet point 1 could be changed to: Will the plan guide inappropriate development away from flood risk areas? <input checked="" type="checkbox"/> Bullet point 2 could be changed to: Does the plan ensure that where development in flood risk areas is permitted, the risks to people and property are managed/mitigated? <input checked="" type="checkbox"/> Bullet point 4 implies development should be located in the areas at highest risk of flooding? Development should be located in areas at lowest risk. <input checked="" type="checkbox"/> Bullet point 7 – This could be changed to: Will the plan consider the risk of flooding to communities/allocations both now and in the future taking account of climate change? <input checked="" type="checkbox"/> Bullet point 13 – Could this be changed to consider flood risk in general and not just the coast. We would not want the local plan to impact future flood risk management projects/schemes or impact on the outcome of the BFI. Could it be changed to: Does the policy affect opportunities for future flood and coastal risk management? <input checked="" type="checkbox"/> Bullet point 14 – As above could this be changed to: Does the allocation/policy/strategic action restrict choice for managing flood risk and the coast in the future?	Agreed.	Decision making criteria amended to reflect these comments.
#28	Ian Robinson	RSPB	Page 11 3.7 – Water. Last sentence is inaccurate. Deficiency is affecting the entirety now and isn't just a factor which may affect the Broads during peak tourist season, influx during this season will only exacerbate the problem.	Agreed.	Will amend this section to reflect this comment.
#29	Ian Robinson	RSPB	Page 18 3.9 – the statement 'parts of the Yare Broads and Marshes are unfavourable due to excess water levels – this doesn't align with the unit condition assessment.	Noted.	Will check the assessment and amend as required.
#30	Ian Robinson	RSPB	In addition need to state the pattern of inundation/rainfall is changing and species are unable to adapt to these changes.	Noted.	Will add this to the text.
#31	Ian Robinson	RSPB	Consideration needs to be given to translocating species ahead of any irreversible changes resulting from climate change or sea level rise. Follow up comment:  If species such as fen orchid or any of the 66 species which are found exclusively in the Broads and which have been the subject of conservation action and management for many years were deemed worthy of protection organisations and protected landscape should consider how to maintain populations in the short term. Part of that approach would need to be ensuring management is optimal to at least maintain and ideally increase numbers.  In parallel there needs to be planning and input from statutory agencies (e.g. NE, EA, BA) as well as NGO's and landowners regarding how to deal with species which have niche requirements (like fen orchid) and which would be difficult to maintain in situ (in the face of climate change and sea level rise).  The decision might be one of maintain with the ultimate view that the species will ultimately be lost, or it may be maintain with the aim of finding alternative sites further inland which could become sites able to accept species in the Broads under threat, and which have suitable conditions to support successful translocation.  The point I was trying to make is to start considering these issues now and looking for potential donor sites and planning in advance of irreversible changes. It really requires a partnership approach and where a species is championed by an organisation that organisation should act as lead supported by others.  There will also be a need to communicate the likelihood of change, along the lines that Broadland Futures Initiative and Water Resources East are doing.	The Broads Authority have been discussing actual species translocation, species translocation via habitat connectivity with partners for decades and have supported several active projects within the Broads. We are supporting BFI who are reviewing salinity and hydrological connection to assess climate change or sea level rise risk factors. Our Biodiversity Audit outlines some of this risk.	No change to document, but will consider this comment as produce the Local Plan for the Broads and Broads Plan.
#32	Ian Robinson	RSPB	General Comment – a lot of the maps are useful but the resolution is too fine and makes it difficult to make use of them/see detail	Noted. These were how the maps were sent to us.	Will liaise with data provider about ways to present data in future iterations of the SA.
#33	Ian Robinson	RSPB	Page 23 STEAM report Fig 4 – acronyms need clarifying. The information provided is useful but is hard to interpret	Noted. In future iterations, will provide some explanation.	In future versions, explain the STEAM data.
#34	Ian Robinson	RSPB	Page 32 Map 16 – relevance. Much of the dark blue area is farmland and has negligible issues related to housing. The map provides a disproportionate assessment of reality.	LSOAs (Lower-layer Super Output Areas) are small areas designed to be of a similar population size, with an average of approximately 1,500 residents or 650 households. The issue may be as to how much of a LSOA is actually within the Broads, and the recently completed Indices of Multiple Deprivation Topic Paper shows things in more detail and provides estimates of the amount of a LSOA that is within the Broads.	No change.
#35	Ian Robinson	RSPB	Page 39 Map 17 Page 40 Map 18 and Page 43 Map 19 – of very little use due to there being too much information crammed into a very small area. Might be better to provide a link to enable interpretation with better resolution	Noted. These were how the maps were sent to us.	Will liaise with data provider about ways to present data in future iterations of the SA.
#36	Ian Robinson	RSPB	Page 44 Map 20 – don't understand the relevance of this map, needs context	As stated in the report, this map shows incidences of crime near to the Broads in Norwich along the banks of the River Wensum.	No change.
#37	Ian Robinson	RSPB	Page 14 etc 6.4 – opportunity. Add 'educate residents in and adjacent to the National Park in wiser, more sustainable use of water resource.'	Comment noted. Whilst the BA does have an education function, that tends to be more in relation to school children rather than home owners. We think that Essex and Suffolk Water and Anglian Water Services are best placed to deliver such education.	No change.
#38	Ian Robinson	RSPB	Page 19 8.4 – are the timescales fixed? I wonder if there could be alignment with Shoreline Management Plan terminology and use of the timescales used therein e.g. short=0-25 years, medium=25-50 years, long= 50-100 years.	Various other Suffolk and Norfolk LPAs and National Park Authorities were asked what timescales they use in their SA and the timescales as set out in the SA Scoping Report seem to be common.	No change.
#39	Ian Robinson	RSPB	8.8 – does the word cumulative mean the same as in-combination	In combination would be the correct term for HRA, but this is SA. Note that 8.9 relates to synergistic effects and that is like in combination.	No change.
#40	Ian Robinson	RSPB	Page 39 – ENV2 – misses the main factor namely use of/demand for water by householders is too high and unsustainable	Point noted and that is inferred in the wording that relates to the zone being in deficit.	No change.
#41	Ian Robinson	RSPB	ENV3 – add physical management and maintenance of habitats	Agreed.	Add this to decision making criteria for ENV3.

#42	Ian Robinson	RSPB	ENV5 -add impact of shoreline management plans.	More relevant to ENV6 - agree and add that to decision making criteria.	Amend decision making criteria for ENV6: Does the allocation/policy/strategic action affect the shoreline management plan?
#43	Andrew Marsh	Historic England	<p>We recommend that the special qualities of the Broads, point 'J' is renamed 'Historic Environment'. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage, and both designated and non-designated heritage assets. Point 'J' should then list heritage asset using terminology consistent with the NPPF, namely:</p> <ul style="list-style-type: none"> <li>• Listed Buildings</li> <li>• Scheduled Monuments</li> <li>• Conservation Areas</li> <li>• Registered Parks and Gardens</li> <li>• Registered Battlefields</li> <li>• Protected Wrecks</li> <li>• Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings</li> <li>• Heritage at Risk</li> </ul>	Agree with the change to the text. The list could be included as a footnote.	Amend point j to Historic Environment and add list as a footnote.
#44	Andrew Marsh	Historic England	We welcome the identification of sustainability issues and problems set out in section 6, particularly those related to the historic environment, and are particularly pleased to see reference within the section to setting, archaeology, waterlogged heritage, and heritage at risk.	Support noted.	No change.
#45	Andrew Marsh	Historic England	We are however disappointed that no opportunities have been identified in relation to / for the historic environment, for example are does the Plan offer any opportunities to tackle heritage at risk, or to improve access to and appreciation of heritage assets?	The SWOT analysis does not relate just to the Local Plan. It is a SWOT analysis of the area. That being said, comment noted and working with the Historic Environment Manager, we will include the opportunities, for example the Water Mills and Marshes work.	Incorporate opportunities relating to heritage and the historic environment into the SWOT analysis.
#46	Andrew Marsh	Historic England	We very much welcome the Sustainability Appraisal Objectives set out within section 7.1, particularly Objective ENV9, 'To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings'. Overall the objectives demonstrate an integrated approach to the conservation and enhancement of the historic environment which sees the interrelationship between conservation and other spatial planning goals recognised within several different policies rather than in isolation.	Support noted.	No change.
#47	Andrew Marsh	Historic England	We look forward to engaging with you as these proposals progress over the coming months. Finally, we should like to 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 (either as a result of this consultation or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.	Noted.	No change.