

Broads Local Plan  
Issues and Options  
Sustainability Appraisal  
July 2022

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# 1. Introduction

The Issues and Options identifies issues in the Broads Authority which the Local Plan could seek to address. It is the first stage of the Local Plan production. The options range from no policy or minimal intervention to more significant intervention. At this stage, policy content is not included; this is for the subsequent stages of the Local Plan.

The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) be undertaken for plans such as Local Plans. The term “sustainability appraisal” is used to describe a form of assessment that considers the social, environmental and economic effects of implementing a particular plan or planning policy document. It is intended that the SA process helps plans meet the objective of contributing to the achievement of sustainable development. The results of the sustainability appraisal will inform the Authority’s decisions on the Local Plan, and the planning inspector’s judgement on the Local Plan’s legal compliance and soundness.

## 2. The SA Scoping Report

This Scoping Report<sup>1</sup> forms the starting point for a process of sustainability appraisal which will guide the evolution and assessment of the Broads Local Plan. A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the Local Plan being assessed.

This Scoping Report sets the context and objectives, establishing the baseline and decides the scope. It:

- a) Identifies other relevant policies, plans and programmes and sustainability objectives;
- b) Collects baseline information;
- c) Identifies sustainability issues and problems;
- d) Develops the sustainability appraisal framework; and
- e) Consults the consultation bodies on the scope of the sustainability report.

The Scoping Report was consulted on between 23 July 2021 and 27 August 2021. The Authority consulted Natural England, English Heritage and Environment Agency as well as the RSPB, New Anglia LEP, Norfolk and Suffolk Nature Recovery Partnership, and the Marine Management Organisation, Norfolk and Suffolk County Council, Broadland, Waveney, South Norfolk and North Norfolk District Councils, Great Yarmouth Borough Council and Norwich City Council.

The scoping report was generally well received. Some comments were received and these are set out at [Appendix 1](#).

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<sup>1</sup> <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

### 3. Baseline

The baseline that was set out in the SA Scoping Report has been updated. This is at [Appendix 2](#).

#### Map 1: Broads Authority Executive Area

Map 1 © Crown copyright and database rights 2016. Ordnance Survey 100021573  
A map of the Broads with more information is on p2 of [Broadcaster 2022 by Countrywide Publications](#)



### 4. Literature Review

There is a comprehensive review of relevant studies in the SA Scoping Report. The documents assessed as part of that report are listed in [Appendix 3](#). Appendix 3 also includes additional documents that have been assessed for this version of the SA.

## 5. Sustainability Appraisal Framework

The Sustainability Appraisal Objectives are as follows. Decision making questions are included at [Appendix 4](#).

### Environmental SA Objectives

ENV1: To reduce the adverse effects of traffic (on roads and water).

ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.

ENV3: To protect and enhance biodiversity and geodiversity.

ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.

ENV5: To adapt, become resilient and mitigate against the impacts of climate change

ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.

ENV7: To manage resources sustainably through the effective use of land, energy and materials.

ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.

ENV9: To conserve and where appropriate enhance the cultural heritage, historic environment, heritage assets and their settings.

ENV10: To achieve the highest quality of design that is innovative, imaginative, and sustainable and reflects local distinctiveness.

ENV11: To improve air quality and minimise noise, vibration and light pollution.

ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape.

### Social SA Objectives

SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.

SOC2: To reduce poverty, inequality and social exclusion.

SOC3: To improve education and skills including those related to local traditional industries.

SOC4: To enable a suitable stock of housing meeting local needs, including affordability.

SOC5: To maximise opportunities for new/ additional employment.

SOC6: To improve the quality, range and accessibility of community services and facilities, and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.

SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.

#### Economic SA Objectives

ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.

ECO2: To ensure the economy actively contributes to social and environmental well-being.

ECO3: To offer opportunities for tourism and recreation in a way that helps the economy, society and the environment.

## 6. The Issues and Options Sustainability Appraisal

The NPPG sets out the requirements for a Sustainability Appraisal at various stages of the Local Plan production. The table below discusses the requirements and how this SA addresses them.

<b>Developing and refining alternatives and assessing effects</b>	
Test the Local Plan objectives against the sustainability appraisal framework	The objectives and vision from the current Local Plan are the basis for the new Local Plan. The Issues and Options consultation seeks comments on those objectives and visions. So it is more for the next version of the Local Plan to include proposed vision and objectives.
Develop the Local Plan options including reasonable alternatives	The options and alternatives are not developed in the Issues and Options. They will be developed more in the Preferred options. There is an assessment of how each potential option could rate against each SA Objective. This is <a href="#">in Appendix 5</a> .
Evaluate the likely effects of the Local Plan and alternatives	
Consider ways of mitigating adverse effects and maximising beneficial effects	There is no policy text in the Issues and Options to assess. This requirement of the SA will be undertaken at the Preferred Options stage when there is draft policy text.
Propose measures to monitor the significant effects of implementing the Local Plan	Monitoring indicators will relate to the content of the policy. There is no policy content at the Issues and Options stage. Monitoring indicators will be produced at the Preferred Options stage.

A Sustainability Appraisal is designed to inform policy content following the assessments against the SA Objectives. At the Issues and Options stage, there is no policy wording. The options discuss potential ways to address the issue. That is to say that these could be broad policy directions rather than content. As such, this interim SA uses a traffic light system to give an indication about how the potential policy direction rates against each SA objective:

1	Conflict with SA Objective that is unlikely to be able to be addressed through policy wording.
2	Potential conflict with SA Objective but could be addressed through policy wording.
3	Positive impact on SA Objective.
?	Unknown impact on SA Objective. Depends on wording or reflects current situation.
	Not relevant

## 7. Subsequent versions of the SA

### Compatibility of the SA Objectives and plan objectives

An assessment of the SA Objectives against the objectives of the Local Plan will check compatibility.

### Reasonable alternatives

If a strategy or policy area is identified, reasonable alternatives to addressing that issue need to be identified and assessed. This could include a 'do nothing' scenario. This process will assist in the identification of, and justify, the most appropriate policy response, if any.

### Short, medium and long-term effects

Regulations require the assessment of the effects of a plan or programme over short, medium and long terms. The time periods for these are:

- Short term – 0-5 years
- Medium term – 5-10 years
- Long term – longer than 10 years

### Permanent and temporary effects

The process will identify if the effect of the proposed strategic action or policy will be permanent or temporary.

### Positive and negative effects

The SA process will assess the proposed strategy or policy approach, or site allocation, and identify any negative impacts of positive impacts relating to the SA Objectives. The process will seek to minimise any negative impacts and maximise any positive impacts.

### Secondary effects

These effects arise not as a direct result of the strategy or policy, but away from the original effect or as a result of a complex pathway.



### **Cumulative effects**

An assessment of the cumulative impacts of the strategic actions or policies is required. This matrix will identify the impacts of the Local Plan on the various SA Objectives, taken as a whole.

### **Synergistic effects**

These are effects that interact to produce a total effect greater than the sum of the individual effects.

### **Update to the literature review**

During the production of the Plans new relevant documents and policies will emerge, as well as local documents being progressed to subsequent stages. New and updated documents will be reviewed at each stage for their relevance to the Local Plan for the Broads and their relevant Sustainability Appraisals.

### **Production of the Local Plan for the Broads**

Sustainability Appraisals will be produced to assess and inform the Local Plan throughout its production:

- Preferred Options SA – to accompany the Preferred Options of the Local Plan.
- Publication SA – to accompany the Publication version of the Local Plan.

## Appendix 1: Comments received on the SA Scoping Report

Ref	Name	Organisation	Comment	BA response	Amendments
#1	Laura Mundy	East Suffolk Council	<p>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:</p> <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>	<p>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.</p>	<p>In future SA, include link to separate piece of work that assesses the Local Plans that are relevant to the Broads in detail.</p>
#2	Laura Mundy	East Suffolk Council	<p>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):</p> <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>	<p>Noted. We will assess relevant documents in the next version of the SA.</p>	<p>Assess documents as part of the next version of the SA.</p>

Ref	Name	Organisation	Comment	BA response	Amendments
#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 reference 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 data 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. <p>ENV1 - Could include cycling distance from key services.</p> <p>ENV5 - Could make reference to flood risk, specifically that arising as the result of climate change.</p> <p>ENV7 - Could reference contaminated land. Should consider agricultural land quality.</p> <p>ENV8 - Should consider potential increases in waste production.</p> <p>ENV10 - Could include reference to residential amenity</p> <p>SOC4 - Should also consider specialist housing.</p> <p>SOC6 - Could include cycling distance from key services.</p>	<p>ENV1 - agreed</p> <p>ENV5 - ENV6 covers flood risk adequately</p> <p>ENV7 - agreed</p> <p>ENV8 - consider this is covered adequately in the framework</p> <p>ENV10 - agreed</p> <p>SOC4 - agreed</p> <p>SOC6 - agreed</p>	<p>ENV1 - add cycle distance to decision making questions.</p> <p>ENV5 - no change</p> <p>ENV7 - include contaminated land and agricultural land quality</p> <p>ENV8 - no change</p> <p>ENV10 - add reference to amenity</p> <p>SOC4 - add reference to older persons and specialist housing</p> <p>SOC6 - add cycle distance to decision making questions</p>
#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.

Ref	Name	Organisation	Comment	BA response	Amendments
#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	Great Yarmouth flood defences Project 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	Beccles Flood Risk Management Project 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.

Ref	Name	Organisation	Comment	BA response	Amendments
#19	Liam Robson	Environment Agency	Bungay Flood Risk Management Project 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 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.	Agreed.	Change ENV5 to: To adapt, become resilient and mitigate against the impacts of climate change and add Will the

Ref	Name	Organisation	Comment	BA response	Amendments
			The decision criteria question could be: Will the plan help communities become more resilient and adapt to the impacts of climate change?		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	<p>ENV6 – The decision making criteria are a little muddled and repetitive please see ideas below.</p> <ul style="list-style-type: none"> <li>· Bullet point 1 could be changed to: Will the plan guide inappropriate development away from flood risk areas?</li> <li>· 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?</li> <li>· 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.</li> <li>· 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?</li> <li>· 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?</li> <li>· 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?</li> </ul>	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.

Ref	Name	Organisation	Comment	BA response	Amendments
#31	Ian Robinson	RSPB	<p>Consideration needs to be given to translocating species ahead of any irreversible changes resulting from climate change or sea level rise. Follow up comment:</p> <p>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.</p> <p>Part of that approach would need to be ensuring management is optimal to at least maintain and ideally increase numbers.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p>	<p>No change to document, but will consider this comment as produce the Local Plan for the Broads and Broads Plan.</p>
#32	Ian Robinson	RSPB	<p>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</p>	<p>Noted. These were how the maps were sent to us.</p>	<p>Will liaise with data provider about ways to present data in future iterations of the SA.</p>
#33	Ian Robinson	RSPB	<p>Page 23 STEAM report Fig 4 – acronyms need clarifying. The information provided is useful but is hard to interpret</p>	<p>Noted. In future iterations, will provide some explanation.</p>	<p>In future versions, explain the STEAM data.</p>
#34	Ian Robinson	RSPB	<p>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.</p>	<p>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.</p>	<p>No change.</p>
#35	Ian Robinson	RSPB	<p>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</p>	<p>Noted. These were how the maps were sent to us.</p>	<p>Will liaise with data provider about ways to present data in future iterations of the SA.</p>
#36	Ian Robinson	RSPB	<p>Page 44 Map 20 – don't understand the relevance of this map, needs context</p>	<p>As stated in the report, this map shows incidences of crime near to the Broads in Norwich along the banks of the River Wensum.</p>	<p>No change.</p>

Ref	Name	Organisation	Comment	BA response	Amendments
#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	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: <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.



Ref	Name	Organisation	Comment	BA response	Amendments
#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.

## Appendix 2: The Baseline

The baseline has been updated. Go [here](#) for updated baseline.

## Appendix 3: Literature Review

The SA Scoping Report Literature Review reviewed many documents and these can be found here: [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0024/405618/Appendix-2-literature-review.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0024/405618/Appendix-2-literature-review.pdf)

The documents reviewed in this SA are new ones that have been reviewed. Go [here](#) for the additions to the literature review.

## Appendix 4: Sustainability Appraisal Framework

SA Objective	SEA General Theme	Decision making criteria/prompting questions
ENV1: To reduce the adverse effects of traffic (on roads and water).	Climate change, air and pollution.	<ul style="list-style-type: none"> <li>• How does the policy/allocation/strategic action affect:               <ul style="list-style-type: none"> <li>○ Walking, cycling, public transport?</li> <li>○ Air quality?</li> <li>○ Amenity?</li> <li>○ Single occupancy car use?</li> <li>○ Use of waterways?</li> <li>○ Access to special qualities of the Broads by sustainable transport modes?</li> <li>○ The net impact of transport infrastructure such as road signage, lighting, conspicuous structures and parking?</li> </ul> </li> <li>• What is the resulting impact of traffic on               <ul style="list-style-type: none"> <li>○ Heritage?</li> <li>○ Landscape?</li> <li>○ People?</li> <li>○ Water?</li> </ul> </li> <li>• Is the allocation within walking distance<sup>2</sup> or cycling distance<sup>3</sup> of key services<sup>4</sup>?</li> <li>• Will routes be               <ul style="list-style-type: none"> <li>○ functional and accessible for all?</li> <li>○ safe and attractive public spaces?</li> </ul> </li> <li>• Does it consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles?</li> </ul>
ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.	Land, water and soil resources.	<ul style="list-style-type: none"> <li>• How does the policy/allocation/strategic action affect               <ul style="list-style-type: none"> <li>○ Water quality?</li> <li>○ Water quantity?</li> <li>○ Surface water run off? Does it reduce run-off rates? Does it increase water absorption / management?</li> <li>○ Wastewater?</li> <li>○ Drainage?</li> <li>○ Pathways for pollutants?</li> </ul> </li> </ul>
ENV3: To protect and enhance biodiversity and geodiversity.	Biodiversity.	<ul style="list-style-type: none"> <li>• How does the policy/allocation/strategic action affect:               <ul style="list-style-type: none"> <li>○ The ability to retain and maintain soil carbon?</li> <li>○ Geological interests?</li> <li>○ The potential for managed accessible geological feature exposures?</li> <li>○ County Wildlife Sites?</li> <li>○ Local and National Nature Reserves?</li> <li>○ Ramsar Sites?</li> <li>○ SPAs, SACs?</li> </ul> </li> </ul>

<sup>2</sup> Manual for Streets says this is 10 minutes/800m

<sup>3</sup> Suffolk County Council and Norfolk County Council do not have official cycling distances. Suffolk County Council suggested between 5km and 10km and Norfolk County Council suggested up to 5 miles. For the purposes of the SA assessment, a distance of around 3 to 6 miles or 30 minute is used, but taking into consideration gradient, safety (or perception of) and convenience of routes.

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> <li>○ SSSIs?</li> <li>○ BAP Priority Species and habitats?</li> <li>○ Habitat connectivity and Ecological Networks?</li> <li>○ Trees and hedgerows?</li> <li>○ Waterbodies?</li> <li>○ Green Infrastructure?</li> <li>○ physical management and maintenance of habitats?</li> </ul>
<p>ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.</p>	<p>Cultural heritage, landscape and townscape.</p>	<ul style="list-style-type: none"> <li>● How does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> <li>○ The setting of the Broads?</li> <li>○ The perception of the Broads?</li> <li>○ The Landscape Character?</li> <li>○ Cultural heritage and heritage assets?</li> <li>○ Dark skies and tranquillity?</li> <li>○ The special qualities of the Broads<sup>5</sup>?</li> <li>○ Landscape features?</li> <li>○ Peat?</li> <li>○ Conservation Areas?</li> <li>○ Designated and undesignated heritage assets?</li> <li>○ The quality and local distinctiveness of the Broads towns/villages/buildings?</li> <li>○ Open Space?</li> <li>○ Green Infrastructure?</li> <li>○ Harmful incremental change?</li> </ul> </li> </ul>
<p>ENV5: To adapt, become resilient and mitigate against the impacts of climate change</p>	<p>Climate change, air and pollution.</p>	<ul style="list-style-type: none"> <li>● How does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> <li>○ Emissions of greenhouse gases?</li> <li>○ Sequestering carbon dioxide?</li> <li>○ Single occupancy car use?</li> <li>○ HGV/delivery movements?</li> <li>○ Public transport?</li> <li>○ Cycling/walking?</li> <li>○ Boat emissions?</li> <li>○ The ability of communities to adapt?</li> <li>○ The ability of habitats and species to adapt?</li> <li>○ Peat?</li> <li>○ Energy use?</li> <li>○ Open Space?</li> <li>○ Green Infrastructure?</li> </ul> </li> <li>● Will the allocation/policy/strategic action help communities become more resilient and adapt to the impacts of climate change</li> </ul>

<sup>5</sup> Taken from the Climate Change Adaptation Plan: Open water in lakes and rivers, Breydon Water (estuary), Fens / reed beds, Grazing marshes and ditches, Wet woodlands, Historic buildings, especially mills, Boating and the riverside economy, Farmland (including rights of way), Open landscapes, big skies and tranquillity and the coast.

SA Objective	SEA General Theme	Decision making criteria/prompting questions
ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.	Land, water and soil resources. Climate change, air and pollution.	<ul style="list-style-type: none"> <li>• Will the allocation/policy/strategic action <ul style="list-style-type: none"> <li>○ guide inappropriate development away from flood risk areas?</li> <li>○ ensure that where development in flood risk areas is permitted, the risks to people and property are managed/mitigated?</li> <li>○ consider the risk of flooding to communities/allocations both now and in the future taking account of climate change?</li> <li>○ affect opportunities for future flood and coastal risk management?</li> <li>○ restrict choice for managing flood risk and the coast in the future?</li> </ul> </li> <li>• Does the policy consider different sources of flooding<sup>6</sup>?</li> <li>• Does the allocation/policy/strategic action affect the shoreline management plan?</li> </ul>
ENV7: To manage resources sustainably through the effective use of land, energy and materials.	Land, water and soil resources.	<ul style="list-style-type: none"> <li>• Is the allocation on: <ul style="list-style-type: none"> <li>○ Brownfield Land?</li> <li>○ Greenfield Land?</li> </ul> </li> <li>• Does the allocation use land effectively?</li> <li>• Does the allocation/policy/strategic action affect energy efficiency?</li> <li>• Are there any safeguarded mineral sites?</li> <li>• Will it prevent the sterilisation of known or suspected mineral resources by development?</li> <li>• Does the policy consider origin of resource/where resource derived from?</li> <li>• Is the allocation on: <ul style="list-style-type: none"> <li>○ Contaminated land</li> <li>○ Best and most versatile agricultural land</li> </ul> </li> </ul>
ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.	Population and human health. Climate change, air and pollution.	<ul style="list-style-type: none"> <li>• Does the policy help reduce waste, reuse waste or recycle/compost?</li> </ul>
ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings	Cultural heritage, landscape and townscape.	<ul style="list-style-type: none"> <li>• Does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> <li>○ The quality and local distinctiveness of the Broads towns/villages/buildings?</li> <li>○ Designated and undesignated heritage assets?</li> <li>○ Conservation Areas?</li> <li>○ Archaeology?</li> <li>○ Local culture and traditions?</li> <li>○ The wider cultural heritage of the broads?</li> <li>○ The history, traditions, customs and the spaces and places these rely upon or relate to?</li> </ul> </li> </ul>
ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.	Cultural heritage, landscape and townscape.	<ul style="list-style-type: none"> <li>• Does the allocation/policy/strategic action <ul style="list-style-type: none"> <li>○ Appreciate what is special about the site?</li> <li>○ Relate to the site's setting in the landscape/townscape?</li> <li>○ Appreciate the rich cultural heritage of the area?</li> <li>○ Address/consider residential amenity?</li> </ul> </li> <li>• Are these issues considered?</li> </ul>

<sup>6</sup> Including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> <li>○ local character (including landscape setting)</li> <li>○ safe, connected and efficient streets</li> <li>○ a network of greenspaces (including parks) and public places</li> <li>○ crime prevention</li> <li>○ security and lighting measures in the context of dark skies</li> <li>○ access and inclusion</li> <li>○ efficient use of natural resources</li> <li>○ cohesive &amp; vibrant neighbourhoods</li> <li>○ layout – the way in which buildings and spaces relate to each other</li> <li>○ form – the shape of buildings</li> <li>○ scale – the size of buildings</li> <li>○ detailing – the important smaller elements of building and spaces</li> <li>○ materials – what a building is made from</li> <li>○ sensitive design of road infrastructure? (E.g. reduced signage road markings, use of local materials and alternative traffic calming methods).</li> </ul>
<p>ENV11: To improve air quality and minimise noise, vibration and light pollution.</p>	<p>Population and human health. Climate change, air and pollution.</p>	<ul style="list-style-type: none"> <li>● Does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> <li>○ Air quality?</li> <li>○ Noise production?</li> <li>○ Vibration?</li> <li>○ Light pollution/dark skies?</li> </ul> </li> <li>● How does the allocation/policy/strategic action relate to Air Quality Management Areas?</li> <li>● Would the allocation make additional noise or be sensitive to the prevailing acoustic environment?</li> <li>● Have cumulative impacts of development/change been considered?</li> <li>● Does the allocation/policy/strategic action affect the tranquillity of the Broads?</li> </ul>
<p>ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape</p>	<p>Climate change, air and pollution. Cultural heritage, landscape and townscape.</p>	<ul style="list-style-type: none"> <li>● Does the allocation/policy/strategic action affect <ul style="list-style-type: none"> <li>○ Renewable/low carbon energy generation?</li> <li>○ Renewable/low carbon energy transmission?</li> <li>○ The setting of the Broads?</li> <li>○ The perception of the Broads?</li> <li>○ The Landscape Character?</li> <li>○ The special qualities of the Broads?</li> </ul> </li> <li>● Have Cumulative impacts of renewable/low carbon energy generation been considered?</li> </ul>
<p>SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.</p>	<p>Population and human health.</p>	<ul style="list-style-type: none"> <li>● Does the allocation/policy/strategic action: <ul style="list-style-type: none"> <li>○ Affect physical and/or mental health?</li> <li>○ Affect wellbeing?</li> <li>○ Promote active lifestyles?</li> <li>○ Promote active travel?</li> </ul> </li> <li>● Does the allocation/policy/strategic action include: <ul style="list-style-type: none"> <li>○ Publicly accessible open space?</li> <li>○ Sports facilities?</li> <li>○ Health infrastructure?</li> </ul> </li> </ul>

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> <li>• Does the policy enable active use of water space?</li> </ul>
SOC2: To reduce poverty, inequality and social exclusion.	Population and human health. Inclusive communities.	<ul style="list-style-type: none"> <li>• Does the allocation/policy/strategic action affect any of these domains?               <ul style="list-style-type: none"> <li>○ Income</li> <li>○ Employment</li> <li>○ Health and Disability</li> <li>○ Education, Skills and Training</li> <li>○ Barriers to Housing and Services</li> <li>○ Crime</li> <li>○ Living Environment</li> </ul> </li> <li>• Does the allocation/policy/strategic action affect inclusive communities?</li> <li>• Does it affect community cohesion?</li> <li>• Does it affect quality of life?</li> <li>• Does the policy avoid potential for inequality or serve to positively address existing identified inequalities through its implementation?</li> </ul>
SOC3: To improve education and skills including those related to local traditional industries.	Population and human health. Economic Activity.	<ul style="list-style-type: none"> <li>• Is the allocation/policy/strategic action for an education/skills establishment?</li> <li>• Does the policy/allocation/strategic action enable improved understanding of the special qualities, pressures and management of the Broads to all?</li> <li>• Does it relate to Traditional Broads industries?</li> <li>• Will it facilitate improved access to vocational training, education and skills for all, including young people?</li> <li>• Will it facilitate opportunity for delivery and uptake of traditional skills training which may benefit wider Broads purposes?</li> </ul>
SOC4: To enable suitable stock of housing meeting local needs including affordability.	Population and human health. Inclusive communities.	<ul style="list-style-type: none"> <li>• Does the policy/allocation/strategic action affect:               <ul style="list-style-type: none"> <li>○ Housing?</li> <li>○ Affordable Housing?</li> <li>○ Gypsy and Traveller accommodation?</li> <li>○ Residential moorings/boats used as residences?</li> <li>○ Older persons housing?</li> <li>○ Specialist housing?</li> </ul> </li> </ul>
SOC5: To maximise opportunities for new/ additional employment	Economic activity.	<ul style="list-style-type: none"> <li>• Does the policy/allocation/strategic action affect:               <ul style="list-style-type: none"> <li>○ Employment land uses?</li> <li>○ Numbers of jobs?</li> <li>○ Tourism?</li> <li>○ Does it relate to Traditional Broads industries?</li> </ul> </li> </ul>
SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.	Population and human health. Inclusive communities.	<ul style="list-style-type: none"> <li>• Is the allocation/policy/strategic action within walking distance (800m) from Key Services?</li> <li>• Is the allocation within a settlement boundary?</li> <li>• Is the allocation/policy/strategic action for a key service?</li> <li>• Will the allocation/policy/strategic action affect public transport, walking and cycling?</li> <li>• Does the policy/allocation/strategic action relate to Local Green Space?</li> <li>• Will routes be functional and accessible for all?</li> <li>• Will routes be safe and attractive public spaces?</li> </ul>



SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> <li>• Does it consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles?</li> <li>• Will it support the retention of key facilities and services ensuring that local needs are met locally wherever possible or alternative sustainable access is provided?</li> </ul>
SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.	Population and human health. Inclusive communities.	<ul style="list-style-type: none"> <li>• Does the policy/allocation/strategic action relate to: <ul style="list-style-type: none"> <li>○ Designing out crime?</li> <li>○ Designing in community safety?</li> <li>○ An inclusive environment?</li> <li>○ Robust structure and identity?</li> <li>○ Interaction with other uses positively?</li> <li>○ Avoiding opportunities for conflict?</li> </ul> </li> </ul>
ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.	Economic activity.	<ul style="list-style-type: none"> <li>• Will it provide the spaces and infrastructure to support self-employment opportunities and business start-up?</li> <li>• Will it support existing business viability and local employment growth?</li> <li>• Does it contribute to a thriving rural community?</li> <li>• Does it contribute to a prosperous rural community?</li> </ul>
ECO2: To ensure the economy actively contributes to social and environmental well-being.	Economic activity. Population and human health. Inclusive communities	<ul style="list-style-type: none"> <li>• How does the policy/allocation/strategic action affect 'Social Capital'? <ul style="list-style-type: none"> <li>○ Skills development</li> <li>○ Community cohesion</li> <li>○ Amenity</li> <li>○ Job provision</li> <li>○ Quality of life</li> </ul> </li> <li>• How does it affect 'Low Carbon'? <ul style="list-style-type: none"> <li>○ Innovation</li> <li>○ Resource efficiency</li> </ul> </li> <li>• How does it affect 'Natural Capital'? <ul style="list-style-type: none"> <li>○ Landscape</li> <li>○ Biodiversity</li> </ul> </li> </ul>
ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.	Economic activity. Population and human health. Inclusive communities.	<ul style="list-style-type: none"> <li>• Does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> <li>○ Sustainable tourism.</li> <li>○ Responsible tourism.</li> </ul> </li> <li>• Does it: <ul style="list-style-type: none"> <li>○ Promote enjoyment and understanding of the Broads?</li> <li>○ Raise awareness of the Broads as a special destination?</li> <li>○ Drive up the quality of the visitor experience?</li> <li>○ Strengthen tourism performance across the whole Broads area?</li> <li>○ Maintain the Broads' position as a premier inland boating destination in the UK?</li> <li>○ Respect the sensitive environment of the Broads?</li> <li>○ Provide the right conditions for successful tourism businesses?</li> <li>○ Will it maximise benefits and minimise impacts from visitors to communities?</li> </ul> </li> </ul>

## Appendix 5: Assessment of how each potential option could rate against SA Objectives.

At the Issues and Options stage, there is no policy wording. The options discuss potential ways to address the issue. That is to say that these could be broad policy directions rather than content. As such, this interim SA uses a traffic light system to give an indication about how the potential policy direction rates against each SA objective:

1	Conflict with SA Objective that is unlikely to be able to be addressed through policy wording.
2	Potential conflict with SA Objective but could be addressed through policy wording.
3	Positive impact on SA Objective.
?	Unknown impact on SA Objective. Depends on wording or reflects current situation.
	Not relevant

The following sections have not been assessed against the SA objectives. This is because they did not really present options; instead they raised an issue and asked generally for thoughts.

- Objectives – we ask for your thoughts on the current objectives. We will SA the proposed objectives in the next version of the Local Plan.
- Your part of the Broads – simply asks questions about what the community/businesses think of their part of the Broads.
- Climate Change Checklist – asks for thoughts on the current approach and checklist.
- Wind energy – general thoughts requested on the current approach.
- Local Green Space – seeks nominations for Local Green Space. Any proposed Local Green Space will be assessed in the next version of the Local Plan.
- Farm diversification - general thoughts requested on the current approach.
- Marketing – asks for thoughts on the current approach.
- Sites allocated for change - asks for thoughts on the current approach and policies.
- Development boundaries – generally, asks thoughts on evidence and the current approach.
- Housing need, residential moorings, residential caravans and gypsy and traveller need – these sections introduce the studies and asks general questions.
- Call for sites – in relation to housing, residential moorings and gypsy and traveller need – sites will either become preferred allocations or reasonable alternatives (and assessed in fures SAs) or not reasonable alternatives (and not assessed in future SAs).
- Design – a general section on design that cross refers to the design guide out for consultation at the moment.
- Current policies – this asks thoughts on our current policies. All policies in the next Local Plan will be assessed.

## A5.1 Vision

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
Proposed Broads Plan vision	3	3	3	3	3	3	3		3				3		3	3	3	3	3	3	3	3	3

## A5.2 Source of heating

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: Generally seeking to influence the heating options of new development – using a hierarchy and requiring to be heat pump ready.					3		3					3	?	?									
B: Not seeking to influence the heating options of new development.					1		1					1											

- In relation to SOC1 and SOC2, option A may have potential benefits because they could lead to financial savings thus affecting wellbeing and inequalities.
- Option B rates as negative on some SA Objectives as without requiring a standard, new build will continue to be built to the current standard which may be better than in the past, but not as efficient as they need to be to mitigate climate change.

## A5.3 Construction methods and materials

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: Require applicants to set out a schedule of materials used and the embodied carbon, and state how they have chosen materials with less impact/embodied carbon.				?	3		3		?	?													
B: Do not set such a requirement.					1		1																

- Option B rates negative on some SA Objectives as without requiring this, new build could continue to be built without consideration to the impact the materials and their transportation could have on climate change.

- ?: Design is an important consideration in the Broads and option A will need to consider that.

#### A5.4 Additions to other policies (related to climate change)

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: Encouraging retrofit over rebuild				3	3		3		3														
A: Don't encourage retrofit				2	2		2		2														
B: Greywater recycling		3			3					3				?									
B: Don't encourage or recycle greywater recycling		2			2					2													
C: Stronger emphasis on building orientation					3		3			3				?									
C: Don't include an emphasis on building orientation					2		2			2													

- ?: In relation to SOC2, greywater recycling and building orientation may have potential benefits because they could lead to financial savings thus affecting wellbeing and inequalities.
- The alternative options rate as number 2 (potential conflict) because the current local plan does address these to some extent, but the proposed options are stronger.

#### A5.5 Trees, woodlands, hedges and shrubs

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: No specific policy. Rely on DM8 and DM13.			2	2	2				2	2	2												
B: Amend policies DM8 and DM13 to include a greater emphasis on trees, woodlands, hedges and shrubs.			3	3*					3*	3*	3												
C: Have a new policy on the subject of trees, woodlands, hedges and shrubs. This would include management, maintenance and protection of existing trees, woodlands, hedges and shrubs, as appropriate, or			3	3*	3				3*	3*	3												

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
creation of new areas for trees, woodlands, hedges and shrubs.																							

- Option A has potential conflict as option B and C would have a positive impact on the SA Objectives. Amber also because the issues could be addressed, to some extent, by current policies in the local plan.
- \* rates positive, but the mantra of ‘the right tree in the right place’ will be of relevance.

### A5.6 Peat

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: Do not have a policy on peat/reduce the requirements in the current policy.		1	1	1	1		1		1														
B: Do not the change the approach as set out in policy and in the guide – so roll forward current approach.		3	3	3	3		3		3														
C: Change the emphasis so there is a stronger requirement to dispose of peat in a way that prevents it drying out. The current approach to excavating peat would be continued.		3	3	3	3		3		3												?	?	?
D: Change the emphasis to reduce significantly the amount of peat excavated in the first place by making the policy stance stronger. This could be through a presumption against the excavation of peat. That being said, there would need to be circumstances where some small-scale development would be considered, perhaps using set criteria and following the mitigation hierarchy. The current approach to disposing of excavated peat would be continued.		3	3	3	3		3		3												?	?	?
E: Combine options B and C – so that less peat is excavated and for any that is excavated, there is a		3	3	3	3		3		3												?	?	?

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
stronger requirement to dispose of peat in a way that prevents it drying out.																							
F: Potentially look into creating areas for new peat. This will take many years of course and the land would need to be found.		3	3	3	3		3		3														

- Option A rates negative on some ENV SA Objectives because not having a policy will mean that schemes that result in the excavation of peat do not have a policy framework to seek reduction and appropriate ‘disposal’.
- Options C, D, E and F are ? against ECO SA Objectives as , depending on the wording of the final policy, businesses may not be able to do what they have done in the past or how they have done it in the past.

#### A5.7 Energy Efficiency of the Existing Housing Stock

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: Do not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.					2		2			2		?				2						2	
B: Require the existing building to move up the EPC rating.					3		3		2	3		?	3	?		3						3	
C: Require that a certain percentage of the budget spent on the extension is spent on improving the energy performance of the existing building.					3		3		2	3		?	3	?		3						3	

- Option A has potential conflict against some ENV SA Objectives because options B and C rate more favourable against these SA Objectives.
- ENV12 is rated as a ? for all options because, depending on wording, the policy may or may not include provision for renewable energy generation.
- Options B and C rate potential conflict against ENV9 because, as noted in the section of the Issues and Options document itself, any policy would need to consider improving energy efficiency of certain types of buildings against the impact on the actual building.

- Options B and C are ? against SOC2 as if this policy is taken forward, there would be some initial financial burden on the applicant, but there could also be savings.

### A5.8 Flood Resilience of existing dwellings

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: No policy – do not address, through the Local Plan, the issue of resilience to flooding of the existing housing stock.					?	?							?										
B: Require the applicant to detail what measures they will take to improve the existing situation, with the level of improvement proportionate to the scale of new development proposed (if indeed the property does not have resilience measures or may benefit from more).					3	3							3										

A: rates as ? as property owners may well install such resilience measures themselves, without being required to.

B: rates as positive as benefits of the resilient measures against these SA objectives will be realised for more people, with a policy.

### A5.9 Quay heading in front of quay heading

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: No specific policy approach to address quay heading in front of quay heading.				2			2		2														
B: Geographic risk-based approach.				3			3		3														
C: Have a policy that applies to all the Broads, regardless of river width.				3			3		3														

Option A is rated as potential conflict because there are policies in the Local Plan that seek the protection of navigation. There are also bye laws. But the options B and C would result in positive impacts.

### A5.10 Water efficiency of new dwellings

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: Do not set a water efficiency standard – the default would be 125 l/h/d.		1	1													?							
B: Continue the current policy approach of 110 l/h/d		3	3													?							
C: Investigate whether it is reasonable or justifiable to seek a standard that designs for less water a day than 110 l/h/d.		3	3													?							
D: Investigate the potential to require water neutrality.		3	3													?							

A: rates negative as the East is an area of water stress and if water efficiency of new dwellings is not addressed, even with the low levels of development in the Broads, 125 l/h/d is a worse standard than the other options.

B, C and D: rate as positive as even though the new dwellings will still use water and the East is an area of water stress, they will be designed to use less water than 125l/h/d.

For SOC4, the options rate as ? as water supply could be a constraint on providing houses. By designing houses to use less, the housing need may be able to be met.

### A5.11 Tranquillity

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: do not address tranquillity specifically in the Local Plan. Rely on other landscape, dark skies and amenity policies that will be in the Local Plan.			2	2							2		2										2
B: improve the consideration of tranquillity in the Local Plan by including it in related polices, potentially the landscape section of the local plan.			3	3							3		3										3



	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3
C: a stand-alone, criteria-based policy, following the example of some National Park Authority local plans. The dark skies policy remains a separate policy.			3	3							3		3									3
D: as per option 3, but also including the dark skies policy.			3	3							3		3									3

- Option A is rated as potential conflict as option B, C and D would have a positive impact on the SA Objectives. Potential conflict also because the issues could be addressed, to some extent, by current policies in the local plan.

### A5.12 Agricultural development

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3
A: No specific policy. Use existing policies to guide and determine applications for agricultural development.		2	2	2		2	2			2											2	
B: A new development management policy, specifically on agricultural buildings which would cover design, longevity of use, landscaping and environmental considerations as well as the justification for development and potential benefits through contributions/access/biodiversity/flood improvements.		3	3	3		3	3			3											3	

- Option A is rated as potential conflict as option B would have a positive impact on the SA Objectives. Potential conflict also because the issues could be addressed, to some extent, by current policies in the local plan.

### A5.13 Biodiversity/Environment net gain

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: Do not set a higher than 10% standard relating to biodiversity net gain.			2		2					2													
B: Introduce a standard of more than 10% BNG.			3		3					3													
C: Introduce environmental net gain.	3	3	3	3	3	3	3	3	3	3	3	3											

- Options A rates as potential conflict as the approach does help protect and enhance biodiversity, but do not go as far as option B.
- C is positive on all ENV SA objectives as environmental net gain would affect those aspects positively.

### A5.14 Accessible Homes

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
A: Wait until the Government standard comes in. Continue with the current Local Plan approach.													2	2		2			2				
B: Amend the M4(2) threshold so it applies to more schemes in the Broads, subject to viability.													3	3		3			3				
C: Consider introducing a M4(3) standard, subject to viability.													3	3		3			3				

- Option A rate as potential conflict as the approach does help provide accessible homes, but does not go as far as options B and C.