

Broads Authority

Agenda 31 January 2020

10.00am

Yare House, Thorpe Road, Norwich, NR1 1RY

Please note that the Authority will deal with confidential items near the start of this meeting, when the public will be excluded.

Introduction

1. To receive apologies for absence
2. Chairman's announcements
3. Introduction of members and declarations of interest
4. To note whether any items have been proposed as matters of urgent business
5. Public question time – to note whether any questions have been raised by members of the public
6. **To receive and confirm the minutes of the Broads Authority meeting held on 22 November 2019** (Pages 4 – 18)
7. **Summary of actions and outstanding issues following decisions at previous meetings – to note the schedule** (Pages 19 – 32)
8. **Exclusion of the public**
The Authority is asked to consider exclusion of the public from the meeting under Section 100A of the Local Government Act 1972 for the consideration of the item below on the grounds that it involves the likely disclosure of exempt information as defined by Paragraphs 1, 2, 3 and 4 of Part 1 of Schedule 12A to the Act as amended, and that the public interest in maintaining the exemption outweighs the public benefit in disclosing the information.
9. **To receive the Exempt Minutes from the Broads Authority meeting on 22 November 2019** (Pages 33 – 36)
10. **Provision of Legal Services and Monitoring Officer** (Pages 37 – 39)
Report by Chief Executive
11. **Progress report by the Monitoring Officer** (Pages 40 – 44)
Report by Monitoring Officer

To invite the public back into the meeting

For Decision: Strategy and policy

12. **Financial performance and direction** (Pages 45 - 73)
Financial Planning Budget General 2020/2021 and Financial Strategy 2022/23
Consolidated income and expenditure: 1 April to November/December 2019
Report by Chief Financial Officer
13. **Landscapes Review - Response** (Pages 74 – 85)
Report by Chief Executive
14. **Strategic priorities**
Strategic Priorities update 2019/20 (Pages 86 – 90)
Report by Head of Governance
15. **Statement of Community Involvement for adoption** (Pages 91 – 133)
Report by Planning Policy Officer
16. **Flood Risk Supplementary Planning Document (SPD) for public consultation** (Pages 134 – 220) Report by Planning Policy Officer
17. **Memorandum of Understanding between the Broads Charitable Trust and the Broads Authority** (Pages 221 – 227)
Report by Director of Strategic Services

Reports for information

Governance

18. **Risk Management Register and Policy - updates** (Pages 228 – 239)
Report by Head of Governance (deferred from 22 November 2019)
19. The Port Marine Safety Code: To consider any items of business raised by the designated person in respect of the Port Marine Safety Code

Minutes to be received

20. **To receive the minutes of the following meetings:**

[Audit and Risk Committee – 23 July 2019](#)

[Broads Local Access Forum – 4 September 2019](#)

[Navigation Committee – 31 October 2019](#)

[Planning Committee – 8 November 2019](#)

[Planning Committee – 6 December 2019](#)

21. **Feedback from Members appointed to represent the Authority on outside bodies:**
Members to provide significant issues from recent meetings attended.

22. Other items of business
Items of business which the Chairman decides should be considered as a matter of urgency pursuant to section 1008 (4)(b) of the Local Government Act 1972
23. To answer any formal questions of which due notice has been given
24. **To note the date of the next meeting/workshop – Friday 20 March 2020 at 10.00am at Yare House, 62/64 Thorpe Road, Norwich**

Broads Authority

Minutes of the meeting held on 22 November 2019

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Present

Bill Dickson – in the Chair, Kelvin Allen, Louis Baugh, Harry Blathwayt, Julie Brockiek-Coulton, Jacquie Burgess, Andree Gee, Lana Hemsall, Tim Jickells, Bruce Keith, James Knight, Greg Munford, Simon Roberts, Simon Sparrow, Nicky Talbot (Minutes 1-14), Vic Thomson, Melanie Vigo di Gallidoro, Fran Whymark.

In attendance

John Packman – Chief Executive, Sandra Beckett – Administrative Officer (Governance), Steven Bell – Monitoring Officer, Maria Conti – Head of Governance, Emma Krelle – Chief Financial Officer, Harry Mach – Carbon Reductions Project Manager up to and including Minute 8, Rob Rogers – Director of Operations, Marie-Pierre Tighe – Director of Strategic Services.

1. Apologies and welcome

The Chairman welcomed everyone to the meeting. In particular he welcomed Asher Minns, the Executive Director of the Tyndall Centre for Climate Change Research at the University of East Anglia.

Apologies received from Matthew Bradbury, Tristram Hilborn and Leslie Mogford.

2. Chairman's announcements

Openness of Local Government Bodies Regulations 2014

The Chairman reminded Members that the meeting would be recorded as a back-up for accuracy. The Broads Authority retained the copyright. If a member or a member of the public wished to receive a copy of the recording, they should contact the Governance team. No one else indicated that they would be recording or filming the meeting.

Staff matters

The Chairman acknowledged the contributions from the following members of staff.

Will Burchnall, the Water, Mills and Marshes Partnership Project Manager, was leaving the Authority on 29 November after 7 years to deliver a new project at Sheringham Park with the National Trust. Will had been successful in developing the Broads Landscape Partnership bid for National Lottery Heritage funding, seeing it being awarded and delivering the projects. On behalf of the Authority, the Chairman thanked him for all his work, wished him well and hoped his next projects would be as successful as the ongoing WMM.

Steve Birtles was retiring as Head of Safety Management in December 2019. Steve had done much to progress safety within the Broads, developing and implementing the Safety Management System, administering the Port Marine Safety Code and helping to improve health and safety management within the Authority. He wished Steve a long, happy and healthy retirement.

Karen Sayer, Design and Information Supervisor, has completed 25 years continued service with the Authority since 1994. She had also worked for the Authority from 1983 to 1987

before going to the Peak District National Park for 7 years. She has therefore worked a total of 36 years with National Parks. Her contribution to the Authority's public face has been through the design of our logo, specialist publications such as the Broads Plan, Broadcaster and Annual report as well as leaflets including Broadsheet, signs, interpretation panels and photographs. The Chairman thanked Karen for her tremendous contribution and commitment and presented her with a bouquet.

Sandra Beckett, Administrative Officer (Governance) had completed 40 years with the Authority, being the first employee appointed by the first Chief Executive Aitken Clark in 1979 prior to the Authority becoming a Special Statutory Authority in 1989. She has seen the Authority develop from just 2 members of staff to 150 employed now. Her particular focus has been her support for members and the Authority's committees as well as our two Chief Executives, Aitken Clark and John Packman. On behalf of all members and staff past and present, he thanked her for her unfailing support and as a token of appreciation presented her with a bouquet.

General proceedings

The Chairman commented he would take it that members had read the papers and therefore the emphasis would be for members to ask questions and debate the issues.

3. Introduction of members and declarations of interest

Members indicated they had no further declarations of interest other than those already registered, and as set out in Appendix 1 to these minutes.

4. Items of urgent business

The Chairman proposed to take an item of urgent business relating to Whitlingham. The matter was urgent as it involved financial and staff matters which required discussion before the next Broads Authority meeting. Given the nature of the matter, the Chairman proposed to take this as an exempt item.

It was resolved

- (i) That an item on Whitlingham be taken as an item of urgent business as matters involving finance and personnel needed to be discussed before the next meeting on 31 January 2020 and that this be taken as an exempt item in accordance with Section 100A, paragraphs 1,2 3 and 4 of Schedule 12A of the Local Government Act 1972
- (ii) that the order of business be varied in accordance with Standing Order 3(2) and it be taken after Agenda item no 14.

5. Public question time

No public questions had been received.

6. Minutes of Broads Authority meeting held on 27 September 2019

The minutes of the meeting held on 27 September 2019 were approved as a correct record and signed by the Chairman.

7. Summary of actions and outstanding issues following decisions at previous meetings

The Authority received and noted a schedule of progress and actions taken following decisions of previous meetings. It was noted that a number of the items on the agenda were interrelated and further progress was also included within the Strategic Direction report. Attention was drawn to the following:

Transfer of Mutford Lock – the Harbour Revision Orders were still being progressed by the Solicitors for the MMO. The Chairman had raised this informally with the MMO and would continue to pursue the matter.

Pilot agri-environment scheme for the Broads – the first workshop with farmers and landowners on 13 November 2019 had been successful. It was attended by approximately 70 people, facilitated by an ex-CEO of Exmoor National Park and coordinated by our Environment Policy Adviser, Andrea Kelly together with colleagues from Natural England and the NFU. A member commented that the workshop had resulted in a common understanding of the new scheme and affirmation of its concept and development. There was very positive feedback on the proposed way forward and the event had been very worthwhile.

National Parks Review – the response from the Government to the Landscapes Review was likely to be some time, due to other pressing national political matters. In the meantime, the Chief Executive had circulated members with a rough draft of a report intended to go to the January 2020 meeting. This would be revised for that meeting and discussion welcomed on the draft response to the Review's 27 recommendations.

Hosting National Parks' Communications Unit – The Draft Communications Strategy for the National Parks was to be presented to the English National Parks Chief Executives and Chairs' Group on 26 November 2019 for approval. It was hoped to provide a progress report to the January meeting of the Authority.

A member requested that the Summary of Progress include more details.

8. Responding to climate change emergency

Asher Minns, Executive Director of the Tyndall Centre for Climate Change Research, UEA, gave a presentation on responding to climate change, with particular relevance to the Broads. He emphasised that the area was the most vulnerable region of the UK to climate change and sea level rise, including coastal erosion. Awareness of climate change had been documented since the 19th century, and the increase of CO₂ in the atmosphere was fully evidenced. However, the rate of increase in carbon emissions had been greater in the last fifty years and

the need to reduce them was recognised internationally, especially following the 2015 UN Paris Agreement, which had also heightened public awareness. He showed graphs of the global fossil CO₂ emissions, figures relating to atmospheric growth, land-use change, land and ocean sink between 2007 and 2016. Future warming depended on future emissions and he provided graphs of the requirements to reduce carbon emission to zero by 2045-2080. Mr Minns said the Broads could be a significant area to absorb CO₂ through locking carbon into peatland, referring to the UK Peatland Code and he cited the work the Tyndall Centre and UEA were doing to advise local authorities. Forward-thinking options included looking at how to be a net zero planning authority and develop net zero climate and biodiversity restoration solutions. It was important to engage with people, visitors as well as residents, and work in collaboration with others. The significant element was communication and working in collaboration with others.

The Carbon Reductions Project Manager gave an update on progress since the Broads Authority meeting on 27 September 2019, following the adoption of the Climate Change Emergency Statement for the Broads. This included developing a 10-year action plan, and establishing key performance indicators and a baseline for the Broads as a whole. He highlighted the National Parks England Climate Change Position Statement agreed at National Parks England's AGM on 30 October 2019. He also drew attention to the key actions being undertaken by officers to understand the Authority's emissions and how our carbon footprint could be reduced. The greatest area where there was a need to reduce carbon centred on the transport network, as illustrated by the maps provided.

In discussion, Members recognised that transport was key. It was accepted that the Authority did not have the resources to supply public transport, and there was a need to increase collaborative working with the Local Authorities to find solutions, including a more integrated transport system and simpler access to public transport. It was noted that the promotion of visitors from overseas to the National Parks was a challenging concept.

Although the Broads had the potential capacity to offset carbon, it was considered this should be a temporary measure and last resort, as it could be seen as a 'permit to pollute'. A voluntary offsetting scheme could be worthwhile for the Authority if supported by a relevant governance and monitoring framework. It could also be used as a financial mechanism and a valuable source of income. An important challenge was to identify potential offsetting sites.

The Authority's main aim was to reduce its carbon emissions and help achieve net negative carbon emissions across the Broads through influence and collaboration. Members considered it was important to view matters in the round, looking at impact and effect, including sea level rise and flood risk. They acknowledged that the Broads Futures Initiative was an important focus for responding to increased flood risk, with BFI public engagement events planned in summer 2020.

Reference was made to the Transforming Cities project produced by Norfolk County Council, which included an overhaul of the public transport services and a host of measures to reduce carbon emissions and reduce the effects of climate change, as well as support for Norwich to become a transforming city. A member commented it would be helpful if all Committee

meetings were held at Yare House, which was on a sustainable public transport route, rather than elsewhere.

Members noted that the Authority was focusing on adaptation and mitigation, with officers meeting with the other Local Authorities and working with the UEA to advance understanding and means of reducing carbon emissions.

The Chairman thanked Asher Minns for his enlightening presentation, Harry Mach for his update, and members for their contributions.

It was resolved to note the reports.

9. Proposed navigation charges for 2020/21 in the navigation area and adjacent waters

The Authority received a report on the proposed level of charges in the navigation area and adjacent waters for 2020/2021 following consideration by the Tolls Review Group of the impact of the major changes made to the structure of the charges in April 2017, trends over the last year in boat numbers and finance, and potential options and advice from the Navigation Committee on 31 October 2019. Members noted the significant agreement between the Tolls Review Group and the Navigation Committee, as follows:

- There should be a minor amendment to the structure of the tolls such that electric powered auxiliary yachts should be charged the same as a sailing boat; (to encourage a move to electric power where technically feasible – in line with objectives on climate change)
- Charges should be raised by a minimum of 1.8% to retain the essential services and account for a likely reduction of ten hired motor cruisers in the hire fleet in 2020;
- The repetition of the stakeholders' survey was not a priority for the coming year;
- The provision of a 24-hour mooring at Peto's Marsh with pontoons providing access to the Angles Way and the new Suffolk Wildlife Trust (SWT) visitor centre should be supported.

However, it was noted that the Navigation Committee had differing views about an online safety package, the suggested lower increase for unpowered, hybrid and electric powered craft, and the level of funding from tolls for the new 24-hour mooring at Peto's Marsh. With regard to provision of moorings, the Broads Act stated that expenditure incurred in respect of moorings was Navigation Expenditure and could not be funded from National Park Grant.

Members considered six options as a result of the consultations and the impact of the six different levels of increase on the most common categories and size of vessels. The Navigation Committee's view had been that there should be an across the board increase of 2.3% to allow for an extra £15,000 to fund 50% of the Peto's Marsh 24-hour mooring. The Tolls Review Group had expressed preference for a 3.6% increase to enable the full provision of moorings at Peto's Marsh and the online safety training initiative.

Since the Navigation Committee meeting, officers had looked into alternative methods of raising funds for the Peto's Marsh moorings, taking advice from other organisations, but concluded that these methods would not provide value for money.

It was made clear that the Authority was very much a partner with the Suffolk Wildlife Trust in the development of the Carlton Marshes site, and that Peto's Marsh would provide a much-needed location for the disposal of dredgings from Oulton Broad and help maintain the flood banks. Members considered it was important to complete the provision of moorings in one phase, and this should coincide with the opening of the Carlton Marshes centre next summer. Therefore, they were supportive of raising sufficient funds to cover the full cost of provision.

Members agreed with the Navigation Committee's view that the boat owners survey and development of an online safety package were not priorities. They considered that introducing a lower differential increase in tolls for electric and hybrid craft would send out a definite signal that the Authority was in support of reducing carbon and reliance on fossil fuels, in line with its statement on climate change, although they recognised that not all the technology was yet in place.

It was clarified that the navigation budget was very sensitive and a cautious approach was taken, including the policy to maintain navigation reserves at 10%. It was important to take account of the increased costs to deliver the Authority's statutory duties.

Fran Whymark proposed, seconded by Jacquie Burgess and

It was resolved by 15 votes for, one against and 1 abstention (one member having declared an interest as a Trustee of the Suffolk Wildlife Trust)

- i. **That there should be a differential increase in tolls such that unpowered, electric and hybrid craft have lower increases than diesel or petrol-powered craft.**
- ii. **That the level of tolls be increased by 2.9% with an increase of just 1% for unpowered, hybrid and electric craft.**
- iii. **The increase to allow for £30,000 to cover the full cost of providing mooring at Peto's Marsh.**
- iv. **Change the structure of the tolls such that electric powered auxiliary yachts pay the same as sailing boats.**

10. Financial performance and direction

The Authority received a report providing a strategic overview of the key financial issues and items for decision. This included the Statement of Accounts for 2018/19 following the external audit and consideration by the Audit and Risk Committee (ARC) on 19 November 2019. It also included the second report for this financial year 2019/20 on the consolidated income and expenditure figures up to 30 September 2019. The ARC had received the Statement of Accounts at its meeting on 19 November 2019.

The Chief Financial Officer (CFO) was pleased to report that there were no substantial changes to the 2018/19 accounts following the now completed audit. These detailed a surplus of £84,760. As the audit took place a considerable time after the year end, the Authority was required to close the year's accounts before any adjustments could be made. The closing balance was correct, although when submitting the final statement of accounts there would need to be an explanatory table and letter referring to items that had been accrued following the year end. These referred to CANAPE claim 2 and adjustments to the pension liability. According to the Broads Act, the Statement of Accounts was required to be laid before Parliament by the Secretary of State, but it was unlikely that this would happen before January 2020.

The CFO also provided the latest figures to the consolidated income and expenditure figures up to 31 October 2019. She explained that the total variance had been reduced slightly to £178,692. The forecast had increased to £72,425, with the planning fees reduced by £31,000. The October earmarked reserves closing balance was £1.882m.

The Chairman of the ARC reported that the Committee had expressed the Authority's concerns and disappointment at the very late audit of the Accounts. The External Audit Partner present at the meeting had offered a fulsome apology but explained that the quality of the audit had not been affected. The Chairman of the ARC commented that it had been exceedingly disruptive to the small financial team having to accommodate the delayed audit process at the same time as usual business. Members congratulated the team on completing the work in exceptionally difficult circumstances.

Melanie Vigo di Gallidoro proposed, seconded by Bruce Keith and

It was resolved unanimously

- (i) To adopt the Statement of Accounts for 2018/19**
- (ii) To note the income and expenditure figures from April to 30 September 2019**

11. National Parks branding exercise – presentation

The Authority received a presentation from the Head of Communications on the progress of the National Parks Communications Team and the branding project, including the publication of a booklet on the shared story of the UK National Parks. While the National Parks each engaged with many different organisations, there was a gap in promoting them as a collective unit. The aim was to provide simple messages to promote the key shared values that the National Parks were built on, and the direction they were going. These values included care, inspiration, connection, balance and diversity, given the Parks' shared purposes and expertise. The emphasis was on inspiration, and the aim was to nurture an appreciation of landscapes and nature generally through national parks, and promote personal wellbeing with the motto 'inspire to care'. The booklet was available in print and as a pdf.

It was resolved to welcome and note the publication.

12. Strategic direction

The Authority received the latest Broads Plan 6-month progress report. They also received updates on the Authority's annual strategic priorities (2019/20) and on the status of the Authority's guiding strategies.

Members noted that all the main projects were on track.

It was resolved to note the report.

13. Peer Review update

The Authority received an update on the desk-based review of the Peer Review Action Plan, undertaken by the Managing Director of Broadland District Council and Chief Executive of North Norfolk District Council. A point brief was prepared by the external reviewers and the main actions involved the Broads Authority's Chairman and Chief Executive being invited to attend the Norfolk Leaders' meetings six-monthly and the Norfolk Chief Executives meeting quarterly. William Nunn, a Local Government Association Regional Peer, had agreed to provide support to the Authority's Chairman, Vice-Chairman and Chief Executive, with one meeting having been held to date.

As a result of the Peer Review's suggestion for greater engagement with the constituent Local Authorities, the Chairman and Chief Executive had met with the Leaders and Chief Executives of Suffolk, Norfolk, East Suffolk, Great Yarmouth and Norwich Councils, where the meetings had been very productive.

A member welcomed the external assistance relating to the Peer Review but expressed concern that, following what had been a very positive member workshop in January 2018, some of the recommendations had been ignored, such as safe space meeting, members only meetings, a skills audit and members and staff working together on individual projects. He queried what had been achieved.

The Head of Governance clarified that the total number of Broads Authority meetings had not been reduced, but two of the six scheduled meetings were now primarily for workshop style meetings or site visits, to give members more time to meet informally. Members commented that these, as well as the away days, were valuable and useful areas for informal discussion.

A member queried why the Authority was on a year's notice to the Local Government Association (LGA), since the LGA had supported the Authority in the Peer Review process. The Chief Executive clarified that the Authority continued to be a full and active member. The notice had been to anticipate in case of potential future cuts in resources. The cost per annum was in the region of £1,950.

Kelvin Allen proposed, seconded by Simon Roberts and

It was resolved unanimously to note the report and that the Authority should remove the one year's notice to the LGA and remain as a fully active member.

14. Chairs Group – Terms of Reference

The Authority received a report on the proposed Terms of Reference for the Chairs Group, which was set up following the Authority's decisions on the Peer Review Action Plan in May 2018. It was emphasised that the Chairs Group had been set up as an informal means of giving greater support to the Chairman, Chief Executive and Management Team, acting as a sounding board and in an advisory capacity only. It was not a decision-making body. Terms of reference had been drawn up to give more clarity on its purpose and responsibilities.

A member commented that, as the team doing the external review of the implementation of the Peer Review Action Plan had not completed their work, terms of reference were premature and implied a cabinet style, rather than the collegiate set up of the Authority.

Some members felt the Chairs Group had exceeded its role and made decisions, referring to the response to the Glover Review. The Chief Executive explained that he had discussed the role of the Chairs Group with one of the external reviewers, who indicated that many local authorities had similar arrangements. He clarified that the Authority had given the Chairs Group delegated powers to respond to the Glover Review, following full member discussions at the Authority meetings in September 2018 and November 2018.

Other members emphasised that the Authority had agreed to set up a Chairs Group at the meeting in May 2018 as part of the Peer Review Group Action Plan. The Group comprised democratically elected Chairs and Vice-Chairs who were willing to commit time to the extra responsibility to provide support to the Chair and Chief Executive, and in whom members themselves had placed the responsibility. The aim was to widen the support for the Chair and the Chief Executive. It was recognised that there was a matter of trust. The issue before members was whether to adopt the terms of reference or defer their consideration.

Jacque Burgess proposed, seconded by Bruce Keith and

It was resolved by 11 votes to 6 against, to approve the Terms of Reference for the Chairs' Group, for inclusion in the Broads Authority's constitutional documents.

Members requested that the Chairs Group consider looking at ways of improving the trust within the Authority and consider the option of having minutes of the Chairs Group meetings and dates and agendas publicised to other members.

Nicky Talbot gave her apologies as she had to leave the meeting.

Items 23, 23a, 24 and 25 were taken at this point and the recording was suspended.

The meeting resumed in public following consideration of all the exempt items.

15. Corporate Partnerships Register

The Authority received the updated Corporate Partnerships Register, outlining its key partnerships with external organisations (Appendix 1 of the report). The partnerships were

with those organisations who shared responsibility for agreeing and implementing actions to meet common goals. This did not include statutory authorities.

It was resolved to note the Corporate Partnerships Register at Appendix 1 of the report.

16. Risk Management Policy and Register

The updated Corporate Risk Register and Risk Management Policy had been reviewed by the Audit and Risk Committee at its meeting on 19 November 2019. The Auditors had raised queries on some items and therefore the Chairman of the Audit and Risk Committee proposed that the item be deferred to the next Authority meeting when updates could be provided.

It was resolved to defer the Corporate Risk Register and Risk Management Policy to the next Authority meeting.

17. The Port Marine Safety Code: To consider any items of business raised by the Designated Person in respect of the Port Marine Safety Code

There were no matters to report under this item.

18. Minutes received

The Chairman indicated that he would assume that members had read these minutes and were invited to ask any questions.

It was resolved to receive and note the minutes from:

Navigation Committee on 5 September 2019

Planning Committee on 13 September 2019 and 11 October 2019

19. Feedback from Members appointed to represent the Authority on outside bodies 2019/2020

None reported.

20. Any other items of business to be considered as a matter of urgency

The Authority had agreed to consider a matter of urgency following item 14. This is documented at Agenda Item 23a.

21. Formal questions

There were no formal questions of which notice had been given.

22. Date of next meeting

The next meeting of the Authority would be held on 31 January 2020 at 10.00 am at Yare House, 62 – 64 Thorpe Road, Norwich.

23. Exclusion of the public

Melanie Vigo di Gallidoro proposed seconded by Kelvin Allen and it was **resolved**

to exclude the public from the meeting under Section 100A of the Local Government Act 1972 for the consideration of the following items on the grounds that they involved the likely disclosure of exempt information as defined by Paragraph 1, 2, 3, and 4 of Part 1 of Schedule 12A to the Act as amended, and that the public interest in maintaining the exemption outweighed the public benefit in disclosing the information.

The public left the meeting and the recording was suspended.

Summary of Exempt Minutes

23a Item of Urgent Business - Whitlingham

The Chief Executive gave members a briefing, containing exempt information, regarding the decision by the Colman Estate to end the partnership with the Broads Authority relating to the operation of Whitlingham Country Park and the lease of the Flint Barn. He outlined the background to the arrangements with the Trust, the leases for the Flint Barn and the arrangements with the caterers, and gave details of the key points and timeline of events leading up to the decision.

It was emphasised that it was the decision of the Colman Estate and its Trustees to run Whitlingham independently from the Broads Authority with a separate identity, and that they proposed to end the Service Level Agreement on 31 March 2020 with an amicable separation over an agreed timescale. There had not been any decision to be made by the Broads Authority board on this matter.

Following discussion and expressions of disappointment, members generally considered that there could not have been a different outcome had the matter been brought to the Authority for discussion, given that the decision rested entirely with the Trust. They felt it was important to move forward and learn lessons from the matter.

Tim Jickells proposed, seconded by Melanie Vigo di Gallidoro and

It was resolved by 12 votes in favour and 3 against

that the Authority notes with regret the outcome of the negotiations with the Whitlingham Charitable Trust, but accepts that officers had used their best efforts to support the interests and business of the Authority.

24. Exempt minutes of the Navigation Committee meeting on 5 September 2019

It was resolved to receive the Exempt minutes of the Navigation Committee meeting of 5 September 2019.

25. Visitor Services Review

The Authority received a report containing exempt information setting out short-term and long-term options to provide alternative visitor information and boat trip facilities in light of the Authority no longer being involved with Whitlingham Country Park.

It was resolved to note the report and endorse the strategic direction being taken:

- (i) To continue to examine the short-term options presented and test different small- scale options if possible**
- (ii) To defer considering a business case and site analysis for a Visitor and Education Centre.**

The meeting ended at 13.52 pm

Signed by

Chairman

Appendix 1 - Declaration of interests Broads Authority, 22 November 2019

Member	Agenda/minute	Nature of interest
Bill Dickson	9 (Navigation Charges)	Toll payer as previously declared
Nicky Talbot	9, (Navigation charges) 25 (Visitor Services Review)	Toll payer (9) Work for the Norfolk Wildlife Trust on an ad hoc basis
Greg Munford	9 (Navigation charges)	Chief Executive of Richardson Leisure
Simon Sparrow	9	Toll Payer
James Knight	9	Toll payer
Harry Blathwayt	9	Toll payer
Kelvin Allen	9	Member of Navigation Committee
Simon Roberts	9	Suffolk Wildlife Trust
Tim Jickells	-	As previously declared.

Broads Authority

31 January 2020

Agenda item number 7

Summary of Progress 31 January 2020

Report by Administrative Officer (Governance)

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
Transfer of Mutford Lock	26/01/2018	John Packman	The two Harbour Revision Orders are submitted and the tripartite agreement noted in the report be completed in all respects, to give effect to completing the transfer of Mutford Lock in the Navigation Area and the ownership to the Broads Authority.	<p>The two Harbour Revision Orders were published for 42 day public consultation on 3 August 2018. No objections have been raised under either order.</p> <p>The MMO is progressing the HROs - anticipated these would be determined by end of July 2019.</p> <p>Final determination of HROs still awaited. Chairman taken matter up informally with MMO.</p> <p>Date for final determination unknown.</p>	31/07/2019

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
Pilot agri-environment scheme for the Broads	16/03/2018	Andrea Kelly	Content of submission to Defra for pilot agri-environment scheme for the Broads, which builds on the partnership work with the National Farmers Union and local land managers and prepared with assistance of local conservation NGOs, welcomed and noted.	Defra awarded Broads Test and Trial contract in October. Sub-contracts awarded to Natural England, Norfolk Farming Wildlife Advisory Group and facilitator. Broads Test and Trial published on website. First partnership workshop 13 November: 63 farmers and land managers hosted by BA, NFU, Natural England, Norfolk Farming Wildlife Advisory Group and facilitator, excellent participant feedback. Workshop report circulated to Steering Group and participants and interest parties Defra ELMs team and Broads farmer site visit postponed to February 2020 due to election.	30/06/2020
Acle Bridge	28/09/2018	John Packman	Chief Executive delegated: <ul style="list-style-type: none"> to continue discussions with the neighbouring landowner over the possibility of purchasing additional land at the Acle Bridge site; to continue discussions with Great Yarmouth 	Activity focused on repairs of moorings and installation of electric charging points – due for completion Easter 2020. Acle Bridge site included as part of strategic approach to visitor services in Visitor Services Review (Exempt report) on BA agenda for 22 November 2019.	31/01/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			<p>Borough Council for the acquisition of the toilet block;</p> <ul style="list-style-type: none"> to proceed with the essential repairs to the moorings at the Acle Bridge site subject to the views of the Navigation Committee to investigate whether the development of a Visitor and Education Centre could form an important element in a wider more ambitious project to improve the infrastructure for Broads tourism and raise awareness of the special qualities of the area in future; and in the context of reviewing the Sustainable Tourism 	<p>In line with Members' decision current Visitor Services development focused on sites other than Acle Bridge e.g. The Forum in Norwich – see below. (Visitor Services Review)</p>	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			Strategy, to consider with members options for a wider project to enhance tourism in the Broads.		
National Parks Review: Response	28/09/2018	John Packman	The Chairs' Group together with the Chief Executive consider and provide a robust response for submission to the Review Team based on the eight areas required of the team and guidance from Members as indicated. The deadline response submission 18 December 2018 . Chairs' Group to meet meeting again on 5 December 2018 to finalise the response and consider the points raised. Members were encouraged to submit any comments they wished to make	Landscapes Review Final Report published on 21 September 2019. Awaiting Government response to review. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf Members received preliminary paper for discussion in November 2019 and January 2020. Item on this agenda highlighting report's 27 proposals and asking Members to consider priorities for more detailed discussion at future meetings.	31/01/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			individually to that group.		
Collaboration with Norfolk County Council	01/02/2019	John Packman	The Authority supports Norfolk County Council's aspiration for a single management structure for the Norfolk Coast Area of Outstanding Natural Beauty and the Wash, and North Norfolk Coast Natura 2000. That the areas of co-operation with Norfolk County Council and the progress that is being made is noted. That officers explore the possibility of more formal yet flexible platforms for future collaboration with Norfolk County Council focussing on procurement, bidding for external funding and staffing arrangements. (eg: A Memorandum of Understanding)	<p>Collaborative work ongoing with Norfolk County Council.</p> <p>BA member and officer site visit to Norfolk coast in association with Norfolk Coast Partnership took place on 4 July 2019.</p> <p>Project proposal for BA to be partner in Interreg EXPERIENCE project was successful.</p> <p>Kick-off meeting planned in Dec 2019 was postponed due to purdah.</p> <p>BA involved in developing Norfolk and Suffolk Environment Plan, led jointly by Norfolk and Suffolk County Councils. UEA developing asset inventory with set of indicators. Aim is to communicate outcome of work in spring 2020.</p>	22/05/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			Project proposal to be submitted to Norfolk County Council to be a partner in the EU Interreg programme Experience. This 3 year project involves taking forward the recent Discover England project to French and US markets and extending National Park branding. The draft budget is c £270,000 for over 3 years with a match funding contribution from the Authority of £75,013.		
Hosting National Parks' Communications Unit	22/03/2019	Rob Leigh	BA hosting UK National Parks Communications Service on basis set out in report, and Appendix 1 of report approved.	Communications Strategy approved by English CEO and Chairs groups on 28 November 2019. Internal roll out of National Parks branding/messaging launched. BA officers briefed at Staff Development Day on 16 October 2019 and Members briefed at BA meeting on 22 November 2019. Work ongoing to scope the review of the National Parks website.	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				Ongoing campaign support including photography competition and Discover National Parks Fortnight 4-19 th April 2020 underway. Ongoing workplan and steering group meetings scheduled. Next Heads of Communications meeting 2 nd – 4 th March 2020	
Permissive footpath at Reedham: Recommendation from Broads Local Access Forum	26/07/2019	Rob Rogers	To instruct BA officers to continue discussions with Norfolk County Council, Reedham Parish Council and landowner to find collaborative solution to missing permissive footpath link at Reedham.	Further discussions with Reedham Parish Council (RPC) indicate great deal of progress on this permissive footway. RPC and landowner having ongoing discussions and many of the issues preventing footway being reinstated have been resolved and RPC hope to have it repaired and open within this financial year.	22/11/2019
External funding	26/07/2019	John Packman	Proposed principles and key areas of work for external funding agreed as set out in report, to be developed by officers for further discussion with members to	Lewis Treloar appointed as Waterways and Recreation Officer in September 2019. Discussions with Broads Charitable Trust ongoing - Memorandum of Understanding between BA and Trust being drawn up for	31/01/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			<p>include the immediate next steps: Recruit a replacement Waterways and Recreation Officer with external funding bid writing experience; Continue to work with Broads Charitable Trust to align priorities; Through the Broads Charitable Trust, submit bids for funding to charities already identified as having the potential to support the Water Mills and Marshes programme; Explore with Norfolk County Council opportunities for further joint submissions for external funding; and Continue discussions with the Norfolk Coast Partnership on potential areas for joint working and</p>	<p>consideration at this meeting.</p> <p>Bids prepared for external funding to support Water, Mills and Marshes programme. Collaboration with Norfolk County Council continuing.</p> <p>Director of Strategic Services attending Norfolk Coast Partnership meetings.</p>	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			collaboration, including external fund raising.		
Weavers Way footpath on River Chet	26/07/2019	Rob Rogers	Weavers Way footpath by River Chet included in priority actions for new Waterways and Recreation Officer. Discussions with Norfolk County Council taking place.	New Waterways and Recreation Officer started with BA on 2 Sept 2019 and has undertaken induction training. This footpath is on his priority list of areas to deal with. Further updates to follow.	27/09/2019
Mooring Provision priorities (Exempt)	26/07/2019	Rob Rogers	To approve the Navigation Committee's recommendations from June 2019 on the strategic approach.	Exempt report to Navigation Committee on 16 January 2020 with status update. Lease negotiations of new and existing sites progressing.	
Draft planning documents for consultation	27/09/2019	Natalie Beal	Draft Marketing and Viability Supplementary Planning Document approved for public consultation - response and further report to be considered by Planning Committee, potentially in workshop format.	All documents submitted for public consultation between 30 September and 22 November 2019. <ul style="list-style-type: none"> Statement of Community Involvement (SCI) and responses to consultation considered by Planning Committee on 6 December 2019. Report recommending adoption on this agenda. Flood Risk SPD and responses to 	20/03/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			Draft Flood Risk SPD and Draft Statement of Community Involvement SCI approved for public consultation.	consultation considered by Planning Committee on 10 January 2020. Minor amendments made. Draft included on this Agenda to approve for 2nd round of consultation. <ul style="list-style-type: none"> Marketing and Viability SPD to go to Planning Committee on 7 February 2020. 	
Extinguishment of Public Rights of Way	27/09/2019	Cally Smith	To approve the preparation of the Public Extinguishment Orders for the PROWS which have been diverted under the Broads Flood Alleviation Project (BFAP).	Oct 2019 - Head of Planning discussed first bundle of five sections of PROWs for which diverted footpaths all have Dedication Agreements in place. Waterways and Recreation Officer supporting work. Preparatory works for first set of extinguishment applications underway. Legal position clarified; BA has powers to process Extinguishment Orders itself, which will save costs. Pre-consultation meeting held with Ramblers and Open Spaces Society.	31/05/2021
Water Resources East	27/09/2019	Marie-Pierre Tighe	Broads Authority to join Water Resources East (WRE) Water Resources Board at a cost of £15,000 for 2019/20 to support work and	WRE Directors' Board meeting 8 October 2019 attended by Director of Strategic Services, who was appointed as Board member. WRE Managing Director presented their work to Broadland Futures Initiative group in	30/11/2021

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			connect initiatives in Broadland catchment to wider Eastern Region. Funds to come from National Park Reserves. BA to review its WRE membership in September 2020.	December 2019. Director of Strategic Services attended meeting on 14 January 2020: procurement policy and appointment of auditor, operational budget, 20/21 business plan. Overall aim is to agree Water Management Plan by December 2021.	
Responding to Climate Change Emergency	27/09/2019	John Packman	To adopt the Climate Change Emergency Statement for the Broads included as Appendix 1 of the First Report and the principles outlined. Recognition of climate emergency to work toward making the Broads Authority 'carbon neutral' by 2030, with further objective of reducing all carbon emissions to zero by 2040. Establish base line for CO2 emissions using a common	Principles agreed in September 2019 - first in a series of items dealing with climate change. Presentation from Asher Minns, Director of Tyndall Centre at UEA and update by CANAPE Project Manager/Carbon Reduction Projects Manager on 22 November 2019. Planning Committee received report on 10 January 2020 on planning policy response to climate change mitigation and adaptation: <ul style="list-style-type: none"> - Broads Local Plan policies 2019 that address climate change mitigation, - Collaboration with Local Planning Authorities in Norfolk and Suffolk - Norfolk Strategic Planning Framework - Climate change sub-committee, Suffolk County Council and East Suffolk Council 	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			<p>methodology with NPAs and develop an Action Plan and Monitoring system.</p> <p>Work with constituent local authorities to reduce emissions from domestic, travel and other sources in the Broads across the two counties.</p> <p>Work with farmers, land managers, NFU and Defra to influence land management practices, to maintain and build organic matter and carbon in soil, improve biodiversity and store water to protect against flooding and drought.</p> <p>Work with boating and tourism organisations to continue promoting and developing environmentally friendly boating and sustainable tourism ; and</p>	Building Regulations - potential future changes	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			aspires to offsetting carbon emissions locally within the Broads by a Broads offsetting scheme.		
Visitor Services Review (Exempt)	22/11/2019	Rob Leigh	<p>Report noted and strategic direction endorsed:</p> <ul style="list-style-type: none"> • To continue to examine the short-term options presented and test different small-scale options if possible. • To defer considering a business case and site analysis for a Visitor and Education Centre. 	<p>Negotiations with Norwich City Council are continuing very positively. Aiming for the launch of the new facility in the Forum for April 2020. BA have committed financial support from existing visitor centre budgets to contribute to refurbishment works. This will include a staff presence, display area, retail, interactive activities, retail and visitor information.</p> <p>Sound progress has also been made for a visitor centre presence at Lowestoft rail station. Again we are seeking for this to be in place prior to the 2020 season funded from existing visitor centre budgets.</p>	31/03/2020
Proposed Navigation Charges for 2020/21 in the	22/11/2019	Bill Housden	<ul style="list-style-type: none"> • There should be a differential increase in tolls such that unpowered, electric and 	Notice to toll payers to be sent out early February 2020.	31/05/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
navigation area and adjacent waters			<p>hybrid craft have lower increases than diesel or petrol-powered craft.</p> <ul style="list-style-type: none"> • The level of tolls be increased by 2.9% with an increase of just 1% for unpowered, hybrid and electric craft. • The increase to allow for £30,000 to cover the full cost of providing mooring at Peto's Marsh. • Change the structure of the tolls such that electric powered auxiliary yachts pay the same as sailing boats. 		

Author: Sandra Beckett

Date of report: 20 January 2020

Broads Authority

31 January 2020

Agenda item number 12

Financial performance and direction - Budget general 2020/2021 and Financial Strategy 2022/23

Report by Chief Financial Officer

Purpose

This report provides a strategic overview of current key financial issues and items for decision.

Recommended decision

- i. That the income and expenditure figures be noted.
 - ii. That the Authority adopts the 2020/21 Budget and endorses the assumptions made applied in the preparation of the Budget.
 - iii. That the Authority adopts the Earmarked Reserves Strategy for the period 2020/21 to 2022/23.
 - iv. That the Authority notes the next steps in considering repayment of the Public Works Loan.
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1. Introduction

- 1.1. This report covers three items, consolidated Income and Expenditure, the consolidated budget and the potential early settlement of the loan from the Public Works Loan Board (PWLB).
- 1.2. Sections 2 to 5 provide a summary of the Consolidated Income and Expenditure up until 30 November, any amendments to the Latest Available Budget (LAB), Forecast Outturn (predicted year end position) and the movements on the earmarked reserves.
- 1.3. Sections 6 to 13 contains the updated draft budget for 2020/21 and the draft financial strategy to 2021/22. An outline of the draft budget for 2020/21 was presented to the Committee at its meeting on 22 November 2019 to inform the setting of navigation charges for 2020/21. Following the Authority's subsequent decision to apply a 2.9% increase in navigation charges for powered vessels and a 1% increase for unpowered, hybrid and electric vessels, this report now sets out an updated budget for 2020/21 alongside the draft financial strategy to 2022/23.
- 1.4. Section 14 contains details about the next steps in considering the early settlement of the loan from the PWLB. The loan was taken out in 2007 for a period of 20 years to acquire the Dockyard Operation from May Gurney. The purpose of the loan was to enable the Authority to undertake dredging in an economical and efficient manner.

2. Overview of actual income and expenditure

Table 1

Actual Income and Expenditure by Directorate to 30 November 2019

Directorate	Profiled Latest Available Budget £	Actual income and expenditure £	Actual variance £
Income	(5,951,865)	(5,969,634)	+ 17,769
Operations	2,702,834	2,623,762	+ 79,072
Strategic Services	1,143,581	1,087,546	+ 56,035

Directorate	Profiled Latest Available Budget £	Actual income and expenditure £	Actual variance £
Chief Executive	1,065,179	978,397	+ 86,782
Projects, Corporate Items and Contributions from Earmarked Reserves	(71,797)	(34,842)	- 36,955
Net (Surplus) / Deficit	(1,112,068)	(1,314,771)	+ 202,703

2.1. Core navigation income is above the profiled budget at the end of month eight. The overall position as at 30 November 2019 is a favourable variance of £202,703 or a 18.23% difference from the profiled LAB. This is principally due to:

- An overall favourable variance of £17,769 within income:
 - Hire Craft Tolls is £9,578 behind the profiled budget.
 - Private Craft Tolls is £17,426 above the profiled budget.
- An underspend within Operations relating to:
 - Construction and Maintenance Salaries is under the profiled budget by £16,120 due to vacancies that have arisen throughout the year which have taken some time to replace.
 - Equipment, Vehicle and Vessels is over the profiled budget by £20,954 due to the electric van being purchased one month ahead of schedule.
 - Land Management is under the profiled budget by £38,170 due to the uncertain nature of when income from the Rural Payments Agency will be received.
 - Practical Maintenance is above the profiled budget by £27,255 due to the Breydon channel markers and the boardwalk at Hoveton being completed ahead of schedule.
 - Waterways and Recreation Strategy is under the profiled budget by £12,512 due to a vacancy.
 - Ranger Services is under the profiled budget by £31,365 due to a number of variances across all budgets.
 - Operational Premises is under the profiled budget by £42,222 due to a timing difference on the concrete pad work at the dockyard being completed. This is offset by the corresponding Premises reserve variance.
 - Head Office is over the profiled budget by £55,773 due to the quarterly charges being received one month ahead of schedule.

- Project Funding is under the profiled budget by £39,156 due to timing differences and the uncertain nature of when projects will be submitted.
- An underspend within Strategic Services relating to:
 - Development Management is over the profiled budget by £48,522 due to Section 106 monies being paid out. This is offset by the corresponding Planning Delivery Grant and Section 106 reserve variance. It should be noted that income from Planning fees is under budget and the Local Plan Inspection coming in less than expected has reduced the overall variance.
 - Strategy and Projects is under the profiled budget by £37,836 due to salary savings following a vacancy and a delayed Catchment projects. This is due to slip into 2020/21 as its delivery is dependent on warmer weather. This is offset by the corresponding Catchment reserve variance.
 - Volunteers is under the profiled budget by £12,913 due to timing differences and salary savings following a vacancy.
 - Communications is under the profiled budget by £35,328 due a number of variances within all budgets which are timing differences.
 - Visitor Centres and Yacht Stations is under the profiled budget by £20,771 due to holiday pay for the seasonal staff being paid in December.
- An underspend within Chief Executive relating to:
 - Legal is under the profiled budget by £40,642 due to salary savings.
 - Asset Management is under the profiled budget by £17,928 due to timing differences on lease payments and consultancy.
 - Finance and Insurance is under profiled budget by £18,035 due to salary savings following a vacancy and savings on insurance premiums.
- An adverse variance within reserves relating to the Premises, Planning Delivery Grant, Section 106 and Catchment reserves. These offset the favourable variances detailed above.

2.2. The charts at Appendix 1 provide a visual overview of actual income and expenditure compared with both the original budget and the LAB.

3. Latest available budget

3.1. The Authority's income and expenditure is monitored against the latest available budget (LAB) for 2019/20. The LAB is based on the original budget for the year, with adjustments for known and approved budget changes such as carry-forwards and budget virements. Full details of movements from the original budget are set out in Appendix 2.

Table 2

Adjustments to LAB

Item	Authorisation reference	Amount £
Original budget 2019/20 (deficit)	Broads Authority 01/02/19 Agenda item number 12	44,381
Approved carry-forwards from 2018/19	Broads Authority 17/05/19 Agenda item number 12	15,094
Cybercrime	Broads Authority 17/05/19 Agenda item number 25	36,000
Water Resources East membership	Broads Authority 27/06/19 Agenda item number 13	15,000
LAB as at 30 November 2019	n/a	110,475

4. Overview of forecast outturn 2019/20

- 4.1. Budget holders have been asked to comment on the expected income and expenditure at the end of the financial year in respect of all budget lines for which they are responsible. The forecast outturn reflects the following changes from the LAB as shown in Table 3.

Table 3

Adjustments to Forecast Outturn

Item	Amount £
Forecast outturn deficit per LAB	110,475
Adjustments reported 22 November 2019	(63,550)
Decrease to Construction & Maintenance salaries following a vacancy	(13,900)
Decrease to Planning Fee income	31,500
Decrease to Development Management salaries	(8,400)
Decrease to Strategy & Projects salaries following a vacancy	(13,100)
Decrease to Volunteer Services salaries following a vacancy	(5,300)
Decrease to Strategic Services Management & Admin salaries following a vacancy	(9,000)
Decrease to Finance salaries following a vacancy	(6,000)
Forecast outturn deficit as at 30 November 2019	22,725

5. Reserves

Table 4

Consolidated Earmarked Reserves

Reserve name	Balance at 1 April 2019 £	In-year movements £	Current reserve balance £
Property	(569,750)	(72,462)	(642,212)
Plant, Vessels and Equipment	(275,190)	(86,897)	(362,087)
Premises	(195,326)	(76,645)	(271,971)
Planning Delivery Grant	(269,293)	64,311	(204,982)
Upper Thurne Enhancement	(120,409)	(21,000)	(141,409)
Section 106	(103,392)	60,419	(42,973)
Heritage Lottery Fund	(89,706)	304,392	214,686
Catchment Partnership	(88,988)	(3,882)	(92,870)
CANAPE	(80,476)	(60,550)	(141,026)
Computer Software	(11,476)	(10,000)	(21,476)
Total	(1,804,006)	97,686	(1,706,320)

5.1. £885,797 of the current reserve balance above relates to Navigation reserves.

6. 2020/21 Budget proposals

- 6.1. The draft budget is set out in Appendix 3 and the financial strategy to 2022/23 to provide context. The draft navigation budget was considered by Navigation Committee on 16 January 2020. A verbal update will be provided during the meeting.
- 6.2. As with the 2019/20 Budget it has been prepared on a zero budget basis. This makes no assumptions of the automatic rollover of previous years' budgets. Budget holders are sent a template in July to consider expenditure for the next financial year in line with strategic direction previously agreed with members. It takes into consideration priorities around dredging, moorings and plant cutting agreed in the relevant strategies and is split between essential and desirable expenditure. This is then reviewed by Management Team in September to ensure requests are in line with expectations. It

provides the baseline information for the Tolls Working Group to consider in October prior to making recommendations around the level of navigation charges required.

6.3. The draft budget takes account of the following factors:

- A provisional 2% pay increase for staff and increased pension costs. This is subject to the National Joint Council (NJC) finalising the pay deal for 2020/21 onwards.
- The loss of ten boats in the hire fleet, this accounts for approximately £11,500.
- Interest on deposits remain at a similar level to 2019/20.
- National Park Grant remains at 2019/20 level. This is subject to confirmation from DEFRA.
- The installation of pontoons at Peto's Marsh.
- The removal of Whitlingham Tourist Information Centre running costs, catering concession income and associated staff recharges.

6.4. Total core income for 2020/21 is budgeted to be £6,960,178, including £3,414,078 for National Park Grant, £1,199,000 for hire craft tolls and £2,244,000 for private craft tolls. This income takes account of the latest available data for boat numbers. Net expenditure is budgeted at £7,113,696. This will result in a consolidated budget deficit of £153,518, which is balanced by the higher level of reserves at the end of 2019/20. Taking into account the transfer of £20,500 of interest to earmarked reserves, reserves at the end of March 2021 are forecast to be £1,269,132 (£893,264 National Park and £375,868 Navigation which amounts to 25.2% and 10.5% of net expenditure for the year respectively.

6.5. Table 5 sets out an overview of the proposed 2020/21 budget, which is provided in more detail in Appendix 3.

Table 5

Draft 2020/21 Budget

Source	National Park £	Navigation £	Consolidated £
National Park Grant	(3,414,078)	0	(3,414,078)
Navigation Tolls	0	(3,505,100)	(3,505,100)
Other Income	(20,500)	(20,500)	(41,000)
Total Income	(3,434,578)	(3,525,600)	(6,960,178)
Operations	1,432,692	2,503,622	3,936,314
Strategic Services	1,268,041	336,518	1,604,559
Chief Executive	737,861	651,462	1,389,323
Corporate Items	104,100	79,400	183,500

Source	National Park £	Navigation £	Consolidated £
Total Expenditure	3,542,694	3,571,002	7,113,696
Net (Surplus) / Deficit	108,116	45,402	153,518
Opening Reserves (Forecast)	(1,011,630)	(431,520)	(1,443,150)
(Surplus) / Deficit for the year	108,116	45,402	153,518
Interest transfer	10,250	10,250	20,500
Closing Reserves (Forecast)	(893,264)	(375,868)	(1,269,132)

7. Operations

- 7.1. The Operations budget has seen an increase to staff costs to reflect the provisional 2% pay increase currently being negotiated by the NJC. Staff costs have also been updated to reflect the triennial valuation results for the pension costs. The Equipment, Vehicles and Vessels budget has been increased to cover the cost of replacing the JCB 2010 excavator on a Finance Lease. The Practical Maintenance budget has been increased to incorporate the extra costs for the Pontoons at Peto's Marsh. The Ranger Services budget has seen a decrease to income following the loss of staff recharges to Whitlingham Charitable Trust. The contribution to the launch replacements within the Plant, Vessel and Equipment Reserve has been increased as per recommendations discussed with members on 01/02/19. Project Funding has been reduced to decrease the National Park Deficit. It is proposed to revisit this once the outcome of the grant settlement is known. Small scale savings identified in 2019/20 have also been incorporated into 2020/21. In other areas of the budget, the provision represents the level of funding required to enable continuation of the levels of service delivered in the current year.
- 7.2. As with previous years, however, it is important to recognise that the Operations budget has no capacity to take on additional projects or ad-hoc work in 2020/21.

8. Strategic Services

- 8.1. As with the Operations budget, staff costs have increased for the same reasons. Visitor Centres and Yacht Stations have seen the removal of the running costs associated with Whitlingham Tourist Information Centre and the loss of the catering concession income. Staff costs for the visitor centre have been maintained at the same level in order to operate from The Forum for a period of one year. Other locations for 2020/21 being investigated will be potentially covered by existing budgets. Longer term options will be costed for future year budgets once further details become available. The focus

on the Whitlingham replacement means there is little capacity to take on additional projects or other ad-hoc work. In other areas of the budget, the provision represents the level of funding required to enable continuation of the levels of service delivered in the current year.

9. Chief Executive

- 9.1. As with the Operations and Strategic Services budgets, staff costs have increased for the same reasons. The Legal budget has seen a reduction following the decision not to replace the Solicitor post and outsourcing the work. The Collection of Tolls budget has seen an increase to reflect the year round cover now provided. Again, there remains little capacity for additional work.

10. Central and shared costs and cost apportionment

- 10.1. Cost apportionments have remained the same as those for 2019/20 and are consistent with the principles agreed by the Resources Allocation Working Group. Full details of apportionments by budget line for 2020/21 are set out in Appendix 3.
- 10.2. The overall split of proposed net expenditure in 2020/21 remains 50% national park and 50% navigation, whilst income is split 49% and 51%. The 1% movement reflects the uncertainty around the National Park grant which has been budgeted at the same level as 2019/20. Confirmation from DEFRA on the future year(s) is expected before 31 March 2020. A reduction in grant will require planning for future years (2021/22 onwards) to ensure National Park Reserves remain at the recommended levels.
- 10.3. Table 6 below provides further details of central and shared costs. These should not be seen as synonymous with overheads, but have been identified in line with those areas specifically examined by the Resource Allocation Working Group. As such they reflect costs across the Authority that are included within the budgets of both Operations and Strategic Services directorates, and from the Chief Executive's section.

Table 6

Central and Shared Costs

Cost/Percentage split	2020/21 National Park £000s	2020/21 Navigation £000s	2020/21 Consolidated £000s	2021/22 National Park £000s	2021/22 Navigation £000s	2021/22 Consolidated £000s	2022/23 National Park £000s	2022/23 Navigation £000s	2022/23 Consolidated £000s
Share of central and shared costs	1,535	999	2,534	1,554	1,017	2,571	1,575	1,034	2,609
Pension contribution lump-sum	74	49	123	76	51	127	78	52	130
Total	1,609	1,048	2,657	1,630	1,068	2,698	1,653	1,086	2,739
Percentage split of central and shared costs	61%	39%	100%	60%	40%	100%	60%	40%	100%
Total core income	(3,435)	(3,526)	(6,961)	(3,429)	(3,627)	(7,056)	(3,429)	(3,700)	(7,129)
Central and shared costs as a percentage of core income	47%	30%	38%	48%	29%	38%	48%	29%	38%

10.4. Central and shared costs have been identified in line with the work of the Resource Allocation Working Group, to include: operational property, finance and insurance; communications; collection of tolls; ICT; legal; head office; office expenses and pool vehicles; directorate management and administration costs; human resources and staff training; governance and member's allowances; and the Chief Executive. All of these play a vital role in supporting the delivery of frontline services. Central and shared costs also include the lump sum pension contribution, which is made annually to reduce the Authority's share of the pension deficit as calculated by the pension fund actuary. As a

percentage of income, central and shared costs are broadly static and remain at the same level as 2019/20.

11. Assumptions used for the Budget and Financial Strategy

11.1. The following key assumptions have been applied in developing the draft budget and financial strategy:

- National Park Grant will continue at the same level of the 2019/20 settlement;
- Navigation tolls will be collected in line with the budget and boat numbers will remain as forecast;
- Salary increases from 2020/21 onwards are based on a provisional increase of 2%, subject to negotiations with the NJC;
- Staffing levels will remain at 100% of budget. Staff turnover may result in timing differences between vacancy and appointment. Where these savings arise the forecast will be adjusted accordingly;
- The forecast outturn position for 2019/20 will be delivered in line with budget holders' projections; and
- The continued provision until 2021/22 of £60,000 split equally between National Park and Navigation for the implementation of the Hickling vision.

11.2. A detailed sensitivity analysis for some of these key assumptions is set out below in table 7.

Table 7

Budget Sensitivity analysis

Assumption	Change in assumption	Approximate financial impact of change £ (+/-)
National Park budget for 2019/20 will be delivered in line with forecast outturn	1% under/overspend against National Park budget	35,000
Navigation budget for 2019/20 will be delivered in line with forecast outturn	1% under/overspend against Navigation budget	34,000
Overall salary increase of 2% in 2020/21	1% change in salary inflation	47,000
Boat numbers and distribution remain as predicted in 2020/21	1% change in navigation toll income	34,000
National Park Grant in line with current allocations and no further reduction	1% change in National Park Grant allocation	34,000

Assumption	Change in assumption	Approximate financial impact of change £ (+/-)
applied in 2020/21		

12. Earmarked reserves

- 12.1. The Authority's earmarked reserve strategy for the period 2020/21 to 2022/23 is set out in Appendix 4. The strategy details the actual balance of earmarked reserves at the end of November 2019, planned expenditure until the end of the financial year, and also provides an analysis of movements in reserves split between national park and navigation in all years to 2022/23.
- 12.2. Earmarked reserves stand at £1,706,320 (navigation £885,797) at the end of November 2019 and are forecast to increase slightly (to £1,973,542) by the end of the financial year.
- 12.3. Appendix 4 reflects the contributions to reserves allowed for in the budget and financial strategy set out in Appendix 3. Planned expenditure from reserves is itemised within Appendix 4 and includes in 2020/21:
- Replace mini digger, Sanderson Telehandler and NATO floats;
 - Replace three vehicles;
 - Dockyard slip-way piling and wash down area;
 - Repairs to How Hill Boatshed;
 - Planning Officer;
 - Catchment Partnership expenditure;
 - UK Communications Team expenditure;
 - Heritage Lottery Fund expenditure; and
 - CANAPE project expenditure.
- 12.4. Planned expenditure from earmarked reserves in 2021/22 and 2022/23 includes the continued Catchment Partnership, UK Communications Team, Heritage Lottery Fund, CANAPE project expenditure, replacement of eleven vehicles at an estimated cost of £212,545, replacement of JCB JS220 (2017) at an estimated cost of £105,000, replacement of a ranger launch at an estimated cost of £100,000 and the replacement of a wherry at an estimated cost of £120,000.
- 12.5. Taking account of all these items, the forecast balance of earmarked reserves at the end of 2022/23 is £2,212,231, although it should be noted that expenditure plans for 2021/22 and beyond are likely to be refined again when the financial strategy for 2021/22 is developed later on this year.

- 12.6. In 2022/23 the CANAPE project will have been completed. Any surplus balance will need to be redistributed 50:50 between national park and navigation reserves. The exact amount is currently difficult to forecast given the uncertainty surrounding the exchange rate so the figure included in Appendix 4 should not be seen as absolute. Members will need to consider how a potential surplus could be distributed. Options could include increasing the moorings/piling part of the property reserves or creating a new reserve to provide match funding for future projects.

13. Summary

- 13.1. The draft budget presented here incorporates the navigation charges for 2020/21 and is designed to allow the Authority to continue to deliver priority navigation activities at the required level, whilst making prudent provision for asset maintenance over the life of the strategy and beyond. Minor adjustments have also been made reflecting the latest staffing forecasts. As a result of all these factors there is no capacity within the budget for additional projects.
- 13.2. The National Park part of the budget shows a deficit for the next three years. This will be funded from the National Park Reserve resulting in a reserve balance of £893,264 at the end of 2020/21. Whilst the outcome of a new settlement remains uncertain figures for 2021/22 onwards should be viewed with a high degree of uncertainty. The impact of any change (positive or negative) will need careful consideration to make sure expenditure is sustainable.
- 13.3. It is important to recognise that the budget as a whole is highly sensitive to changes in salary inflation, as a result a significant proportion of the budget is made up of staff costs. The budget is based on a 2% increase in salaries for period April 2020 to March 2023. There continues to be uncertainty about the likely award.
- 13.4. The consolidated deficit of £153,518 allowed for in the 2020/21 budget continues to maintain reserves above their minimum. As in previous years, it remains the case that the indicative national park grant and tolls increases in 2021/22 and beyond will need to be revisited during next year's budget setting process to ensure they remain appropriate. This could be as a result of any variations from current assumptions or changes to outturn figures for 2019/20.

14. Early settlement of PWLB loan

- 14.1. At the Audit and Risk Committee meeting last November, it was agreed that the possibility of early repayment of the outstanding loan should be considered. This has been looked at a number of times over the years, but the cost has always been considered prohibitive. However, following the sale of Ludham field base and the creation of the Capital Receipts Reserve, this is now potentially possible.
- 14.2. The Capital Receipt Reserve is held on the balance sheet and is a useable reserve. The balance is £405,000 and is split 60/40 between National Park and Navigation. The

reserve can only be used to fund capital expenditure or to repay debt. The loan repayments are considered 100% Navigation.

- 14.3. Preliminary investigations indicate that this could be beneficial, given the continuation of low interest rates for investments. This will potentially create savings within the Navigation budget over the next seven years for the remaining instalments due. However, this does require confirmation from PWLB regarding the actual premium that would be charged.
- 14.4. The next steps will be to consult the Navigation Committee at its meeting in April and bring a report back to the Authority in May for a decision.

Author: Emma Krelle

Date of report: 10 January 2020

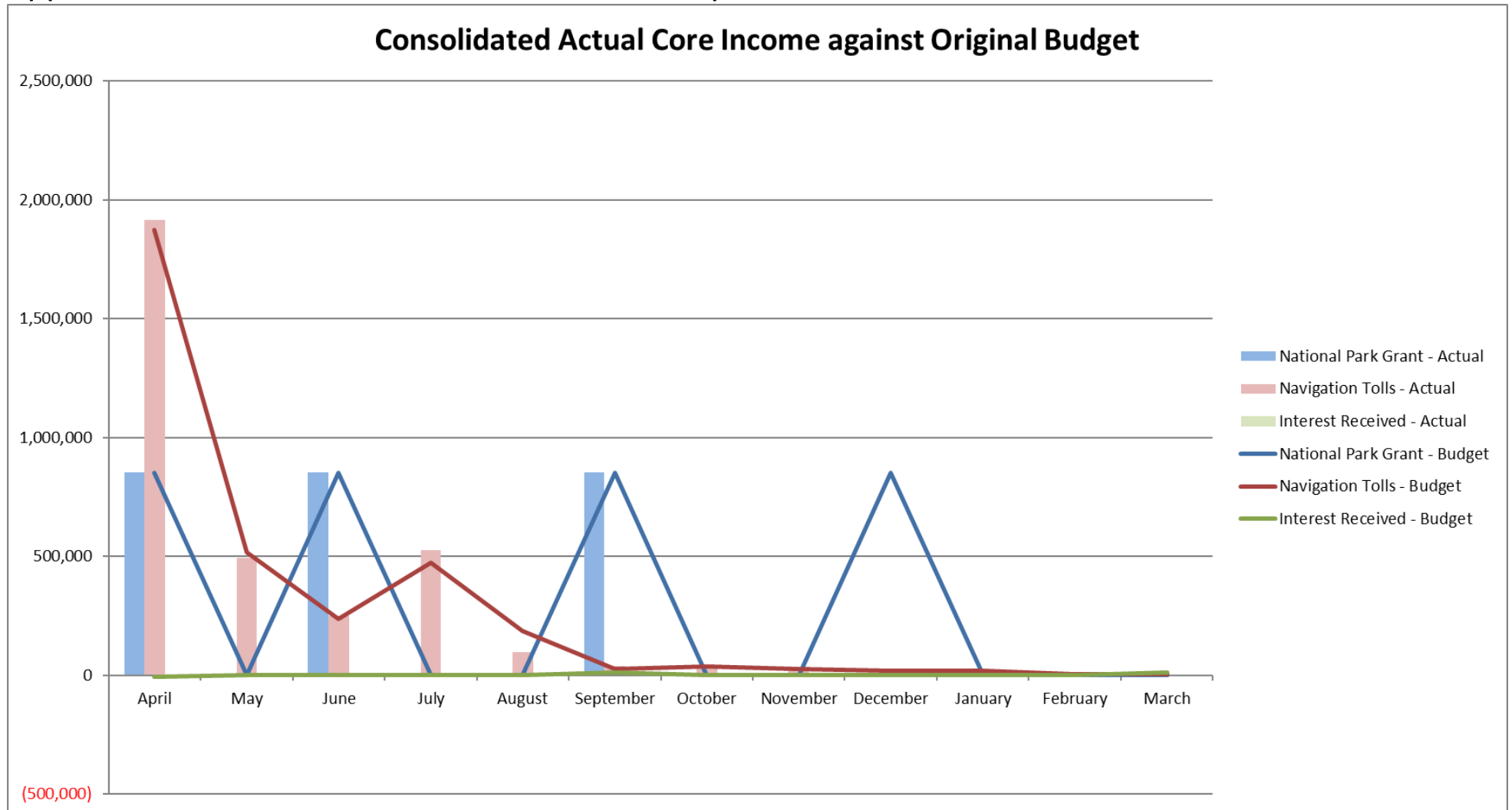
Appendix 1 – Consolidated actual income and expenditure charts to 30 November 2019

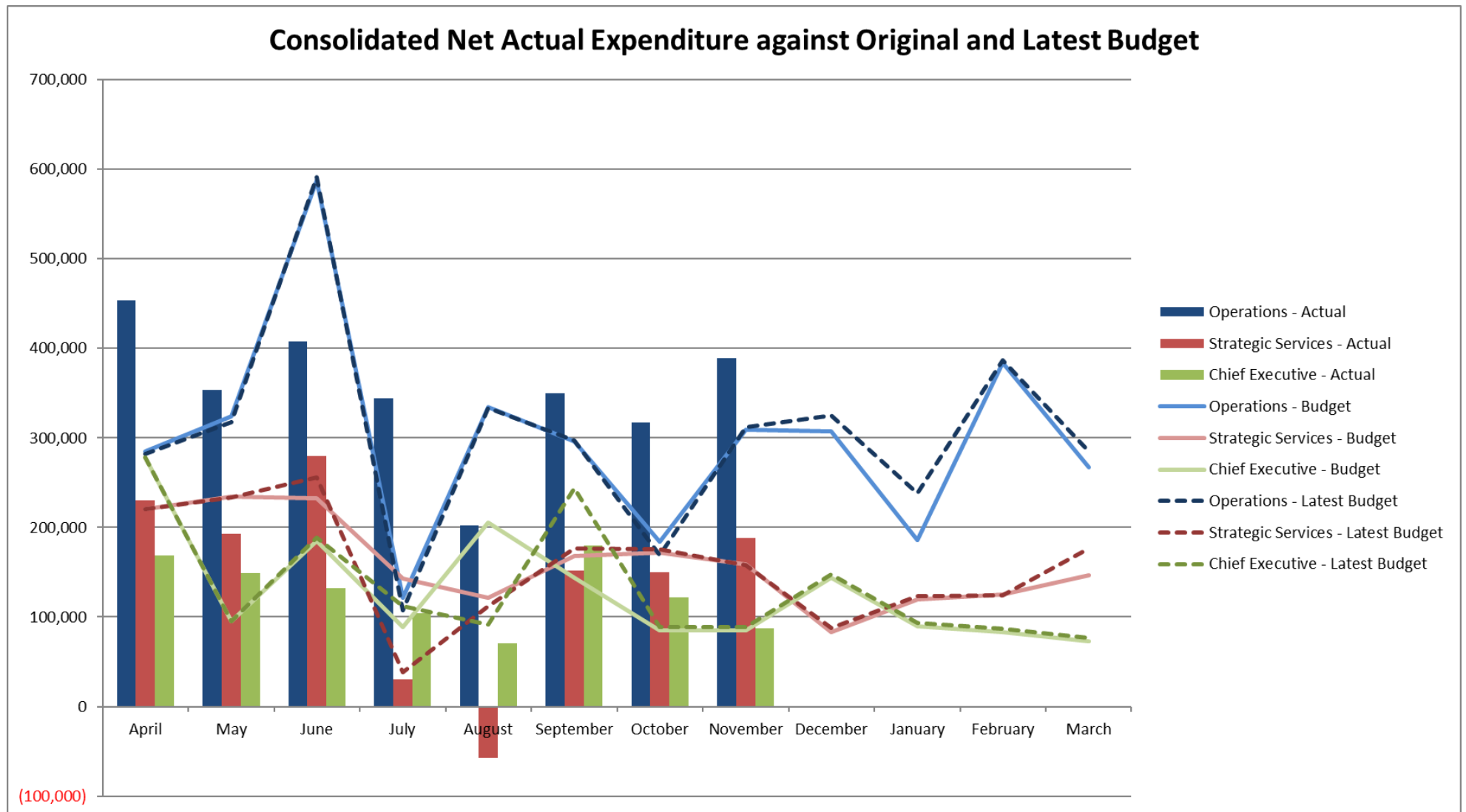
Appendix 2 – Financial monitor: Consolidated income and expenditure 30 November 2019

Appendix 3 – Draft Budget 2020/21 and Financial Strategy to 2022/23.

Appendix 4 – Earmarked Reserves to 2022/23

Appendix 1 – Consolidated actual income and expenditure charts to 30 November 2019





Appendix 2 – Financial monitor: Consolidated income and expenditure 2019/20

Table 1

Income

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Total Income	(6,869,078)	0	(6,869,078)	(6,886,578)	17,500
National Park Grant	(3,414,078)	0	(3,414,078)	(3,414,078)	0
Hire Craft Tolls	(1,189,000)	0	(1,189,000)	(1,179,000)	-10,000
Private Craft Tolls	(2,175,000)	0	(2,175,000)	(2,185,000)	10,000
Short Visit Tolls	(42,000)	0	(42,000)	(42,000)	0
Other Toll Income	(19,000)	0	(19,000)	(19,000)	0
Interest	(30,000)	0	(30,000)	(47,500)	17,500

Table 2
Operations

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Total Operations	3,945,630	57,342	4,002,972	3,965,512	37,460
Construction and Maintenance Salaries	1,225,520	28,167	1,253,687	1,239,787	13,900
Salaries	1,231,130	28,167	1,259,297	1,245,397	13,900
Expenditure	(5,610)	0	(5,610)	(5,610)	0
Equipment, Vehicles & Vessels	454,000	5,550	459,550	459,550	0
Income	0	0	0	0	0
Expenditure	454,000	5,550	459,550	459,550	0
Water Management	125,970	0	125,970	125,970	0
Income	0	0	0	0	0
Expenditure	125,970	0	125,970	125,970	0
Land Management	(48,440)	0	(48,440)	(48,440)	0
Income	(102,600)	0	(102,600)	(102,600)	0
Expenditure	54,160	0	54,160	54,160	0
Practical Maintenance	485,500	0	485,500	485,500	0
Income	(10,700)	0	(10,700)	(10,700)	0
Expenditure	496,200	0	496,200	496,200	0

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Waterways and Recreation Strategy	89,460	(3,500)	85,960	62,400	23,560
Salaries	79,960	(3,500)	76,460	52,900	23,560
Expenditure	9,500	0	9,500	9,500	0
Ranger Services	779,740	0	779,740	779,740	0
Income	(100,000)	0	(100,000)	(100,000)	0
Salaries	701,260	0	701,260	701,260	0
Expenditure	176,880	0	176,880	176,880	0
Pension Payments	1,600	0	1,600	1,600	0
Safety	130,000	27,125	157,125	157,125	0
Income	(3,300)	0	(3,300)	(3,300)	0
Salaries	62,600	0	62,600	62,600	0
Expenditure	70,700	27,125	97,825	97,825	0
Premises	232,910	0	232,910	232,910	0
Income	(1,000)	0	(1,000)	(1,000)	0
Expenditure	233,910	0	233,910	233,910	0
Premises - Head Office	250,640	0	250,640	250,640	0
Income	(240)	0	(240)	(240)	0
Expenditure	250,880	0	250,880	250,880	0

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Project Funding	100,000	0	100,000	100,000	0
Expenditure	100,000	0	100,000	100,000	0
Pension Payments	0	0	0	0	0
Operations Management and Administration	120,330	0	120,330	120,330	0
Salaries	115,620	0	115,620	115,620	0
Expenditure	4,710	0	4,710	4,710	0

Table 3

Strategic Services

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Total Strategic Services	1,679,765	(41,707)	1,638,058	1,589,948	48,110
Development Management	425,615	23,335	448,950	443,975	4,975
Income	(100,000)	0	(100,000)	(68,500)	-31,500
Salaries	403,790	0	403,790	395,390	8,400
Expenditure	117,425	23,335	140,760	112,685	28,075
Pension Payments	4,400	0	4,400	4,400	0
Strategy and Projects Salaries	355,035	(78,801)	276,234	247,399	28,835
Income	(20,470)	0	(20,470)	(20,470)	0
Salaries	247,290	(60,301)	186,989	183,154	3,835
Expenditure	128,215	(18,500)	109,715	84,715	25,000
Pension Payments	0	0	0	0	0
Biodiversity Strategy	7,670	0	7,670	7,670	0
Expenditure	7,670	0	7,670	7,670	0
Human Resources	134,720	15,094	149,814	149,814	0
Income	0	0	0	0	0
Salaries	76,420	0	76,420	76,420	0

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Expenditure	58,300	15,094	73,394	73,394	0
Volunteers	77,340	0	77,340	72,040	5,300
Salaries	51,740	0	51,740	46,440	5,300
Expenditure	25,600	0	25,600	25,600	0
Communications	324,245	0	324,245	324,245	0
Income	0	(99,600)	(99,600)	(99,600)	0
Salaries	240,530	52,250	292,780	292,780	0
Expenditure	83,715	47,350	131,065	131,065	0
Visitor Centres and Yacht Stations	244,260	0	244,260	244,260	0
Income	(245,100)	0	(245,100)	(245,100)	0
Salaries	351,260	0	351,260	351,260	0
Expenditure	138,100	0	138,100	138,100	0
Strategic Services Management and Administration	110,880	(1,335)	109,545	100,545	9,000
Salaries	107,270	0	107,270	98,270	9,000
Expenditure	3,610	(1,335)	2,275	2,275	0

Table 4

Chief Executive

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Total Chief Executive	1,415,254	35,634	1,450,888	1,413,133	37,755
Legal	116,430	0	116,430	90,000	26,430
Income	0	0	0	0	0
Salaries	51,430	0	51,430	0	51,430
Expenditure	65,000	0	65,000	90,000	-25,000
Governance	233,445	35,634	269,079	269,079	0
Income	0	0	0	0	0
Salaries	113,480	35,634	149,114	149,114	0
Expenditure	119,965	0	119,965	119,965	0
Chief Executive	118,830	0	118,830	118,830	0
Salaries	114,330	0	114,330	114,330	0
Expenditure	4,500	0	4,500	4,500	0
Asset Management	113,944	0	113,944	113,944	0
Income	(25,540)	0	(25,540)	(25,540)	0
Salaries	46,890	0	46,890	46,890	0
Expenditure	92,594	0	92,594	92,594	0

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Finance and Insurance	373,735	0	373,735	355,735	18,000
Income	0	0	0	0	0
Salaries	161,100	0	161,100	155,100	6,000
Expenditure	212,635	0	212,635	200,635	12,000
Collection of Tolls	135,860	0	135,860	142,535	-6,675
Salaries	123,360	0	123,360	130,035	-6,675
Expenditure	12,500	0	12,500	12,500	0
ICT	323,010	0	323,010	323,010	0
Salaries	192,660	0	192,660	192,660	0
Expenditure	130,350	0	130,350	130,350	0

Table 5

Projects and Corporate items

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Total Projects and Corporate Items	124,918	51,000	175,918	166,653	9,265
Partnerships / HLF / CANAPE	28,718	0	28,718	19,453	9,265
Income	(754,629)	0	(754,629)	(754,629)	0
Salaries	180,250	0	180,250	170,985	9,265
Expenditure	603,097	0	603,097	603,097	0
Corporate Items	96,200	51,000	147,200	147,200	0
Expenditure	3,200	51,000	54,200	54,200	0
Pension Payments	93,000	0	93,000	93,000	0

Table 6

Contributions from earmarked reserves

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Total contributions from Earmarked Reserves	(252,108)	(36,175)	(288,283)	(225,943)	-62,340
Earmarked Reserves	(252,108)	(36,175)	(288,283)	(225,943)	-62,340
Expenditure	(252,108)	(36,175)	(288,283)	(225,943)	-62,340

Table 7

Net (Surplus) / Deficit

Row Labels	Original budget (Consolidated) £	Budget adjustments (Consolidated) £	Latest Available Budget (Consolidated) £	Forecast outturn (Consolidated) £	Forecast outturn variance (Consolidated) £
Grand Total	44,381	66,094	110,475	22,725	87,750

Appendix 3 - Draft Budget 2020/21 and Financial Strategy to 2022/23

		2018/19			2019/20			2020/21			2021/22			2022/23			2020/21 Apportionment			
Row Labels	National Park 2018/19 (Actual)	Navigation 2018/19 (Actual)	Consolidated 2018/19 (Actual)	National Park 2019/20 (Latest Available Budget)	Navigation 2019/20 (Latest Available Budget)	Consolidated 2019/20 (Latest Available Budget)	National Park 2019/20 (Forecast)	Navigation 2019/20 (Forecast)	Consolidated 2019/20 (Forecast)	National Park 2020/21 (Budget)	Navigation 2020/21 (Budget)	Consolidated 2020/21 (Budget)	National Park 2021/22 (Budget)	Navigation 2021/22 (Budget)	Consolidated 2021/22 (Budget)	National Park 2022/23 (Budget)	Navigation 2022/23 (Budget)	Consolidated 2022/23 (Budget)	National Park	Navigation
Income																				
Income																				
National Park Grant	(3,356,348)	0	(3,356,348)	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	100%	0%
Hire Craft Tolls	0	(1,159,858)	(1,159,858)	0	(1,189,000)	(1,189,000)	0	(1,179,000)	(1,179,000)	0	(1,199,000)	(1,199,000)	0	(1,235,000)	(1,235,000)	0	(1,260,000)	(1,260,000)	0%	100%
Private Craft Tolls	0	(2,134,006)	(2,134,006)	0	(2,175,000)	(2,175,000)	0	(2,185,000)	(2,185,000)	0	(2,244,000)	(2,244,000)	0	(2,312,000)	(2,312,000)	0	(2,359,000)	(2,359,000)	0%	100%
Short Visit Tolls	0	(42,475)	(42,475)	0	(42,000)	(42,000)	0	(42,000)	(42,000)	0	(43,000)	(43,000)	0	(45,000)	(45,000)	0	(46,000)	(46,000)	0%	100%
Other Toll Income	0	(22,956)	(22,956)	0	(19,000)	(19,000)	0	(19,000)	(19,000)	0	(19,100)	(19,100)	0	(19,100)	(19,100)	0	(19,100)	(19,100)	0%	100%
Interest	(18,526)	(18,526)	(37,053)	(15,000)	(15,000)	(30,000)	(23,750)	(23,750)	(47,500)	(20,500)	(20,500)	(41,000)	(15,000)	(15,000)	(30,000)	(15,000)	(15,000)	(30,000)	50%	50%
Income Total	(3,374,874)	(3,377,822)	(6,752,696)	(3,429,078)	(3,440,000)	(6,869,078)	-3,437,828	-3,448,750	-6,886,578	(3,434,578)	(3,525,600)	(6,960,178)	(3,429,078)	(3,626,100)	(7,055,178)	(3,429,078)	(3,699,100)	(7,128,178)	49%	51%
Income Total	(3,374,874)	(3,377,822)	(6,752,696)	(3,429,078)	(3,440,000)	(6,869,078)	-3,437,828	-3,448,750	-6,886,578	(3,434,578)	(3,525,600)	(6,960,178)	(3,429,078)	(3,626,100)	(7,055,178)	(3,429,078)	(3,699,100)	(7,128,178)	49%	51%
Net Expenditure																				
Operations																				
Construction and Maintenance Salaries	425,840	744,406	1,170,246	467,650	791,647	1,259,297	456,530	788,867	1,245,397	497,572	830,508	1,328,080	515,726	859,054	1,374,780	533,324	885,076	1,418,400	37%	63%
Construction and Maintenance Salaries (income)	(3,031)	(5,301)	(8,332)	(2,438)	(3,172)	(5,610)	(2,438)	(3,172)	(5,610)	0	0	0	0	0	0	0	0	0	0%	0%
Equipment, Vehicles and Vessels	146,314	341,399	487,714	114,150	266,350	380,500	114,150	266,350	380,500	120,690	281,610	402,300	125,490	292,810	418,300	119,640	279,160	398,800	30%	70%
Equipment, Vehicles and Vessels (Income)	(4,311)	(10,060)	(14,371)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	0%
Water Management	4,719	87,333	92,052	6,500	119,470	125,970	6,500	119,470	125,970	5,000	98,670	103,670	5,000	119,414	124,414	5,000	119,414	124,414	5%	95%
Water Management (Income)	(2,631)	(668)	(3,299)	0	(3,299)	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	0%
Land Management	50,953	0	50,953	54,160	0	54,160	54,160	0	54,160	58,710	0	58,710	58,710	0	58,710	58,710	0	58,710		

Appendix 4 – Earmarked Reserves to 2022/23

Year	Earmarked Reserves	Property Reserve - TOTAL	Plant, Vessels and Equipment Reserve - TOTAL	Premises Reserve - TOTAL	Other Earmarked Reserves - TOTAL	HLF	CANAPE	Total Earmarked Reserves - National Park	Total Earmarked Reserves - Navigation	GRAND TOTAL Earmarked Reserves
	Balance 01 April 2019	(569,750)	(275,190)	(195,326)	(593,558)	(89,706)	(80,476)	(1,070,645)	(733,361)	(1,804,006)
2019/20	Contributions to Reserves to 30/11/19									
	Vessels and Equipment (VES000451)	0	(92,000)	0	0			(27,600)	(64,400)	(92,000)
	Vehicles (VEH000451)	0	(22,000)	0	0			(6,600)	(15,400)	(22,000)
	Mutford Lock (MLK000451)	(25,000)	0	0	0			0	(25,000)	(25,000)
	Mutford Lock Rent (MLK000552)	(1,462)	0	0	0			0	(1,462)	(1,462)
	Launches (LAU000451)	0	(18,000)	0	0			0	(18,000)	(18,000)
	Ranger Vehicles (RAN000451)	0	(13,000)	0	0			(5,200)	(7,800)	(13,000)
	Dockyard Site (PRM009451)	0	0	(30,000)	0			(9,000)	(21,000)	(30,000)
	Pool Vehicles (PCP000451)	0	(14,000)	0	0			(9,380)	(4,620)	(14,000)
	Pool Vehicles (PCP000552)	0	0	0	0			0	0	0
	Asset Management for Countryside sites (SIM00451)	(46,000)	0	0	0			(46,000)	0	(46,000)
	Building repairs (PRM000451)	0	0	(50,000)	0			(36,000)	(14,000)	(50,000)
	Potter Heigham Chalet Income (UTE000451)	0	0	0	(21,000)			(21,000)	0	(21,000)
	Upper Thurne Monies Recd (UTE000552)	0	0	0	0			0	0	0
	Heritage Lottery Fund (HLF000451)	0	0	0	0			0	0	0
	Heritage Lottery Fund Income (HLFXXX552)	0	0	0	0	(103,752)		(103,752)	0	(103,752)
	CANAPE (CAN000451)	0	0	0	0		(60,000)	(30,000)	(30,000)	(60,000)
	CANAPE Income (CANXXX552)	0	0	0	0		(53,256)	(26,628)	(26,628)	(53,256)
	Income from sale of dockyard asses (VES000552)	0	(9,243)	0	0			(2,773)	(6,470)	(9,243)
	Planning Policy underspend M12 (POL000451)	0	0	0	0			0	0	0
	Catchment Partnership (CAT000451)	0	0	0	(31,280)			(31,280)	0	(31,280)
	Catchment Partnership Monies Recd (CAT000552)	0	0	0	0			0	0	0
	Computer Software (ICT000451)	0	0	0	(10,000)			(6,700)	(3,300)	(10,000)
	Asset Management underspend M12 (ASS000451)	0	0	0	0			0	0	0
	Section 106 (DVM000552)	0	0	0	(5,000)			(5,000)	0	(5,000)
	UK Communications Team underspend M12 (UKC000541)	0	0	0	0			0	0	0
	Contributions from Reserves to 30/11/19									
	Replacement of EU63 LUJ & AO06 XPF (Vans) for CM&E (VEH000450)	0	23,936	0	0			7,181	16,755	23,936
	Pool Vehicles (PCP000450)	0	0	0	0			0	0	0
	Replacement of Dockyard Crane, plus clamshell bucket (VES000450)	0	57,410	0	0			17,223	40,187	57,410
	Dockyard Site Development (PRM009450)	0	0	3,355	0			1,007	2,349	3,355
	John Fox Cottage refurbishment (PRM009450)	0	0	0	0			0	0	0
	Heritage Lottery Fund costs (HLFXXX450)	0	0	0	0	408,144		408,144	0	408,144
	CANAPE Expenditure (CANXXX450)	0	0	0	0		52,707	26,353	26,353	52,707
	Catchment Partnership expenditure (CAT000450)	0	0	0	27,398			27,398	0	27,398
	Policy Planning (POL000450)	0	0	0	44,311			44,311	0	44,311
	Planning Officer (Compliance & Implementation) (DVM000450)	0	0	0	20,000			20,000	0	20,000
	Section 106 (DVM000450)	0	0	0	65,419			65,419	0	65,419
	Actual Balance 30 November 2019	(642,212)	(362,087)	(271,971)	(503,710)	214,686	(141,026)	(820,523)	(885,797)	(1,706,320)
2019/20	Contributions to Reserves to 31/03/20									
	Mutford Lock Rent (MLK000552)	(538)	0	0	0			0	(538)	(538)
	Catchment Partnership income (CAT000552)	0	0	0	(15,000)			(15,000)	0	(15,000)
	Heritage Lottery Fund Income (HLF61X552)	0	0	0	0	(516,128)		(516,128)	0	(516,128)
	CANAPE Income (CANXXX552)	0	0	0	0		(81,493)	(40,746)	(40,746)	(81,493)
	UK Communications Team underspend M12 (UKC000451)	0	0	0	(25,897)			(25,897)	0	(25,897)
	Contributions from Reserves to 31/03/20									
	Replacement of Yare House pool vehicles (two Smart) (PCP000450)	0	27,500	0	0			18,425	9,075	27,500
	Additional Electric Van (PCP000450)	0	17,625	0	0			11,809	5,816	17,625
	Dockyard Site Development (PRM009450)	0	0	41,645	0			12,494	29,152	41,645
	Planning Officer (Compliance & Implementation) (DVM000450)	0	0	0	10,000			10,000	0	10,000
	Catchment Partnership (CAT000450)	0	0	0	12,567			12,567	0	12,567
	Heritage Lottery Fund costs (HLFXXX450)	0	0	0	0	215,280		215,280	0	215,280
	CANAPE Expenditure (CANXXX450)	0	0	0	0		47,216	23,608	23,608	47,216
	Forecast Balance 01 April 2020	(642,750)	(316,962)	(230,326)	(522,040)	(86,162)	(175,302)	(1,114,111)	(859,431)	(1,973,542)

Year	Earmarked Reserves	Property Reserve - TOTAL	Plant, Vessels and Equipment Reserve - TOTAL	Premises Reserve - TOTAL	Other Earmarked Reserves - TOTAL	HLF	CANAPE	Total Earmarked Reserves - National Park	Total Earmarked Reserves - Navigation	GRAND TOTAL Earmarked Reserves
2020/21	<u>Contributions to Reserves to 31/03/21</u>									
	Vessels and Equipment (VES000451)	0	(92,000)	0	0			(27,600)	(64,400)	(92,000)
	Vehicles (VEH000451)	0	(22,000)	0	0			(6,600)	(15,400)	(22,000)
	Mutford Lock (MLK000451)	(25,000)	0	0	0			0	(25,000)	(25,000)
	Mutford Lock Rent (MLK000552)	(2,000)	0	0	0			0	(2,000)	(2,000)
	Launches (LAU000451)	0	(30,000)	0	0			0	(30,000)	(30,000)
	Ranger Vehicles (RAN000451)	0	(13,000)	0	0			(5,200)	(7,800)	(13,000)
	Dockyard Site (PRM009451)	0	0	(30,000)	0			(9,000)	(21,000)	(30,000)
	Pool Vehicles (PCP000451)	0	(14,000)	0	0			(9,380)	(4,620)	(14,000)
	Building repairs (PRM000451)	0	0	(50,000)	0			(36,000)	(14,000)	(50,000)
	Asset Management for Countryside sites (SIM00451)	(46,000)	0	0	0			(46,000)	0	(46,000)
	Computer Software (ICT000451)	0	0	0	(10,000)			(6,700)	(3,300)	(10,000)
	Potter Heigham Chalet Income (UTE000451)	0	0	0	(21,000)			(21,000)	0	(21,000)
	Catchment Partnership (CAT000451)	0	0	0	(33,110)			(33,110)	0	(33,110)
	Heritage Lottery Fund Income (HLF61X552)	0	0	0	0	(496,163)		(496,163)	0	(496,163)
	CANAPE (CAN000451)	0	0	0	0		(60,000)	(30,000)	(30,000)	(60,000)
	CANAPE Income (CANXXX552)	0	0	0	0		(101,309)	(50,655)	(50,655)	(101,309)
	UK Communications Team (Income)	0	0	0	(118,800)			(118,800)	0	(118,800)
	<u>Contributions from Reserves to 31/03/21</u>									
	Replace mini digger, Sanderson Telehandler & NATO Floats x 5 (VES000451)	0	68,000	0	0			20,400	47,600	68,000
	Replace AO12 DWY, AO12 DWX & AO12 KFJ (VEH000450)	0	66,500	0	0			19,950	46,550	66,500
	Slip-way piling and hardstanding wash down area (PRM009450)	0	0	45,000	0			13,500	31,500	45,000
	Repairs to How Hill Boat Shed (BHB000450)	0	0	25,000	0			18,000	7,000	25,000
	Planning Officer (Compliance & Implementation) (DVM000450)	0	0	0	34,300			34,300	0	34,300
	Potter Heigham Staither alterations (UTE000450)	0	0	0	8,000			8,000	0	8,000
	Catchment Partnership (CAT000450)	0	0	0	83,440			83,440	0	83,440
	UK Communications Team (UKC000450)	0	0	0	114,060			114,060	0	114,060
	Heritage Lottery Fund costs (HLFXXX450)	0	0	0	0	496,163		496,163	0	496,163
	CANAPE Expenditure (CANXXX450)	0	0	0	0		90,006	45,003	45,003	90,006
	Forecast Balance 01 April 2021	(715,750)	(353,462)	(240,326)	(465,150)	(86,162)	(246,605)	(1,157,503)	(949,952)	(2,107,455)
2021/22	<u>Contributions to Reserves to 31/03/22</u>									
	Vessels and Equipment (VES000451)	0	(92,000)	0	0			(27,600)	(64,400)	(92,000)
	Vehicles (VEH000451)	0	(38,000)	0	0			(11,400)	(26,600)	(38,000)
	Mutford Lock (MLK000451)	(25,000)	0	0	0			0	(25,000)	(25,000)
	Mutford Lock Rent (MLK000451)	(2,000)	0	0	0			0	(2,000)	(2,000)
	Launches (LAU000451)	0	(30,000)	0	0			0	(30,000)	(30,000)
	Ranger Vehicles (RAN000451)	0	(13,000)	0	0			(5,200)	(7,800)	(13,000)
	Dockyard Site (PRM009451)	0	0	(30,000)	0			(9,000)	(21,000)	(30,000)
	Pool Vehicles (PCP000451)	0	(15,000)	0	0			(10,050)	(4,950)	(15,000)
	Building repairs (PRM000451)	0	0	(50,000)	0			(36,000)	(14,000)	(50,000)
	Asset Management for Countryside sites (SIM00451)	(46,000)	0	0	0			(46,000)	0	(46,000)
	Computer Software (ICT000451)	0	0	0	(10,000)			(6,700)	(3,300)	(10,000)
	Potter Heigham Chalet Income (UTE000451)	0	0	0	(21,000)			(21,000)	0	(21,000)
	Catchment Partnership (CAT000451)	0	0	0	(33,720)			(33,720)	0	(33,720)
	CANAPE (CAN000451)	0	0	0	0		(60,000)	(30,000)	(30,000)	(60,000)
	Heritage Lottery Fund Income (HLF61X552)	0	0	0	0	(448,900)		(448,900)	0	(448,900)
	CANAPE Income (CANXXX552)	0	0	0	0			0	0	0
	UK Communications Team (Income)	0	0	0	(121,095)		(75,500)	(196,595)	0	(196,595)
	<u>Contributions from Reserves to 31/03/22</u>									
	Replacement of AO12 TXS, AO12 TXU & AP12 GUA (VEH000450)	0	57,300	0	0			17,190	40,110	57,300
	Replacement of AU12 OMA & AU12 OMB (RAN000450)	0	40,000	0	0			16,000	24,000	40,000
	Replace JCB JS220 (2017) (VES000450)	0	105,000	0	0			31,500	73,500	105,000
	Replacement of M/L Yare (LAU000450)	0	100,000	0	0			0	100,000	100,000
	Catchment Partnership (CAT000450)	0	0	0	33,720			33,720	0	33,720
	Heritage Lottery Fund costs (HLFXXX450)	0	0	0	0	491,981		491,981	0	491,981
	CANAPE Expenditure (CANXXX450)	0	0	0	0		109,000	54,500	54,500	109,000
	UK Communications Team (UKC000450)	0	0	0	101,470			101,470	0	101,470
	Forecast Balance 01 April 2022	(788,750)	(239,162)	(320,326)	(515,775)	(43,081)	(273,105)	(1,293,307)	(886,892)	(2,180,199)
2022/23	<u>Contributions to Reserves to 31/03/23</u>									
	Vessels and Equipment (VES000451)	0	(92,000)	0	0			(27,600)	(64,400)	(92,000)
	Vehicles (VEH000451)	0	(38,000)	0	0			(11,400)	(26,600)	(38,000)
	Mutford Lock (MLK000451)	(25,000)	0	0	0			0	(25,000)	(25,000)
	Mutford Lock Rent (MLK000451)	(2,000)	0	0	0			0	(2,000)	(2,000)
	Launches (LAU000451)	0	(30,000)	0	0			0	(30,000)	(30,000)
	Ranger Vehicles (RAN000451)	0	(13,000)	0	0			(5,200)	(7,800)	(13,000)
	Dockyard Site (PRM009451)	0	0	(30,000)	0			(9,000)	(21,000)	(30,000)
	Pool Vehicles (PCP000451)	0	(15,000)	0	0			(10,050)	(4,950)	(15,000)
	Building repairs (PRM000451)	0	0	(50,000)	0			(36,000)	(14,000)	(50,000)
	Asset Management for Countryside sites (SIM00451)	(46,000)	0	0	0			(46,000)	0	(46,000)
	Computer Software (ICT000451)	0	0	0	(10,000)			(6,700)	(3,300)	(10,000)
	Potter Heigham Chalet Income (UTE000451)	0	0	0	(21,000)			(21,000)	0	(21,000)
	Catchment Partnership (CAT000451)	0	0	0	(34,410)			(34,410)	0	(34,410)
	Heritage Lottery Fund Income (HLF61X552)	0	0	0	0	(157,159)		(157,159)	0	(157,159)
	<u>Contributions from Reserves to 31/03/23</u>									
	Replacement of AO12 URK, AO12 DWP & AU12 OCN, (VEH000450)	0	57,945	0	0			17,384	40,562	57,945
	Replacement wherry (VES000450)	0	120,000	0	0			36,000	84,000	120,000
	Replacement of AO12 URF, AO12 TXV & AO12 URE(RAN000450)	0	57,300	0	0			22,920	34,380	57,300
	Catchment Partnership (CAT000450)	0	0	0	34,410			34,410	0	34,410
	Heritage Lottery Fund costs (HLFXXX450)	0	0	0	0	200,240		200,240	0	200,240
	CANAPE Expenditure (CANXXX450)	0	0	0	0		11,380	5,690	5,690	11,380
	UK Communications Team (UKC000450)	0	0	0	50,262			50,262	0	50,262
	Closure of CANAPE reserve & repayment of loan	(26,000)	(32,500)	(32,500)	0		91,000	0	0	0
	Forecast Balance 01 April 2023	(887,750)	(224,417)	(432,826)	(496,513)	0	(170,725)	(1,290,920)	(921,311)	(2,212,231)

Broads Authority

31 January 2020

Agenda item number 13

Landscapes Review - response

Report by Chief Executive

Purpose

The Landscapes Review Final Report (Glover Review) was published in September 2019 and its recommendations are being considered by the Broads Authority.

Recommended decision

Provide feedback on the Landscapes Review and identify short-term priorities for more detailed attention by the Broads Authority.

1. The Landscapes Review

- 1.1. In May 2018 Michael Gove, then Secretary of State for the Environment, initiated a review of National Parks and Areas of Outstanding Natural Beauty (AONBs). The Review Team led by Julian Glover was asked to consider what might be done better, what changes might help those who live and work in our protected landscapes, and whether current definitions and systems were sufficient. The [Landscapes Review Final Report](#) was published on 21 September 2019.
- 1.2. The Review contains 27 ambitious proposals, some of which would require changes to the primary legislation, the creation of new bodies and substantial additional resources. Several proposals focus on the structure and governance of our system of protected landscapes. The report recommends, in line with the Broads Authority's submission, a revision to the statutory purposes of National Parks and the Broads Authority to elevate the duty to "Foster the economic and community vitality of their area in support of the first two purposes" to a statutory purpose. This would mean the Broads Authority would have four general purposes. The report also calls for AONBs to share these revised purposes.
- 1.3. The Review also recommends strengthening the statutory footing for National Park Management Plans (in our case, the Broads Plan) and a strengthened Section 62 duty (S17A of the Norfolk and Suffolk Act 1988), which currently reads:

17A General duty of public bodies etc.

- 1) In exercising or performing any functions in relation to, or so as to affect, land in the Broads, a relevant authority shall have regard to the purposes of—
 - a. conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
 - b. promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
 - c. protecting the interests of navigation.
- 1.4. Among the Review highlights are that public bodies should be required to help further the purposes of National Parks and the aims and objectives of Management Plans. The team’s suggestion to create a National Landscapes Service and a significantly expanded ranger service has already received considerable media attention. The team is also clear that National Parks and AONBs should work more closely to deliver more than the sum of their parts. A core recommendation is that National Parks and AONBs come together as one family of national landscapes.

2. Responding to the Review

- 2.1. Defra officials indicate it may be some time before there is a formal Government response to the Review. However, they are encouraging the National Park Authorities to take forward some of the key recommendations, particularly around nature recovery and landscapes for everyone. This is covered in Proposal 1, ‘National landscapes should have a renewed mission to recover and enhance nature’ and Proposal 7, ‘A stronger mission to connect all people with our national landscapes’.
- 2.2. Two further priority areas, around climate change and the future of farming, were identified at a recent meeting of English National Park Chief Executives. The first is under Proposal 3, ‘Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration).’ The second area is under Proposal 5, which talks about a central place for national landscapes in new Environmental Land Management Schemes. ELMs is already underway at a local level through the Broads ‘test and trial’ project.
- 2.3. A draft analysis of the Review from a Broads Authority perspective is in Appendix 1. While our work to meet Broads Plan objectives already fits many of the Review’s recommendations, our resources are at capacity and we cannot commit to taking on additional areas of work before we know the outcome of the National Park Grant for 2020/21. However, we welcome members’ views on themes in the Review for more detailed discussion at future Authority meetings or workshops.

Author: John Packman

Date of report: 17 January 2020

Appendix 1 – Preliminary analysis of Landscape Review Proposals (for discussion with members)

Appendix 1 - Preliminary analysis of Landscapes Review proposals (for discussion with Members)

Table 1

Chapter 1: Landscapes Alive for Nature and Beauty

Landscapes Review proposals	BA observations/draft response	Potential new actions/priorities
Proposal 1: National landscapes should have a renewed mission to recover and enhance nature, and be supported and held to account for delivery by a new National Landscapes Service	The Broads is one of Europe's most important wetlands with abundant biodiversity, and we support the principle of a "renewed mission to recover and enhance nature".	Await Government decision on National Landscape Service. Work with farmers and land managers to identify a transformative programme and ability to coordinate landscape-scale funding, making more of existing resources to enhance biodiversity in the Broads and make it more resilient to climate change. Through modelling, identify priority areas at a landscape scale across the Broads and catchment to target interventions.
Proposal 2: The state of nature and natural capital in our national landscapes should be regularly and robustly assessed, informing the priorities for action	The report proposes the assessment of habitat networks and the state of natural capital, using a standardised process across landscapes. We support this proposal. Our officers carry out species surveys and our Biodiversity Audit uses these data. We could do more, for example with volunteers, using standardised biodiversity monitoring.	Investigate the scope to work with our two neighbouring AONBs on a standardised assessment of natural capital, including a detailed assessment of carbon in peat soils. We are working on natural capital at the combined Norfolk and Suffolk scale which will then provide the context for a more granular approach in the designated landscapes.

Landscapes Review proposals	BA observations/draft response	Potential new actions/priorities
		<p>Develop an ecological model to assess the state of our lakes.</p> <p>Agree with partners a long-term sustainable programme of collecting and reporting on biodiversity data, and on projects to improve biodiversity targets.</p>
Proposal 3: Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration). Their implementation must be backed up by stronger status in law	We welcome this proposal and the recommendation to place a responsibility on public bodies to further the purposes of the Broads Plan, the partnership strategy for the Broads.	Establish a partnership with public and voluntary organisations to implement the next Broads Plan with an increased emphasis on its role and responsibilities as a Partnership Plan for the area.
Proposal 4: National landscapes should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries	We support this proposal. There should be a national plan to join up our precious landscapes and key nature conservation sites to provide greater resilience and adaptation to climate change. The Authority could work with the Norfolk Coast Partnership (Norfolk Coast AONB), the Suffolk Coast & Heaths AONB and the two county councils on this.	<p>Assess the potential to work with the two AONBs and the two county councils to establish a wider Nature Recovery Network for Norfolk and Suffolk.</p> <p>Declare Buttle Marsh as a wilder part of How Hill NNR in 2021.</p>
Proposal 5: A central place for national landscapes in new Environmental Land Management Schemes	The Halvergate Grazing Marshes Scheme was the pilot for agri-environment schemes in the UK. The Authority has been active with the NFU and other agencies in wanting to shape	Continue working in partnership to deliver the Test and Trials project and consider further investment to support engagement with farmers in the Broadland catchment.

Landscapes Review proposals	BA observations/draft response	Potential new actions/priorities
	the development of future arrangements through the Defra Test and Trials process. We support the proposal that national landscapes should have a central place in the new ELMS.	
Proposal 6: A strengthened place for national landscapes in the planning system with AONBs given statutory consultee status, encouragement to develop local plans and changes to the National Planning Policy Framework	This proposal is principally about enhancing the status of AONBs. It also includes a helpful statement on strengthening protection for the setting of designated landscapes. We support this proposal.	Discuss with our neighbouring AONBs the potential to provide expert support on planning matters.

Table 2

Chapter 2: Landscapes for Everyone

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
Proposal 7: A stronger mission to connect all people with our national landscapes, supported and held to account by the new National Landscapes Service	The new UK Communications Team, hosted by the Broads Authority, has the role of raising the profile of the national parks with the general public. We already work with disadvantaged communities, through the Water, Mills and Marshes programme. We support this proposal.	Re-examine how we can engage more with marginalised groups in society such as “ex-offenders, looked after children, those suffering addiction”, using the legacy of Water, Mills and Marshes as a starting point. Is there a collaborative approach that could be developed between all the designated landscapes in the East to enable a more compelling offer to these marginalised

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
		groups and share the resourcing burden?
Proposal 8: A night under the stars in a national landscape for every child	Our Education Officer does great educational and outreach work with schools and young people, and this has been bolstered by the Water, Mills and Marshes programme, but we could always do more through partnership working. We support this proposal and need to consider a long-term, sustainable engagement programme.	Work with partners on a more ambitious and sustainable programme of engagement with schoolchildren and young people.
Proposal 9: New long-term programmes to increase the ethnic diversity of visitors	The Mosaic programme, bringing visitors from urban BME communities into the Broads, was positive but difficult to maintain. The report has highlighted our more recent work with Syrian refugees in Norwich (ref Proposal 7) as best practice.	Expand our programme of engagement with local BME communities.
Proposal 10: Landscapes that cater for and improve the nation's health and wellbeing	This proposal would require building relationships with local public health teams, clinical commissioning groups (CCGs) and social prescribing networks. We have been keen to do this for some time, but are limited by resources. The Broads Integrated Access Strategy identifies actions to enhance accessibility in and to the Broads, in line with the report's	There is a shared need to understand why it isn't happening more already and to develop and learn from different approaches that can be replicated more locally. Then we could engage more proactively with local public health teams, CCGs and social prescribing networks to support health and wellbeing activities in the Broads. Review the accessibility of the public rights of

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
	proposal for a “network of accessible, hard surface, stile-free paths that are disabled and wheelchair friendly”.	way network. Develop collaborative funding bids for infrastructure, facilities and amenities in the Broads.
Proposal 11: Expanding volunteering in our national landscapes	The Authority has more than 160 volunteers. If we are to train and support a larger number, we would need a significant increase in our investment.	Assess capacity and resources needed to expand our volunteer numbers and their areas of work (for example, ranger activities).
Proposal 12: Better information and signs to guide visitors	We have made considerable progress on branding. Through the EXPERIENCE project with Norfolk County Council, we plan to improve Broads National Park signage on the trunk roads. Partnership working with Abellio Greater Anglia is ongoing to improve signage at railway stations. We are also installing village signs as part of our branding scheme.	Investigate scope for further Broads signage linked to the Broads branding scheme Develop jointly branded schemes with partners to guide visitors at sites with high footfall.
Proposal 13: A ranger service in all our national landscapes, part of a national family	We support the ambition for more Rangers though this is limited by current resources. We also support the suggestion that Rangers should have a “key role with schools, supporting our ambition for every school child to spend a night in a national landscape”.	This links to Proposal 8 on increased educational activity, and proposal 11 on increased volunteering capacity.
Proposal 14: National landscapes supported to become leaders in sustainable tourism	The Authority was the first member of the UK National Park family to receive accreditation	Work with partners on the objective for everyone having options to arrive at a

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
	<p>for EU sustainable tourism under the Sustainable Tourism in Estuary Parks (STEP) project. Carbon audits show that transport is key.</p> <p>We support this proposal but would need to be clear on our role.</p>	<p>national park without a car.</p> <p>Update and promote the Green Traveller Guide produced through the STEP project.</p> <p>Include data on the impact of tourism as part of the carbon audit.</p> <p>Assess our ongoing role and investment to support sustainable tourism in the area.</p> <p>(Links to Proposal 19)</p>
<p>Proposal 15: Joining up with others to make the most of what we have, and bringing National Trails into the national landscapes family</p>	<p>The report states: “there is scope for our national landscapes to do more with the other public bodies operating in their areas, from Natural England on SSSIs and National Nature Reserves to Forestry England on public forests”. Other important partners for the Broads Authority are the Environment Agency and the two county councils. We support this proposal.</p>	<p>Continue close working with the two county councils, the Environment Agency, Natural England, the two AONBs and other public bodies to deliver the ambitions of the Broads Plan.</p>
<p>Proposal 16: Consider expanding open access rights in national landscapes</p>	<p>Little detail in this proposal. We must acknowledge the challenges due to private land ownership, wildlife disturbance and flood constraints.</p>	<p>Await response from the Government.</p>

Table 3

Chapter 3: Living Landscapes

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
Proposal 17: National landscapes working for vibrant communities	This proposal suggests adding a third purpose – “to foster the economic and community vitality of the area in support of the first two purposes” (strengthening the current duty). This is in line with the Authority’s submission.	Await response from the Government. (Links to Proposal 23)
Proposal 18: A new National Landscapes Housing Association to build affordable homes	As well as proposing a new housing association for national parks, the report recommends the NPPF is amended to give National Parks more flexibility to deliver affordable home in national landscapes. As most of the Broads is in the functional flood plain, new housing development is limited.	Await response from the Government on NPPF potential changes.
Proposal 19: A new approach to coordinating public transport piloted in the Lake District, and new, more sustainable ways of accessing national landscapes	The report contains a number of ideas around sustainable transport, including “all public car parks in national landscapes which have suitable electricity supply are fitted with e-charging points within the next two years, drawing on central government funding”. We support this proposal.	Work with Norfolk County Council, Abellio Greater Anglia and other partners on a comprehensive sustainable transport strategy for the Broads. This could include the installation of e-charging points in car parks; a ‘last mile’ transport system to reduce the distance travelled by delivery vehicles; bike e-charging points at all major attractions; a requirement for tourism initiatives to respond to the visitor question

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
		<p>“But how do I get there, and get around, without a car?”</p> <p>(Links to Proposal 14)</p>

Table 4

Chapter 4: More special Places

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
Proposal 20: New designated landscapes and a new National Forest	The proposals are for Chilterns, Cotswolds and Dorset to be considered for National Park status and a National Forest status for Sherwood Forest.	Await response from the Government. This does not directly affect the Broads.
Proposal 21: Welcoming new landscape approaches in cities and the coast, and a city park competition	This references London’s declaration of itself as a National Park City in July 2019. It suggests that: “a national competition supported by government for at least one city or large town to try out the National Park City out with the aim of making it England’s greenest city”.	Discuss with Norwich City Council the potential for Norwich to be a National Park City. This could also be extended to Great Yarmouth Borough Council and Lowestoft Town Council, as these towns link the Broads and the AONBs.
Proposal 22: A better designations process	The report states that this process appears to be ‘overly-technical, legalistic, under-resourced and defensive’.	Await response from the Government.

Table 5

Chapter 5: New Ways of Working

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
Proposal 23: Stronger purposes in law for our national landscapes	<p>This proposal suggests rewriting the Broads Authority’s first two purposes (which it shares with the English National Park Authorities) and adding a new purpose to foster the economic and community vitality of the area (strengthening the current duty). The latter suggestion is in line with the Authority’s submission.</p> <p>The report also proposes that an “updated Sandford Principle should apply to all our national landscapes”. This would be contentious with some navigation interests in the Broads.</p>	<p>Await response from the Government.</p> <p>(Links to Proposal 17)</p>
Proposal 24: AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes	This proposal applies to AONBs and includes the suggestion that they should be given statutory consultee status to strengthen their role in the planning subsystem.	Not directly relevant to the Broads Authority, but we would support the proposal under the assumption that the AONBs would receive more resources to carry out strengthened purposes.
Proposal 25: A new National Landscapes Service (NLS) bringing our 44 national landscapes together to achieve more than	This proposal goes beyond bringing the National Parks and AONBs together. It suggests a new NLS would take over some	Await response from the Government.

Recommendations in Landscapes Review	Observations/Draft BA response	Potential action/priority
the sum of their parts	responsibilities from Defra and Natural England.	
Proposal 26: Reformed governance to inspire and secure ambition in our national landscapes and better reflect society	Panel recommends that “National Parks should be governed by smaller, 9-12 person boards, in line with best practice in governance as recommended for charities and companies”. This is in line with the Authority’s submission.	Await response from the Government.
Proposal 27: A new financial model – more money, more secure, more enterprising	The report recognises that “unnecessary complexities, such as the requirement for the Broads Authority to account for income and expenditure from National Park Grant separately ... should be addressed.” The report recommends “a multi-annual financial settlement with Defra”, which the Authority would certainly welcome. It also supports the establishment of a national charity; a similar model has been established by the National Parks.	Await response from the Government.

Draft 2.0 14/1/20

Broads Authority

31 January 2020

Agenda item number 14

Strategic priorities - progress update

Report by Head of Governance

For information

This report gives an update on the implementation of the Broads Authority's set of annual strategic priorities.

1. Introduction

- 1.1. Each year we identify a small set of strategic priorities, focusing on Authority-led projects that have high resource needs or a high impact on the Broads, or that are politically sensitive.
- 1.2. Setting these priorities helps us target resources and make the most of partnership working and external funding opportunities. A progress update on this year's priorities is in Table 1.
- 1.3. Progress against all actions in the Broads Plan, the partnership strategy for the Broads, is reported in 6-monthly update reports. These may be viewed on the [strategy](http://www.broads-authority.gov.uk/strategy) pages of our website at www.broads-authority.gov.uk.

Table 1

Broads Authority strategic priorities 2019/20 – progress update Jan 2020

Theme, aim and milestones	Progress	Lead officer
Water, Mills and Marshes Landscape Partnership Scheme Implement partnership projects to agreed schedule. <ul style="list-style-type: none"> • Monitor and report progress (Sept/Mar) • Submit quarterly claims to National Lottery Heritage Fund (Apr/Jul/ Oct/Jan) • Issue draft legacy plan (Oct) 	Status: On track North Mill and Strumpshaw Steam Engine House works near completion and in progress for Six Mile Mill. Engineering solutions for Muttons and Herringfleet mills under review, and access negotiations for Caldecott Mill near completion. Heritage Skills training project received Highly Commended award at national Constructing Excellence Awards in Preservation 7 Rejuvenation 2019 category. Two exhibitions held at Lowestoft Station and Norwich Cathedral, with third opening at East Gallery in Norwich on 28 January. Whole scheme volunteer income target exceeded since Q6. Education delivery team working with 11 primary schools and 2 high schools in 2020. WMM team working with Wherry Lines Community Rail Partnership to install 2 Changing Places toilets and deliver engagement and interpretation programme. New Historic Environment Manager started in January to manage Land of the Windmills project. New WMM Programme Manager recruited and in process of recruiting Project Officer.	Broads Landscape Partnership Programme Manager
CANAPE (Creating A New Approach to Peatland Ecosystems) Implement work packages 3 and 4 to agreed schedules.	Status: On track Planning underway for Project Steering Group in the Broads in April. Project Reports to funding programme completed on time. Construction work underway at Hickling Broad. Trialling new method of monitoring	CANAPE Project Manager

Theme, aim and milestones	Progress	Lead officer
<ul style="list-style-type: none"> • Monitor and report progress of project activities (Oct and Apr) • Submit claims to INTERREG Programme (Oct and Apr) • Complete Phase 2 of 3 at Chara Bay, Hickling Broad (Mar) and begin sediment infill of restored reedbed • Trial marketing for charcoal at four events (by Sept) • Hold five citizen science engagement events (July to Aug) 	<p>Prymnesium bloom, which should be more accurate and reduce costs in long-term.</p> <p>‘Festival of charcoal’ event in planning to expand marketing of product, and business case being drafted.</p> <p>Planning ongoing for Lowland Peat Conference in March. Paludiculture (wet agriculture) innovator meeting interested parties in the Broads after the event.</p> <p>Citizen Science planned again at How Hill Family Fun days and work ongoing with legacy programmes with Hobart High and How Hill Trust.</p>	
<p><u>Broadland Futures Initiative</u> (Developing integrated flood risk management)</p> <p>Implement joint programme of work with Environment Agency and other partners.</p> <ul style="list-style-type: none"> • Run public e-survey on flooding in Broadland (June to July 2019) • Hold drop-in events (Summer 2020) • Scope decision making system involving elected members (By end 2020) 	<p>Status: On track</p> <p>BFI technical group meets every 2 months. Main items at Dec 2019 meeting were Jacobs deliverable programme, 2020 engagement plan, link with Water Resources East. Minutes on BFI page on BA website.</p> <p>BFI group reviewing first two deliverables from Jacobs: report on origins of BFI area (which will be a public document) and summary of relevant strategic documents.</p> <p>First newsletter published Sept 2019 and second newsletter scheduled for Feb 2020.</p>	Director of Strategic Services
<p>Marketing, promotion and media relations</p> <p>Increase public awareness of Broads National Park brand.</p>	<p>Status: On track</p> <p>Road signs being installed at 35 sites in Norfolk and Suffolk in January. Planning for phase two of initiative begun with further locations identified, supported by Interreg</p>	Head of Comms

Theme, aim and milestones	Progress	Lead officer
<ul style="list-style-type: none"> • Install 35 Broads National Park tourist information road signs (by end 2019) • Publish Broadsheet and Visit the Broads pocket A6 guides for summer season • Develop Broads Ranger experience and market via Airbnb in Summer 2019 • Extend English National Park Experience Collection (by end 2020) <p>Recruit for two posts for new UK NP Communications Team (July)</p>	<p>‘Experience’ fund through Norfolk County Council.</p> <p>BA supported Visit the Broads A6 pocket guide for 2020 with copy, finance and two full page ads (Broads Experiences and National Parks). Broadcaster and Broadsheet for 2020 written, designed and ready for publishing.</p> <p>National Park Experience collection: BA supported development of new Discover England Fund bid for National Park Experiences. Local funding secured through Norfolk County Council for development of Broad Experiences and marking to travel trade and consumers. Due for Feb start.</p> <p>AirBnB Broads Ranger experience in place for 2020 season and bookings already secured.</p> <p>Media trip being arranged for Australian travel trade in May to highlight Experience collection. Collection supplied prizes for Visit Norfolk campaign in February.</p> <p>Events programme updated on Visit the Broads website. Planning underway for Broads presence at Norfolk Show and other events in 2020.</p> <p>Work progressing on new visitor information centres in Norwich and Lowestoft.</p>	
<p>Development of partnership projects</p> <p>Work in collaboration with key partners to develop projects to support delivery of Broads Plan and attract external funding.</p> <ul style="list-style-type: none"> • Complete review of onsite catering operation at Acle Bridge (by Dec) 	<p>Status: On track</p> <p>BA Members discussed Visitor Services Review on 22 Nov 2019 and agreed for small-scale options to be examined and tested.</p> <p>Waterways and Recreation Officer developed design options for Hoveton Riverside Park, for discussion at Hoveton Parish Council meeting in January.</p>	Chief Executive

Theme, aim and milestones	Progress	Lead officer
<ul style="list-style-type: none"> • Develop options analysis for development of Acle Bridge site (by Jan) • Develop options analysis for redevelopment of Hoveton Riverside Park (by Jan) • Agree future level of BA engagement in Whitlingham Country Park and principle of expanding visitor facilities on site (by Jan) 	<p>Service Level Agreement with Whitlingham Charitable Trust ending 31 March 2020 and BA making plans to vacate site.</p>	
<p>Agri-environment pilot</p> <p>Work with partners to design and deliver sustainable wetland and lowland grazing options within proposed Environment Land Management Systems (ELMS)</p> <ul style="list-style-type: none"> • Adopt and implement Broads Biodiversity & Water Strategy and Action Plan 2019-24 (July) • Defra to confirm funds for Test and Trial ELMs in July; if approved, work with partners to project completion • Consider any funding shortfall for BA contribution to local design of ELMs (Autumn) 	<p>Status: On track</p> <p>Broads Biodiversity & Water Strategy and Action Plan 2019-24 adopted.</p> <p>Defra awarded Broads Test and Trial contract in Oct 2019. Sub-contracts awarded to Natural England, Norfolk Farming Wildlife Advisory Group and facilitator.</p> <p>First partnership workshop held 13 Nov 2019 attended by 63 farmers and land managers.</p> <p>Defra ELMs team and Broads farmer site visit postponed to February 2020 due to national election.</p> <p>Project info and workshop notes published on BA website at Broads ELMs</p>	<p>Chief Executive</p>

Author: Maria Conti

Date of report: 15 January 2020

Broads Authority

31 January 2020

Agenda item number 15

Statement of Community Involvement - for adoption

Report by Planning Policy Officer

Purpose

The Authority's Statement of Community Involvement (SCI) adopted in 2014 has been reviewed. This report presents consultation responses to the first revision of the SCI and the proposed final SCI.

Recommended decision

Adopt the revised Statement of Community Involvement.

1. Introduction

- 1.1. Local Planning Authorities must produce a Statement of Community Involvement (SCI) and review it every five years to keep it up-to-date. As such the Broads Authority's SCI adopted in 2014 has been reviewed and updated.
- 1.2. Consultation on the updated SCI closed on 22 November 2019. Appendix 1 sets out responses and subsequent changes to the document, with a track-changed version of the proposed final document at Appendix 2.

2. Purpose of the SCI

- 2.1. Our SCI sets out how we will engage with stakeholders and the local community in the production and review of the Broads Local Plan and the Broads Plan, and in the planning application process.
- 2.2. This is in line with National Planning Policy Guidance, which states that:

Local planning authorities must set out in their Statement of Community Involvement how they will engage communities on the preliminary stages of plan-making, specifically survey stage and Local Development Scheme. Local planning authorities must review their Statements of Community Involvement every 5 years from the adoption date. It is important that Statements of Community Involvement are kept up-to-date to ensure effective community involvement at all stages of the planning process. Therefore, a local planning authority should regularly review and update their

Statement of Community Involvement to reflect any changes to engagement. A local planning authority may review and update their Statement of Community Involvement at the same time as reviewing and updating a plan to reflect what action is taken to involve the community in any change to the plan’.

3. Adopting the SCI

- 3.1. The Planning Committee endorsed the proposed final SCI on 6 December 2019 (Appendix 2) and recommended that it be adopted by the Broads Authority.

Author: Natalie Beal

Date of report: 8 January 2020

[Broads Plan](#) objectives: 8.1

Appendix 1 – Responses to SCI consultation

Appendix 2 – Track-changed version of final SCI

Appendix 1 – Responses to SCI consultation

Name	Organisation	Comment	BA Responses	Proposed changes
Joy Brown	Norwich City Council	Norwich City Council have no comments to make on this document.	Noted.	No change to SCI
Lorraine Houseago	Norfolk County Council	We have no other comments to make.	Noted.	No change to SCI
Penny Turner	Norfolk Policy ACLO	We have no comments on the above at this stage.	Noted.	No change to SCI
Carla Wright	Natural England	We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications. We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals .	Noted.	No change to SCI
Ben Wright	East Suffolk Council	The Council is broadly supportive of the detail included in this Statement of Community Involvement and the various methods the Broads Authority promote in order to encourage public participation. The use of specific methods to help hard to reach groups participate in the planning process should be encouraged.	Noted.	No change to SCI

Name	Organisation	Comment	BA Responses	Proposed changes
Ben Wright	East Suffolk Council	An outline of which team is responsible for which document/process would provide further clarity to members of the public about who to contact if they have a query. This does not need to go into great detail however some description of the difference between planning policy and development management etc. could be really beneficial.	Noted. A list of specific names and contact details will not be included as people change roles. Also, the Broads Authority is a small organisation and reception is manned in normal working hours so it is always easy to speak to someone. But we will elaborate on the three aspects covered in this SCI a bit more.	This Statement of Community Involvement (SCI) is the Broads Authority's formal policy to: i. Identify how and when local communities and stakeholders will be involved in the preparation of the Broads Local Plan – the Planning Policy Officer is responsible for the production of this ; ii. Set out community involvement in the consideration of planning applications – the Development Management Officers are responsible for determining planning applications and the Planning Administration Team are responsible for the receipt and processing of applications and fees ; and iii. State how the community can inform the review of the Broads Plan (the strategic plan to manage the Norfolk and Suffolk Broads) – the Head of Governance is responsible for this at the time of writing .
Ben Wright	East Suffolk Council	Page 4 – it could be useful to further differentiate Supplementary Planning Documents and Planning Guides from Local Plans, seeing as they do not form part of the Development Plan for the area officially but rather provide further details on applying planning policies.	Agree. Will amend figure.	Amend figure so it has a double ended arrow between local plan and guides to show they work together and add arrows from Neighbourhood Plans to planning applications and SPDs and guides to planning applications to show that neighbourhood plans and SPDs and guides in form decision making of planning applications.

Name	Organisation	Comment	BA Responses	Proposed changes
Ben Wright	East Suffolk Council	Page 8 – Could a list of social media platforms used by the Broads Authority and links to them be provided?	Agree. Will add links.	Use social media (Facebook: https://www.facebook.com/BroadsAuthority/ and Twitter: https://twitter.com/BroadsAuth) and information technology.
Ben Wright	East Suffolk Council	Throughout the document – More reference to the use of social media could be very beneficial to the SCI. Social Media has become a key part of public consultations and has been very successful when used across the country. A simple outline of when social media could be used to promote consultations could be one way of doing this.	Noted. We refer to this under Local Plan and a reference in the Broads Plan section can be added too.	Our Broads Engage web pages highlight the consultation methods we use regularly, including stakeholder workshops, committee and interest group meetings, focus groups, social media (Twitter and Facebook) one-to-one discussions, written consultations in paper and electronic formats, surveys and questionnaires, and public events in local venues around the Broads, including ‘drop-in’ area parish forums.
Ben Wright	East Suffolk Council	Page 13 – could a link to the database be added?	We don't think this is appropriate and we list the organisations on our database more generally in an Appendix at the end of the SCI.	No change to SCI
Ben Wright	East Suffolk Council	Throughout – it could be useful to provide links throughout the document to any relevant pages on the Broads Authority website, such as: <ul style="list-style-type: none"> • Contacts database • Planning pages • Pre-app pages • Committee info including right to speak • Weekly list 	Agree. Will add links to Planning Committee, planning pages and weekly list.	Links added

Name	Organisation	Comment	BA Responses	Proposed changes
Ben Wright	East Suffolk Council	Page 21 – While Neighbourhood Plans do add detail beyond the scope of Local Plans, would it be more accurate to say that Neighbourhood Plans themselves include policies that can include additional, more local details reflecting local circumstances that is not appropriate for Local Plans to cover?	Agree. Will add text.	The Localism Act 2011 (as amended) makes provision for communities to prepare their own Neighbourhood Development Plans, which can add detail beyond that of the Local Plans <u>and can include policies that can include additional, more local details reflecting local circumstances that is not appropriate for Local Plans to cover.</u>
Ben Wright	East Suffolk Council	Also, Neighbourhood Plans do not need to necessarily be in conformity with national policy, rather they have to have regard to it. The conformity with Local Plans is only regarded as ‘general conformity’.	Agree. Will add text.	They must <u>have regard</u> to National Policy <u>as well as be in general conformity with</u> any Plan that has been adopted by the Local Authority
Ben Wright	East Suffolk Council	Would it be more accurate to state that Neighbourhood Plans help to decide where development should go and what type of development it should be, alongside the relevant Local Plan?	Agree. Will add text.	Decide where and what type of development should happen in the neighbourhood <u>(alongside the Local Plan)</u> ;
Ben Wright	East Suffolk Council	Is the statement that Neighbourhood Plan policies take precedence over Local Plan policies strictly accurate? Paragraph 30 of the NPPF states that they do take precedence over non-strategic policies where these are in conflict, unless they have been superseded by more recent policies.	Agree. Will amend text.	Include policies: For example, regarding design standards that take precedence over existing policies in the Local Plan for the neighbourhood —provided the Neighbourhood Plan policies do not conflict with the strategic policies in the Local Plan
Jessica Nobbs	Water Management Alliance	Section 2.5 Who we consult refers to three main groups: Specific Consultees, General Consultees and Local Consultees, all of which are listed under Appendix C of the document. We believe both the Broads IDB and Norfolk Rivers IDB should be included in this list of people and organisations.	Noted. You are on the consultation database for planning policy and the Broads Plan. Will add you to Appendix C. In relation to Planning Applications, we consult the relevant IDB by letter.	Water Management Alliance added to Appendix C.

Name	Organisation	Comment	BA Responses	Proposed changes
		<p>According to the National Planning Policy Framework (February 2019), strategic policies set by Local Planning Authorities in their Local Plans should take into account advice from the Environment Agency and other relevant flood risk management authorities, such as Lead Local Flood Authorities (LLFAs) and IDBs. In determining planning applications in accordance with national policy, local policies and relevant guidance, LPAs take into account advice from a number of different sources. These sources include from statutory consultees (such as LLFAs) and the Environment Agency ("EA")) as well as from other Risk Management Authorities ("RMAs") on a non-statutory basis such as IDBs, Anglian Water or the Canals and Rivers Trust. Between December 2014 and March 2015 Government reviewed and consulted the arrangements for providing advice to planning authorities on drainage and flood risk. As part of their response to this consultation Government stated they recognised the important role IDBs fulfil in flood risk management and agreed that "there may be local instances where they should be consulted on new development proposals on a non-statutory basis."</p>		
Charlie Middleton	Beccles Town Council	The Planning Committee, replying on behalf of Beccles Town Council, consider all three documents provide comprehensive support for the planning policies of the Broads Authority.	Support noted.	No change to SCI
Charlie Middleton	Beccles Town Council	However, it is considered that due consideration should be given to amending the minimum consultation period listed in item 43 of the Statement of Community Involvement to a minimum period of 8 weeks, rather than 6 weeks. In support of	This is the minimum set out in regulations. We cannot change the regulations. We do tend to increase the length of the consultation period to take	No change to SCI

Name	Organisation	Comment	BA Responses	Proposed changes
		this proposal, it had been noted that the consultation period for these three planning documents was 8 weeks.	account of school holidays or number or length of documents. This consultation was for 8 weeks because there were three documents. SPD consultations only need to be 4 weeks according to the regulations.	
-	Bramerton Parish Council	No comment.	Noted.	No change to SCI



Statement of Community Involvement

2020

This Statement of Community Involvement is the Broads Authority's formal policy on how local communities and stakeholders will be involved in the preparation of the Authority's Local Plan. It also sets out community involvement in the consideration of planning applications and in the review of the Broads Plan.

**Broads
Authority**

~~Draft for consultation.~~

~~Deadline for comments: 4pm 22 November 2019~~

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1. Introduction

1.1. What is a Statement of Community Involvement?

This Statement of Community Involvement (SCI) is the Broads Authority's formal policy to:

- i. Identify how and when local communities and stakeholders will be involved in the preparation of the Broads Local Plan – the Planning Policy Officer is responsible for the production of this;
- ii. Set out community involvement in the consideration of planning applications – the Development Management Officers are responsible for determining planning applications and the Planning Administration Team are responsible for the receipt and processing of applications and fees; and
- iii. State how the community can inform the review of the Broads Plan (the strategic plan to manage the Norfolk and Suffolk Broads) – the Head of Governance is responsible for this at the time of writing.-

This SCI updates and replaces ~~(when adopted)~~ the 2014 SCI. The National Planning Practice Guidance (NPPG) required SCIs to be updated every 5 years.

The SCI is a requirement of the Planning and Compulsory Purchase Act 2004 (as amended). Section 18¹ states that:

- (1): *The local planning authority must prepare a statement of community involvement.*
- (2): *The statement of community involvement is a statement of the authority's policy as to the involvement in the exercise of the authority's functions under sections 13, 15, 19, 26 and 28 of this Act and Part 3 of the principal Act of persons who appear to the authority to have an interest in matters relating to development in their area.*

The SCI sets out the Authority's policy on consulting and involving people and organisations with an interest in the development and management of the Broads. The Authority must comply with the adopted SCI in preparing any planning document or when determining any planning application. The policy in the SCI will also be used to help inform the review of the Broads Plan.

1.2. Contact details

For more information about the Statement of Community Involvement, planning documents and applications in the Broads Executive Area, or the Broads Plan, please contact us:

Tel: 01603 610734

Email: PlanningPolicy@broads-authority.gov.uk
planning@broads-authority.gov.uk
BroadsPlan@broads-authority.gov.uk

Post: Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, Norfolk NR1 1RY

Website: www.broads-authority.gov.uk

¹ <http://www.legislation.gov.uk/ukpga/2004/5/section/18>


2. Involving the community in planning policy

2.1. The local plan process

The Local Plan² includes policies to help determine planning applications and also allocate some areas of land for certain land uses. When the Broads Authority reviews the Local Plan from around 2020/2021 we will review the adopted planning policies and look into other issues in the Broads Authority Executive Area. The process is set out in Table 1 below. A timeline showing the estimated date for the Local Plan review is in [Appendix A](#).

Over the coming years we will also produce and consult on some Supplementary Planning Documents (SPDs) and planning guides. We follow a set process for SPD production, consultation and adoption, and will produce guides in a similar way.

Table 1: Broads Local Plan Process



1: Identify issues	Review existing policies and identify gaps in policies.
2: Collect evidence	Research what will inform the Local Plan.
3: Consult	Let stakeholders and the public know the Authority is producing the Local Plan and ask for their views on what it should cover. Minimum 6-week consultation period. (Regulation 18)
4: Prepare Draft Plan	Prepare a draft Local Plan with help from evidence and comments received.
5: Consult	Consult stakeholders and the public on the draft Local Plan for a minimum of 6 weeks.
6: Improve Plan	Consider consultation comments and any further evidence when improving the Local Plan.
7: Publish Plan	Consult stakeholders and the public on the improved Local Plan for a minimum of 6 weeks. (Regulation 19)
8: Submit	Assess consultation comments. If the Authority wants to improve the Plan further, stages 6 and 7 are repeated. If the Authority considers the Local Plan is sound, submit it to the Planning Inspectorate. (Regulation 22)
9: Examine	An independent Planning Inspector examines the submitted Local Plan. There may be Public Hearings. (Regulation 24)
10: Adopt	If the Independent Planning Inspector finds the Local Plan sound, the Authority can adopt the Plan. (Regulations 25 and 26)

The public can take part in stages 3, 5 and 7. They can also take part in stage 9 if they made

² <https://www.broads-authority.gov.uk/planning/planning-policies>

49 comments at stage 7. The Authority can carry out extra consultation if needed.

50 2.2. Relationship of the local plan to other documents

51 The following diagram shows how various documents relate to the Broads Local Plan and explains
52 what each document is for.



53 Sustainability Appraisal

54 A Sustainability Assessment (SA), including a Strategic Environmental Assessment (SEA), must take
55 place as part of the Local Plan process. The SA process will assess the social, environmental and
56 economic effects of the Plan and this will help make sure that decisions made contribute to
57 sustainable development. These documents are put together at the same time as the Local Plan and
58 help to inform and shape the Local Plan policies.

59 For Supplementary Planning Documents (SPD), a SEA is completed which may use the SA criteria.

The first stage of the SA is to produce a Scoping Report. This identifies the key sustainability issues for the area through consultation and a review of literature and data. The Environment Agency, Natural England and English Heritage must be consulted at this stage.

Following the Scoping Report, different versions of the SA are produced to go with each stage of the Plan making process. The SA assesses policies and proposals in the Plan and recommends improvements. The SA is published alongside the Local Plan and is also open to comment.

Habitats Regulation Assessment

The Habitats and Birds Directives protect sites of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within Europe. These European Sites include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Sites (OMSs), but at the moment there are no OMSs designated.

Articles 6(3) and 6(4) of the Habitats Directive (European Community 1992) require Habitats Regulations Assessment (HRA) of any plans or projects likely to have a significant effect on a designated feature of a European Site (European Commission 2002).

A Habitats Regulations Assessment assesses potential effects of a proposed plan on all European sites, both within and next to the plan area. It may also include an Appropriate Assessment (AA). The HRA (and AA) should make sure that a plan or project is only approved after determining it will not adversely affect the integrity of any European Site.

The HRA takes the following format:

- Evidence gathering - Identifying European sites in and next to the Broads designated area that may be affected. Research the qualifying features, site conditions, conservation objectives and other relevant plans or projects that might be relevant.
- Task 1 – Screening to decide if a policy is likely to have a significant effect. At this stage there should be enough information available to screen policies effectively.
- Task 2 – Appropriate Assessment and determining the effect on site integrity.

2.3. Duty to Cooperate and Statements of Common Ground

New legislation (Localism Act, section 110) sets out a 'duty to co-operate' which applies to all Local Planning Authorities, National Park Authorities and County Councils in England and to several other public bodies. The new duty means that councils and public bodies must '*engage constructively, actively and on an ongoing basis*' to develop strategic policies. Councils also have to consider joint approaches to plan making.

A statement of common ground records progress made by strategic policy-making authorities during strategic planning for cross-boundary matters. The statement records effective co-operation, or shows where it is not happening, throughout the plan-making process. It can be used at examination to prove that plans are deliverable over the plan period based on effective joint working across local authority boundaries. For Local Planning Authorities, it is used as part of the evidence needed to show they have complied with the duty to cooperate.

99 More information can be found in the NPPG: <https://www.gov.uk/guidance/plan-making>

100 The NPPF and NPPG lists issues requiring cooperation as:

- 101 • The homes and jobs needed in the area;
- 102 • The provision of retail, leisure and other commercial development;
- 103 • The provision of infrastructure for transport, telecommunications, waste management,
- 104 water supply, wastewater, flood risk and the provision of minerals and energy (including
- 105 heat);
- 106 • The provision of health, security, community and cultural infrastructure and other local
- 107 facilities; and
- 108 • Climate change mitigation and adaptation, conservation and enhancement of the natural
- 109 and historic environment, including landscape.

110
111 Certain other public bodies have to follow the duty to cooperate. These are prescribed in the [Town](#)
112 [and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) as amended by the [National](#)
113 [Treatment Agency \(Abolition\) and the Health and Social Care Act 2012 \(Consequential, Transitional](#)
114 [and Saving Provisions\) Order 2013](#). The organisations that have a statutory duty to cooperate³ are:

- 115 • Environment Agency
- 116 • The Civil Aviation Authority
- 117 • The Homes and Communities Agency
- 118 • English Heritage
- 119 • The Office of Rail Regulation
- 120 • Natural England
- 121 • Norfolk County Council and Suffolk County Council
- 122 • Highways Agency
- 123 • New Anglia (Local Enterprise Partnership)
- 124 • Primary Care Trust⁴
- 125 • Marine Management Organisation

126 The Broads Executive Area covers parts of two County Councils and six District/Borough/City Councils:

- 127 • Norfolk County Council
- 128 • Suffolk County Council
- 129 • Broadland District Council
- 130 • Great Yarmouth Borough Council
- 131 • North Norfolk District Council
- 132 • Norwich City Council
- 133 • South Norfolk District Council
- 134 • East Suffolk Council

135
136 The Authority will ensure it 'engages constructively, actively and on an ongoing basis' with relevant
137 organisations. Duty to Cooperate workshops are part of the Local Plan production process.

³ Please note that the regulations also refer to the Mayor of London and Transport for London but these are not relevant to the Broads Authority.

⁴ The Health and Social Care Act 2012 abolishes Strategic Health Authorities and other health bodies such as Primary Care Trusts. Instead there are newly established bodies, the clinical commissioning groups and the National Health Service Commissioning Board.

2.4. How we consult and engage

Advertising consultations

Depending on the consultation stage, we will use some or all the following advertising methods:

- Advertise and promote consultations on the Authority's website.
- Email or write to relevant organisations or individuals who asked to be on our consultation database.
- Display posters at suitable places around the Broads.
- Ask Town and Parish Councils and Councillors for their help letting people know about consultations.
- Use adverts or press releases to promote consultations in the local press or community magazines.
- Use social media ([Facebook: https://www.facebook.com/BroadsAuthority/](https://www.facebook.com/BroadsAuthority/) and [Twitter: https://twitter.com/BroadsAuth](https://twitter.com/BroadsAuth)) and information technology.

Methods of consultation

Depending on the type of consultation document, we will use some or all the following consultation methods:

- We may make presentations to certain groups or organisations.
- Attend Parish meetings if asked, particularly if they can be grouped or where there is a policy issue of local significance.
- We may hold open days or public meetings at accessible venues at times when most people will be able to attend.
- Put printed documents in public venues around the Broads. [Appendix B](#) lists the usual venues.
- We can print copies of the documents for individuals (fee charged to cover costs).
- We may deliver consultation summary leaflets to most homes in an area at certain stages of the plan making process.
- Accept comments by email or post.
- Put up unstaffed displays (including summary posters) in public areas.
- Send out questionnaires, either printed or online.
- Translate parts of documents or summary leaflets into other languages if needed.
- Provide braille or large print versions if needed.

Consultations are held for a set period. We will make sure that deadline dates and times are clear and well publicised. To be included in the consultation comments must reach us by the deadline. Late responses are kept on file, but are unlikely to influence the consultation document. At the formal stages of publication of a Local Plan, late representations are not 'duly made' and therefore cannot be used.

2.5. Who we consult

The Authority consults a wide range of people and organisations, under three main groups:

- **Specific Consultees:** These are the organisations we have to consult to comply with planning regulations. We also include the Local Enterprise Partnership (New Anglia) and the Local Biodiversity Partnership (Wild Anglia) as Specific Consultees.
- **General Consultees:** These are extra organisations that we think are relevant to the consultation. They may be national, regional or local organisations.

- Local Consultees: These organisations or individuals are local to the Broads.

See [Appendix C](#) for a list of consultees, correct at the time of writing and adopting this SCI document.

Some groups can be harder to engage with than others. These groups can include people whose first language is not English, people with disabilities, young people, older people and gypsies, travellers and travelling show people, and those who live on boats. Such groups may be unable or unwilling to engage in traditional consultation methods. Table 2 below explains how we will consult groups that can be harder to engage with.

Table 2 'Hard to engage' groups

Group that may be harder to engage with	How we will consult these groups
Young people	We may attend school assemblies, produce consultation materials aimed at school-aged people, and/or put up displays at venues that young people attend.
People with English not as their first language	We may put display posters in venues used by this particular group. We may translate parts of documents or summary posters and questionnaires if needed.
People with disabilities	Make sure that open days or public meetings are held in accessible venues. Include organisations and individuals that represent this particular group in our General Consultees list (for example the Disabled Persons Transport Advisory Committee). Provide large print and braille versions of consultation materials if needed.
Gypsies, travellers and travelling show people	Include organisations and individuals that represent this particular group in our General Consultees list (for example The National Federation of Gypsy Liaison Groups, The Showmen's Guild of Great Britain and Gypsy Roma Traveller Achievement Service). Also include the Housing Teams of our Constituent Authorities.
Elderly people	Make sure that open days or public meetings are held in accessible venues. Include organisations or individuals that represent this particular group in our General Consultees list (for example Age UK). Make sure that hard copies of documents are available in public venues.
Those who live on boats	Talk to residential boaters face-to-face or drop off leaflets and other information as appropriate. Our Ranger team may also be able to help contact residential boaters.

2.6. Consulting on different stages of different plans - who and how?

Different consultation methods suit different stages of the plan making process and the type of document being consulted. There are regulations that the Authority must follow, setting out who to consult, when and for how long, see Table 3. We may also add in extra stages of consultation.

We will try to avoid school holidays for consultations. If we can't avoid this we may extend the consultation period beyond the minimum required.

195 We prefer to let people know about consultations by email, and also receive comments by email,
 196 as this reduces postage costs and time. But we will send or receive communications by post if
 197 needed.

198 **Table 3 Public consultation requirements of different plans**

Document	Stage	Length of Consultation	Who and how
Sustainability Appraisal Scoping Report ⁵	Before plans are started	5 weeks	We will consult the Environment Agency, Natural England, English Heritage, New Anglia, Wild Anglia, Norfolk and Suffolk County Council and our six constituent districts. We will also consult the RSPB and Marine Management Organisation.
Broads Local Plan and Sustainability Appraisal ⁶	Consultation (Regulation 18)	Minimum 6 weeks	This is the first stage of consulting on a planning document, and consultation methods will be wide ranging. We will notify those on our consultation database, place e-documents on the website, place printed documents in public venues ⁷ around the Broads and hold public events such as open days. We will attend Parish meetings if asked, particularly if they can be grouped or where there is a policy issue of local significance. We may produce summary leaflets or surveys, present to specific groups (such as school assemblies) and produce summary posters or unstaffed displays at suitable venues as needed.
	Publication (Regulation 19)	Minimum of 6 weeks	At this stage of consultation, we will notify those on our consultation database, place documents on the website and place printed documents in public venues around the Broads. We will ask those who respond if they want us to let them know about the progress of the document as it is submitted, examined and potentially adopted.
	Submission (Regulation 22)	-	At Submission stage, we must tell Specific and General consultees and those who asked to be kept informed that they can see the documents on the Authority's website and at appropriate public venues. We will also put a notice in the local press.
	Examination	-	Any consultee who made a representation and

⁵ The Environmental Assessment of Plans and Programmes Regulations 2004:

<http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

⁶ The Town and Country Planning (Local Planning) (England) Regulations 2012:

<http://www.legislation.gov.uk/uksi/2012/767/contents/made> and The Environmental Assessment of Plans

⁷ Regulation 35 of the 2012 regulations say that documents are made available when 'made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours'.

Document	Stage	Length of Consultation	Who and how
	(Regulation 24)		said that they want to attend the Examination in Public and speak at the public hearings will be told the date, time, venue and format of the hearings. We will advertise the date, time, venue and format of the examination on our website and at public venues. The Inspector may also ask someone who has made a representation to provide further information to help their understanding. When we receive the Inspector's Report, we will place it on our website and in public venues, and contact those who asked to be kept informed.
	Adoption (Regulation 26)	-	As well as informing interested parties of adoption, we will place a notice in the local press, write to or email consultees, and place information in public venues and on our website.
Statement of Community Involvement	Draft SCI	5 weeks	There is no requirement to consult at this stage, but the Authority will consult for about 5 weeks. We will notify those on our consultation database and place documents on our website. The final copy will be available at public venues.
Supplementary Planning Documents ⁸	Draft SPD (Regulation 12)	4 weeks	We will notify those on our consultation database, place documents on the website, place printed documents in public venues. We may hold public events such as open days. We may produce summary leaflets or surveys, present to specific groups (such as school assemblies) and produce summary posters or un-staffed displays at suitable venues. We will ask those who responded if they want us to let them know when the Plan is adopted.
	Adoption (Regulation 14)	-	As well as informing the interested parties of adoption, we will place a notice in the local press, write to or email consultees on our database, place information in public venues and on our website.
Guides	Consultation	Around 6 weeks.	We will notify those on our consultation database, place documents on the website, place printed documents in public venues. We may hold public events such as open days. We may produce summary leaflets or surveys, present to specific groups (such as school assemblies) and produce summary posters or

⁸ The Town and Country Planning (Local Planning) (England) Regulations 2012:
<http://www.legislation.gov.uk/uksi/2012/767/regulation/12/made>

Document	Stage	Length of Consultation	Who and how
			un-staffed displays at suitable venues. We will ask those who responded if they want us to let them know when the Plan is adopted.
	Adoption	-	As well as informing the interested parties of adoption, we will place a notice in the local press, write to or email consultees on our database, place information in public venues and on our website.

2.7. What we do with the comments we receive

When you respond to a Planning Policy consultation, your comments will eventually be viewable by the public. This helps ensure a transparent planning system. We will check all comments before they are made public, to make sure that the language used is appropriate for a public audience (i.e. not offensive or inflammatory)

We will abide by data protection rules and will make sure that full personal details are not made publicly available. Names (and job titles and organisations where appropriate) will be made public in the list of consultation responses. We will deal with your personal data in line with GDPR requirements and section 9 and [Appendix D](#).

All comments received will be acknowledged and logged on our database. At the end of the consultation period, we will put together a summary document of comments received, our response, and details about how the comments will be used. We will explain clearly why we made our decisions. The report will be available on the planning policy pages of our website and in paper format on request (a fee may be charged for this). The report will be ready after a reasonable time following the end of the consultation period, allowing us time to read, consider and respond to all comments.

When we submit the Local Plan (or any other planning document) to the Planning Inspectorate to be examined, we must produce a Consultation Report. This report will include the comments received at all stages of the Local Plan production. It will explain how we used the comments and how they have affected the development of Local Plan policy.

We cannot guarantee that every comment will result in changes to the plan that is being consulted on. But we can guarantee that we will read every comment and provide a response saying what actions will be taken or we will explain if no action is taken.

2.8. How can people get involved?

We will advertise our consultations widely in many different ways, so that people can find out about consultations and tell us what they think. Anyone interested can get in touch with us and ask to be kept informed about particular planning documents or consultations. From time to time, we will contact consultees to see if they still want us to keep their details on our consultation database.

3. Involving the community at the planning application stage

The Broads Authority is the local planning authority for all land and properties within the Broads executive area. Therefore, the Authority is responsible for processing and managing most forms of development in the Broads⁹.

3.1. Legislative requirement to consult on planning applications

As well as consulting on strategic documents, the Broads Authority also has to consult the community on planning applications. The requirements are set out in the Town and Country Planning (Development Management Procedure) (England) Order 2010.

3.2. Pre-application discussions

The Localism Act 2011 sets out requirements for consultation in the pre-application process, and the National Planning Policy Framework (NPPF) also encourages applicants to engage in this process. This can provide feedback at an early stage as to whether their application is likely to be acceptable in principle.

The NPPF says: 188. *Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.*

For all applications, we encourage pre-application discussions with our Planning Officers, who can offer guidance and advice on design and on the planning policies and regulations that may apply. They can also give advice about the type and level of information required to enable the Authority to validate and determine their application. We can also let the applicant know which organisations we will be consulting. This will give the applicant an opportunity to contact the organisations beforehand and address any concerns they may have. We can also advise if planning permission is not needed.

The NPPF says: 190. *The more issues that can be resolved at pre-application stage, the greater the benefits.*

Pre-application advice can:

- Help identify issues any developer should consider in formulating proposals including flood risk
- Help identify the level of supporting information and detail that should accompany the plans and forms required to be submitted with any formal application
- Avoid expensive mistakes being made at application stage
- Speed up processing of the application
- Make sure groups or individuals you must consult by law are engaged as early as possible
- Identify schemes which are unlikely to win support
- Avoid time spent on making an application if permission is not needed

⁹ <https://www.broads-authority.gov.uk/planning/planning-permission>

At the time of writing, this service is provided for free. If you want to take advantage of pre-application advice, please fill out the pre-application advice form found on the Authority's website¹⁰.

3.3. Pre-application consultation

The Localism Act sets out the requirements for statutory pre-application consultation; the NPPF also encourages those not required by law to undertake community engagement. All applicants are encouraged to consult neighbours, the appropriate Parish/ Town Council and other local amenity bodies before submitting their application. How this is done will vary in proportion to the scale and nature of the development proposal. As a minimum, for minor applications we recommend the applicants consult immediate neighbours before submitting an application.

For major applications, such as those that may be controversial, on sensitive sites or significant in scale, we encourage developers to engage with the local community at an early (pre-application) stage in order to establish local issues and concerns that may need to be addressed in the application. How this is done is up to the developer, but we would encourage public exhibitions, public meetings, press releases and public notices.

Applicants will then be able to submit a Consultation Statement with their application.

Major applications are defined as residential development comprising 10 or more dwellings OR if the number of dwellings is unknown, the site area is 0.5 hectare or more; or any other use where the floor space proposed is 1,000 square metres or more OR if the site area is one hectare or more.

3.4. Local Development Orders

Local Development Orders are made by local planning authorities and give a grant of planning permission to specific types of development within a defined area. They streamline the planning process by removing the need for developers to make a planning application to a local planning authority.

On producing a Local Development Order, the regulations¹¹ state that the draft local development order and statement for reasons need to be made available in a similar way to those of the Local Plans. The venues as set out in [Appendix B](#) will therefore hold paper copies of the documents, and a copy will be posted on our website.

Where the draft local development order would grant planning permission for development specified in the order, the Authority will display in at least one place on or near to the site to which the order relates a notice (as set out in Schedule 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2010) and give every person whom we know to be the owner or tenant of any part of the site whose name and address is known to the authority, a copy of the Order.

¹⁰ http://www.broads-authority.gov.uk/_data/assets/word_doc/0004/410269/Do_I_need_Planning_Permission_form.doc

¹¹ http://www.legislation.gov.uk/uksi/2010/2184/pdfs/uksi_20102184_en.pdf

295 The consultation will last a minimum of 28 days.

296 The Specific Consultees as set out in [Appendix C](#) will be consulted, as well as the following groups:

- 297 • Voluntary bodies some or all of whose activities benefit any part of the local
- 298 planning authority's area;
- 299 • Bodies which represent the interests of different racial, ethnic or national
- 300 groups in the local planning authority's area;
- 301 • Bodies which represent the interests of different religious groups in the local
- 302 planning authority's area;
- 303 • Bodies which represent the interests of disabled persons in the local planning
- 304 authority's area;
- 305 • Bodies which represent the interests of persons carrying on business in the
- 306 local planning authority's area.
- 307 • Any person with whom they would have been required to consult on an
- 308 application for planning permission for the development proposed to be
- 309 permitted by the order.

310 **3.5. Who will be consulted on planning applications and how?**

311 Once an application has been submitted, the Authority is responsible for managing the consultation,
312 determining who will be consulted and how long they will have to comment. The Authority carries
313 out consultation for applications, even those when pre-application advice has been sought to ensure
314 there is no bias.

315 Depending upon the nature and location of the application, the Authority may consult various
316 bodies and organisations to receive their views regarding the application. These can include the
317 Environment Agency, Anglian Water, Natural England, Norfolk or Suffolk County Council Highways
318 Departments, Norfolk Landscape and Archaeology Department, Norfolk or Suffolk Fire Service,
319 Broads Society and others considered pertinent to the proposal.

320 The Authority may also consult internal officers for their specialist views. These can include the
321 Ecologist, the Landscape Officer, the Heritage Environment Manager, the Authority's Arboriculture
322 Consultant and the Waterways and Recreation Officer. The Parish/Town Council is a statutory
323 consultee and is always consulted.

324 For applications that relate to the use and enjoyment of the water space and/or affect navigation,
325 the Authority will consult with relevant organisations that represent the various users of the Broads
326 system.

327 These organisations/officers are consulted via email (or by post if no email address is provided to the
328 Authority) with information as to how they can view the application online. Neighbours are
329 consulted by post whilst Parish and Town Councils are sent an email informing them of the
330 consultation period or sent a copy of the application by post if an email address is unavailable.

Some applications may have historic environment issues. On these occasions, the Authority will consult with Norfolk County Council Historic Environment Service, and English Heritage East of England Region as well as the Authority's Heritage Environment Manager.

On occasion, planning applications are revised after they have been submitted, due to concerns raised by case officers or to address comments received from consultees or the public. Depending on the significance of the changes, the Authority will re-consult with the Parish Council, neighbours and anyone else likely to be affected by the changes made. The usual time for response to amendments is 10 working days.

In addition to consulting neighbours and other Statutory Bodies the Authority publicises planning applications and other submissions as set out in the Table below to ensure the local communities have a number of ways to find out what is being proposed in their area.

For all Local Planning Authority applications and consents submitted to the Broads Authority, we will:

- a) Send notification of the application to the respective District/Borough/City Council
- b) Display a notice of the proposal in a prominent position on or near the proposed site
- c) Consult, by letter or email, immediate neighbours, respective Parish Council and respective District/Borough/ City Council Ward Members
- d) Publish full details of the application on the Authority's website
- e) Make details of the application available for inspection at the Authority's head office during normal working hours
- f) Consult any relevant statutory and non-statutory bodies

In addition to the above, we will give notice in a local newspaper of the following types of development:

- a) Works within a Conservation Area or within the curtilage of a listed building.
- b) A proposal accompanied by an Environmental Statement
- c) A proposal which is contrary to the Development Plan
- d) A proposal which affects a public right of way
- e) Major development, including development likely to be of interest to a wider number of people
- f) Telecommunications development

A Weekly List¹² of new planning applications is issued each week to allow the public to stay up-to-date with applications submitted for sites within their local area.

3.6. How can people get involved in the application process?

Members of the public can get involved during the consultation period, by informing the Authority in writing of their views on proposals or by providing any relevant information they feel the Authority should know.

¹² <https://planning.broads-authority.gov.uk/online-applications/search.do?action=weeklyList>

Applications are also discussed at Parish/Town Council Committee Meetings. Members of the public may be able to speak at these meetings. However it is advised that the Parish Clerk/Representative is asked for that Parish's protocol in respect of its 'planning meetings'

The Broads Authority's Planning Committee¹³ is also a public meeting and anyone is eligible to register to speak on an application, or turn up on the day to sit and listen.

3.7. How can I find out about planning applications in my area?

The Weekly List published on the Authority's website shows new applications registered within the Broads Authority's Executive Area. Site notices are another way to find out about planning applications. These are erected on or close to the application site in places accessible to the public from public footpath or highway. Press Notices are included in the local newspaper for applications as specified the box on the previous page.

3.8. How to comment on a planning application

Consultation letters, Site Notices and Press Notices will all include details of how to view the planning application and how to make comments on the application.

There is a statutory consultation period of 21 days from the date of the Site Notice or neighbour notification letter, or 14 days from the date of the press advertisement, for responses to be made. However, bodies such as Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation for applications for development potentially affecting a SSSI. Any responses received during this consultation period are uploaded onto the Broads Authority's Public Access system and can be viewed by the wider public.

Comments on a planning application must be made in writing and can be submitted in three different ways:

- a) via the Broads Authority's Public Access system
- b) via email
- c) via post

3.9. What we do with the comments we receive?

We aim to acknowledge representations received from neighbours, Parish/Town Councils, District or other councillors and the Broads Society on undetermined applications within five working days of receipt. We will acknowledge representations from other bodies as appropriate.

The Authority displays all comments received regarding an application on its website under the application's reference (although we will not include any inappropriate or offensive comments). These can be accessed by all members of the public.

¹³ <https://www.broads-authority.gov.uk/about-us/committees/planning-committee>

The Planning Officer responsible for an application which receives comments will take all comments received into consideration when making his/her recommendation. Where appropriate, comments received may result in amendments being made to the proposal and/or adding conditions to the decision notice. In some instances, comments received may result in the refusal of a proposal.

Every Planning Officer will ensure that any comment received is referenced in their final report on the proposal, whether or not further action has been taken as a result of the comment.

The determination of each planning application will either be made at Officer level under the Authority's Scheme of Delegation or by the Planning Committee. If the application is taken before the Planning Committee for determination, any comments or representations received will be brought to the attention of the Members.

3.10. Speaking at Planning Committee¹⁴

The majority of applications are not required to go before the Planning Committee to be decided, because they are of a nature that enables them to be determined by the Authority's Head of Development Management under the Authority's Scheme of Delegation.

For those applications that need to go to Planning Committee, the Planning Committee meeting is held every 4 weeks, on a Friday morning at Yare House, 62-64 Thorpe Road, Norwich.

Members of the public, the Parish Council and Ward Member are eligible to speak at the Planning Committee, either as supporters or objectors and do not need to have provided comments during the initial consultation period. Attendance by the applicant/agent is also encouraged. Anyone who wishes to speak regarding an application must register with the Committee Clerk prior to the commencement of the Meeting.

Each speaker will be given a maximum of 5 minutes. If more than one objector/supporter from a group wishes to speak, then a total of 5 minutes will be allocated to that group. However, it is advised that a group nominate a single spokesperson due to the limited speaking time. The Committee Clerk will advise whether there are other interested parties who have requested to speak.

It is advised that your speech should be brief and to the point, referring to relevant planning issues. Illustrative material is permitted to clarify issues.

Full details, including Committee agenda papers, Committee Minutes and planning decisions, are published on our website at www.broads-authority.gov.uk/Planning.

¹⁴ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0005/414887/PUBLIC-SPEAKING-September-2018.pdf

3.11. Sources of planning advice

Planning Aid

Planning Aid provides free, independent and professional advice to those who are unable to pay professional fees. See section 6 for more details.

Planning Portal

The Planning Portal is the Government's website that offers clear guidance on the planning system in England and Wales. The website also allows you to submit online planning applications to the Council. The website is available to view at www.planningportal.gov.uk.

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4. Involving the community in producing the Broads Plan

4.1. The Broads Plan

The Broads Plan is the strategic plan to manage the Norfolk and Suffolk Broads. It sets out a vision, long-term aims and short-term objectives for the Broads, and coordinates and integrates a wide range of strategies, plans and policies relevant to the area with the purposes and duties set out in the Broads Act. The Broads Plan is a plan for the Broads, not just for the Broads Authority. While the Authority is responsible for its production, a wide range of partners will take a lead or joint role in the delivery and monitoring of specific actions in the Plan.

The Broads Plan helps shape the planning policies adopted with the Broads Local Plan, and neighbouring Local Planning Authorities need to have regard to it when adopting their own planning policies. The Broads Plan may also be a material consideration in making decisions on individual planning applications.

4.2. Reviewing the plan

The Authority is required to review the Broads Plan at least once every five years and update it as appropriate.

Each stage of the review process will involve working with our officers and members, key statutory and delivery partners, and stakeholder groups and individuals with an interest in the Broads. Our Broads Engage web pages¹⁵ highlight the consultation methods we use regularly, including stakeholder workshops, committee and interest group meetings, focus groups, [social media \(Twitter and Facebook\)](#) one-to-one discussions, written consultations in paper and electronic formats, surveys and questionnaires, and public events in local venues around the Broads, including 'drop-in' area parish forums. We will follow the process in Table 2 to engage with those who may be considered as 'hard to engage'.

The stages of a Broads Plan review are:

- Carry out preliminary scoping work to review the Plan's vision, aims and objectives, and assess outputs and outcomes since the Plan was adopted.
- Prepare a first draft Plan and publish it for public consultation for a period of 6-8 weeks. Consider comments received, and carry out additional internal and external consultation if needed.
- Prepare revised draft Plan and publish it for a 6-8 week period of public consultation.
- Prepare and publish final Plan.

The draft and final versions of the Plan and associated documents will be made available in paper and electronic format, and in large print or audio formats on request. We will publish information about consultations on our website, through our social media including Twitter, Facebook and relevant blogs (for example, from the Chief Executive), in our visitor and toll payer newsletters, in the local press, and through the public venues shown in [Appendix B](#).

¹⁵ Broads Engage: <https://www.broads-authority.gov.uk/about-us/how-we-work/broads-engage>

4.3. Environmental report

The Broads Plan review is informed by an Environmental Report (combining Sustainability Appraisal and Strategic Environmental Assessment), which assesses any significant environmental, economic and social impacts of the Plan on conservation sites designated under the European Habitats Directive. This process will be run in parallel with the Plan review process.

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5. Neighbourhood Planning

5.1. About Neighbourhood Plans

The Localism Act 2011 (as amended) makes provision for communities to prepare their own Neighbourhood Development Plans, which can add detail beyond that of the Local Plans and can include policies that can include additional, more local details reflecting local circumstances that is not appropriate for Local Plans to cover. These plans can set planning policies to guide future development in the parish. They must be in conformity with have regard to National Policy as well as be in general conformity with any Plan that has been adopted by the Local Authority. They are community led and can be written by Town or Parish Councils, or where there is no Town or Parish Council by a specially created Neighbourhood Forum.

5.2. Neighbourhood Plans - 'cans' and 'cannots'

A Neighbourhood Plan *can*...

- Decide where and what type of development should happen in the neighbourhood (alongside the Local Plan);
- Promote more development than is set out in the Local Plan; and
- Include policies: For example, regarding design standards, ~~that take precedence over existing policies in the Local Plan for the neighbourhood~~—provided the Neighbourhood Plan policies do not conflict with the strategic policies in the Local Plan.

A Neighbourhood Plan *cannot*...

- Conflict with the strategic policies in the Local Plan prepared by the LPA;
- Be used to prevent development that is included in the Local Plan; and
- Be prepared by a body other than a Parish or Town Council or a Neighbourhood Forum.

5.3. Neighbourhood Plans produced by parishes in The Broads

There are no parishes wholly within the Broads Executive Area. Each parish that is partly in the Broads, where the Broads Authority is the LPA, will also have a part within one of the Authority's constituent council areas, with that council being the LPA.

5.4. Producing A Neighbourhood Plan

While the Neighbourhood Plan will be written by the community, the Local Planning Authority (LPA) still has a role to play. The Authority and its constituent councils work together to assist the community in producing a Neighbourhood Plan. The Council usually leads on the Local Planning Authority's side of producing the Neighbourhood Plan, usually because the majority of the area of a Parish is not in the Broads Executive Area but also because the Council will eventually run the referendum stage of production.

509 That being said, both the Authority and the other Council need to undertake the required formal
 510 stages in line with their particular procedures. Table 4 summarises the process¹⁶.

511 **Table 4 Explanation of the Stages of Neighbourhood Plan Production**

Stage	Explanation
Designating a Neighbourhood Area or Neighbourhood Forum	<p>If the application is for an entire parish, then the LPAs designate the Neighbourhood Plan.</p> <p>If for an area different to an entire parish, the Council and the Broads Authority will advertise the application for six weeks. The Council will probably lead on contacting particular consultees, with the Authority providing relevant contact details. The Authority will advertise the consultation on its website.</p> <p>On completion of the consultation (if required), the Authority and Council designate the Neighbourhood Area or take the decision to designate the Neighbourhood Forum. At the meeting of the full Authority, the majority of the Authority's formal involvement in the production of a Neighbourhood Plan is delegated to the Planning Committee.</p>
Pre-submission publicity and consultation	The qualifying body (Parish Council or Neighbourhood Forum) publicises the draft plan or Order and invites representations and consults the consultation bodies as appropriate. The Authority and Council help. The Authority will place the consultation document on its website and in its Head Office reception.
Submission to the local planning authority and publication	The Authority and Council checks that the submitted proposal complies with all relevant legislation. If the plan meets the legal requirements, the Authority and Council publicise the proposal for a minimum of 6 weeks and invite representations, and appoint an independent examiner (with the agreement of the qualifying body).
Submission to Independent Examiner and Examination	The Neighbourhood Plan and representations are sent to the independent examiner, who undertakes the examination. The independent examiner issues a report to the local planning authority and qualifying body. The Authority and Council consider the report and reach their own view – to proceed to referendum or not.
Referendum	On deciding to proceed to referendum, the Council organises and runs the referendum.
Making the neighbourhood plan	The results of the referendum are reported to the full Authority. Paragraph 38A (4)(a) of the Planning and Compulsory Purchase Act 2004 requires that the Local Planning Authority must make the neighbourhood plan if more than half of those voting have voted in

¹⁶ More detail on the process of producing a Neighbourhood Plan can be found here <https://www.gov.uk/guidance/neighbourhood-planning--2#key-stages-in-neighbourhood-planning>

Stage	Explanation
	favour of the plan being used to help decide planning applications in the plan area.

Once the neighbourhood area is approved, the Authority and Council are legally required to provide support and advice covering such issues as planning matters and advice on the legal requirements for producing a Neighbourhood Plan. The Authority and Council are also responsible for checking that the submitted Neighbourhood Plan has followed the proper legal process, publicising the proposed plan and arranging for the independent examination and referendum to take place. The NPPG sets out the role for the LPA: <https://www.gov.uk/guidance/neighbourhood-planning--2#the-role-of-the-local-planning-authority-in-neighbourhood-planning>

5.5. How the community is involved in the process

The community are formally involved in the following stages. The Neighbourhood Forum/Parish Council may involve the community in other ways at other stages of the Neighbourhood Plan production.

Table 5: Community involvement in neighbourhood planning process

Stage	Length of time	How and who?
Pre-submission consultation	6 weeks	Relevant consultees are invited to comment on the draft Neighbourhood Plan. The draft plan is displayed on the Authority's website. A hard copy is displayed at the Authority's head office.
Publication	6 weeks	Relevant consultees are invited to comment on the publication version of the Neighbourhood Plan. The draft plan is displayed on the Authority's website. A hard copy is displayed at the Authority's head office.
Referendum	One day only to cast vote	Those who live in the Parish and are over 18. Polling stations for each ward of a Parish. Run by the Council.

5.6. More information

For more information, visit these useful websites:

Locality:

<https://locality.org.uk/>

Forum for Neighbourhood Planning:

<https://neighbourhoodplanning.org/>

Community Knowledge Hub:

<http://planning.communityknowledgehub.org.uk/>

Government Guidance:

<http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/>

534 Planning Help:
535 [http://www.planninghelp.org.uk/improve-where-you-live/shape-your-local-area/neighbourhood-](http://www.planninghelp.org.uk/improve-where-you-live/shape-your-local-area/neighbourhood-plans)
536 [plans](http://www.planninghelp.org.uk/improve-where-you-live/shape-your-local-area/neighbourhood-plans)
537 Planning Advisory Service:
538 <https://www.local.gov.uk/pas/pas-topics/neighbourhood-plans>
539 Localism Act and Neighbourhood Planning:
540 <http://www.legislation.gov.uk/ukpga/2011/20/part/6/chapter/3>

DRAFT

6. Planning help and advice available to the community

6.1. Introduction

Planning Aid is a voluntary service linked to the Royal Town Planning Institute (RTPI) that offers free independent professional advice on planning issues. Planning Aid is provided to support community groups and individuals who have limited resources to participate effectively in planning matters.

6.2. What type of service is provided by Planning Aid?

The current remit of Planning Aid involves advising community groups in negotiations with the Local Planning Authority and, if necessary, representing the groups at examination.

Planning Aid England can help individuals and communities to:

- Understand and take part in the planning system
- Take part in the preparation of plans
- Comment on planning applications
- Apply for planning permission
- Appeal against a decision
- Help individuals represent themselves at appeals or public enquiries

Every part of the UK is covered by Planning Aid, with each region having its own service. Developers should consider contacting Planning Aid for advice about appropriate engagement techniques.

6.3 contact and more information

Planning Aid England can be contacted on 020 7929 8338 (although no advice given over the phone) or fill out the on-line form: <https://planningaid.zendesk.com/hc/en-us/requests/new>. Further information can be found on the RTPI website at <https://www.rtpi.org.uk/planning-aid/>.

Information regarding the planning system can also be found on the Government planning portal website at www.planningportal.gov.uk.

7. Complaints procedure

We operate a three-stage procedure¹⁷ to ensure complaints about our services and performance are dealt with impartially, objectively and professionally.

7.1 stage one: informal complaints

Initially you may wish to informally contact a senior manager for the area of work where you have a complaint or comment. Alternatively, if you telephone the Broads Authority and explain that you wish to make a complaint, you will be put through to the senior member of staff best able to deal with your concerns.

As a further option you can email the Authority via our contact form. By approaching the Authority in this way, your concerns will be dealt with efficiently and every effort made to resolve your complaint. You will be provided with a written reply to email or written informal complaints within 10 working days of receipt. This applies to telephone informal complaints that cannot be resolved at the time.

7.2 stage two: formal complaints

Please submit a formal complaint by completing and submitting a formal complaint form which will be forwarded to the relevant director. You will be sent an acknowledgement within three working days of receipt.

When a director receives a formal complaint, it is their responsibility to consider the whole complaint objectively and with professionalism. You will get a detailed reply in writing within 10 working days, identifying whether your complaint is upheld or not. If it is not possible to respond in full within 10 working days you will be sent a letter explaining why and be given an indication of when the response will be ready. The reply will include details of how to take the matter forward should you remain dissatisfied.

7.3 stage three: Chief Executive review

Your request to proceed to the Chief Executive's Review Stage is normally only available if you have been through the Formal Complaints Stage process. Your complaint should be in writing and addressed to the Chief Executive stating your request for a Chief Executive's Review of your complaint. An acknowledgement letter will be sent within three days of receipt and a detailed reply will be sent within 20 working days. If it is not possible to respond in the timescale you will be sent a letter explaining why.

This is the last stage in the Authority's complaint process and it requires the Chief Executive to review your complaint in an impartial manner, undertaking a full and independent review of your concerns. If he considers it helpful, he may seek the assistance of the Authority's Monitoring Officer and may seek direction from the appropriate committee.

Please note that if your Formal Complaint concerns action that the Chief Executive has taken, your Formal Complaint will be reviewed by the Chairman of the Authority. An acknowledgement letter will be sent within three days of receipt and a detailed reply will be sent within 20 working days. If it is not possible to respond in the timescale you will be sent a letter explaining why.

¹⁷ <https://www.broads-authority.gov.uk/contact-us/comments-and-complaints/how-to-complain>

7.4 what happens next?

The Authority wants to improve service and resolve problems as quickly as possible. If your complaint is upheld, you will receive a written apology and explanation of action taken to prevent a similar thing happening again.

7.5 what if I am still not satisfied?

The reply from the Chief Executive or Chairman will set out your right to contact the Commission for Local Administration in England (the Local Government Ombudsman). If you consider your complaint was made because the Authority had not followed procedures correctly and may have caused you an injustice, the Local Government Ombudsman can be contacted at the Oaks, Westwood Way, Westwood Business Park, Coventry, CV4 8JB. The website address is www.lgo.org.uk.

Other complaints procedures¹⁸

Our three-stage complaint procedure covers complaints about services and performance of the Broads Authority. However, if your complaint falls into one of the categories below, a different system is in place.

Maladministration

For complaints about administrative matters you can contact the Local Government Ombudsman. The Ombudsman usually prefers that an attempt has been made to resolve the complaint using the Authority's complaints scheme.

Member Code of Conduct

Complaints about conduct of a member or committees can be made formally by writing to the Monitoring Officer, Broads Authority, Yare House, 62 - 64 Thorpe Road, Norwich, NR1 1RY. Alternatively, you may raise the matter informally with the Solicitor and Monitoring Officer. The Code of Conduct for Members and Complaints Procedure, and Complaints Form provides guidance on this matter.

Financial Wrongdoings

The Treasurer and Financial Adviser, Chief Executive, and/or Monitoring Officer will investigate a matter if your complaint is about financial wrongdoings by the Broads Authority.

Unlawful Behaviour or Action

The Authority's Monitoring Officer will investigate a complaint if there is a concern about unlawful behaviour or action by the Broads Authority itself. In addition: if a complaint suggests criminal behaviour the matter will be reported to the Police applicants for planning permission have a legal right to appeal in the case of planning decisions with which they disagree. Details of appeals are included in the letter of refusal sent to the applicant.

Unreasonable Complainant Behaviour

A small number of complainants can be considered unreasonably persistent and/or vexatious; the Policy on the Management of Unreasonable Complainant Behaviour identifies these situations and outlines how they are responded to.

¹⁸ <https://www.broads-authority.gov.uk/contact-us/comments-and-complaints/other-complaints-procedures>

8. Reviewing the Statement of Community Involvement

8.1. Reviewing and revising the SCI

The SCI will be kept under review. Revisions will be made only if there are new groups we wish to engage with or where the regulations relating to public consultation change. It will be reviewed in five years' time (2024) at the latest.

9. Data protection

9.1. Data protection

The Broads Authority is registered under the Data Protection Act 1988 for the purpose of processing personal data in the performance of its legitimate business. The information held by the Authority will be processed in compliance with the principles set out in the Act. When we consult on documents, we will send out the information sheet at [Appendix D](#) that says how we will treat data we receive.

Appendix A: Local Development Scheme

A Local Development Scheme (LDS) sets out the timeline for producing Local Plans and related documents. The following LDS is in place at the time of adopting this SCI, and may change from time to time. It was adopted in July 2019.

Broads Authority Local Development Scheme - July 2019		Completed?	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
SCI	Production																																												
	Planning Committee																																												
	Full Authority						13																																						
	Consultation																																												
	Refinement																																												
	Planning Committee																																												
	Full Authority/Adoption																																												
Flood Risk, Safety by the Water and Marketing and Viability Guide/SPD	Production																																												
	Navigation Committee (safety by water guide)																																												
	Planning Committee						5																																						
	Full Authority						13																																						
	Consultation																																												
	Assessing responses/Amendment																																												
	Navigation Committee (safety by water guide)																																												
	Planning Committee																																												
	Full Authority/Adoption																																												
Residential moorings, archaeology, light pollution and peat guide/SPD	Production																																												
	Navigation Committee (residential moorings guide)																																												
	Planning Committee																																												
	Full Authority																																												
	Consultation																																												
	Assessing responses/Amendment																																												
	Navigation Committee (residential moorings guide)																																												
	Planning Committee																																												
	Full Authority/Adoption																																												
Mooring plot and leisure plot, Green Infrastructure and Ecological Networks and Climate Change Guide/SPD	Production																																												
	Navigation Committee (mooring and leisure plot)																																												
	Planning Committee																																												
	Full Authority																																												
	Consultation																																												
	Assessing responses/Amendment																																												
	Navigation Committee (mooring and leisure plot)																																												
	Planning Committee																																												
	Full Authority/Adoption																																												
Local Plan	Review of Local Plan																																												
	Internal review sessions																																												
	Project planning																																												
Broads Plan	Review of Broads Plan																																												
	Internal review sessions																																												
	Project planning																																												

Preparation

Committee

Consultation

Adoption

V

Comments and amended draft sent by email.

?

Dates for committee meetings yet to be set

Appendix B: Venues around the Broads Executive Area

Libraries

Acle Library
 Beccles Library
 Brundall Library
 Bungay Library
 Cromer Library
 Great Yarmouth Library
 Loddon Library
 Lowestoft Library
 Oulton Broad Library
 Norwich Millennium Library
 Stalham Library
 Wroxham Library

Local Authority Offices¹⁹

Broads Authority Offices, Yare House, 62-64 Thorpe Road, Norwich
 Broadland District Council Office, Thorpe Road, Norwich
 Great Yarmouth District Council Offices, Town Hall
 North Norfolk District Council Offices, Holt Road, Cromer
 South Norfolk Council Offices, Swan Lane, Long Stratton
 East Suffolk Council, the Marina Customer Service Centre, Lowestoft
 Norfolk County Council, County Hall, Norwich
 Suffolk County Council, Endeavour House, Ipswich

Broads Authority Tourist Information Centres

Whitlingham Visitor Centre, Whitlingham Lane, Trowse – up until March 2020.

¹⁹ We no longer leave documents at Norwich City Council's offices as there is no reception and also as the Forum is next door.

Appendix C: List of consultees (planning policy and Broads Plan)

At the time of writing, all those on the consultation database are being contacted to see if they wish to remain on it, and to confirm their details. As such, this information is correct as at ~~October 2014~~November 2019 following a review of the contact database whereby people were asked if they wanted to stay on it or not. From time to time, other organisations may be added to the consultation list.

Specific Consultees

Norfolk County Council	The Environment Agency
Suffolk County Council	National Health Service Commissioning Boards NHS
The Highways Agency Highways England	STP Estates
Natural England	Town and Parish Councils partly within the Broads
Homes and Communities Agency	Executive Area
Network Rail	Coal Authority
English Heritage	Relevant electricity and gas companies
Clinical Commissioning Groups	Local Enterprise Partnership (New Anglia)
Neighbouring District Councils	Relevant Telecommunications Companies
Norfolk and Suffolk Constabulary	Local Nature Partnership (Wild Anglia)
Marine Management Organisation	Relevant sewerage and water undertakers

General Consultees

Age UK	Home Builders Federation
Airport Operators Association	Landowners, agents, developers and Housing
Ancient Monuments Society	Associations operating in the area
Arts Council England (South East)	MEPs - Eastern Region
British Trust for Ornithology	Mobile Operators Association
Civil Aviation Authority	MPs
CPRE Norfolk	National Farmers Union
CPRE Suffolk	National Trust
Crime Prevention and Architectural Liaison Officer	Norfolk & Norwich Transport Action Group
Norfolk	Norfolk Archaeological Unit
Crime Prevention and Architectural Liaison Officer	Norfolk Biodiversity Partnership
Suffolk	Norfolk Coalition of Disabled People (Equal Rights)
Crown Estate	Norfolk Constabulary
Defence Infrastructure Organisation	Norfolk Farming & Wildlife Advisory Group
Department for Transport	Norfolk Fire Service
Design Council	Norfolk Geodiversity Partnership
Disabled Persons Transport Advisory Committee	Norfolk Landscape Archaeology
East of England Ambulance Service	Norfolk Local Access Forum
Equity and Human Rights Commission	Norfolk Rural Community Council
Equal Lives	Norfolk Wildlife Trust
Fields in Trust	Norwich & Norfolk Racial Equality Council
Forestry Commission England (East England	Public Health – Norfolk and Suffolk
Conservancy)	Renewables East
Freight Transport Association	RSPB Eastern England
GeoSuffolk	Secretary of State for Communities and Local
Gypsy Roma Traveller Achievement Service	Government
Health and Safety Executive	Secretary of State for Transport
Historic Environment Service	Sport England - Eastern Region
	Suffolk Archaeological Service

764	Suffolk Biodiversity Partnership	774	The Crown Estate
765	Suffolk Coalition of Disabled People	775	The Gypsy Council
766	Suffolk Constabulary	776	The National Federation of Gypsy Liaison Groups
767	Suffolk Fire Service	777	The National Trust
768	Suffolk Geodiversity Partnership	778	The Society for the Protection of Ancient Buildings
769	Suffolk Local Access Forum	779	The Theatres Trust
770	Suffolk Strategic Partnership	780	<u>The Traveller Movement</u>
771	Suffolk Wildlife Trust	781	The Woodland Trust
772	SUSTRANS	782	Train Operating Companies
773	The Council for British Archaeology	783	<u>Water Management Alliance</u>
784	<u>Local Consultees</u>		
785	AONB groups	790	Local partnerships
786	Chambers of Trade	791	Local residents
787	Civic societies	792	Residents associations
788	Local businesses	793	Schools
789	Local interest groups	794	County Council and Ward Councillors
795	<u>Consultees specific to the Broads</u>		
796	Anglers Consultative Assoc (Norfolk & Suffolk)	817	Country Land & Business Association
797	Association of Inland Navigation Authorities	818	Cruising Association
798	British Assoc of Shooting and Conservation	819	East Anglian Cycling Club
799	British Canoe Union	820	East Anglian Trail Riders Association
800	<u>British Canoeing</u>	821	East Anglian Waterways Assn Ltd
801	British Horse Society	822	Eastern Rivers Ski Club
802	British Marine Federation	823	Eastern <u>Regional</u> Rowing Council
803	British Reed Growers Association	824	Hire Boat operators
804	British Rowing	825	Inland Waterways Association
805	British Waterski	826	Nancy Oldfield Trust
806	British Waterways	827	Norfolk & Suffolk Boating Association
807	Broads Angling <u>Strategy Services</u> Group	828	Norfolk Heritage Fleet Trust
808	Broads Hire Boat Federation	829	Norfolk Wherry Trust
809	Broads Local Access Forum	830	Norfolk Windmills Trust
810	Broads Reed and Sedge Cutters Assn	831	Norwich & District Wildfowlers Association
811	Broads Society	832	<u>Oulton Broad Water Sports Centre</u>
812	Broads Tourism	833	<u>Rural Action East</u>
813	Brundall Riverside <u>Estate</u> Association	834	Suffolk Water Sports Association
814	Butterfly Conservation - Norfolk Branch	835	The Broads Trust
815	Campaign for National Parks	836	UK Association of National Park Authorities
816	<u>Community Action Norfolk</u>	837	Yare Users Association

Appendix D: Local Plan data privacy notice

This consultation document and consultation process have been developed to adhere to the Broads Authority's Statement of Community Involvement²⁰.

Information provided by you in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), and the Environmental Information Regulations 2004).

Are you satisfied that this consultation has followed the Consultation Principles? If not, or you have any other observations about how we can improve the process, please contact us at planningpolicy@broads-authority.gov.uk.

Annex A: Privacy notice

Personal data

The following is to explain your rights and give you the information you are entitled to under the Data Protection Act 2018. Our Data Protection Policy can be found here: http://www.broads-authority.gov.uk/data/assets/pdf_file/0003/1111485/Data-Protection-Policy-2018.pdf.

The Broads Authority will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will be made publicly available as part of the process. It will not however be sold or transferred to third parties other than for the purposes of the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Broads Authority is the data controller. The Data Protection Officer can be contacted at dpo@broads-authority.gov.uk or (01603) 610734.

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters. We will also contact you about later stages of the Local Plan process.

3. Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a Local Planning Authority, the Broads Authority may process personal data as necessary for the effective performance of a task carried out in the public interest, i.e. a consultation.

4. With whom we will be sharing your personal data

Your personal data will not be shared with any organisation outside of MHCLG. Only your name and organisation will be made public alongside your response to this consultation.

Your personal data will not be transferred outside the EU.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

²⁰ Our current SCI is here: http://www.broads-authority.gov.uk/data/assets/pdf_file/0006/576609/Final-Adopted-Statement-of-Community-Involvement-November-2014.pdf

Your personal data will be held for 16 years from the closure of the consultation in accordance with our Data and Information Retention Policy. A copy can be found here <http://www.broads-authority.gov.uk/about-us/privacy>.

6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a) to see what data we have about you
- b) to ask us to stop using your data, but keep it on record
- c) to ask to have all or some of your data deleted or corrected
- d) to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be used for any automated decision making.

Broads Authority

31 January 2020

Agenda item number 16

Flood Risk SPD – for public consultation

Report by Planning Policy Officer

Purpose

The Flood Risk Supplementary Planning Document (SPD) was adopted in 2017. Following the adoption of the Local Plan for the Broads in May 2019, the SPD is being reviewed and updated. The SPD has been subject to first stage public consultation and this report details responses received, a track changed version of the SPD and the next steps in the process.

Recommended decision

Endorse the revised Flood Risk SPD for second stage public consultation.

1. Introduction

- 1.1. The Local Plan for the Broads was adopted in May 2019, and the Broads Authority is now looking in more detail into the interpretation and implementation of its policies.
- 1.2. The Flood Risk Supplementary Planning Document (SPD) was adopted in 2017. Under the new Local Plan this SPD is out of date, and is acting as a guide rather than a supplementary planning document. We are therefore reviewing and updating the SPD.

2. Flood Risk Supplementary Planning Document

- 2.1. The NPPG states that: ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are, however, a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development. Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing Supplementary Planning Documents. In exceptional circumstances, a Strategic Environmental Assessment (SEA) may be required when producing a Supplementary Planning Document.’
- 2.2. A full SEA of the Flood Risk SPD has not been completed, reflecting the responses from the Consultation Bodies. The responses to the SEA screening request are in the [Consultation: Flood Risk Supplementary Planning Document \(SPD\)](#) report to Planning

Committee on 13 September 2019. No comments were received on the SEA Assessment during the consultation period and therefore no changes have been made.

- 2.3. The draft SPD was subject to first stage public consultation for 8 weeks from 27 September to 22 November 2019. The responses received are in Appendix 1 and a track changed version of the draft SPD is in Appendix 2.

3. Consultation

- 3.1. As the Regulations require two rounds of consultation, we propose to consult on the revised draft SPD, likely to be from 31 January to 6 March 2020. The consultation responses and amended SPD will be presented to Planning Committee for approval and subsequently to the Broads Authority for adoption.

Author: Natalie Beal

Date of report: 2 January 2020

[Broads Plan](#) objectives:

Appendix 1 – Flood Risk SPD – responses to first stage consultation

Appendix 2 – Tracked change New Flood Risk SPD for second stage consultation

Appendix 1 – Revised Flood Risk SPD - responses to first stage consultation

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
#1	Laura Waters	Norfolk County Council	On 3rd January this year we responded directly to Natalie Beal on the Broads SPD as consulted on at the time. Elaine Simpson had various short comments to make on the document and we welcome that these comments have been included/utilised in the current document. Having had this opportunity to review the most recent consultation, as LLFA, we have no further comments to make on the SPD.	Support noted.	No change to Flood Risk SPD
#2	Lorraine Houseago	Norfolk County Council	We have no other comments to make.	Noted.	No change to Flood Risk SPD
#3	Nathan Makwana	Anglian Water Services	Having previously had the opportunity to comment and be involved on the development of the previous draft, I note that this iteration incorporates previously suggested comments. On this basis, Anglian Water have no further comment to make. We of course welcome any further opportunity to comment.	Support noted.	No change to Flood Risk SPD
#4	Penny Turner	Norfolk Policy ACLO	We have no comments on the above at this stage.	Noted.	No change to Flood Risk SPD
#5	Charlette Hounsell	Norwich City Council	Section 6.2 – it may be useful to reference in this section that consultation with neighbouring/overlapping authorities at pre-application stage is advised	Agree. Will incorporate into SPD.	6.2.2 It will also be appropriate to consult neighbouring Local Planning Authorities if scheme proposals are on or near to the border.
#6	Charlette Hounsell	Norwich City Council	Section 6.5.5 – in setting out what should be considered for a site to be reasonably available, there is no mention of site ownership or whether the owners of sites have any intention of them being developed. If owners of sites have no intention of developing them, can they be considered as reasonably available sites?	This is covered to some extent by the first bullet point, but we will expand this to address this comment.	6.5.5 A site is considered to be reasonably available if all of the following apply: • The site is available to be developed (including considering site ownership or whether the owners of sites have any intention of them being developed);
#7	Charlette Hounsell	Norwich City Council	Section 6.5.9 & Section 7.1.3 – Suggest inclusion of reference to the need to comply with relevant planning policies of any relevant local authorities to the development site/proposal	Noted. This is a given, but we have added some text.	6.5.9 It is acknowledged that the area of search could be outside of the Broads Authority Executive Area and would require discussions with other Local Planning Authorities (and proposals would therefore need to comply with relevant planning policies of the relevant Local Planning Authorities). 7.1.3 It should be noted that all aspects of the development need to comply with policies of the Local Plan (adopted 2019) and that conformity with policies SP2 and DM5 does not override applicability of other policies (of the Broads Authority and other relevant Local Planning Authority).
#8	Charlette Hounsell	Norwich City Council	Section 6.10.6 – The last sentence of this paragraph refers to flood resistance and resilience of buildings information to be found at section 5. I believe this information is found at section 7.	Agreed.	Change from 5 to 7.

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
#9	Charlette Hounsell	Norwich City Council	Section 9 – Suggest inclusion of web links to local authorities and LLFAs	It is not clear what links are required. The changes to the SPD as a result of other comments from Charlotte may help raise awareness of other LPAs.	No change to SPD.
#10	Charlette Hounsell	Norwich City Council	Does this document take account of ADEPT and EA Flood Risk Emergency Plans for New Development guidance? https://www.adeptnet.org.uk/floodriskemergencyplan	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.
#11	Charlette Hounsell	Norwich City Council	Part of utilities site is within Broads Authority area and adjacent to the East Norwich Area as defined in JCS 12 – should there be some reference to this?	The issue of cross boundary sites (which after clarification with Charlotte was what this comment sought to address) is covered by the other changes to the comments from Charlotte.	No change to SPD.
#12		Marine Management Organisation	<p>Page 16, Section 5.5.4: Refers to the tidal influence within the Broads, as well as the National Planning Policy Framework. We would also recommend you mention the East Inshore and East Offshore Marine Plans here, or elsewhere in section 5.5.</p> <p>Asked for clarification: As these are recommendations, I am not able to provide specific text. We suggest that your own interpretation of the East Marine Plans informs your plans, and refer to the Marine Plans where you deem appropriate. Coastal, and tidal flooding is covered across multiple policies within the East Marine Plans such as SOC1, CC1 and Objectives 6 and 9. Other signposting includes Paragraph 249 –Coastal change management.</p>	Noted and we will include some text.	5.4 Marine Management Organisation and flood risk 5.4.1 Coastal, and tidal flooding is covered across multiple policies within the East Marine Inshore and Off Shore Plans such as SOC1, CC1 and Objectives 6 and 9. Other references include Paragraph 249 – Coastal change management.
#13		Marine Management Organisation	<p>Page 67: You refer to Environment Agency permits. It may also be appropriate to refer to Marine Licences from the Marine Management Organisation, as this may be relevant to applicants.</p> <p>Asked for clarification: With regards to referencing the Marine Management Organisations Marine Licences, lines 1552-1556 refer to the appropriate requirements for a “a permit under the Environmental Permitting 1554 (England and Wales) Regulations 2010 from the Environment Agency”. As there are exemptions, particularly within the Broads, I cannot suggest specific text. However, as this is directed at applicants this seems to be an appropriate place to note that a Marine Licence may be required for works that are carried out on tidal rivers.</p>	Noted and we will include some text.	As requested, we will add this to the Flood Risk Tick Sheet: Also note that a Marine Management Organisation Marine Licence may be required for works that are carried out on tidal rivers.
#14	Ben Wright	East Suffolk	Para 5.4.2 refers to the Waveney SFRA (2018). This SFRA was produced for both Councils and may be better referred to as the East Suffolk SFRA.	Agree - will change text.	Change to say 'East Coast'.
#15	Ben Wright	East Suffolk	Para 5.4.3 refers to Waveney. This reference should be changed to “the former Waveney area”.	Agree - will change text.	Change to say 'the Waveney part of East Suffolk

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
#16	Ben Wright	East Suffolk	Para 5.4.4 – the joint statement with the EA continually refers to Waveney. This should be changed to either East Suffolk or the former Waveney area.	Noted and that is because it was produced in 2018. It is not proposed to go through all old documents adopted put in place before April 2019 to change the reference. But as and when documents like this are updated then we will make the amendment.	No change to Flood Risk SPD
#17	Jessica Nobbs	Water Management Alliance	<p>Section 8.3.5 of the document refers to Land Drainage Consent. It is identified that consent would be required from the relevant Internal Drainage Board (IDB) where alterations to a watercourse (including infilling, culverting or amending) are proposed as per the Board's Byelaws (specifically Byelaw 4) and Section 23, Land Drainage Act 1991. In addition to this, we feel it would be relevant to refer to other consents that may be required from the Board by including the two following statements:</p> <p>- If a surface water (or treated foul water) discharge is proposed to a watercourse within an Internal Drainage District (IDD) (either directly or indirectly), then the proposed development will require a Land Drainage Consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's charging policy.</p> <p>- If there is a Board Adopted watercourse within/adjacent to the site boundary and should works be proposed within 9 metres of the watercourse, consent would be required to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure).</p>	Noted and will amend text.	<p><u>Other consents that may be required from the IDB include:</u></p> <ul style="list-style-type: none"> <u>• If a surface water (or treated foul water) discharge is proposed to a watercourse within an Internal Drainage District (IDD) (either directly or indirectly), then the proposed development will require a Land Drainage Consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's charging policy.</u> <u>• If there is a Board Adopted watercourse within/adjacent to the site boundary and should works be proposed within 9 metres of the watercourse, consent would be required to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure).</u>
#18	Jessica Nobbs	Water Management Alliance	Maps of the Broads (2006) Internal Drainage District and the Norfolk Rivers Internal Drainage District are available here and here. These maps show which watercourses are designated as Adopted Watercourses by each Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. The designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse).	Noted and will amend text.	<p><u>4.8.4 Maps of the Broads (2006) Internal Drainage District and the Norfolk Rivers Internal Drainage District are available here and here. These maps show which watercourses are designated as Adopted Watercourses by each Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. The designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse</u></p>

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
#19	Liam Robson	Environment Agency	In relation to paragraph 5.5.8 it should be noted that Environment Agency flood warnings cover both tidal and fluvial flooding.	Noted and will amend text.	Although tidal surges can develop rapidly within 6-12 hours because of the movements of weather systems in the North Sea, the Environment Agency Flood Warning System covers the whole of the Broads area which could provide early warning (for fluvial and tidal flooding).
#20	Liam Robson	Environment Agency	Paragraph 5.5.9 states the standard of protection in the Broads area. It should be noted that some defences have a 1 in 200 standard or higher.	Noted and will amend text.	5.6.9 Existing flood defences in the Broads area offer a low standard of protection (typically up to a 1 in 7-year standard and some defences have a 1 in 200 standard or higher), so they may be overtopped during a flood event.
#21	Liam Robson	Environment Agency	The tidal flood risk section of this document states that “...the prior has defences to protect up to the 0.5% annual probability tidal flood”. It should be noted that not all defences may be up to this standard.	Noted, although this was copied verbatim from the SFRA. Will amend text.	There is acute risk of tidal flooding in Great Yarmouth and across the Broads within the study area; the prior has defences to protect up to the 0.5% annual probability tidal flood (although not all defences may be up to this standard).
#22	Liam Robson	Environment Agency	The fluvial section of this table states how climate change will significantly influence the predicted flood levels as a consequence of changes to mean sea level. As this is in the fluvial section, it should mention climate change increasing river flows (between 25% and 65% increase).	Noted, but that is the fluvial column in a few tables, not just Great Yarmouth's. In the absence of a suggestion that addresses all of the tables, some text will be added to section 4.1.	4.1.1 Fluvial flood risk is flooding from rivers because of a river overflowing or its banks being breached. It should be noted that climate change is likely to result in increased river flows (between 25% and 65% increase)
#23	Liam Robson	Environment Agency	It is good to see the inclusion of paragraph 6.3.2 however, it is unclear that this is the only flood risk issue mentioned in detail in this summary section. This could therefore be moved to a more detailed section. Section 7.6.1 would be best, as it links to the need to let water in and adopt flood resilient construction measures if more than 600mm of water around the building.	Agree. Will move text.	6.3.2 moved to 7.6.1.
#24	Liam Robson	Environment Agency	In relation to point i in paragraph 6.10.3, the FRA should show the accurate location of the flood zones on their site based on a comparison of EA flood levels and GPS site survey, not just using our flood maps.	Noted and will amend text.	i) Flood risk zones 1 – 3 within the site with reference to the SFRA/EA Flood Zone maps. The FRA should show the accurate location of the flood zones on the site based on a comparison of EA flood levels and GPS site survey;
#25	Liam Robson	Environment Agency	It appears that the document states that what is considered to be safe will be taken on a case-by-case basis. You may want to consider further what safe specifically looks like.	EA were asked for their thoughts about what safe would look like but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
#26	Liam Robson	Environment Agency	The mention of whether less vulnerable development at risk of flooding would be safe seems to indicate that you will not allow more vulnerable to flood. The SPD could therefore be enhanced by explicitly saying this as we require more vulnerable flood levels to be above actual risk 1%/0.5 cc flood levels (unless replacement dwellings). It should probably be under 6.10.5, could be under 6.10.6 but does not relate to residual risk, just actual risk. Perhaps a new paragraph between the two referring to the need for new more vulnerable development to not flood in the actual risk 1%/0.5% climate change flood event, through defences, raised land or raised floor levels.	Noted. Will add a new paragraph	6.10.6 It is important to note that the Environment Agency need new more vulnerable development to not flood in the actual risk 1%/0.5% climate change flood event, through the provision of defences, raised land or raised floor levels.
#27	Liam Robson	Environment Agency	In terms of safe refuge, we require all more vulnerable developments to have safe refuge above the extreme climate change flood level, unless agreed in consultation with emergency planners that it can be made safe through a flood response plan without refuge. It could be beneficial if the SPD were to have comments on refuge requirements e.g. are stairwells acceptable and when is refuge required?	Asked for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broad. EA were asked for their thoughts about if stairwells are acceptable and when a refuge is required but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#28	Liam Robson	Environment Agency	Paragraph 6.11.3 states that a Flood Risk Assessment should propose mitigation measures. These should be provided up to the design flood event (1% fluvial/0.5% tidal) including climate change for the lifetime of the development.	Noted and will amend text.	6.11.3 A Flood Risk Assessment should consider whether this will happen and propose mitigation measures which should be provided up to the design flood event (1% fluvial/0.5% tidal) including climate change for the lifetime of the development . These may include for example the provision of compensatory floodplain storage, although this can be difficult to achieve in the Broad area. Compensatory floodplain storage is the lowering of higher land levels to provide additional flood storage at the same level as the flood storage is removed. Therefore, this is difficult to achieve in the Broad as the floodplain is very flat with little higher land available to lower.. One of the only options in the Broad is the raising of buildings on stilts to provide voids underneath and not remove flood storage. Such measures would need to be designed to ensure that water is always stored under the building and can empty after a flood. This would require intermittent boarding, no storage under the building and regular maintenance.
#29	Liam Robson	Environment Agency	Paragraph 6.11.3 also references compensatory storage. It would be beneficial to define what compensatory storage is here i.e. the lowering of higher land levels to provide additional flood storage at the same level as the flood storage is removed. Therefore, this is difficult to achieve in the Broad as the floodplain is very flat with little higher land available to lower.	Noted and will amend text.	
#30	Liam Robson	Environment Agency	Paragraph 6.11.3 also includes a sentence which states “such measures would need to be designed to ensure that water is always stored under the building and can empty after a flood”. This is not compensatory storage and is instead providing a void under the building to reduce the volume of flood storage removed. There should therefore be a sentence before this one saying that ‘one of the only options in the Broad is the raising of buildings on stilts to provide voids underneath and not remove flood storage’.	Noted and will amend text.	
#31	Liam Robson	Environment Agency	The Flood Response Plan may be one aspect of the proposed management measures that make a development safe and acceptable in flood risk terms. So the development might not be acceptable terms until the Flood Response plan is submitted and considered.	Noted.	No change to Flood Risk SPD

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
#32	Liam Robson	Environment Agency	The Environment Agency and the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) have produced some joint guidance on flood risk emergency plans for new development which can be downloaded at https://www.adeptnet.org.uk/floodriskemergencyplan . The SPD should ensure that it follows the requirements.	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.
#33	Liam Robson	Environment Agency	Raising Floor Levels In relation to paragraph 7.2.3; we require raised floor levels (above 1% cc/0.5% cc) for residential building conversions, unless it is confirmed in consultation with emergency planners that the safety of the development can be managed through other means such as resilience/resistance measures and flood response plan. It could be beneficial if the SPD specifies when this would be acceptable and when raised floor levels required?	Asked for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broads. EA were asked what specific changes they would like but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#34	Liam Robson	Environment Agency	In terms of paragraph 7.2.4 We require the finished floor levels of new residential development to be above the actual risk design flood level including 100 years of climate change (1% fluvial plus cc / 0.5% tidal plus cc). We also require higher refuge above the extreme 0.1% cc flood level, unless in consultation with emergency planners that the development can be safe without higher refuge through evacuation and the Flood Response Plan. The SPD could therefore be enhanced by specifying when higher refuge is required.	Asked for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broads. EA were asked what specific changes they would like but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#35	Liam Robson	Environment Agency	Please note the sentence for citation 50 at the bottom of the page under line 962 is incomplete.	It is, it just is on the next page.	No change to Flood Risk SPD
#36	Liam Robson	Environment Agency	Environment Agency This paragraph states the Agency has principle responsibility for river flooding. This should also state tidal/coastal flooding.	Noted and will amend text.	The Agency has principle responsibility for river, tidal and coastal flooding.
#37	Liam Robson	Environment Agency	Chapter 1: Flood Response Plan Guidance The Environment Agency and the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) have produced some joint guidance on flood risk emergency plans for new development which can be downloaded at https://www.adeptnet.org.uk/floodriskemergencyplan . This appendix should ensure that it follows the requirements of the ADEPT guidance. The ADEPT guidance goes into more detail on how information on safe access routes and refuge provision should be included in the Emergency Plan, perhaps some of this can be included? But the minimum is to ensure the ADEPT guidance is referenced in Appendix D.	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
#38	Liam Robson	Environment Agency	Introduction Line 1264 states that "...if not submitted with an application, are often required by planning condition if permission is issue". ADEPT guidance says this is not allowed, the Flood Response Plan needs to be submitted upfront, as it is necessary to determine the safety of the development.	Noted and will amend text.	This guidance has been produced to assist with the preparation of Flood Response Plans (FRP). FRPs should need to be provided as part of a Flood Risk Assessment where this is necessary to accompany a planning. application or, if not submitted with an application, are often required by planning condition if permission is issued.
#39	Charlie Middleton	Beccles Town Council	The Planning Committee, replying on behalf of Beccles Town Council, consider all three documents provide comprehensive support for the planning policies of the Broads Authority.	Support noted.	No change to SPD
#40	Iain Withington	North Norfolk District Council	Section 5.1.1 and 5.2.1: Could usefully insert into both paragraphs text around Climate change flood extents, that are incorporated in the SFRA and that development should also have regard to these food risk extents from all sources of flooding.	Noted and will amend text.	Add this text to 5.1.1: <u>Development should also have regard to the climate change flood extents (from all sources of flooding) and these are mapped in the Strategic Flood Risk Assessment (see 5.5).</u> Add this text to 5.1.2: <u>As mentioned previously, the impact of climate change needs to be considered (see 5.1.1)</u>
#41	Iain Withington	North Norfolk District Council	5.3: CC flood extents are mentioned here but greater emphasis that the SFRA demonstrates the CC flood extents and these should also be used as a basis for further comment and assessment i.e. through site specific FRAs	Noted and will amend text.	Add this text to 5.3.1: <u>(and the SFRAs demonstrate the climate change flood extents).</u>
#42	Iain Withington	North Norfolk District Council	5.4.1: Could use the wording climate change flood extents rather than impacts	Noted and will amend text.	Change to say: they consider the impacts of climate change <u>flood extents</u>
#43	Iain Withington	North Norfolk District Council	5.4.3: Could mention that CC allowances have been agreed with the Environment Agency and LLFA in the SFRA and with all the Norfolk authorities	Noted and will amend text.	Add: <u>In Norfolk, climate change allowances have been agreed with the Environment Agency and LLFA in the SFRA and with all the Norfolk authorities.</u>
#44	Iain Withington	North Norfolk District Council	5.4.4: Add text around the precautionary approach adopted by the SFRA and expected time line for the updated modelling rather than as time goes by wording.	Noted and will amend text.	Amend text as follows: <u>If a proposed development is shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site specific Flood Risk Assessment to define and confirm the extent of Flood Zone 3b. This may require detailed hydraulic modelling.</u> so a site-specific flood risk assessment is required to assess actual flood risk to the site. To cover this, a joint position statement has been produced between the Broads Authority and the Environment Agency. <u>The Joint Position Statement indicates that modelling on the Broadland Flood Alleviation Project Area (much of the area without modelling) will be completed by the end of 2021.</u>
#45	Iain Withington	North Norfolk District Council	6.3: Include reference to CC flood extents.	Noted and will amend text.	Amend text to say: Developers should carefully assess the full range of issues associated with all sources of flood risk when producing

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
					development proposals, including climate change flood extents.
#46	Iain Withington	North Norfolk District Council	<p>Horning development: I can see no reference to the joint position statement with Anglian water on the development restrictions in the Horning water recycling centre catchment , i.e. Knackers wood WRC</p> <p>Reference should be given to the SCG which states that : 'New development likely to give rise to additional foul drainage output will not be permitted where either (a) this intensifies the use of non-mains foul drainage arrangements, or (b) this intensifies the use of mains foul sewer ahead of essential sewerage infrastructure works and demonstration that there is sufficient capacity at the sewage treatment works to serve the proposed development without harming nearby designated sites.'</p> <p>The SCG goes on to say "This means that there will be a presumption against developments that increase flows to the WRC in the short term. Similarly, there will be a presumption against developments that rely upon standalone foul water treatment solutions as they too have the potential to adversely affect water quality."</p> <p>As far as I am aware the situation has not moved on and this still stands, see below AW text</p>	Noted. This SPD is about flood risk, not wastewater. The Position Statement is heavily referenced in the Local Plan. We will reference this in the table for North Norfolk under foul sewerage.	Add this text: Of relevance to the North Norfolk area is the Joint Position Statement relating to Horning Knackers Wood Water Recycling Centre. To summarise, due to capacity issues, development that increases foul drainage output is not likely to be permitted.
#47	Iain Withington	North Norfolk District Council	<p>Hoveton Anglian water have also commented on proposals in our emerging local plan with regard Hoveton, where it is understood they are developing a position statement. These comments stem from the acknowledgment of particular issues of discharge and flooding from the river into the drainage systems.</p> <p>"Policy DS13 states that a wider water catchment strategy and foul water drainage strategy are required for this allocation site. However, the supporting text refers to the water catchment strategy being aligned with the overall catchment strategy. Any site specific strategy would need to be aligned with any wider catchment strategy. Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. To be effective there is a need to clarify what is the requirement for the applicant in relation to foul drainage and how this relates to any further technical work or investigation(s) undertaken by Anglian Water rather than the developer."</p> <p>You may like to flag these issues for consideration in your NNDC tables for foul sewer and WRC</p>	Noted and will amend text. Also, will request that NNDC keep us informed of the progress on this issue.	Add this text: At the time of writing, there are early discussions between the Environment Agency, North Norfolk District Council and the Broads Authority about particular issues of discharge and flooding from the river into the drainage systems.

Ref	Name	Organisation	Comment	BA Responses	Proposed changes
#48	Iain Withington	North Norfolk District Council	Comment to NNDC Local Plan consultation from Anglian Water Services - for information. Horning WRC: There have been a number of recorded incidents of flooding within the Horning sewerage catchment from surface water, groundwater and fluvial sources which are the responsibility of multiple agencies. This reduces the available capacity of foul sewerage network for additional foul flows from additional development within the catchment as outlined in the Joint Position Statement for Horning. Anglian Water has undertaken CCTV surveys of the existing public sewerage network at Horning to investigate the cause(s) of these flooding incidents. Following the completion of surveys we have undertaken repairs in February/March 2018 to mitigate surface water ingress where it interacts with the foul sewerage network in Anglian Water's ownership. We have also been actively working with relevant (flood) risk management authorities to address historic flooding in the Horning sewerage catchment where it relates to Anglian Water's assets. As part of which we been liaising with North Norfolk District Council to enable the removal of existing surface water connections to the foul sewerage network from existing residential and commercial properties so that existing surface water flows can be discharged to suitable alternatives e.g. watercourses. The Environment Agency has also committed to undertaking threshold surveys within the sewerage catchment to establish flood risk from the Broads for every household within the catchment. The Joint Position Statement for Horning is to be updated to reflect the current position relating to the investigation and works undertaken to date by Anglian Water and by other risk management authorities within the catchment.	Noted.	No change to SPD
#49	Iain Withington	North Norfolk District Council	Comment to NNDC Local Plan consultation from Anglian Water Services - for information. Hoveton: Anglian Water is currently preparing a position statement relating to Hoveton catchment which follows recent discussions with Cllr Dixon. It is intended to set out the current position relating to this catchment including historic issues within the network and the implications for new development.	Noted.	No change to SPD



Broads Flood Risk Supplementary Planning Document

Draft for consultation ~~September~~ January 2020~~2019~~

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1. Introduction

1.1 The purpose of this SPD is to

- a) increase awareness of the nature of flood risk in the Broads area;
- b) give advice to developers and others about the Authority's approach to the issue of development and flood risk, and;
- c) stress the need to maintain a high standard of design in new waterside development.

1.2 Flooding can cause damage to property and infrastructure. Coastal flooding can be particularly damaging. The threat of flooding can also cause fear and distress to people and in some cases, flooding can lead to injury¹ and even loss of life. Inappropriate flooding can also harm the important habitats and species who rely on the Broads. This can have long term consequences for site maintenance and achieving conservation objectives. On the other hand, flooding is also a natural process within a floodplain. In some circumstances it can benefit wildlife.

1.3 The Broads Authority is the Local Planning Authority within the Broads area and this Supplementary Planning Document (SPD) applies only to land within the Authority's executive boundary. The Authority takes advice from the Environment Agency (EA) and Lead Local Flood Authorities (LLFA) on flood related issues concerning development. The EA is responsible for flood defence and has permissive powers to carry out work to construct and improve flood defences.

1.4 The NPPF 2019 defines supplementary planning documents as '*documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.*'

1.5 The Authority considers that this SPD will help applicants consider the issue of flooding in an appropriate way. The SPD should be read alongside policy SP2 and DM5 of the Local Plan for the Broads (adopted 2019). The SPD is a material consideration in determining planning applications. The advice and guidance herein will not add unnecessary financial burden to development.

^{1 1} There is a residual risk from all water, especially if it is moving (a flood, at certain velocity and above 4-6cm in depth) which would sweep people and things before it.

2. About this consultation

2.1 This SPD replaces the 2017 SPD. This update to the 2017 SPD is required because the policy on which the 2017 SPD was based (DP29 of the Development Management DPD) has been superseded and replaced by SP2 and DM5 of the Local Plan for the Broads. We have also taken this opportunity to make some other changes that perhaps make things clearer or reflect changes to guidance/practice.

2.2 We consulted on the first draft of this document back in September 2019. We have made some amendments following the comments we received as part of that consultation. As the regulations for producing a SPD require two stages of consultation, we are consulting you again.

2.3 This version is the second draft for consultation. Please tell us your thoughts and suggest any changes you think would make the SPD better and set out your reasons. This consultation runs for 5 weeks only and will run from 27 September to 4pm 22 November. We will then read to each of the comments received with our responses. We may make changes if we agree with you. If we do not make changes we will set out why. The final SPD will be adopted at a future meeting of Full Authority. Please email us your comments: planningpolicy@broads-authority.gov.uk.

2.4 This consultation document and consultation process have been developed to adhere to the Broads Authority's Statement of Community Involvement².

2.5 Information provided by you in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), and the Environmental Information Regulations 2004). Please see [Appendix G](#) for the Privacy Notice.

2.6 **Are you satisfied that this consultation has followed the Consultation Principles?** If not, or you have any other observations about how we can improve the process, please contact us at planningpolicy@broads-authority.gov.uk.

2.7 Historic England, Natural England and the Environment Agency were asked for their opinions relating to the need for a Strategic Environment Assessment. Historic England replied saying 'we would advise that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD'. The Environment Agency said 'we are satisfied that in itself the SPD will not have additional significant environment effects further than those assessed as part of the Local Plan. The SPD outlines the approach to take in order to comply with the Local Plan. Therefore our view would be that the Flood Risk SPD does not require a specific SEA to be undertaken'. Natural England said 'that there are unlikely to be significant environmental effects from the proposed plan on sensitive sites that Natural England has a statutory duty to protect'. The SEA Screening is at [Appendix H](#).

² Our current SCI is here: http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/576609/Final-Adopted-Statement-of-Community-Involvement-November-2014.pdf

65 3. Local Plan policies SP2 and DM5.

66 3.1 The Flood Risk SPD is in conformity with the Local Plan for the Broads (adopted 2019) and the
67 National Planning Policy Framework (NPPF) (2019). It expands on Local Plan policy SP2 and DM5
68 and DM6:

Policy SP2: Strategic flood risk policy

All new development:

- a) Will be located to minimise flood risk, mitigating any residual risk through design and management measures, and ensuring that flood risk to other areas is not materially increased; and
- b) Will incorporate appropriate surface water drainage mitigation measures, and will implement sustainable drainage (SuDS) principles, to minimise its own risk of flooding and to not materially increase the flood risk to other areas.

Particular care will be required in relation to habitats designated as being of international, national, regional and local importance in the area and beyond which are water sensitive.

Development proposals which would have an adverse impact on flood risk management will be refused.

Policy DM5: Development and flood risk

Development within the Environment Agency's flood risk zones will be acceptable only when:

- i) It is compatible with national policy and when the sequential test and the exception test, where applicable, have been satisfied;
- ii) A site specific Flood Risk Assessment, where required, demonstrates an acceptable flood risk and/or suitable flood protection mitigation measures are incorporated into the proposals, where necessary, which can be satisfactorily implemented; and
- iii) It would not affect the ability for future flood alleviation projects to be undertaken.

The Site Specific Flood Risk Assessment will need to meet the requirements of the NPPG and demonstrate or assess:

- a) That the development is safe for its lifetime, taking into account the vulnerability of its users and climate change;
- b) Whether the proposed development will make a significant contribution to achieving the objectives of the Local Plan;
- c) Whether the development involves the redevelopment of previously developed land or buildings and would result in environmental improvements over the current condition of the site;
- d) Whether appropriate measures to ensure resilience to potential flooding have been incorporated into the development;
- e) Whether appropriate measures to reduce the risk of flooding (on and offsite), including sustainable drainage systems, have been incorporated;
- f) Where the proposal involves the replacement of an existing building, whether the replacement building is located and/or designed without increasing flood risk and, where possible, to reduce the risks and effects of flooding;

- g) Whether an acceptable flood risk and/or suitable flood protection mitigation measures are incorporated into the proposals, where necessary, which can be satisfactorily implemented;
- h) Whether the risk of flooding is not increased elsewhere and, wherever possible, is reduced;
- i) That the integrity of existing coastal and river defences are not undermined;
- j) That the development does not reduce the potential of land used for current or future flood management;
- k) Compatibility with the appropriate Catchment Flood Management Plan or Shoreline Management Plan;
- l) Use of development to reduce the risk of flooding through location, layout and design and incorporate sustainable drainage systems to minimise surface water run-off and avoid pollution (see DM6);
- m) That sites at little or no risk of flooding are developed in preference to areas at higher risk;
- n) There is safe access and egress from the site;
- o) There are management and maintenance plans for flood protection/mitigation measures, including arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime;
- p) That the development would not negatively impact on water quality of surface water and ground water; and
- q) There is a Flood Response Plan (FRP).

The relocation of existing development to an undeveloped site with a lower probability of flooding will be permitted where:

- r) The vacated site would be reinstated as naturally functioning flood plain;
- s) The benefits of flood risk reduction outweigh the benefits of leaving the proposed new site undeveloped; and
- t) The development of the proposed new site is appropriate when considered against the other policies of the Local Plan.

In the case of the replacement of an existing residential property in flood zone 3a, the replacement dwelling must be on a like-for-like basis, with no increase in the number of bedrooms, on the same sized footprint³ and wherever possible being relocated in a less vulnerable part of the site.

Any required additional or enhanced flood defences should not conflict with the purposes and special qualities of the Broads.

Policy DM6: Surface water run-off

All development proposals will need to incorporate measures to attenuate surface water run-off in a manner appropriate to the Broads. This will need to reflect the characteristics of the site in accordance with a drainage hierarchy for rainwater so that, in order of priority, they:

- a) Continue natural discharge processes;
- b) Store water for later use;
- c) Adopt shallow infiltration techniques in areas of suitable porosity;
- d) Store water in open water features for gradual release to a watercourse;

³ The “footprint” is the aggregate ground floor area of the existing on-site buildings, including outbuildings which affect the functionality of the floodplain but excluding temporary buildings, open spaces with direct external access between wings of a building, and areas of hard standing.

- e) Store water in sealed water features for gradual release to a watercourse;
- f) Discharge direct to a watercourse;
- g) Discharge direct to a surface water drain (highways, Anglian Water or other body or within private ownership);
- h) Discharge direct to deep infiltration or borehole soakaways; or
- i) Discharge direct to a combined sewer

The surface water runoff rate that will occur as a consequence of the development is required to be no more than the existing pre-development greenfield runoff rate. Brownfield sites should aim to reduce runoff as close to greenfield rates as possible. The discharge rate for brownfield sites should be no more than the rate prior to any new development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals for brownfield sites. The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant sewerage undertaker.

Sustainable Drainage Systems (SuDS) shall be used unless, following adequate assessment, soil conditions and/or engineering feasibility dictate otherwise.

Proposals to address surface water must be considered at an early stage of the scheme design process. The following criteria need to be addressed when designing measures to address surface water:

- i) Use a risk assessment on treatment stages to reflect the type of proposed development and how surface water run-off and drainage will affect the receptor. A 1.2m clearance between the base of infiltration SuDS and the peak seasonal groundwater levels is required;
- ii) Take the current drainage arrangements of the area into account (including groundwater levels);
- iii) Take natural site drainage and topography into account;
- iv) Effectively manage water including maintenance of and, where possible improvement to water quality; and
- v) Provide amenity for local residents whilst ensuring a safe environment.

Where SuDS via ground infiltration is feasible, to ensure that SuDS discharge water from the development at the same or lesser rate as prior to construction, developers must undertake groundwater monitoring within the winter period and winter percolation testing in accordance with the current procedure⁴.

Minor developments that increase the footprint of an impermeable surface are required, where appropriate, to incorporate mitigation measures to reduce surface water runoff, manage surface water flood risk to the development itself and to others, maximise the use of permeable materials to increase infiltration capacity, incorporate on-site water storage, and make use of green roofs and green walls wherever reasonably practicable and appropriate, in accordance with design policies.

Within the critical drainage catchments as identified by the Lead Local Flood Authority, and in other areas where the best available evidence indicates that a serious and exceptional risk of

⁴ Currently BRE Digest 365: www.brebookshop.com/details.jsp?id=327592

surface water flooding exists, all development proposals involving new buildings, extensions and additional areas of hard surfacing shall ensure that adequate and appropriate consideration has been given to mitigating surface water flood risk.

Schemes that involve SuDS will be required to provide details of the management regime to ensure effective operation of the type of SuDS delivered in perpetuity.

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4. Sources of flood risk

4.1 Fluvial

4.1.1 Fluvial flood risk is flooding from rivers because of a river overflowing or its banks being breached. It should be noted that climate change is likely to result in increased river flows (between 25% and 65% increase)

4.2 Surface water runoff (pluvial flooding)

4.2.1 This is rainwater (including snow and other precipitation) which (a) is on the surface of the ground (whether or not it is moving), and (b) has not entered a watercourse, drainage system or public sewer. (The Flood and Water Management Act 2010 (FWMA) definition)

4.2.2 Intense rainfall, often not lasting a long time, that is unable to soak into the ground or enter drainage systems, can run quickly off land and result in local flooding. Surface water flooding problems are linked to issues of poor drainage, or drainage blockage by debris, and sewer flooding.

4.2.3 There are several stakeholders identified by the FWMA who have a role in managing surface runoff flooding, these are; Lead Local Flood Authorities, Local Planning Authorities, Water Utilities Companies, Highways Authorities, Riparian Owners.

4.3 Tidal

4.3.1 Tidal flooding is caused by extreme tide levels beyond ground and/or defence levels. Tidal flooding often also occurs by waves overtopping or breaching defences (artificial or natural like dunes).

4.3.2 Tidal flood risk is assessed based on Extreme Still Water Sea Levels (ESWSL), plus an allowance for the interaction of wind and waves. An ESWSL is the level the sea is expected to reach during a storm event for a particular magnitude of flood event as a result of the combination of astronomical tides and meteorological surges. The scale of these events is referred to as 'still' water with additional allowances for the effect of waves, wind and swell. The astronomical tide levels are mainly generated by the gravitational effects of the sun and the moon. Surge events are the result of meteorological conditions where low atmospheric pressure causes the sea level to be increased to a higher level than during more average or high atmospheric pressure conditions. The wave heights and swells are influenced by the strength, direction and persistence of the wind and the profile of the nearshore.

4.4 Groundwater

4.4.1 This is water below the surface of the ground and in direct contact with the ground or subsoil. It is worth noting that this definition does not include water in buried pipes or other containers. (The Flood and Water Management Act 2010 (FWMA) definition).

4.4.2 The UK Groundwater Forum describes groundwater flooding because of water rising from the underlying strata or from water flowing from abnormal springs.

- 106 4.4.3 In comparison to fluvial flooding, current understanding of the risks posed by groundwater
107 flooding is limited and mapping of flood risk from groundwater sources is in its infancy.
- 108 4.4.4 Flooding from groundwater is classed as a Local Flood Risk and as such is the responsibility of
109 the Lead Local Flood Authority which is Suffolk/Norfolk County Council. Under the Flood and
110 Water Management Act (2010), LLFAs have powers to carry out risk management functions
111 relating to groundwater flood risk.
- 112 4.4.5 Groundwater flooding is most likely in low-lying areas with permeable strata (aquifers)
113 underneath and more likely to appear after periods of sustained rainfall. Groundwater
114 flooding tends to occur sporadically in both location and time, and tends to last longer than
115 fluvial, pluvial or sewer flooding. Groundwater flooding can also interact with other flood
116 sources, worsening the risk of pluvial, fluvial or sewer flooding by reducing rainfall
117 infiltration or discharge to sewers.
- 118 4.4.6 Groundwater flooding risk increases where long reaches of watercourse are culverted and
119 higher groundwater levels are not able to naturally pass into watercourses. It should be
120 noted that although an area may be designated as susceptible to groundwater flooding, this
121 does not mean that groundwater flooding will definitely be a problem within these areas;
122 rather it indicates potential risk.
- 123 4.4.7 The future risk from this source is less certain than other sources as climate change
124 predictions indicate that, although sea levels will rise (thus possibly raising groundwater
125 levels), overall summer rainfall will decrease, with a long-term effect of lowering the
126 groundwater levels. However, long periods of wet weather, such as those experienced in the
127 autumn and winter of 2000/01 are predicted to increase. These are the type of weather
128 patterns that can cause ground water flooding to occur.
- 129 **4.5 Foul Sewerage Flooding**
- 130 4.5.1 Sewer flooding can occur during periods of extreme weather when intense rainfall overloads
131 the sewer system capacity (surface water, foul or combined), and/or when sewers cannot
132 discharge properly to watercourses due to high water levels. Sewer flooding can also happen
133 because of blockages⁵, collapses or equipment failure in the sewerage system. Infiltration or
134 entry of soil or groundwater into the sewer system via faults in the fabric of the sewerage
135 system, is another cause of sewer flooding. Infiltration is often related to shallow
136 groundwater, and may cause high flows for prolonged periods of time.
- 137 4.5.2 Even where sewers are built to current standards, they are likely to be overwhelmed by
138 larger events of the magnitude often considered when looking at river or surface water
139 flooding. Existing sewers can also become overloaded as new development adds to the
140 discharge to their catchment, or due to incremental increases in roofed and paved surfaces
141 at the individual property scale (urban creep). Sewer flooding is therefore a problem that
142 could occur in many locations.

⁵ Anglian Water actively works with their customers as part of their Keep it Clear Campaign to reduce the number of blockages which occur from cooking fat, wipes and other items which should not be disposed in drains.

4.5.3 The applicant will need to consider the available capacity of existing sewers to receive additional foul flows into the public sewerage network rather than historic issues which are the responsibility of Anglian Water and other risk management authorities (where relevant).

4.5.4 Applicants should also assess the risk of foul sewerage flooding. Anglian Water Services are the sewerage undertaker and can provide relevant information to applicants to inform preparation of Flood Risk Assessments. See section 7.9 for the submission requirements for applicants when preparing a foul drainage strategy proportionate to the scale of the proposed development. Anglian Water offer pre-planning service for identifying feasible drainage solutions for major development proposals.

(<https://www.anglianwater.co.uk/developers/development-services/pre-planning-services>)

4.6 Coastal

4.6.1 If the coast is eroding, then the potential effect is that tidal flood and erosion defences near to the sea will be lost and flood risk may increase. To maintain an appropriate standard of safety from flooding works may be needed to slow down or stop the rate of coastal erosion and so maintain the integrity of the coastal defences. The (2010) North Norfolk Shoreline Management Plan (SMP) SMP 6 Kelling to Lowestoft describe the high-level strategy and coastal policies.

4.7 Reservoirs

4.7.1 Reservoir flooding is very different from other forms of flooding. It may happen with little or no warning and evacuation will need to happen immediately. The likelihood of such flooding is difficult to estimate, but it is less likely than flooding from rivers or surface water. It may not be possible to seek refuge upstairs from floodwater as buildings could be unsafe or unstable because of the force of water from the reservoir breach or failure.

4.7.2 Flooding from reservoirs with an impounded volume greater than 25,000 cubic metres are governed by the Reservoir Act 1975 and are listed on a register held by the Environment Agency. The level and standard of inspection and maintenance required under the Act means that the risk of flooding from reservoirs is relatively low. Recent changes to legislation under the Flood and Water Management Act require the Environment agency to designate the risk of flooding from these reservoirs. The Environment agency is currently progressing a 'Risk Designation' process so that the risk is formally determined.

4.8 Ordinary Watercourses

4.8.1 Ordinary Watercourses are defined as; every river, stream, ditch, drain, cut, dyke, sluice, sewer (other than a public sewer) and passage through which water flows and which does not form part of a main river. These watercourses, although not shown at risk on the Environment Agency flood map for planning, can be a source of fluvial flooding. The Environment Agency flood map for planning can only model and show risk of flooding on catchments greater than 3km². Appropriate site-specific risk assessments still need to consider ordinary watercourses as a source of flood risk.

4.8.2 In terms of local flood risk management, these watercourses are still largely influenced by the Land Drainage Act 1991. This Act identifies three key stakeholders in the management of ordinary watercourses, these are; Internal Drainage Boards, Local District Authorities and Riparian Owners.

4.8.3 In the County of Norfolk for example there are approximately 7,178 km of mapped ordinary watercourses included in the Environment Agency's Detailed River Network dataset. This is probably a conservative figure as many ordinary watercourses in Norfolk remain unmapped.

4.8.4 Maps of the Broads (2006) Internal Drainage District and the Norfolk Rivers Internal Drainage District are available [here](#) and [here](#). These maps show which watercourses are designated as Adopted Watercourses by each Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. The designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse

5. Understanding Flood Risk

5.1 What is flood risk?

5.1.1 According to the National Planning Practice Guidance (NPPG), “flood risk” is a combination of the probability and the potential consequences of flooding from all sources – 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. Development should also have regard to the climate change flood extents (from all sources of flooding) and these are mapped in the Strategic Flood Risk Assessment (see 5.5).

5.2 What are flood risk zones?

5.2.1 Flood Zones 1, 2 and 3 outline areas at low risk, medium risk and high risk respectively from both tidal and fluvial flooding. Flood Zones do not consider the effects of flood defences, so are a worst-case assessment of flood risk. They are shown on the Environment Agency’s Flood Map for Planning (Rivers and Sea)⁶ and on the SFRA maps⁷ and defined in the table below (taken from the NPPG). As mentioned previously, the impact of climate change needs to be considered (see 5.1.1)

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 1 in 1,000 (0.1%) annual probability of river or sea flooding. All land outside Zones 2 and 3
Zone 2 Medium Probability	Land having between a 1 in 100 (1%) and 1 in 1,000 (0.1%) annual probability of river flooding; or Land having between a 1 in 200 (0.5%) and 1 in 1,000 (0.1%) annual probability of sea flooding.
Zone 3a High Probability	Land having a 1 in 100 (1%) or greater annual probability of river flooding; or Land having a 1 in 200 (0.5%) or greater annual probability of sea flooding.
Zone 3b The Functional Floodplain	This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency.

5.3 EA flood risk

5.3.1 The Environment Agency (EA) flood risk maps (river and sea) show the current probability or likelihood of flooding without defences in place. They therefore show a ‘worst case’ scenario. However, the EA maps do not include climate change predictions of rising sea levels, increase in peak river flow, or increased peak rainfall intensity. Also, the EA flood risk maps just show areas identified as Flood Zone 3 and do not set out zones 3a and 3b. So, the EA maps are not sufficient to use to consider the impact of flooding to an individual property. Site-specific flood risk assessments (FRA) are required to consider the impacts of all sources of flooding on an individual property. These should also include climate change considerations (and the SFRAs demonstrate the climate change flood extents).

⁶ See the flood maps here: <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

⁷ SFRAs in place relevant to the Broads: <http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>

5.3.2 Whilst most of the Broads Authority area is covered by the river and coastal flood map, those areas outside of it (e.g. Flood Zone 1) should also look at the Risk of Surface Water Flood Map on the EA website. This shows surface water flooding but also shows a proxy risk for fluvial flooding experienced from an ordinary watercourse until a specific FRA is undertaken (i.e. where the EA fluvial modelling could not extend as the catchments were too small to include (those smaller than 3km²)).

5.4 Marine Management Organisation and flood risk

5.4.1 Coastal, and tidal flooding is covered across multiple policies within the East Marine Inshore and Off Shore Plans⁸ such as SOC1, CC1 and Objectives 6 and 9. Other references include Paragraph 249 – Coastal change management.

5.5 Strategic Flood Risk Assessment

5.5.1 A Strategic Flood Risk Assessment is a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future. They consider the ~~impacts of~~ climate change flood extents, and assess the impact that land use changes and development in the area will have on flood risk. They are used to inform Local Plans and act as a starting point or basis for considering flood risk on a particular site. SFRA's are high-level strategic documents and, as such, do not go into detail on an individual site-specific basis.

5.5.2 The Broads Authority Executive Area is covered by four Strategic Flood Risk Assessments (SFRA)⁹:

- Greater Norwich SFRA (2017)
- Great Yarmouth SFRA (2017)
- North Norfolk SFRA (2017)
- ~~Waveney~~ East Suffolk SFRA (2018)

5.5.3 Many of the SFRA's did flood modelling to reflect up to date climate change allowances such as surface water extent with 40% climate change included. They also brought together the many flood model outputs that have been competed around Norfolk and the Waveney area or East Suffolk. In Norfolk, climate change allowances have been agreed with the Environment Agency and LLFA in the SFRA and with all the Norfolk authorities.

5.5.4 Not all of the Broads Authority Executive Area has been modelled for flood risk. For some areas the actual extent of flood zone 3b and 3a is not known. As such, a precautionary approach has been adopted. In areas of no modelling, it is presumed that the entire area is flood zone 3 (in ~~Waveney~~ East Suffolk) or indicative flood zone 3b (in Norfolk). If a proposed development is shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site specific Flood Risk Assessment to define and confirm the extent of Flood Zone 3b. This may require detailed hydraulic modelling. so a site-specific flood risk assessment is required to assess actual flood risk to the site. To cover this, a joint position

⁸ <https://www.gov.uk/government/publications/east-inshore-and-east-offshore-marine-plans>

⁹ Go here to see the SFRA's: <https://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>

statement has been produced between the Broads Authority and the Environment Agency¹⁰.
The Joint Position Statement indicates that modelling on the Broadland Flood Alleviation Project Area (much of the area without modelling) will be completed by the end of 2021.

5.5.5 More information on SFRAs can be found in Appendix C of the Local Plan or you can go here to see the SFRAs yourself: <https://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>

5.5.6 As time goes by and further modelling is done, the EA maps will be updated and the SFRA will become outdated. As DM5 explains in the reasoned justification, site specific FRAs will find out the precise nature of flood risk on site, so they will consider both the SFRA and Flood Map for Planning. Even in the future when they don't correspond anymore, the SFRA will still be useful as it is likely that areas of flood zone 3b will not be drastically different.

5.6 Nature of flood risk in the Broads

5.6.1 Approximately 82.5% of the Broads Authority Executive Area is covered by flood zone 3 (3, 3a & 3b). This equates to 25,472 hectares. The Broads Authority boundary is tightly drawn around the edge of the floodplain. The extent and nature of flood risk, with significant areas of 'functional floodplain', mean that flood risk is a major constraint on development in the Broads.

5.6.2 The flood risk in the Broads is mainly from both fluvial and tidal sources. The whole character and development in the Broads over many hundreds of years has been closely associated with the water environment and flood risk. Much of the Broads area is defended by flood defence embankments, which are maintained by the Environment Agency to reduce flooding. The flood defences, where they exist, only reduce the risk of flooding and will never eliminate it; this has been the case historically within the Broads.

5.6.3 Working, living and visiting the Broads have been, and will continue to be, activities that have co-existed with the risk of flooding. However, any new development (which includes change of use, etc) must be in line with government policy and minimise flood risk. In the Broads area, this means identifying the risks from flooding and ensuring that they are at as low a level as possible compatible with the wetland and water-based environment.

5.6.4 The Broads is not subject to open sea conditions (relating to tidal range and wave action) but much of the Broads are tidally influenced. Paragraph 163, footnote 50 of the NPPF refers to 'other sources of flooding' being assessed (surface water, sewer, reservoir, groundwater, tidal, fluvial). Any flood risk assessment should therefore consider all sources of flooding but it is acknowledged that the main focus will be tidal and fluvial flood risk.

5.6.5 The flood probability mapping carried out within the SFRA does not signify the degree of hazard likely to be experienced in the Broads Authority area, especially in the more upstream catchment areas and those areas not at risk of breaching of coastal defences,

¹⁰ Go here for the Joint Position Statement: http://www.broads-authority.gov.uk/data/assets/pdf_file/0011/958286/SFRA-Position-Statement-June-2018.pdf

- 299 because it does not quantify depth or water velocity. Hazard, or “danger to people”, is a
300 function of depth and velocity. Hazard is very site specific and could vary greatly over a
301 relatively small area due to the presence of drains, dykes, quay-headings, flood banks, etc.
302 Hazards can be hidden by turbid floodwaters and a site-specific Flood Risk Assessment will
303 need to measure this.
- 304 5.6.6 Setting aside the above, hazard and risk does tend to be predictable on the Broads and this
305 has implications for how these are managed.
- 306 5.6.7 Fluvial flooding associated with upstream areas of individual catchments within the Broads is
307 not normally “flashy” and the hazard from these floods, apart from unusual meteorological
308 conditions, is not severe. Consideration of flood risk at a particular location should also take
309 account of climate change as highlighted in section 5.3 and 5.4.
- 310 5.6.8 The typical Broads river has a permeable catchment¹¹, is groundwater dominated¹², and is a
311 slow responding watercourse with a slow increase and decrease of flow in response to
312 rainfall. Although tidal surges can develop rapidly within 6-12 hours because of the
313 movements of weather systems in the North Sea, the Environment Agency Flood Warning
314 System covers the whole of the Broads area which could provide early warning (for fluvial
315 and tidal flooding). Signing up to this service is voluntary or it may be a requirement of
316 planning permission.
- 317 5.6.9 Existing flood defences in the Broads area offer a low standard of protection (typically up to
318 a 1 in 7-year standard and some defences have a 1 in 200 standard or higher), so they may
319 be overtopped during a flood event. The nature of flooding in the Broads is such that flood
320 water is likely to have a slow velocity, shallow depth and low hazard, unless it is in an area
321 beside a breach in defences where the flow could be greater and the risk would
322 subsequently be higher.
- 323 5.6.10 Some people living and working within the Broads are historically familiar with the water
324 environment and are unlikely to be surprised or alarmed by the possibility of floods or rising
325 water levels or may be more prepared. That being said, others may not have had any
326 experience of flooding. Measures will need to be in place to ensure effective communication
327 with visitors - an issue which is already addressed on many sites locally.
- 328 5.6.11 Any development encroaching within any of the plotted Flood Zones may increase flood risk
329 to adjacent areas. The effect on flood risk of several small encroachments is cumulative. If
330 the requirements of the NPPF and NPPG are met in full, then additional development should
331 not increase flood risk elsewhere.

¹¹ A river catchment is the area of land whose water drains into that river. A permeable catchment lies on porous rock, such as chalk or sandstone.

¹² Where groundwater accounts for much of the inflow and outflow of the watercourse.

332 5.6.12 The following provides information about specific areas of the Broads and the type of flood
333 risk that is particularly relevant to them. This information is taken from the various Strategic
334 Flood Risk Assessments.

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Sources of flood risk						
Tidal	Surface water	Fluvial	Groundwater	Foul sewer	Coastal	Reservoirs
<p>Greater Norwich</p> <ul style="list-style-type: none"> Fluvial and tidal interactions influence flooding in the river network. Along parts of the River Yare (downstream of Norwich) and across the Broads tidal levels are higher than fluvial levels in some places. Combined river and tidal flooding is known to sometimes affect settlements including Wroxham and Brundall whilst high tide levels combined with a storm surge can affect the Broads. Additional impacts of tidal influence include rivers not being able to flow freely at high tide (called tide-locking). This would affect settlements such as Norwich and Wroxham. This can affect any locations up to the tidal limit of the rivers in the Greater Norwich area. 	<ul style="list-style-type: none"> No settlements in the Broads part of Greater Norwich identified as history of surface water flooding or being at the most risk. 	<ul style="list-style-type: none"> Fluvial flood risk is primarily associated with the River Yare, River Bure and River Waveney watercourses and their tributaries. Urban settlements are at risk from fluvial flooding from the River Yare, River Bure and River Waveney catchments (as well as other sources of flooding). The greatest fluvial flood risk area is from the River Wensum in Norwich (part of the River Yare catchment). Additional risk from the River Bure. Fluvial flooding can be exacerbated in the upper reaches of the catchment, due to mill structures restricting the flow (i.e. in Horstead). Often the combination of watercourses and the interaction of two or more sources of out of bank flow across the floodplain can have profound implications for the extent of the risk (i.e. the River Wensum and the River Yare within Norwich). 	<ul style="list-style-type: none"> Within Norwich city there are areas containing cavities in the underlying chalk strata. Water infiltration in the past has led to the collapse of these cavities resulting in subsidence. There are several locations within South Norfolk identified as being at risk of groundwater flooding but these are not in the Broads. Within the Broadland area it is believed pumping from the IDB maintain the water table at a relatively lower level reducing the risk of groundwater flooding. Much of the Broads Authority administrative area is shown to have a low susceptibility to groundwater flooding, i.e. within the <25% category. Areas with increased susceptibility tend to be found along the valleys of watercourses including the Rivers Waveney, Yare and Bure. However, for significant parts of the Broads Authority administrative area, there is no data shown in the AStGWf dataset. 	<ul style="list-style-type: none"> The 2007 Greater Norwich Water Cycle Study identified that sewerage treatment works ranged from having no spare capacity to considerable capacity The sewerage system within the city centre of the Norwich is at capacity and recommended upgrading the system. The majority of Norwich city is served by sewers with a 1 in 30-year design standard. Some smaller parts of the city have drains with a design below 1 in 5-years. A Section 19 Flood Investigation Report was created after heavy rainfall exceeded the capacity of the drainage systems and caused surface water flooding that resulted in approximately 80 properties being flooded in the Norwich Urban Area. A lack of coordination between stakeholders to maintain and clean the drainage system was identified as a key cause. Additional Section 19 Flood Investigation Reports found that flooding primarily due to the exceedance of drainage capacity had taken place at Station Road in Ditchingham. This indicates that some of flooding in South Norfolk is caused or exacerbated by sewer flooding. The DG5 register* indicates a total of 264 recorded flood incidents in Greater Norwich. 	<ul style="list-style-type: none"> N/A. 	<ul style="list-style-type: none"> Several reservoirs are located within the Greater Norwich area. However, there are also reservoirs outside of the area whose inundation mapping is shown to affect the Greater Norwich area

Sources of flood risk						
Tidal	Surface water	Fluvial	Groundwater	Foul sewer	Coastal	Reservoirs
Great Yarmouth	<ul style="list-style-type: none"> Tidal flooding is the most significant flood risk in the borough. There is acute risk of tidal flooding in Great Yarmouth and across the Broads within the study area; the prior has defences to protect up to the 0.5% annual probability tidal flood <u>(although not all defences may be up to this standard)</u>. Great Yarmouth is bound to the east by the North Sea and is entirely located within the tidally influenced area of the Broadlands River catchment. The Rivers Yare, Bure and Waveney are subject to significant tidal influences at the downstream ends of their catchments. Tidal influences are powerful enough to reverse the flow of the rivers and hold back water within the surrounding drainage system. This ‘tide-locking’ effect raises levels further up the catchments and in adjoining tributaries increasing the flood risk over a broad area. A combination of a storm surge caused by a low-pressure system within the North Sea coinciding with the arrival of high tide could result in a high risk of tidal / coastal flooding. The tidal flood risk is managed by an extensive network of flood asset infrastructure. However, there remains residual risk in the event of a breach or overtopping scenario. The consequences of a breach/failure of an asset could be significant and result in widespread inundation of adjacent lowlying land and property, as well as the potential for significant risk to life. 					
	<ul style="list-style-type: none"> Several settlements are at risk of flooding. These include Martham, Winterton-on-Sea, Caister-on-Sea, Great Yarmouth, Hemsby, Ormesby-St-Margaret, Hopton-on-Sea, Gorleston, Bradwell and Belton. More detailed investigation revealed eight Critical Drainage Areas (CDAs) where the risk of surface water flooding was most acute. Great Yarmouth CDA include Bradwell, Claydon, Southtown and Cobham, Gorleston, South Yarmouth, Northgate and North Yarmouth. Other CDAs in the study area are Caister on-Sea and Hemsby. A Section 19 Flood Investigation Report was prepared in 2015 following extensive flooding in the summer of 2014 that affected 59 properties. The flooding affected properties across eight catchments with the worst affected being Hemsby (28 properties) and Ormesby St. Margaret (17 properties). The flooding affected a wide area. 	<ul style="list-style-type: none"> Primarily associated with the Rivers Yare, Bure and Waveney and their tributaries. Due to the low-lying nature, fluvial as well as tidal flooding represents a significant risk. Tidal water levels along downstream reaches are strongly influenced by tide levels (climate change will significantly influence the predicted flood levels as a consequence of changes to mean sea level). Most of the rivers are embanked and are higher than the adjacent land. This represents a residual risk in the event of a breach or overtopping due to fluvial, tidal or combined flood events. Breach / failure events are difficult to predict but the effects are likely to be severe with rapid inundation of land behind the embankments and a severe risk to life to be expected. Flooding may not be from one watercourse alone. Often the combination of watercourses and the interaction of two or more sources of out of bank flow across the floodplain can have profound implications for the extent of the risk (i.e. the Rivers Bure Yare within Great Yarmouth). 	<ul style="list-style-type: none"> Groundwater emergence is more susceptible in areas to the north and south of the town. Areas to the north and south of the town centre, as well as those close to the coast where the tidal influence on groundwater is greatest, are considered among the most susceptible in the study area. Underlying groundwater levels in the Great Yarmouth area are very high. However, the water table is likely to be kept artificially low through the extensive use of pump infrastructure. As a result, pumping failures could have a potential effect on the water table. 	<ul style="list-style-type: none"> Surface water and sewer flooding within Great Yarmouth and Gorleston was frequently caused by the inadequate capacity of the existing sewage system, or by sewers unable to drain freely into rivers. There is an additional risk of foul sewer flooding as a resulting from misconnections between the surface water drainage and foul sewer. Historically the sewer network within the urban area of Great Yarmouth had been susceptible to flooding, although efforts were made by Anglian Water, and completed in 2009, to reduce this risk. Further reports of flooding had been made for both the Hemsby and Ormesby areas where sewage had reportedly escaped from the foul system. The DG5 register* indicates a total of 144 recorded flood incidents in the Great Yarmouth borough 	<ul style="list-style-type: none"> Coastal erosion is a prominent process along much of the Great Yarmouth coastline directly threatening some settlements and posing an additional threat to coastal defences. Should these defences be compromised there could be the additional risk of inundation to properties behind in areas susceptible to coastal flooding. Coastal flooding can also often occur by wave overtopping of defences. Coastal flood risk is expected to be attributable to storm surge tides combined with large waves. This may result in flooding of the beaches and undefended areas or cause overtopping of defences within the town of Great Yarmouth, as well as affecting the coastal zones to the north and south of the town. 	<ul style="list-style-type: none"> Three reservoirs are located within the Great Yarmouth borough however, there is also one reservoir outside of the area whose inundation mapping is shown to affect the district.

		Sources of flood risk						
		Tidal	Surface water	Fluvial	Groundwater	Foul sewer	Coastal	Reservoirs
North Norfolk	<ul style="list-style-type: none">Tidal flooding is the most significant hazard in the district as North Norfolk is bounded to the north and east by the North Sea and many of its watercourses are tidally influenced.The Broads river network located to the east of the district in particular is dominated by tidal influence. As such, flooding within the Broads area is typically slow and relatively predictable due to the predominant tidal influence.Tidal flooding due to combination of high tidal levels and a storm surge is also a recognised issue throughout the Broads area.	<ul style="list-style-type: none">SFRA does not identify settlements in the Broads part of North Norfolk as having a history of surface water flooding or being at the most risk in the district.	<ul style="list-style-type: none">Fluvial flooding in North Norfolk district is predominantly a combination of fluvial and tidal flooding particularly in the Broads river system that lies to the east and south of the district.Although North Norfolk is a largely rural district there are a sizable number of towns and villages where these watercourses have the potential to get out of bank and cause flooding to property.Fluvial flooding can be exacerbated in the upper reaches of the Broadlands catchment, due to mill structures restricting the flow (i.e. in Fakenham).Another complicating factor could be the failure or the overwhelming of pumping stations that may result in localised flooding.	<ul style="list-style-type: none">No concerns specific to North Norfolk.	<ul style="list-style-type: none"><u>The DG5 register indicates a total of 109 recorded flood incidents in the North Norfolk district.</u><u>Of relevance to the North Norfolk area is the Joint Position Statement relating to Horning Knackers Wood Water Recycling Centre¹³. To summarise, due to capacity issues, development that increases foul drainage output is not likely to be permitted.</u><u>At the time of writing, there are early discussions between the Environment Agency, North Norfolk District Council and the Broads Authority about particular issues of discharge and flooding from the river into the drainage systems.</u>	<ul style="list-style-type: none">Coastal erosion is a prominent process along much of the North Norfolk coast directly threatening some settlements and posing an additional threat to coastal defences.	<ul style="list-style-type: none">15 reservoirs are located within the North Norfolk area however; there are also five reservoirs outside of the area whose inundation mapping is shown to affect the district.	

¹³Knackers Wood Water Recycling Centre, Horning, Joint Position Statement https://www.broads-authority.gov.uk/data/assets/pdf_file/0006/1152357/20170124-Joint-Position-Statement-inc-LAs-Horning-v4-2017-signed.pdf

		Sources of flood risk						
		Tidal	Surface water	Fluvial	Groundwater	Foul sewer	Coastal	Reservoirs
Waveney/East Suffolk	<ul style="list-style-type: none">• The eastern boundary of (the former) Waveney Districts <u>(now East Suffolk)</u> is formed by the land-sea interface.• Daily tidal fluctuation, occurring when the freshwater from the rivers is met by the incoming tide from the North Sea and Surge tides, which occur due to climatic conditions creating bands of low pressure in the Atlantic and North Sea. This causes a surge of water to move across the Atlantic, travelling southwards into the North Sea and becoming compressed as it travels towards and through the narrow English Channel, between Great Britain and mainland Europe. This causes a rapid rise in sea levels, which can be exacerbated by strong northerly winds.• Along the coastline there are several Main River estuaries and therefore the tidal conditions interact with fluvial mechanisms, caused by prolonged rainfall within the upper reaches of the river catchments.• Tidal flooding constitutes the main form of flood risk along this boundary, which comprises an exposed but defended coastline.	<ul style="list-style-type: none">• The area is mainly underlain by the Lowestoft Formation, which is found in the majority of inland non-riverine areas which is mainly chalky, pebbly, sandy clay (till), with variable permeability.• Impermeable areas will encourage surface water runoff, potentially exacerbating surface water flood risk, whilst areas which are permeable will reduce the risk of surface water flooding by facilitating faster drainage of rainfall.• As such, new development, and associated hard standing areas, can increase volumes of runoff. Ultimately this may lead to exceedance of the available pipe network capacity, resulting in surface water flooding.	<ul style="list-style-type: none">• The River Waveney has a relatively shallow gradient of 1:2100 creating a low carrying capacity and a limited ability to erode and alter its course during a flood event. Areas surrounding the river are low-lying and flat, meaning when its banks are overtopped it spreads into an extensive floodplain. This subsequently drains slowly due to the low gradient and may be marshy in areas.• There are a multitude of sluices found along the non-tidal reaches of the river to regulate levels during low flow conditions, to assist in land drainage and to supply a limited amount of flood storage to the system.• Flooding in July 2015 demonstrated the high risk associated with Kirkley Stream, which flows north to join the Inner Harbour at Lowestoft. Subsequent hydraulic modelling has identified several locations along the watercourse as at risk of river and surface water flooding. The stream survey shows that there is very little fall along its length, only a 1.4 m drop in height over a distance of 1,500 m; a restriction in flow anywhere along the stream will quickly lead to rising water as the channel is essentially flat.	<ul style="list-style-type: none">• Primary mechanisms for elevated groundwater are associated with<ul style="list-style-type: none">○ Short period of above average rainfall in permeable superficial deposits○ Permeable superficial deposits in hydraulic continuity with high river water levels;○ Interruption of groundwater flow paths; and○ Cessation of groundwater abstraction causing groundwater rebound.• The vast majority of the study area has a designation of “Limited potential for groundwater flooding to occur”, except in some concentrated areas surrounding the watercourses where the designation given is “Potential for groundwater flooding to occur at surface”. This is due to the permeable superficial alluvium being in hydraulic continuity with high water levels (river or tidal).	<ul style="list-style-type: none">• Sewer outfalls linked to the harbour may become tide-locked during high tide; this has previously resulted in flooding of low-lying areas within Lowestoft (notably Station Square, Beven Street, Tonning Street and Norwich Road) north of the harbour.• South of the harbour also experiences similar levels of flood risk as the area is dependent on storm water overflows into the harbour and Anglian Water’s harbour pumping station which discharges towards Ness point.	<ul style="list-style-type: none">• As many of the major settlements are located along the coast, there have been multiple flood alleviation schemes undertaken to protect these areas.• Coastline is exposed but defended.• It is expected that sea level will rise which will increase the rate of coastal erosion	<ul style="list-style-type: none">• Throughout the district there are around 24 waterbodies with Potential Reservoir Flood Risk	

338 * Anglian Water hold a DG5 register this database records incidents of flooding relating to public foul, combined or surface water sewers and identifies which properties suffered flooding. It is important to recognise the DG5 register does not contain
339 information about properties and areas at risk of sewer flooding caused by operational issues such as blockages. Also, the register represents a snap shot in time and will get outdated with properties being added to the register following rainfall
340 events, whilst risk will be reduced in some locations by capital investment to increase the capacity of the network. As such the sewer flooding flood risk register is not a comprehensive ‘at risk register’.

5.7 The Broads Flood Risk Alleviation Project and Broadland Futures Initiative

5.6.1 The Broadland Flood Alleviation Project (BFAP) is a long-term project to provide a range of flood defence improvements, maintenance and emergency response services within the tidal areas of the Rivers Yare, Bure, Waveney and their tributaries.

5.6.2 The main aim of project work was to strengthen existing flood defences and restore them to a height that existed in 1995 (a level defined by the Environment Agency) and make additional allowances for sea level rise and future settlement of the flood banks.

5.6.3 This aim has largely been achieved, through a phased programme of improvement works comprising:

- Strengthening the existing flood banks, restoring them to agreed levels where excessive settlement has occurred
- Replacing existing erosion protection that is in a poor condition using more environmentally acceptable methods wherever possible
- Providing new protection where erosion is currently threatening the integrity of the flood defences
- Carrying out works at undefended communities

5.6.4 The Broadland Futures Initiative (BFI)¹⁴ is a partnership for future flood risk management in the Broadland area. The main goal is to agree a framework for future flood risk management that better copes with our changing climate and rising sea level. The focus will be on what happens from the mid-2020s onwards. Planning is needed now to secure support and make well-informed decisions.

5.6.5 The Initiative has been set up by organisations responsible for managing coastal and inland flood risk. The Environment Agency have the lead responsibility and will be working with Natural England, County Councils, Internal Drainage Boards, Broads Authority and National Farmers Union. The Broads Authority will support the Initiative Project Team and governance arrangements.

5.6.6 The BFI will also work in partnership with local communities and other stakeholders to identify the way forward. This will be a democratic process, with local politicians making the core decisions to agree a framework for future flood risk management that better copes with our changing climate.

5.8 Functional Flood Plain

5.7.1 The NPPG¹⁵ describes the Functional Flood Plain as ‘*where water has to flow or be stored in times of flood*’ and goes on to say:

A functional floodplain is a very important planning tool in making space for flood waters when flooding occurs. Generally, development should be directed away from these areas using the Environment Agency’s catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities.

5.7.2 The flood probability mapping indicates in some areas that the functional floodplain extends to the boundary of the Broads Authority area. The SFRAs identify Functional Floodplain and it covers a

¹⁴ Broadland Futures Initiative: <https://www.broads-authority.gov.uk/looking-after/climate-change/broadland-futures-initiative>

¹⁵ Functional floodplain: <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Strategic-Flood-Risk-Assessment-section>

significant part of the Broads Authority area. FRAs will need to take this into account. See section 5.4 for more detail.

5.9 The Coast

5.8.1 The Broads Authority has a small stretch of coast in the Executive Area (Winterton/Horsey area). The Kelling to Lowestoft Ness Shoreline Management Plan unit 6.13¹⁶ covers Eccles to Winterton Beach Road. Coastal erosion is a sensitive issue and the detail of the approach for this area is included in the Management Plan. As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. This is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment, or a retired line of defence further inland. In relation to the present day, the Plan says:

‘Due to the considerable assets at risk and the uncertainty of how the coastline could evolve, the policy option from the present day is to continue to hold the line of the existing defence. This policy option is likely to involve maintenance of existing seawalls and reef structures, replacing groynes as necessary and continuing to re-nourish beaches with dredged sand. This policy option will provide an appropriate standard of protection to all assets behind the present defence line, and, with the recharge, a beach will be maintained as well as a supply of sediment to downdrift areas.’

¹⁶ Go to page 100: <https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1239&p=0>

6. Making and assessing a planning application

6.1 Site-Specific Flood Risk Assessment (FRA).

6.1.1 Proposals for developments in areas at risk of flooding are subject to set requirements and must be accompanied by an appropriate Site-Specific Flood Risk Assessment (FRA). The basic requirements of the FRA are set out in the NPPG. There is more on FRAs later in this section.

6.2 Where to get advice

6.2.1 The Broads Authority encourages applicants to seek pre-application advice on their proposals and officers can provide advice on which proposals will require an FRA. The Environment Agency¹⁷ can provide some of the necessary data for an FRA and offer a pre-application advice service¹⁸. The Environment Agency offer one free preliminary opinion to developers which outlines the nature of the information required to accompany an application. Further detailed advice, which may include a technical review of documents prior to submission, is available from the Environment Agency as part of a charged service. All requests for data are provided free of charge.

6.2.2 It will also be appropriate to consult neighbouring Local Planning Authorities if scheme proposals are on or near to the border.

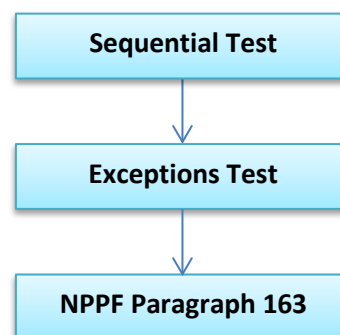
6.3 Considering flood risk

6.3.1 Developers should carefully assess the full range of issues associated with all sources of flood risk when producing development proposals, including climate change flood extents. Failure to consider these issues is likely to lead to delay or to refusal of planning permission. Developers must demonstrate that development minimises flood risk both on and off site, will ensure the safety of the occupants and will still be of a scale and design appropriate to its Broads setting. Flood risk mitigation, resilience and resistance measures should be considered at an early stage and integrated into a high-quality design which satisfies the objectives of other planning policies.

~~6.3.2 The Broads Authority, when determining a planning application, will need to be aware that if a building is subject to more than 600mm of external flood water, it may not be safe. We may refuse the application if this has not been considered adequately in the FRA.~~

6.4 Sequential and exceptions tests - general

6.4.1 The NPPG sets out a Sequential Test¹⁹ to development and all sources of flood risk that is done by the planning authority to direct development away from flood risk areas. It also sets out an Exception Test²⁰ for development located in zones of higher flood risk. This provides a method to manage all sources of flood risk, while still allowing necessary development to occur, subject to appropriate risk reduction and



¹⁷ You can email enquiries_eastanglia@environment-agency.gov.uk

¹⁸ The pre application enquiry form can be found here: <https://www.gov.uk/government/publications/pre-planning-application-enquiry-form-preliminary-opinion>

¹⁹ Sequential test: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/the-sequential-risk-based-approach-to-the-location-of-development/>

²⁰ Exceptions Test: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/the-exception-test/>

mitigation measures. The steps taken to assess an application for development in flood zones 3a and 3b are in this simple flow chart.

6.4.2 The NPPF sets out clearly that the sequential test and exception test should be applied to all sources of flooding and prioritise acceptable land uses. There is a distinction between proposed development in flood risk zones 1, 2 and 3a and proposed development in flood risk zone 3b. In the case of the former, the NPPG is very clear on circumstances in which the Sequential and Exception tests must be applied. In terms of proposed development in Flood Zone 3b the NPPG sets out (in the table below, copied from the NPPG) which types of development are water compatible and may therefore be acceptable^{21 22}.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓ *

Key: ✓ Development is appropriate ✗ Development should not be permitted.

† In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

* In Flood Zone 3b (functional floodplain) essential infrastructure that has to be there and has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere

Although the sequential test must be applied, due to the limited availability of sites in Flood Zone 1, the main objective, as applied to the Broads, is likely to be to reduce flood risk to new development through the application of the sequential approach and to maximise opportunities to build in resilience both at the site and buildings level through design. The improvement of safety and management of risk, including response to risk, must be addressed at the design stage.

²¹ Flood Zone and flood risk tables: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/>

²² For more detail, go here: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-3-flood-risk-vulnerability-and-flood-zone-compatibility/>

Any development being promoted in Flood Zone 1 should also consider flood risk from other sources (not just river and sea flooding). This means that the updated surface water flood map on the Environment Agency’s flood map and assessed through the 2017 and 2018 SFRAs, should also be checked to apply the sequential approach and sequential test when making decisions. The 1:1000 year surface water map can be seen as equivalent probability to Flood zone 2 (river and sea map) or flood zone 3 accounting for an allowance of climate change, and the 1:100 year surface water map can be seen as equivalent to Flood Zone 3 (river and sea flood map) without climate change. This is only practical to apply to significant flow paths shown on the surface water flood map and not to small areas of ponding.

6.5 Sequential Test – specific requirements

6.5.1 The sequential test is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The Sequential Test will be carried out by the Broads Authority on relevant applications located in Flood Zones 2 and 3 in accordance with the NPPF (except for minor development or changes of use – excluding a change of use involving camping and caravans), drawing on information provided by the developer. Sites must be reasonably available (see page 6.5.5 for more on this) to be considered as part of the Sequential Test. The Environment Agency advises that the Sequential Test should be undertaken in isolation and judged on flood risk issues only. The results of the test should then be compared to other non-flood risk matters - a site may therefore pass the Sequential Test but still be considered inappropriate for other reasons, such as being contrary to the Local Plan.

6.5.2 The Authority will aim to minimise flood risk by directing development away from areas of high risk. However, this does not override other Local Plan policies which may indicate the unsuitability of land in Flood Zones 1 or 2 for other reasons.

6.5.3 The NPPG says:

The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

6.5.4 The following sections elaborate on how various elements of the Sequential Test should be addressed. In applying the sequential test, the Authority will use the following:

6.5.5 A site is considered to be **reasonably available** if all of the following apply:

- The site is available to be developed (including considering site ownership or whether the owners of sites have any intention of them being developed); and
- The site is within the agreed area of search; and

- 489 • The site is of comparable size in that it can accommodate the requirements of the proposed
- 490 development; and
- 491 • The site is not safeguarded in the relevant Local Plan (including Minerals and Waste) or
- 492 Neighbourhood Plan for another use; and
- 493 • It does not conflict with any other policies in the Local Plan.

494 6.5.6 A site is not considered to be reasonably available if they fail to meet all of the above
 495 requirements or already have planning permission for a development that is likely to be
 496 implemented.

497 6.5.7 The **area of search** should be guided by the requirement for the proposed development in a
 498 particular area and should be discussed with the Broads Authority at the pre-application stage.

499 6.5.8 The Authority considers the following areas of search to be reasonable:

- 500 • The rest of the particular district within the Broads Authority Executive Area
- 501 • Within the entire Parish (including the part that may be out of the Broads)
- 502 • Other settlements/parishes that are nearby (that may be out of the district)

503 6.5.9 It is acknowledged that the area of search could be outside of the Broads Authority Executive
 504 Area and would require discussions with other Local Planning Authorities (and proposals would
 505 therefore need to comply with relevant planning policies of the relevant Local Planning Authorities).
 506 However, sites that are at less risk of flooding could be in the part of the settlement that is not in the
 507 Broads.

508 6.5.10 The Authority acknowledges that some schemes are site specific, such as the regeneration of
 509 a particular brownfield site or extension of a building, so it is impractical to change the location.

510 6.5.11 In all cases the developer must justify with evidence to the Broads Authority what area of
 511 search has been used when making the application.

512 6.5.12 If there are found to be other reasonably available sites at a lower risk of flooding, then the
 513 development has **failed the Sequential Test** and this could lead to refusal of planning permission.
 514 Failing to pass the Sequential Test is sufficient grounds for refusal, as it would make the proposal
 515 contrary to the NPPF and Local Plan policies.

516 6.5.13 If, however there are no other reasonably available sites, then the development has **passed**
 517 **the Sequential Test**. The Exception Test may also need to be undertaken at this point (if required).

518 6.6 Exception Test – specific requirements

519 6.6.1 The NPPF says:

520 *158. The aim of the sequential test is to steer new development to areas with the lowest risk of*
 521 *flooding. Development should not be allocated or permitted if there are reasonably available sites*
 522 *appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood*
 523 *risk assessment will provide the basis for applying this test. The sequential approach should be used*
 524 *in areas known to be at risk now or in the future from any form of flooding.*

159. If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

6.6.2 The requirements of the Exception Test are set out in the NPPG. Table 3²³ of the NPPG sets out when the Exception Test needs to be carried out. The Broads Authority has considered these tests and has clarified how they will be interpreted locally in the context of the landscape character and spatial vision. Again, the developer must provide the evidence to enable the Exception Test to be applied by the Authority.

6.6.3 The following conditions must be met for the Authority to be sure that a proposal is appropriate, in flood risk terms, if an Exception Test is required.

6.6.4 The NPPF at paragraph 160 says that for the Exception Test to be passed ‘it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk’. To assess this, the Authority will use the most **up to date Local Plan Sustainability Appraisal Objectives**. The current objectives are set out at [Appendix C](#).

6.6.5 The NPPF at paragraph 160 goes on to say that for the Exception Test to be passed ‘b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The Broads Authority will presume **100 years for residential** development as per the National Planning Policy Guidance. The Authority requires **developers to set out the anticipated lifetime of non-residential development and justify this**.

6.6.6 In addition to these conditions, the following will also be applied as part of the Exception Test:

- a) The development must not compromise future flood alleviation or flood defence schemes;
- b) The Flood Risk Assessment must demonstrate how resilience to flooding has been incorporated through a design which does not detract from the character of the locality;
- c) The site-specific Flood Risk Assessment must demonstrate how the development will be compatible with the nature of flooding in the Broads, considering climate change and sea level rise over the planned life of the development (see section 6.5 on Climate Smart Thinking); and,
- d) in the case of the replacement of a residential property, a residential development must be on a like-for-like basis, with no increase in the number of bedrooms, on the same sized footprint²⁴, potentially being relocated in a less vulnerable part of the site.

6.7 The nature of the land and the specific functionality of the floodplain

²³ For more detail, go here: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-3-flood-risk-vulnerability-and-flood-zone-compatibility/>

²⁴ The “footprint” is the aggregate ground floor area of the existing on-site buildings, including outbuildings which affect the functionality of the floodplain but excluding temporary buildings, open spaces with direct external access between wings of a building, and areas of hardstanding.

6.7.1 The approach in any particular case will depend on the nature of the land and the specific functionality of the floodplain, considering the presence of built structures and site infrastructure. The following principles will apply to development in flood zone 3.

6.7.2 In the case of a ‘greenfield’ site which has not been the subject of any previous development, the site could function as an unconstrained, open floodplain, subject to the presence of any ‘defences’. It may provide areas for water storage in times of flood and may have other value associated with this, for example as wet woodland.

6.7.3 Sites categorised as “**brownfield sites which have been previously developed**” will often cover sites larger than a single plot and may have been in use for a variety of uses, often employment based. These will often be characterised by areas of built development, including buildings and hardstandings, with undeveloped areas which might include vegetated margins or open areas. Parts of the site may function as functional floodplain and parts will not. The functionality of any part will depend on the way in which the water would behave in times of flood. If flood waters which inundate the site in a 1:20 (5%) annual probability event can pass under or through a building or sit on land this will be defined as functional floodplain. Where an existing building or structure acts as a barrier to flood water then its functionality is compromised and it will not be classified as Flood Zone 3b and can be described as Flood Zone 3a.

6.7.4 When considering development proposals for brownfield sites which have been previously developed, the objective is to locate development in a sequentially appropriate manner on the site and to reduce risk through design. An initial site appraisal should identify the different flood risk zones on the site (where applicable) and differentiate between areas of Flood Zone 3a and Flood Zone 3b, as described above.

6.7.5 The objective when looking at development proposals on previously developed brownfield sites is to seek opportunities to restore the functionality of the floodplain. This must, however, be balanced against the need to maintain the land uses and development which support the economic and social viability of the Broads communities. So, the over-riding principle in respect of development is that it should not increase risk above the existing level.

6.7.6 Development should be located in a sequentially appropriate manner (which considers areas of lower flood risk first as discussed in the following section) across any flood risk zones, in accordance with the NPPG. Where there is existing development within Flood Zone 3a or 3b, opportunities to improve flood risk should follow the following hierarchy:

- i) relocate development to Flood Zone 1 (subject to other sources of flooding as discussed previously)
- ii) relocate development to a lower flood risk zone
- iii) ensure there is no net increase in the development area within Flood Zone 3a.

6.7.7 Land uses or development which is of a higher level of vulnerability, as defined in the NPPG, than existing or previous uses on the site will only be permitted if it complies with table 3²⁵ of the NPPG and all the other policy requirements (such as safety and not increasing flood risk elsewhere).

6.7.8 Sites categorised as “**brownfield sites which are currently developed**” will often cover individual sites where replacement development is proposed. These will often be smaller plots and are owner occupied with limited (if any) opportunity for relocating development to an area of lesser flood risk, either on-site or elsewhere.

6.7.9 When considering proposals for replacement development, an initial appraisal should identify whether the development is in Flood Zone 3a or Flood Zone 3b.

6.7.10 If the site is in Flood Zone 3b, new water compatible development and essential infrastructure that has been subject to the Exception Test (as defined in the NPPG) will be permitted or a like-for-like replacement of an existing use. As detailed above, existing built development on site may prevent parts of the site from functioning as Flood Zone 3b, meaning it will be considered as Flood Zone 3a. In those cases, it may be acceptable to locate development appropriate to Flood Zone 3a within the extent of the previously developed footprint. This will be subject to the usual considerations in terms of safety of the development.

6.7.11 If the site is in Flood Zone 3a, new development for water compatible uses, less vulnerable uses or more vulnerable subject to the Exception Test (as defined in the NPPG) will be permitted or a like-for-like replacement of an existing use. In all cases the safety of the proposed development would need to be considered.

6.7.12 The objective when looking at development proposals on brownfield sites which are currently developed is to ensure that development does not increase flood risk to the site or the building or elsewhere above the existing level. Opportunities to reduce flood risk should also be considered.

6.7.13 The Authority may permit the relocation of existing development out of Flood Zone 3b to an undeveloped site with a lower probability of flooding where the vacated site is reinstated as naturally functioning floodplain, and where the benefits to flood risk outweigh the benefits of leaving the new site undeveloped. Such proposals will be considered against adopted planning policies.

6.8 Existing footprint of development in Flood Zone 3b and Permitted Development (PD)

6.8.1 Firstly, it is worth noting that the following only applies to development within Flood Risk Zone 3B where ‘more vulnerable’ development is not considered appropriate, according to the NPPG.

²⁵ Table 3 is copied previously in this SPD or can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf

6.8.2 For a replacement dwelling in Flood Zone 3B the existing footprint is currently defined in the footnote to policy DM5²⁶. This does not make any reference to permitted development rights, only to existing buildings. The ‘like for like’ requirement of the policy is still valid as that is the starting point for the application – that the base position for any replacement dwelling in flood zone 3b is like for like. The Authority and Environment Agency consider that a scheme for a replacement dwelling may only include what is permitted through PD rights Class A enlargement, improvement or other alteration of a dwelling house²⁷ as a pragmatic approach. The inclusion of these PD rights in the calculation of footprint is considered a reasonable approach to take, as it would avoid the need for applicants to first construct a rear extension only to include it in the calculations for a replacement dwelling. It is important to note however that there may be other considerations that might be relevant to decision making other than flood risk; for example landscape character impacts.

6.8.3 If an application for a replacement dwelling is approved, the PD rights for extensions/outbuildings will be removed by the Authority in order to restrict further development within the functional floodplain. Householder PD rights would also be removed when permitting householder extensions within Flood Zone 3B, for the same reason; to restrict the further development within the functional floodplain.

6.9 Environment Agency’s standing advice

6.9.1 You need to follow the Environment Agency’s standing advice²⁸ if you’re carrying out a flood risk assessment for a development classed as:

- a minor extension (household extensions or non-domestic extensions less than 250 square metres) in [flood zone 2 or 3](#)
- ‘[more vulnerable](#)’ in flood zone 2 (except for landfill or waste facility sites, caravan or camping sites)
- ‘[less vulnerable](#)’ in flood zone 2 (except for agriculture and forestry, waste treatment, and water and sewage treatment)
- ‘[water compatible](#)’ in flood zone 2

6.9.2 This includes developments involving a [change of use](#) into one of these vulnerable categories or into the water compatible category.

6.10 Information for Flood Risk Assessments

6.10.1 Guidance on when an FRA is required and on preparing an FRA, including how to obtain flood risk data, is available from the Environment Agency²⁹. The NPPG³⁰ sets what is required in an FRA with a useful checklist.

6.10.2 The flood maps on the Environment Agency website³¹ and the SFRA³² show the flood zones and other sources of flood risk, highlighting when an FRA is required for flood risk from a main river or the sea. Further more detailed information will be required to consider the specific risk to the site

²⁶ Footnote 22 says the “footprint” is the aggregate ground floor area of the existing on site buildings, including outbuildings which affect the functionality of the floodplain but excluding temporary buildings, open spaces with direct external access between wings of a building, and areas of hard standing.

²⁷ SCHEDULE 2 Permitted development rights, PART 1 Development within the curtilage of a dwellinghouse, Class A – enlargement, improvement or other alteration of a dwellinghouse <http://www.legislation.gov.uk/ukxi/2015/596/made>

²⁸ <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice>

²⁹ Flood risk assessment for planning applications <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

³⁰ Site-specific flood risk assessment: Checklist <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/site-specific-flood-risk-assessment-checklist/>

³¹ EA flood maps <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

³² SFRAs <http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>

and how it should be managed. Other documents should be consulted to assess risk of flooding from other sources and historical accounts such as Strategic Flood Risk Assessments, Surface Water Management Plans³³ or local studies. Any site-specific FRA needs to also include an assessment of historical flooding.

6.10.3 A comprehensive and accurate site appraisal will be essential as part of an FRA to identify constraints and potential areas for development on a site within the floodplain¹. The appraisal as part of a Flood Risk Assessment should identify:

- i) Flood risk zones 1 – 3 within the site with reference to the SFRA/EA Flood Zone maps. -The FRA should show the accurate location of the flood zones on the site based on a comparison of EA flood levels and GPS site survey;
- ii) The boundaries between areas of Flood Zone 3a and the Flood Zone 3b;
- iii) The boundaries within mapped areas of Flood Zone 3b where water has to flow or be stored and land areas where buildings and other infrastructure restrict this functionality. The following will need to be considered in identifying these boundaries:
 - Extent of buildings on site and their footprints
 - Extent of hardstandings on site and their coverage
 - Permeability of the buildings and hardstandings on site, including the contribution of voids
 - Extent of open areas and drainage infrastructure on site and their capacity
 - Flow pathways and patterns within and off-site

6.10.4 Climate change is an important consideration in producing FRAs. An allowance for climate change must be included as part of any submitted flood risk assessment. The SFRAs³⁴ show how climate change could affect an area. Guidance on the allowances to use can be found by using the following hyperlink <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. Environment Agency has prepared a locally specific factsheet on climate change allowances. This can be requested via enquiries_eastanglia@environment-agency.gov.uk.

6.10.5 Where redevelopment is appropriate in Flood Zones 3a and 3b, according to the principles of the Planning Practice Guidance (NPPG), it should seek to demonstrate an improvement in flood risk management (considering climate change over the development lifetime). For example, a building may be redesigned to be more flood resistant or have habitable areas raised and so at less risk. The frequency of flooding to the surrounding land may become greater and more hazardous with time, therefore offsetting any improvement to the design of the building and challenging the overall sustainability of the location for the given land use. These issues will need to be addressed in the site-specific Flood Risk Assessment (FRA). Some landowners may decide that risk management is too onerous and seek to relocate.

6.10.6 It is important to note that the Environment Agency need new more vulnerable development to not flood in the actual risk 1%/0.5% climate change flood event, through the provision of defences, raised land or raised floor levels.

6.10.7 The management of residual risk is another area that has to be addressed. There is no definition of what is deemed to be 'safe', but there is information from various sources that can provide a guide to what is acceptable in respect of flood depths and velocities. It will be the Authority's role to determine what is considered safe in terms of access routes during flood events and whether unsafe access can be adequately managed through the submission of a Flood Response Plan. The Authority will also consider if proposed less vulnerable developments at risk of flooding

³³ Surface Water Management Plans <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/flood-and-water-management-policies/surface-water-management-plans> and <http://www.greensuffolk.org/flooding/surface-water-management-plans/>

³⁴ SFRA <http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>

that would be safe and sustainable and whether flood resilient measures and flood response plans are sufficient to mitigate risk. A key document in this respect is the Defra/EA Research Report FD2320, 'Flood Risk Assessment Guidance for New Development'³⁵. Advice on the flood resistance and resilience of buildings can be found at section 5-7 of this SPD.

6.10.8 Provision of this information (as set out in 6.10.3) will allow an accurate calculation to be made of the extent and location of Flood Zone 3a and Flood Zone 3b within the site. The objective of the appraisal is to identify the location and extent of the site that would be appropriate for development, so that the Broads Authority can ensure that it does not increase flood risk either off site or to the development. Understanding how a site is affected at times of flooding can identify opportunities to allow a development to go ahead, reduce flood risk and identify mechanisms to improve flood storage capacity through layout and design. The appraisal will demonstrate where this is required.

6.10.9 For certain application types the Environment Agency has prepared Flood Risk Standing Advice³⁶. Considerable additional information for developers and landowners is available. Developers should refer to these sources of information so they are fully informed of the requirements at the time of their application.

6.10.10 For minor development³⁷, a Local Flood Risk Tick Sheet has been produced. This will assist applicants in producing a flood risk assessment for minor developments. It is in conformity with the NPPG FRA guidance and is designed to be user friendly for the applicant yet provide the information the BA needs to determine applications. See [Appendix F](#).

6.11 Without increasing flood risk elsewhere

6.11.1 The NPPF at paragraph 163 says '*when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere...*'.

6.11.2 One of the key objectives of a Flood Risk Assessment is to establish if a proposal will increase flood risk elsewhere. This may happen where development causes flows to be diverted, or where development takes up additional space within the floodplain causing floodplain storage capacity to be reduced.

6.11.3 A Flood Risk Assessment should consider whether this will happen and propose mitigation measures which should be provided up to the design flood event (1% fluvial/0.5% tidal) including climate change for the lifetime of the development. These may include for example the provision of compensatory floodplain storage, ~~although this can be difficult to achieve in the Broads area.~~ Compensatory floodplain storage is the lowering of higher land levels to provide additional flood storage at the same level as the flood storage is removed. Therefore, this is difficult to achieve in the Broads as the floodplain is very flat with little higher land available to lower.- One of the only options in the Broads is the raising of buildings on stilts to provide voids underneath and not remove flood storage. Such measures would need to be designed to ensure that water is always stored under the building and can empty after a flood. This would require intermittent boarding, no storage under the building and regular maintenance.

³⁵ Defra/EA Research Report FD2320 http://sciencesearch.defra.gov.uk/Document.aspx?Document=FD2320_3364_TRP.pdf

³⁶ Standing advice <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice>

³⁷ Please note that this is minor development in relation to flood risk rather than other definitions of minor development: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/what-is-meant-by-minor-development-in-relation-to-flood-risk/>

6.11.4 Sustainable drainage (SuDS) proposals should also be included within an assessment where a development would increase the impermeable area that would increase the surface water runoff from the site. This will ensure that flood risk is not increased elsewhere. For Brownfield sites, proposals should be put forward to limit the surface water discharge as close to greenfield runoff rates.

6.12 Flood response plan template.

6.12.1 A site-specific Flood Response Plan will always be required for development in flood zone 3. The client/developer responsibilities for health and safety and facilities management may also require a site-specific flood response plan. These are important considerations on commercial sites and are potential requirements for compliance with the Construction (Design and Management) Regulations 2015³⁸.

6.12.2 They can form one means of managing residual risk where a development is found to be acceptable in flood risk terms and is a valuable document for owners and occupiers of all property at risk of flooding to have in place. The Authority has produced guidance and a suggested structure for these plans. The guidance and structure can be found at [Appendix D](#).

³⁸ Construction (Design and Management) Regulations 2015 <http://www.hse.gov.uk/pUbns/priced/l153.pdf>

7. Reducing Flood Risk to Development

7.1 Section introduction

7.1.1 Developers must demonstrate that development both appropriately manages flood risk and will still be of a scale and design appropriate to its Broads setting. The Authority will not permit development where the accommodation of measures to reduce flood risk leads to other, unacceptable, consequences. These may include an intrusive scale of building or land raising³⁹ which is inappropriate in the landscape or built environment.

7.1.2 Developers should also note that, in accordance with advice in the NPPG, any necessary flood defence works required because of the development form part of that development and should be funded by the developer.

7.1.3 It should be noted that all aspects of the development need to comply with policies of the Local Plan (adopted 2019) and that conformity with policies SP2 and DM5 does not override applicability of other policies (of the Broads Authority and other relevant Local Planning Authority).

7.1.4 The Authority will continue to give considerable weight to the advice of the Environment Agency with regard to the appropriateness of development and necessary flood alleviation measures.

7.1.5 The following sections discuss ways of potentially reducing flood risk to development. Historic England was keen to emphasise the waterlogged archaeology in the area and that changes to the flow of water could affect preservation.

7.2 Raising Floor Levels

7.2.1 This involves setting the building floor level above an appropriate flood level. This approach provides a partial solution by giving protection to people and accommodation, provided that the flood level does not exceed the floor level provided.

7.2.2 A development could be designed to allow the site to flood beneath a raised building. This method does not protect the building curtilage or access roads from flooding. In addition, flooding may prevent the effective operation of local drainage and sewage systems, with potential adverse environmental and amenity consequences.

7.2.3 It is also difficult to apply new floor levels to building conversions.

7.2.4 The appropriate minimum floor levels to manage flood risk will be determined through the site-specific Flood Risk Assessment. The use of raised floor levels has significant implications for development. Firstly, it can lead to a raising of the ridge level and overall height of the building. Secondly, it affects the relationship between the floor level and the surrounding site and therefore the means of access into the building, including access for all (whereby access ramps for example might need to be longer and higher when compared to not raising the floor). These aspects need careful consideration by the architect at an early stage to ensure that the resulting development will

³⁹ See policy DM17 of the Local Plan for the Broads.

be acceptable in terms of its design in relation to its surroundings and that it complies with legal and policy requirements with regard to access for all.

7.3 Raising Plot Levels

7.3.1 Developers may seek to reduce the risk of flooding by raising the level of the land, either in isolation or in combination with a minimum floor level. This approach is unlikely to be a viable option in the Broads. The Authority and the Environment Agency have a preference against raising land levels, because:

- (i) It can serve to divert flood water onto neighbouring plots, particularly in areas primarily affected by fluvial flooding.
- (ii) Land in the Broads area is often wet and of poor load bearing capacity. Raising land by adding soil or other material may lead to the site sinking over a period of time.
- (iii) It affects the relationship of the site to surrounding plots, and to access roads. On waterside sites, the relationship to the river or broad is changed, often leading to the need for higher piling and quay heading, affecting the visual quality of the water's edge.
- (iv) It can be damaging to ecology, geomorphology, trees and other vegetation on the site.
- (v) It can change the character of the landscape. Land raising can increase the height and prominence of new buildings.
- (vi) It may be difficult to ensure that any replacement of lost flood storage capacity behaves in the same manner.

7.3.2 Furthermore, there is a policy in the new Local Plan for the Broads (policy DM17) which relates to land raising and is of relevance.

7.3.3 Compensatory floodplain storage may be required as a mitigation measure, but this can be difficult to achieve on small plots and the impact off-site would always need to be assessed.

7.4 Bunds or Flood Walls

7.4.1 In some exceptional cases it may be appropriate to consider the use of earth bunds or flood walls to reduce the risk of flooding of development or to protect existing development. This approach is less likely to be applicable to small-scale developments.

7.4.2 While acceptable in some locations, bunds or flood walls are likely to be damaging to the character of the landscape or built environment in others.

7.4.3 As with land raising, bunds can divert flood water onto neighbouring land, particularly in areas primarily affected by fluvial flooding. The provision of alternative flood storage capacity in the drainage compartment will be a requirement in the use of this technique. Careful consideration will be needed to ensure that the engineering requirements for bunds or flood walls are met and that, as far as possible, they are designed to be sympathetic to the local character. In addition, it will be important to ensure that a bund or flood wall does not prejudice the operational requirements of the site, for example at a boatyard or other employment site. This requirement may not apply to the use of bunds to create a temporary storage area or to provide pollution prevention but the potential to increase flood risk elsewhere may need to be considered.

7.4.4 An Environmental Permit may be required under the Environmental Permitting (England and Wales) Regulations 2010. Check the information at <https://www.gov.uk/topic/environmental-management/environmental-permits> for advice.

7.5 Floating/Amphibious Structures

7.5.1 Another option to explore is a fixed but floating solution to development for commercial uses or replacement residential properties. Development might be located on land or in a mooring cut within a currently developed plot giving connectivity with the landscape, retaining the feeling of intimacy on the waterway and the sense of space between developments experienced throughout the Broads system.

7.5.2 For such development to be acceptable, it must also not increase flood risk elsewhere; reduce flood risk overall wherever possible; and be safe for its lifetime taking into account climate change. Solutions would have to address design issues, including height and the visual impact of floats, as well as consideration of safe access and egress at times of flood and infrastructure requirements. Impact on navigation is also an important consideration.

7.5.3 The appropriateness of such development must be considered based upon its Flood Risk Vulnerability Classification from Table 2 of the Flood Risk and Coastal Change Planning Practice Guidance (discussed previously in this document).

7.5.4 Such development would also need to consider Water Framework Directive impacts through an assessment of direct effects on river morphology.

7.6 Resilience and Resistance

7.6.1 Flood-resilient buildings are designed and constructed to reduce the impact of flood water entering the building (through air bricks, through walls or through toilets or plug holes). As a result, no permanent damage is caused, structural integrity is maintained and drying and cleaning is easier. Flood-resistant construction can prevent entry of water or minimise the amount that may enter a building where there is short duration flooding outside with water depths of 0.6 metres or less. 6.3.2 The Broads Authority, when determining a planning application, will need to be aware that if a building is subject to more than 600mm of external flood water, it may not be safe. We may refuse the application if this has not been considered adequately in the FRA.

7.6.2 Consideration should be given at the design stage to the potential effects of flooding on the electrical, foul drainage and other key aspects of the development.

7.6.3 Developers may also put forward innovative approaches towards reducing the risks or effects of flooding. The Broads Authority will consider such proposals which:

- Build in resilience and allow sites to flood, for example in commercial non- residential buildings and voids around or under replacement chalets or extensions to buildings for example.
- Utilise floating walkways as a safe means of escape.

- Use soft river edge protection measures which absorb water, reduce erosion from wake and encourage plant growth⁴⁰.
- Provide compensatory flood storage capacity or washlands (which are areas provided to be deliberately flooded).

7.6.4 Further information can be found in the following documents:

- Improving the Flood Performance of New Buildings: Flood Resilient Construction (CLG 2007)⁴¹
- Six Steps to Property Level Flood Protection - Guidance for property owners⁴²
- Flood Protection and your property. A guide to protecting your home (Property Care Association, 2014)⁴³
- Homeowner's guide to flood resilience – A living document (Know Your Flood Risk)⁴⁴
- The Property Flood Resilience Action Plan - DEFRA⁴⁵

7.7 Sustainable Drainage Systems (SUDS)

7.71 Policy DM6 of the Local Plan for the Broads refers to Surface Water Run Off. There is much detailed information there. This section is more of a summary.

7.72 Surface water drainage systems developed in line with the ideals of sustainable development are collectively referred to as Sustainable Drainage Systems (SuDS). Approaches to manage surface water that consider water quantity (flooding), water quality (pollution), amenity and biodiversity issues are collectively referred to as Sustainable drainage. The idea of SuDS is to copy, as closely as possible, the natural drainage from a site before development. Including the use of shallow surface structures to copy the pre-development scenario and manage water close to where it falls. SuDS can be designed to slow water down (attenuate) before it enters streams, rivers and other watercourses, they provide areas to store water in natural contours and can be used to allow water to soak (infiltrate) into the ground, evaporate from surface water or transpire from vegetation (known as evapotranspiration). It is important to include sufficient treatment steps as part of the design of SuDS to ensure water quality is protected. There is also potential for schemes to include water reuse such as through rainwater and stormwater harvesting as options that can help to alleviate surface water flood risk. These are systems that are designed to both store water for reuse and attenuate flows and would also reduce potable (clean) water use.

7.7.2 All major development is expected to include Sustainable Drainage (SuDS) to manage surface water runoff, unless it is demonstrated to be inappropriate (as per NPPF paragraph 165). Also see Policy DM6 of the Local Plan for the Broads.

⁴⁰ See Design Guides: <https://www.broads-authority.gov.uk/planning/planning-permission/design-guides>

⁴¹ Flood Resilient Construction:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7730/flood_performance.pdf

⁴² [https://www.bre.co.uk/filelibrary/pdf/projects/flooding/Property_owners_booklet_v2_web_\(2\).pdf](https://www.bre.co.uk/filelibrary/pdf/projects/flooding/Property_owners_booklet_v2_web_(2).pdf). The guidance has been endorsed by the National Flood Forum, the Association of British Insurers, Defra, the Environment Agency, the Flood Protection Association, and the Local Government Association and was produced through the EUFP7 funded SMARTeST Project (further details: www.floodresilience.eu).

⁴³ A guide to protecting your home <http://www.property-care.org/wp-content/uploads/2015/03/FPG-Leaflet-A5-Folded-to-A3-Draft-3-FINAL-WEB.pdf>

⁴⁴ Homeowners Guide to Flood resilience http://www.knowyourfloodrisk.co.uk/sites/default/files/FloodGuide_ForHomeowners.pdf

⁴⁵ THE PROPERTY FLOOD RESILIENCE ACTION PLAN

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551615/flood-resilience-bonfield-action-plan-2016.pdf

897 Applicants should follow SuDS hierarchy by fully considering alternatives before surface water
898 discharge to public sewer. AWS would only accept a surface water connection if evidence were to be
899 provided. AWS would welcome early liaison if applicants wish to pursue this option.

900 7.7.3 Where any SuDS are proposed it is important to demonstrate that the SuDS hierarchy has been
901 followed both in terms of:

- 902 • surface water disposal location, prioritised in the following order: disposal of water to shallow
903 infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration
904 generally greater than 2m below ground level (deep infiltration systems can pose a risk to
905 groundwater quality and are not usually supported. Deep infiltration is unlikely to work in the
906 Broads Authority area due to high groundwater levels. ⁴⁶); and
907 • the SuDS components used within the management train (source, site and regional control).

908 7.7.4 At least one feasible proposal for the disposal of surface water drainage should be
909 demonstrated and, in many cases, supported by the inclusion of appropriate information. Evidence
910 is required to be provided to the Broads Authority and sewerage undertaker in relevant situations to
911 demonstrate that it is not possible to discharge surface water via infiltration or to a watercourse in
912 accordance with CIRIA SuDS Manual (2015) and Part H of Building Regulations. It is recognised that
913 many areas in the Broads Authority area may not be suitable for infiltration SuDS due to the location
914 in low lying areas very close to main rivers or due to high ground water levels. The Environment
915 Agency are also generally not supportive of infiltration SuDS because at such a shallow depth to
916 groundwater, it is essentially discharging any contaminants straight down to groundwater without
917 treatment. However, other SuDS disposal options are likely to be available and there are many SuDS
918 components which can attenuate and treat water quality without relying on infiltration. Careful
919 consideration would be needed to ensure that any development would not remove flood water
920 storage in areas of fluvial flood risk (e.g. Flood Zone 3) and that the SuDS scheme would work in an
921 area at risk of fluvial / tidal flooding. There may also be constraints to surface water discharges
922 relating to high water levels in a receiving watercourse especially those which are tidal.

923 7.7.5 There are various sources of technical information that can be used when addressing surface
924 water and designing SuDS:

- 925 • NPPG⁴⁷
- 926 • Non-statutory technical standards for the design, maintenance and operation of sustainable
927 drainage systems⁴⁸
- 928 • SuDS manual produced by CIRIA⁴⁹. More generally CIRIA are developing new best practice
929 guidance for integrated water management (including the use of SuDS). For information, go
930 here:
931 [https://www.ciria.org/Research/Projects_underway2/Delivering_successful_integrated_water](https://www.ciria.org/Research/Projects_underway2/Delivering_successful_integrated_water_mangement_through_the_planning_ystem.aspx)
932 [mangement_through_the_planning_ystem.aspx](https://www.ciria.org/Research/Projects_underway2/Delivering_successful_integrated_water_mangement_through_the_planning_ystem.aspx).
- 933 • With regards to adopting SuDS, Anglian Water's current standards for SuDs adoption are
934 available to view at the following address: <http://www.anglianwater.co.uk/developers/suds.aspx>

⁴⁶ There is guidance from Norfolk and Suffolk County Councils as the LLFAs for the area. At the time of writing, the guidance was under review.

⁴⁷ Why are sustainable drainage systems important? <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/reducing-the-causes-and-impacts-of-flooding/why-are-sustainable-drainage-systems-important/>

⁴⁸ Non-statutory technical standards for sustainable drainage systems
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf

⁴⁹In delivering SuDS there is a requirement to meet the framework set out by the Government's 'non statutory technical standards' and the revised SuDS Manual complements these but goes further to support the cost-effective delivery of multiple benefits.
https://www.ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx

7.8 Addressing groundwater flood risk

7.8.1 Groundwater flooding has a unique flooding mechanism. It may emerge from below ground level and for this reason many conventional flood defence and mitigation methods are not suitable. Flood risk may be reduced through building design by ensuring that floor levels are raised sufficiently above the water table. Site design would also need to preserve any flow routes followed by the groundwater overland and make sure flood risk is not increased downstream.

7.8.2 Proposed basement areas are likely to be particularly susceptible to groundwater flooding in certain areas. This may be mitigated through waterproof construction; however, consideration should be given to the potential impact on subterranean flow or water tables. When redeveloping existing buildings, it may be acceptable to install pumps in basements as a resilience measure. However, for new development this is unlikely to be considered an acceptable solution. Site specific ground investigation is also likely to be required in locations where below ground development is proposed or there is known groundwater flood risk.

7.9 Addressing foul water/sewer flooding

7.9.1 Anglian Water wish to emphasise that it shouldn't be assumed there is capacity within the public sewerage network for additional surface water flows. Anglian Water's Surface Water Drainage Policy is available to view here: <https://www.anglianwater.co.uk/siteassets/developer/surface-water-drainage-policy.pdf>.

7.9.2 Also, of relevance is policy DM2 of the Local Plan for the Broads.

7.9.3 Anglian Water wish to emphasise the submission requirements for applicants when proposing a foul connection to the public sewerage network. The foul drainage strategy should include the following information:

- Development size
- Proposed discharge rate and method (gravity or pumped connection)
- Discharge location identifying specific manhole
- Feasible mitigation strategy in agreement with Anglian Water (if required).

7.10 Addressing reservoir flood risk

7.10.1 The risk of a reservoir failure is a residual risk. Whilst a residual risk, developers should consider reservoir flooding during the planning stage.

7.10.2 Developers should contact the reservoir owner to obtain information which may include:

- reservoir characteristics: type, dam height at outlet, area/volume, overflow location;
- operation: discharge rates / maximum discharge;
- discharge during emergency drawdown; and
- inspection / maintenance regime.

7.10.3 Developers should apply the sequential approach to locating development within the site. The following questions should be considered:

- 971 ○ can risk be avoided through substituting less vulnerable uses or by amending the site
- 972 lay-out?
- 973 ○ can it be demonstrated that less vulnerable uses for the site have been considered and
- 974 reasonably discounted? and
- 975 ○ can layout be varied to reduce the number of people or flood risk vulnerability or
- 976 building units be in higher risk parts of the site?

977 7.10.4 Developers should consult with relevant authorities regarding emergency plans in case of
978 reservoir breach. In addition to the risk of inundation those considering development in areas
979 affected by breach events should also assess the potential hydraulic forces imposed by the rapid
980 flood event and check that the proposed infrastructure fabric can withstand the loads imposed on
981 the structures by a breach event.

8. Other Important Considerations

8.1 Planning permission does not guarantee insurance cover

8.1.1 Future insurance cover (in terms of adequate value and at a reasonable cost) for development in flood zones should be an important consideration for the applicant/developer of the scheme. If a scheme was to get planning permission, there is no guarantee that it will successfully get adequate insurance cover at a reasonable cost to the owner or occupier. The Broads Authority strongly recommends that prior to application and delivery on site an insurance provider is contacted and the likelihood of a development getting insured for an adequate value at an acceptable cost is investigated. You may wish to contact Flood RE⁵⁰ who is ‘helping to provide affordable and available home insurance’.

8.2 Check Building Regulation requirements

8.2.1 A development proposal could seek to address flood risk through its design and seem acceptable from a planning point of view, but there could be issues with meeting the requirements of Building Regulations. The Broads Authority strongly recommends that any design measures to mitigate against or manage flood risk and make a development resilient or resistant to flood risk is discussed with a Building Regulations professional prior to application and delivery on site.

8.3 Ensure you have the necessary consents

8.3.1 Under the Environmental Permitting (England and Wales) Regulations 2010, an **environmental permit** may be required for works in, under, over or within 8m of a main river or flood defence; or within 16m of a tidally influenced main river or associated flood defence. In the Broads, main rivers are usually tidally influenced so the wider distance will most likely apply.

8.3.2 ‘Flood Risk Activities’ may require the Environment Agency to issue a **bespoke permit**, or may be covered by a **standard rules permit** which includes a set of fixed rules. Activities identified as lower risk may be excluded from the need for a permit or may need to be registered as an exempt activity and comply with certain rules.

8.3.3 Further information on Flood Risk Activity permits is available from:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

8.3.4 To apply or seek further advice, contact the Environment Agency by email:

floodriskactivity@environment-agency.gov.uk or by telephone: 03708 506 506.

8.3.5 **Land drainage consent**⁵¹ may also be required for any culverts or works affecting the flow of an ordinary watercourse (non-main river). This consent would be required from the appropriate Internal Drainage Board (IDB) or where not in an IDB area Norfolk/Suffolk County Council as LLFA. It should be noted that the Broads Authority tries to avoid the use of culverts and the Environment Agency are generally opposed to them as well⁵². Consent for such works will not normally be

⁵⁰ Flood Re is helping to provide affordable and available home insurance. <http://www.floodre.co.uk/>

⁵¹ Under section 23 of the Land Drainage Act 1991

⁵² The Environment Agency say: *We are generally opposed to the culverting of watercourses because of the adverse ecological, flood risk, human safety and aesthetic impacts. We consider each application to culvert a watercourse on its own merits and in accordance with our risk-based approach to permitting. We will only approve a culvert if there is no reasonably practicable alternative, or if we think the*

granted in watercourses due to the adverse impacts on ecology and the potential for an increase in flood risk, except when used as part of water control structures within drainage systems on marshes or fen sites and occasionally for access for equipment over marsh drainage dykes. Culverts are generally pipes through which the watercourse is channelled and can potentially restrict the flow. If the use of a culvert cannot be avoided then their size should be designed so they are appropriately designed for both low and high have capacity for high flow conditions (and this specification might be a matter for the IDB, LLFA or Environment Agency to consider). It should be noted that these approvals are separate from the planning process.

Other consents that may be required from the IDB include:

- If a surface water (or treated foul water) discharge is proposed to a watercourse within an Internal Drainage District (IDD) (either directly or indirectly), then the proposed development will require a Land Drainage Consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's charging policy.
- If there is a Board Adopted watercourse within/adjacent to the site boundary and should works be proposed within 9 metres of the watercourse, consent would be required to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure).

8.4 Flood Warnings – only for tidal and fluvial flooding

8.4.1 It is emphasised that the application of measures referred to in this document is not a guarantee against flooding. While the risk of flooding can be reduced, a residual risk will always remain.

8.4.2 Individual dwellings and whole sites can be registered with the Environment Agency's flood warning service 'Floodline Warnings Direct'. The Floodline Warnings Direct (FWD) service provides information concerning the current and future flooding danger. If flooding in your area is anticipated, the Environment Agency will issue a flood warning by phone, text or email.

8.4.3 The Environment Agency endeavour to give 10 to 12 hours' notice of Tidal Flooding through the Flood Warning Service to the coast, estuaries and Broads. This may vary depending on the conditions on the day, timing of the tide in question and your particular location in the Broads (due to the time the tide takes to travel up the Broadland rivers). The notice given for potential fluvial flooding problems will be no less than 2 hours and will usually be a lot more. Further information can be obtained via: <https://flood-warning-information.service.gov.uk>.

8.4.4 It is not possible for the EA to warn for a 'Breach' of defences. This should be considered a part of the Flood Response Plan. There is no flood warnings for any watercourse outside of those formally covered by Flood Warning Service, only generalised flood alerts are available to indicate weather conditions that might lead to surface water flooding, flooding on other watercourse or from groundwater. These are not specific to an area or severity of flooding expected.

detrimental effects would be so minor that a costlier alternative would not be justified. In all cases where it is appropriate to do so, applicants must provide adequate mitigation measures, accept sole ownership and responsibility for future maintenance. We will actively pursue the restoration of culverted watercourses to open channels.

8.5 Consider a 'Climate Smart' Approach

8.5.1 To consider how to ensure your development is suitably proofed against a changing climate you may wish to take a Climate-Smart Approach. The Approach takes you through a series of simple steps to consider how a difference in the climate might impact on the way you live or work and what options you could develop to help build resilience or adapt to a changing regime. These are summarised in this diagram and more detail is given in [Appendix E](#).

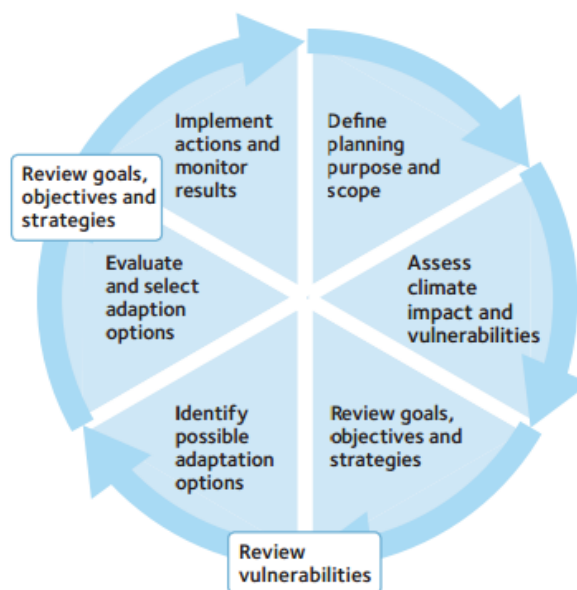


Figure 1 Climate-smart planning cycle

8.5.3 The long-term aim of climate-smart planning is to sustain the environment and the multiple benefits it provides for people. Adaptive actions should also seek to reduce greenhouse gas emissions and improve evidence and understanding of climate change processes and impacts.

8.5.4 We can test whether our plans will help us adapt to changes in weather, climate change and sea level rise by:

- Focusing on future possibilities rather than trying to retain the past
- Being flexible enough to cope with climate uncertainties
- Avoiding adaptation actions that actually makes (other) things worse – sometimes known as 'maladaptation'

8.5.5 Climate-smart planning can be done at an individual site level or a larger area level. It should help identify adaptive options within the proposed development or identify when there needs to be changes to the proposed goals because climate (flood) risks means the original intentions become unachievable – perhaps due to cost or technical issues. Climate-smart planning is therefore a repeating cycle.

8.5.6 An increased risk of flooding (from a rising sea level and more extreme rainfall events) is probably the greatest changing risk but consideration of all extreme events, periods of increased temperature and more cloud free days could all have impacts. Warmer weather and less days of frost could be opportunities that might help a development and could be easily adapted to. A simple table of likely risks and some initial thinking about adaptation options can be found in the Full and Summary Broads Climate Adaptation Plans⁵³.

⁵³ Climate Change Adaptation Report http://www.broads-authority.gov.uk/_data/assets/pdf_file/0005/709160/Climate-Adaptation-Plan-Report.pdf

9. Links to useful websites

Finding out about flood risk

The EA website shows flood risk in the area:

<https://flood-map-for-planning.service.gov.uk/>

Long term flood risk assessment for locations in England can be found here:

<https://flood-warning-information.service.gov.uk/long-term-flood-risk>

Government Guidance

Government Guidance can be found here:

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

Flood Risk Assessment

Flood risk assessment for planning applications. Find out when you need to do a flood risk assessment as part of your planning application, how to do one and how it's processed.

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

Framework and Guidance for Assessing and Managing Flood Risk for New Development – Full Documentation and Tools. EA

http://sciencesearch.defra.gov.uk/Document.aspx?Document=FD2320_3364_TRP.pdf

Surface Water Management Plans

Some areas of Norfolk and Suffolk have their own Surface Water Management Plans. Go here to have a look:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/flood-and-water-management-policies/surface-water-management-plans> and
<http://www.greensuffolk.org/flooding/surface-water-management-plans/>

Preparing for flooding

<https://www.gov.uk/prepare-for-flooding>

Protecting property

SIX STEPS TO PROPERTY LEVEL FLOOD PROTECTION. Guidance for property owners.

[https://www.bre.co.uk/filelibrary/pdf/projects/flooding/Property_owners_booklet_v2_web_\(2\).pdf](https://www.bre.co.uk/filelibrary/pdf/projects/flooding/Property_owners_booklet_v2_web_(2).pdf)

Homeowners Guide to Flood resilience - A Living Document

http://www.knowyourfloodrisk.co.uk/sites/default/files/FloodGuide_ForHomeowners.pdf

THE PROPERTY FLOOD RESILIENCE ACTION PLAN. An action plan to enable better uptake of resilience measures for properties at high flood risk.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551615/flood-resilience-bonfield-action-plan-2016.pdf

Flood Advice for Businesses.

http://www.knowyourfloodrisk.co.uk/sites/default/files/FloodGuide_ForBusinesses.pdf

- 1126 Would your business stay afloat? A guide to preparing your business for flooding.
1127 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/410606/LIT_5284.pdf
- 1128 Flooding minimising the risk. Flood plan guidance for communities and groups. Practical advice to
1129 help you create a flood plan.
1130 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292939/LIT_5286_b9ff43.pdf
- 1131 Combined resistance and resilience measures.
1132 http://www.knowyourfloodrisk.co.uk/sites/default/files/FloodGuide_ForResilience.pdf
1133
- 1134 Blue Pages. This is a directory of property flood products and services put together to advise and
1135 inform you of what's available to help reduce the risk of flooding to your home or business.
1136 <http://www.bluepages.org.uk/>
- 1137 **After a flood**
1138 Flood Recovery Guide.
1139 http://www.knowyourfloodrisk.co.uk/sites/default/files/FloodRecoveryGuide_Interactive.pdf
- 1140 **SuDS**
1141 Non-statutory technical standards for the design, maintenance and operation of sustainable
1142 drainage systems.
1143 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf
1144
- 1145 SuDS manual produced by CIRIA .
1146 https://www.ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx
1147 With regards to adopting SuDS, Anglian Water's current standards for SuDS adoption are available to view at the following
1148 address: <http://www.anglianwater.co.uk/developers/suds.aspx>
- 1149 **Permits**
1150 Further information on Flood Risk Activity permits is available from: [https://www.gov.uk/guidance/flood-](https://www.gov.uk/guidance/flood-risk-activities-environmental-permits)
1151 [risk-activities-environmental-permits](https://www.gov.uk/guidance/flood-risk-activities-environmental-permits)
- 1152 **Flood Warnings**
1153 Flood warnings currently issued for England and Wales:
1154 <https://flood-warning-information.service.gov.uk>.
- 1155 Sign up for flood warnings (England and Wales)
1156 <https://www.gov.uk/sign-up-for-flood-warnings>
- 1157 **Norfolk Resilience Forum**
1158 <http://www.norfolkprepared.gov.uk/local-risks/plans/>

1159 **10.Summary and Conclusions**

1160 The purpose of this SPD is to increase awareness of the nature of flood risk in the Broads area, give
1161 advice to developers and others about the Authority’s approach to the issue of development and
1162 flood risk, and stress the need to maintain a high standard of design in new waterside development.

1163 This SPD replaces the 2017 SPD

1164 The SPD seeks to clarify and expand on Policies SP2 and DM5 of the Local Plan for the Broads. It sets
1165 out a local approach to some national guidance. Furthermore, there are templates and checklists
1166 relating to small scale Flood Risk Assessments and Flood Response Plans.

Appendix A: Glossary and Abbreviations

Catchment

The area contributing surface water flow to a point on a drainage or river system. It can be divided into sub-catchments.

Climate Change

Climate refers to the weather over a period of time (at least a decade and probably nearer 30 years) and takes account of natural variability. Climate change refers to the current more rapid change of conditions that is being driven by increased greenhouse gas emission primarily from fossil fuels altering the gas levels in the atmosphere. This in turn alters the main weather processes and creates conditions that are unlike normal patterns.

Environment Agency

Are a UK non-departmental public body of DEFRA with the principle aim of protecting and enhancing the environment to contribute towards the objective of achieving sustainable development. The Agency has principle responsibility for river, tidal and coastal flooding.

Exception Test

If, following application of the Sequential Test (see below), it is not possible for proposed development to be located in zones of lower probability of flooding, the Exception Test should be applied. For the Exception Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Flood Resilience

Measures that minimise water ingress and promote fast drying and easy cleaning, to prevent any permanent damage.

Flood Resistance

Measures to prevent flood water entering a building or damaging its fabric. This has the same meaning as flood proof.

Flood Risk

The level of flood risk is the product of the frequency or likelihood of the flood events and their consequences (such as loss, damage, harm, distress and disruption).

Flood Zone

Flood Zones show the probability of flooding, ignoring the presence of existing defences

Zone 1: Low Probability of flooding

Land having a less than 1 in 1,000 (0.1%) annual probability of river or sea flooding.

Zone 2: Medium Probability of flooding

Land having between a 1 in 100 (1%) and 1 in 1,000 (0.1%) annual probability of river flooding; or Land having between a 1 in 200 (0.5%) and 1 in 1,000 (0.1%) annual probability of sea/tidal flooding.

Zone 3a: High Probability

Land having a 1 in 100 (1%) or greater annual probability of river flooding; or
Land having a 1 in 200 (0.5%) or greater annual probability of sea/tidal flooding.

Zone 3b: The Functional Floodplain

This zone comprises land where water has to flow or be stored in times of flood, during a flood event with an annual probability of 1 in 20 (5%) or greater.

Floodplain

Land adjacent to a watercourse that is subject to repeated flooding under natural conditions.

Flood Risk Assessment (FRA)

An assessment of the risk of flooding, particularly in relation to residential, commercial and industrial land use. FRAs are required to be completed according to the NPPF alongside planning applications in areas that are known to be at risk of flooding.

Fluvial flooding

Flooding from a watercourse (brooks, streams, rivers and lakes etc) that occurs when the water features cannot cope with the amount of water draining into them, from the land. When rainfall is heavy and / or prolonged, a large amount of run-off reaches the rivers and eventually causes them to overtop their banks.

Functional Floodplain

Land where water has to flow or be stored in times of flood.

Lead Local Flood Authority (LLFA)

Established through the Flood and Water Management Act as the body responsible for managing local flood risk from surface runoff, ordinary watercourses and groundwater.

Main River

Main rivers are usually larger rivers and streams. In England, the Environment Agency decides which watercourses are main rivers. It consults with other risk management authorities and the public before making these decisions. The main river map is then updated to reflect these changes.

Minor Development - flood risk

- minor non-residential extensions: industrial/commercial/leisure etc. extensions with a footprint less than 250 square metres.
- alterations: development that does not increase the size of buildings eg alterations to external appearance.
- householder development: For example; sheds, garages, games rooms etc. within the curtilage of the existing dwelling, in addition to physical extensions to the existing dwelling itself. This definition excludes any proposed development that would create a separate dwelling within the curtilage of the existing dwelling e.g. subdivision of houses into flats.

Material Consideration

A legal term describing a matter or subject which is relevant (material) for a local authority to consider when using its powers under planning law in dealing with a planning application.

Ordinary Watercourse

An 'ordinary watercourse' is a watercourse that is not part of a main river and includes rivers, streams, ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

Pluvial Flooding

Flooding that result from rainfall generated overland flow before the runoff enters any watercourse or sewer. It is usually associated with high intensity rainfall events. Also referred to as surface water flooding.

Residual Flood Risk⁵⁴

The remaining flood risk after risk reduction measures have been considered. Or the risk following the failure of defence/flood protection measures.

River Morphology

The shape of the river channel, including the form of the bed and banks.

Run-off

Water flow over the ground surface to the drainage system. This occurs if the ground is impermeable, is saturated or if rainfall is particularly intense.

Section 106 (Town and Country Planning Act 1990)

A section within the Town and Country Planning Act 1990 that allows a planning obligation to a local planning authority to be legally binding.

Sequential Test

The NPPF advocates that planners use a sequential test when considering land allocations for development to avoid flood risk where possible. The Sequential Test aims to steer development to Flood Zone 1, which is an area at low risk of flooding. Where it is not possible to locate development in such locations sites in Flood Zone 2 will be considered. Only where it is not possible to locate development within Flood Zones 1 and 2 will development in Flood Zone 3 be considered.

SUDS (Sustainable Drainage Systems)

A sequence of management practices and control structures designed to drain surface water in a more sustainable fashion than some conventional techniques. Surface water management - The management of runoff in stages as it drains from a site.

Watercourse

A term including all rivers, streams ditches drains cuts culverts dykes sluices and passages through which water flows.

Water Framework Directive

The Water Framework Directive (WFD) is legislation to protect and improve water resources. It requires an integrated approach to the management of water; including rivers, streams, lakes, estuaries and coastal waters, as well as surface water and groundwater.

⁵⁴ <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/developers-to-demonstrate-that-development-will-be-safe-to-satisfy-the-second-part-of-the-exception-test/what-is-residual-risk/>

Appendix B: The Broads Planning Policy Context

National Planning Policy

The National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied. In relation to flood risk, paragraph 155 generally summarises the approach taken to flood risk:

155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

The National Planning Practice Guidance is an on-line resource that elaborates and gives more detail of policies in the NPPF. For example, the NPPG has vulnerability classification tables as well as information on what a Strategic Flood Risk Assessment should address.

The NPPF and NPPG have replaced PPS25 in relation to the Government's planning policy on flood risk and flooding.

The NPPG pages on flood risk and coastal change can be found here:

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

The NPPF can be found here:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Neighbourhood Plans

At the time of writing, Acle, Brundall, Salhouse, Strumpshaw and Wroxham Neighbourhood Plans have been adopted. The Neighbourhood Plans do not include an additional policy on flood risk, but where flood risk has the potential to be a consideration on a particular site, the policy emphasises this and directs towards Broads Authority and national flood risk policy.

The New Broads Local Plan

The Core Strategy, Development Management DPD and Sites Specific Local Plan have been replaced in their entirety by the Local Plan for the Broads which was adopted May 2019. The flood risk policies of the new Local Plan are included at chapter 3.

Appendix C: Sustainable Appraisal Objectives and Decision-Making

Criteria

The NPPF at paragraph 160 says that for the Exception Test to be passed *‘it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk’*. To assess this, the Authority will use the most up to date Local Plan Sustainability Appraisal Objectives. Currently, these are the Sustainability Objectives used to assess the new Local Plan for the Broads and are listed below with decision making criteria.

SA Objective	Decision making criteria/prompting questions. Positive impact: + or ++ Not appropriate: N/A Neutral: 0 Negative impact: - or -- Uncertain/depends on implementation: ?
ENV1: To reduce the adverse effects of traffic (on roads and water).	<ul style="list-style-type: none"> How does the policy/allocation affect: <ul style="list-style-type: none"> Walking, cycling, public transport? Air quality? Amenity? Single occupancy car use? Use of waterways? Access to special qualities of the Broads by sustainable transport modes? The net impact of transport infrastructure such as road signage, lighting, conspicuous structures and parking? What is the resulting impact of traffic on <ul style="list-style-type: none"> Heritage? Landscape? People? Water? Is the allocation within walking distance⁵⁵ of key services⁵⁶? Will routes be <ul style="list-style-type: none"> functional and accessible for all? safe and attractive public spaces? 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?
ENV2: To improve water quality and use water efficiently.	<ul style="list-style-type: none"> How does the policy/allocation affect <ul style="list-style-type: none"> Water quality? Water quantity? Surface water run off? Does it reduce run-off rates? Does it increase water absorption / management? Wastewater? Drainage? Pathways for pollutants?
ENV3: To protect and enhance biodiversity and geodiversity.	<ul style="list-style-type: none"> How does the policy/allocation affect: <ul style="list-style-type: none"> The ability to retain and maintain soil carbon? Geological interests? The potential for managed accessible geological feature exposures? County Wildlife Sites? Local and National Nature Reserves? Ramsar Sites? SPAs, SACs? SSSIs? BAP Priority Species and habitats? Habitat connectivity and Ecological Networks?

⁵⁵ Manual For Streets says this is 10 minutes/800m

⁵⁶ Using the Greater Norwich Joint Core Strategy definition for Key Services: primary school; secondary school; convenience shop; village hall; primary health care; library; public transport

SA Objective	Decision making criteria/prompting questions. Positive impact: + or ++ Not appropriate: N/A Neutral: 0 Negative impact: - or -- Uncertain/depends on implementation: ?
	<ul style="list-style-type: none"> ○ Trees and hedgerows? ○ Waterbodies? ○ Green Infrastructure?
ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.	<ul style="list-style-type: none"> • How does the policy/allocation affect: <ul style="list-style-type: none"> ○ The setting of the Broads? ○ The perception of the Broads? ○ The Landscape Character? ○ The special qualities of the Broads⁵⁷? ○ Landscape features? ○ Peat? ○ Conservation Areas? ○ Designated and undesignated heritage assets? ○ The quality and local distinctiveness of the Broads towns/villages/buildings? ○ Open Space? ○ Green Infrastructure? ○ Harmful incremental change?
ENV5: To adapt to and mitigate against the impacts of climate change.	<ul style="list-style-type: none"> • How does the policy/allocation affect: <ul style="list-style-type: none"> ○ Emissions of greenhouse gases? ○ Single occupancy car use? ○ HGV/delivery movements? ○ Public transport? ○ Cycling/walking? ○ Boat emissions? ○ The ability of communities to adapt? ○ The ability of habitats and species to adapt? ○ Peat? ○ Energy use? ○ Open Space? ○ Green Infrastructure?
ENV6: To avoid, reduce and manage flood risk.	<ul style="list-style-type: none"> • Is flood risk avoided? • Is flood risk managed/mitigated? • How does the policy/allocation affect flooding: <ul style="list-style-type: none"> ○ On site? ○ In the vicinity? ○ Elsewhere? • Is the allocation in the area of highest risk of flooding? • Is the allocation appropriate to the flood risk on site? • Does the policy consider different sources of flooding⁵⁸? • What is the impact of climate change on flood risk? • Can flood risk be reduced? • How vulnerable is the proposed land use⁵⁹? • Does it reduce run-off rates? • Does it increase water absorption / management?
ENV7: To manage resources sustainably through the effective use of	<ul style="list-style-type: none"> • Is the allocation on: <ul style="list-style-type: none"> ○ Brownfield Land? ○ Greenfield Land? • Does the allocation use land effectively?

⁵⁷ 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.

⁵⁸ 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.

⁵⁹ <http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/>

SA Objective	Decision making criteria/prompting questions. Positive impact: + or ++ Not appropriate: N/A Neutral: 0 Negative impact: - or -- Uncertain/depends on implementation: ?
land, energy and materials.	<ul style="list-style-type: none"> Does the policy/allocation affect energy efficiency? Are there any safeguarded mineral sites? Will it prevent the sterilisation of known or suspected mineral resources by development? Does the policy consider origin of resource/where resource derived from?
ENV8: To minimise the production and impacts of waste through reducing what is wasted, re-using and recycling what is left.	<ul style="list-style-type: none"> Does the policy help reduce waste, reuse waste or recycle/compost?
ENV9: To conserve and where appropriate enhance the cultural heritage and archaeological importance of the area.	<ul style="list-style-type: none"> Does the policy/allocation affect: <ul style="list-style-type: none"> The quality and local distinctiveness of the Broads towns/villages/buildings? Designated and undesignated heritage assets? Conservation Areas? Archaeology? Local culture and traditions? The wider cultural heritage of the broads? The history, traditions, customs and the spaces and places these rely upon or relate to?
ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.	<ul style="list-style-type: none"> Does the policy/allocation <ul style="list-style-type: none"> Appreciate what is special about the site? Relate to the site's setting in the landscape/townscape? Appreciate the rich cultural heritage of the area? Are these issues considered? <ul style="list-style-type: none"> local character (including landscape setting) safe, connected and efficient streets a network of greenspaces (including parks) and public places crime prevention security and lighting measures access and inclusion efficient use of natural resources cohesive & vibrant neighbourhoods layout – the way in which buildings and spaces relate to each other form – the shape of buildings scale – the size of buildings detailing – the important smaller elements of building and spaces materials – what a building is made from sensitive design of road infrastructure? (E.g. reduced signage road markings, use of local materials and alternative traffic calming methods).
ENV11: To improve air quality and minimise noise, vibration and light pollution.	<ul style="list-style-type: none"> Does the policy/allocation affect: <ul style="list-style-type: none"> Air quality? Noise production? Vibration? Light pollution/dark skies? How does the policy/allocation relate to Air Quality Management Areas? Would the allocation make additional noise or be sensitive to the prevailing acoustic environment? Does an existing lighting installation make the proposed location for a development unsuitable? Have cumulative impacts of development/change been considered? Does the policy/allocation affect the tranquillity of the Broads?

SA Objective	Decision making criteria/prompting questions. Positive impact: + or ++ Not appropriate: N/A Neutral: 0 Negative impact: - or -- Uncertain/depends on implementation: ?
ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape	<ul style="list-style-type: none"> Does the policy/allocation affect <ul style="list-style-type: none"> Renewable/low carbon energy generation? Renewable/low carbon energy transmission? The setting of the Broads? The perception of the Broads? The Landscape Character? The special qualities of the Broads? Have Cumulative impacts of renewable/low carbon energy generation been considered?
ENV13: To reduce vulnerability to coastal change.	<ul style="list-style-type: none"> Does the policy/allocation affect risk to people or property? Does the policy affect opportunities for future coastal management? Does the policy/allocation restrict choice for managing the coast in the future? Does the policy/allocation consider the effect of or potential for damage (e.g. to a structure)?
SOC1: To improve the health of the population and promote a healthy lifestyle.	<ul style="list-style-type: none"> Does the policy/allocation: <ul style="list-style-type: none"> Affect health? Affect wellbeing? Promote active lifestyles? Promote active travel? Does the policy/allocation include: <ul style="list-style-type: none"> Publicly accessible open space? Sports facilities? Health infrastructure? Does the policy enable active use of water space?
SOC2: To reduce poverty, inequality and social exclusion.	<ul style="list-style-type: none"> Does the policy/allocation affect any of these domains? <ul style="list-style-type: none"> Income Employment Health and Disability Education, Skills and Training Barriers to Housing and Services Crime Living Environment Does the policy/allocation affect inclusive communities? Does it affect community cohesion? Does it affect quality of life? Does the policy avoid potential for inequality or serve to positively address existing identified inequalities through its implementation?
SOC3: To improve education and skills including those related to local traditional industries.	<ul style="list-style-type: none"> Is the allocation/policy for an education/skills establishment? Does the policy/allocation enable improved understanding of the special qualities, pressures and management of the Broads to all? Does it relate to Traditional Broads industries? Will it facilitate improved access to vocational training, education and skills for all, including young people? Will it facilitate opportunity for delivery and uptake of traditional skills training which may benefit wider Broads purposes?
SOC4: To enable suitable stock of housing meeting local needs including affordability.	<ul style="list-style-type: none"> Does the policy/allocation affect: <ul style="list-style-type: none"> Housing? Affordable Housing? Gypsy and Traveller accommodation? Residential moorings/boats used as residences?

SA Objective	Decision making criteria/prompting questions. Positive impact: + or ++ Not appropriate: N/A Neutral: 0 Negative impact: - or -- Uncertain/depends on implementation: ?
SOC5: To maximise opportunities for new/ additional employment	<ul style="list-style-type: none"> Does the policy/allocation affect: <ul style="list-style-type: none"> Employment land uses? Numbers of jobs? Tourism? Does it relate to Traditional Broads industries?
SOC6a: To improve the quality, range and accessibility of community services and facilities.	<ul style="list-style-type: none"> Is the allocation/policy for a key service? Will the policy/allocation affect public transport, walking and cycling? Does the policy/allocation relate to Local Green Space? Will routes be functional and accessible for all? Will routes be safe and attractive public spaces? 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?
SOC6b: 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.	<ul style="list-style-type: none"> Is the allocation/policy within walking distance (800m) from Key Services (primary school; secondary school; convenience shop; village hall; primary health care; library; public transport)? Is the allocation within a settlement boundary? 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? Will the policy/allocation affect public transport, walking and cycling? Will routes be functional and accessible for all? Will routes be safe and attractive public spaces? 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?
SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.	<ul style="list-style-type: none"> Does the policy/allocation relate to: <ul style="list-style-type: none"> Designing out crime? Designing in community safety? An inclusive environment? Robust structure and identity? Interaction with other uses positively? Avoiding opportunities for conflict?
ECO1: To support a flourishing and sustainable economy	<ul style="list-style-type: none"> Will it provide the spaces and infrastructure to support self-employment opportunities and business start-up? Will it support existing business viability and local employment growth?
ECO2: To ensure the economy actively contributes to social and environmental well-being.	<ul style="list-style-type: none"> How does the policy/allocation affect 'Social Capital'? <ul style="list-style-type: none"> Skills development Community cohesion Amenity Job provision Quality of life How does it affect 'Low Carbon'? <ul style="list-style-type: none"> Innovation Resource efficiency How does it affect 'Natural Capital'? <ul style="list-style-type: none"> Landscape Biodiversity
ECO3: To improve economic performance in rural areas.	<ul style="list-style-type: none"> Does it contribute to a thriving rural community? Does it contribute to a prosperous rural community?
ECO4: To offer opportunities for	<ul style="list-style-type: none"> Does the policy/allocation affect: <ul style="list-style-type: none"> Sustainable tourism.

SA Objective	Decision making criteria/prompting questions. Positive impact: + or ++ Not appropriate: N/A Neutral: 0 Negative impact: - or -- Uncertain/depends on implementation: ?
Tourism and recreation in a way that helps the economy, society and the environment.	<ul style="list-style-type: none"> ○ Responsible tourism. ● Does it: <ul style="list-style-type: none"> ○ Promote enjoyment and understanding of the Broads? ○ Raise awareness of the Broads as a special destination? ○ Drive up the quality of the visitor experience? ○ Strengthen tourism performance across the whole Broads area? ○ Maintain the Broads' position as a premier inland boating destination in the UK? ○ Respect the sensitive environment of the Broads? ○ Provide the right conditions for successful tourism businesses? ○ Will it maximise benefits and minimise impacts from visitors to communities?

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Appendix D: Flood Response Plan Guidance and Structure



Broads Authority

Flood Response Plan Guidance and Suggested Structure

Chapter 1: Flood Response Plan Guidance

1. Introduction

This guidance has been produced to assist with the preparation of Flood Response Plans (FRP). FRPs ~~should-need to~~ be provided as part of a Flood Risk Assessment where this is necessary to accompany a planning ~~application or, if not submitted with an application, are often required by planning condition if permission is issued.~~

All residents and businesses in flood risk areas are encouraged to prepare and maintain a Flood Response Plan so they are prepared in the event of a flood.

Floods present a danger to health and life and can damage property. It is important to be prepared in advance to limit the dangers and damage. At times of flooding, emergency and other local services will be under significant pressure. The better prepared you are, the less pressure the services will be under so they can attend to the most vulnerable in the community. Even if you are not physically injured in a flood, the consequences can have an emotional impact. The shock and disruption and damage to, or loss of, property and possessions can have big impacts. Being proactive and having a Plan you are familiar with in advance can help you take prompt, effective action when warnings are issued and result in an easy and efficient recovery.

Every effort has been made to ensure this guidance is accurate and comprehensive as at the date it was prepared. However, it is the responsibility of the developer to ensure that any additional risks relevant to a particular property development are fully considered. The Broads Authority will not accept responsibility for any errors, omissions or misleading statements in this guidance or for any loss, damage or inconvenience caused as a result of relying on this guidance.

You will need to adapt the template to reflect the specifics of your site; such as the size and the number of people who use and what they use it for.

According to a new guide produced by ADEPT and the Environment Agency in September 2019⁶⁰, flood response plans should address the following:

- characterise and quantify the flood risk
- list relevant flood warnings and estimate the likely lead-time available
- detail who is at risk – including vulnerable people and transient users
- explain how the EP will be triggered, by who and when
- define any areas of responsibility for those participating in the EP

⁶⁰ Flood risk emergency plans for new development: <https://www.adeptnet.org.uk/floodriskemergencyplan>

- describe what actions are required by the people in the development
- set out the type and performance of any flood resistance or resilience measures to be installed prior to a flood
- establish safe access and escape routes to a safe location
- outline the evacuation procedure, place of refuge and related equipment needed to serve occupants for the required duration
- detail what emergency service infrastructure and/or contributions are proposed
- establish procedures for implementing, monitoring and maintaining the plan throughout the lifetime of the development

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2. Flood Response Plans - considerations

2.1 Flood Warnings

The Environment Agency is responsible for providing flood warnings to the public. Anyone can register with the Environment Agency's flood warning service 'Floodline Warnings Direct'⁶¹. The Floodline Warnings Direct (FWD) service provides information about the current and future flooding danger. If flooding may happen, the Environment Agency will issue a flood warning to registered users by telephoning a pre-arranged number with a recorded message or by sending a text or email.

The 3 flood warning codes are shown below. You can go to the Flood Information Service⁶² to see what warnings are in place around the Country.



Severe Flood Warning
Severe flooding. Danger to life.



Flood Warning
Flooding is expected.
Immediate action required



Flood Alert
Flooding is possible.
Be prepared

2.2 Liaise with neighbours

When drafting a FRP you are strongly encouraged to liaise with the owners/occupiers of any neighbouring and nearby sites. That way you can coordinate procedures and minimise confusion during an incident.

2.3 Evacuating

FRPs should reflect the fact that people should evacuate *prior* to a flood occurring. Once flooding has *inundated* an area, staying put rather than evacuating, could be the safer option. This is because of the dangers of moving in flooded areas such as lifted manhole covers and contaminated water. It is important to note that in the Broads area, flood waters may take a longer time to subside which can cause difficulties for those taking refuge within buildings. Your FRP needs to reflect the local circumstances.

Ensure that the FRP deals with the potential difficulties involved in immediate evacuation which may need to be carried out in inclement weather. The FRP needs to address how people will reach local authority designated rest centres.

2.4 People requiring extra assistance

Informing appropriate response organisations, such as Social Services, about any elderly or vulnerable people who may require extra assistance in the event of an emergency such as a flood.

Particular attention should be given to the communication of warnings to vulnerable people including those with impaired hearing or sight and those with restricted mobility.

3. Other sources of useful information

⁶¹ Register With Floodline Warnings Direct <https://www.gov.uk/sign-up-for-flood-warnings>

⁶² <https://flood-warning-information.service.gov.uk/>

Emergencies web pages of the County and District Councils contain useful information which you may wish to consult/refer to in your FRP:

- Norfolk County Council:
http://www.norfolk.gov.uk/safety_emergencies_and_accidents/index.htm
- Suffolk County Council and Waveney District Council:
<https://www.suffolk.gov.uk/emergency-and-rescue/>
- South Norfolk Council:
<http://www.south-norfolk.gov.uk/environment/1507.asp>
- Broadland Council:
<http://www.broadland.gov.uk/environment/316.asp>
- Norwich Council:
https://www.norwich.gov.uk/info/20226/emergency_planning
- North Norfolk Council:
<https://www.north-norfolk.gov.uk/tasks/emergency-planning/>
- Great Yarmouth Council:
<http://www.great-yarmouth.gov.uk/article/2512/Emergency-planning>
- Met Office website.
<http://www.metoffice.gov.uk/public/weather/forecast/?tab=map>
- National Flood Forum
The NFF is an independent body that supports flood preparedness and flood recovery. It has advice about flood protection products and clean up processes. It also covers other areas of post flooding support. <http://www.floodforum.org.uk/>
- Flood risk emergency plans for new development
<https://www.adeptnet.org.uk/floodriskemergencyplan>

4. Your Flood Response Plan

Flood Response Plans may be different for different buildings. This would reflect the time of day someone might be there, how many people are in or around the building and what the building is used for.

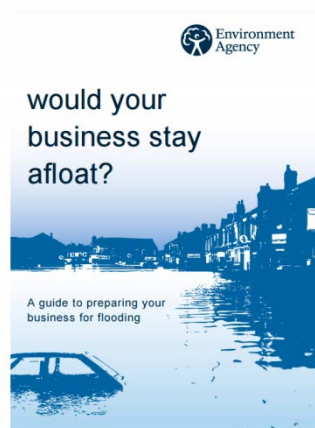
- **Businesses** can follow the Environment Agency's guide 'Would your business stay afloat? A guide to preparing your business for flooding'⁶³.
- **Community organisations** can follow the Environment Agency's guide 'Flooding - minimising the risk. Flood plan guidance for communities and groups. Practical advice to help you create a flood plan'⁶⁴.

⁶³ would your business stay afloat?

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/410606/LIT_5284.pdf

⁶⁴ Flooding - minimising the risk

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292939/LIT_5286_b9ff43.pdf



1424

1425 The following suggested structure is for the production of Plans for residential, holiday and other
1426 development which includes overnight accommodation.

1427 **Chapter 2: Suggested structure for your Flood Response Plan**

1428 **1. Introduction**

- 1429 • Describe the site fully and accurately including where it is and what it is used for:
- 1430 ○ State the name and address of the property.
- 1431 ○ Attach a site plan to identify the location and size of the site.
- 1432 ○ Identify what type of development it is (a residential dwelling, holiday let, second home,
1433 etc.) and the size (number of storeys, number of bedrooms, any outbuildings, etc).
- 1434 ○ Identify where the access into the site and into the building is – will this be safe at times
1435 of flood? If not, are there other safe accesses that can be used?
- 1436 ○ Identify where people could safely be rescued from in an emergency if a flood occurs
1437 before the building is evacuated (usable safe refuge).
- 1438 • Identify potential sources of floodwater and what to look out for.
- 1439 • What timescale are people likely to have to respond to flood warnings?
- 1440 • State who will be responsible for implementing the Flood Response Plan and who will review it
1441 and how regularly.
- 1442 • State the date the Plan was adopted and refer to timescales for review.
- 1443 • State which flood zone the site is in (as identified in a Flood Risk Assessment or on the
1444 Environment Agency's website⁶⁵). A flood zone identifies how likely the site is to flood.
- 1445 • Identify the scope of the plan – the site, building, property and people

Zone 1: Low Probability of flooding

Land having a less than 1 in 1,000 (0.1%) annual probability of river or sea flooding.

Zone 2: Medium Probability of flooding

Land having between a 1 in 100 (1%) and 1 in 1,000 (0.1%) annual probability of river flooding; or
Land having between a 1 in 200 (0.5%) and 1 in 1,000 (0.1%) annual probability of sea/tidal
flooding.

Zone 3a: High Probability

⁶⁵ Long term flood risk assessment for locations in England

<http://watermaps.environment-agency.gov.uk/wiyby/wiyby.aspx?topic=floodmap#x=357683&y=355134&scale=2>

Land having a 1 in 100 (1%) or greater annual probability of river flooding; or
Land having a 1 in 200 (0.5%) or greater annual probability of sea/tidal flooding.

Zone 3b: The Functional Floodplain

This zone comprises land where water has to flow or be stored in times of flood, during a flood event with an annual probability of 1 in 20 (5%) or greater.

2. Warning arrangements



- Register the site with the Environment Agency's Floodline Warnings Direct service.
- Who receives these warnings and how? What if they are away? What will they do when they receive a warning?
- Where will a copy of this Plan be kept? How will all residents/tenants know where to find it?
- How will response organisations (like the police and fire service) be made aware of elderly or vulnerable people who may require extra assistance in the event of an emergency such as a flood?
- If warnings are received outside of normal working hours, how will you tell the staff/visitors before they leave for work? Who will inspect the premises before letting them arrive?


3. Instructions to residents/tenants in the event of a flood warning

The plan needs to set out clear instructions and actions for each stage of warning. This needs to form an easy-to-refer-to plan that can be followed in an emergency, providing all the necessary information and identifying who is responsible for doing what. It needs to identify at which stage the property should be evacuated, how and where to. A plan showing a safe exit route needs to be included.

If refuge is to be taken within the property, the plan needs to identify the circumstances when this should take place, where there is safe refuge and where any resources such as a flood kit (see below) will be found. Single storey properties may not have a place of safe refuge, so evacuating at an early stage to a safe place is more important.

The following table shows the stages of flood warning. What will you do at each stage?

 <p>Flood Alert Flooding is possible. Be prepared.</p>	<ul style="list-style-type: none"> • How will you respond to this alert? • What will you need to do to be prepared? • Is any other action necessary? • Who do you need to tell there is an alert in place? What will they need to do?
 <p>Flood Warning Flooding is expected. Immediate action required.</p>	<ul style="list-style-type: none"> • How will you respond to this warning? • What is the immediate action you need to take? • Who do you need to tell there is a warning in place? What will they need to do?
	<ul style="list-style-type: none"> • How will you respond to this severe warning? • What action(s) do you need to take?

 <p>Severe Flood Warning Severe flooding. Danger to life.</p>	<ul style="list-style-type: none"> • Who do you need to tell there is a severe warning in place? What will they need to do?
<p>Warnings no longer in force - no flooding occurred</p>	<ul style="list-style-type: none"> • How will you know when warnings are no longer in force? • Who do you need to tell the danger has passed? • What action is necessary?
<p>Warnings no longer in force - flooding has occurred</p>	<ul style="list-style-type: none"> • How will you know when warnings are no longer in force? • Who do you need to tell the danger has passed? • What action is necessary? • Re-occupation of flooded premises should only be carried out following consultation with the emergency services and appropriate authorities. This is because of any residual hazards. Identify who needs to be consulted, when and how.

1467

Chapter 3: Important Considerations for your Flood Response Plan

The following considerations may be relevant and important to your Flood Response Plan. They could help reduce the impact of a flood on people and property. A comprehensive and effective Plan will identify all actions that would be necessary before, during and after a flood event.

Be Proactive

- Do not wait for a flood – be proactive and consider what can be permanently moved to a safer higher level. Produce a checklist of remaining items that must be moved if there is a flood event. E.g. important documents, IT or vehicles.
- Check your insurance policy covers flooding.
- Look at the best way of stopping floodwater entering your property. There are a range of flood protection products on the market, a directory of these is available from the National Flood Forum at www.bluepages.org.uk
- Find out where you can get gel bags if you are in a fresh water area.
- Identify who can help you and who you can help.
- Understand the different flood warning levels.
- Make sure you keep an up to date contact list for all staff/residents
- Produce a Business Continuity Plan – part could relate to how to continue at times of flood.

Familiarisation

- Emphasise the need for all who work/live at your site to be familiar and comfortable with the Plan and its contents. You may wish to hold staff awareness briefings or add flood risk to the staff induction.
- Consider practicing your response to warnings and how to evacuate.
- Become familiar with the safest route from the property to any local evacuation centre. Get to know your local volunteer Emergency Co-ordinator. Ask the Emergency Planning Team at your local District Council for details.

Actions to consider (to identify at each stage of warning)

- The plan should identify which actions will be undertaken when a flood alert is issued, which will be done when a flood warning is issued, etc.
- Check at what time the flooding is expected. If the site is vulnerable to tidal flooding, there can be 6 to 12-hour warning.
 - Stay calm and tune in to BBC Radio Norfolk/Suffolk for weather forecasts and local information.
 - Fasten your outer doors and fix any flood protection devices.
 - Shut off your gas/electric supplies – show on a plan where this is as well as give details of how to do this. Do not touch electrics if already wet.
 - Fill bath and buckets with water in case supply is shut off. Drinking water should be stored in clean containers.
 - Move any important documents, valuables and sentimental items above the flood level or protect them by placing them in sealed plastic bags.
 - Move furniture and electrical items if possible. Roll up carpets and rugs. Remove curtains, or hang them over rods.
 - Consider moving vehicles to higher ground and make safe or secure any large or loose items outside that could cause damage if moved by floodwater. Pay particular attention to how boats

- 1510 are moored – if too tightly, they could list. If too loose they could cast adrift or float onto the
1511 landside of the quay heading.
- 1512 • Ensure any hazardous materials are safe and secure and do not create any additional risks by
1513 coming in contact with flood waters
 - 1514 • Tie or anchor down equipment that could potentially float and cause an additional hazard (e.g.
1515 containers used for storage).
 - 1516 • Tell your neighbours about the warning, especially if they are elderly or vulnerable. Consider
1517 coordinating plans with neighbours/neighbouring organisations.
 - 1518 • If advised to do so, move to an identified Evacuation Centre or other safe place (such as a friend
1519 or relative). If it is not possible to evacuate, move to a safe refuge. If the property is single
1520 storey, move to an identified refuge place with nearby neighbours with safe, higher level
1521 accommodation.
 - 1522 • Take essential medicines, infant care items, personal documents/identification for each member
1523 of the family when you evacuate.
 - 1524 • Take food, clothes, blankets, candles/torches with you when you evacuate.
 - 1525 • Remember any pets (and their needs such as food, cages and litter trays).
 - 1526 • Notify visitors to the site that it is not safe.
 - 1527 • How will you shut down the site in an orderly fashion so people and assets can be protected?

1528 Flood Kit

1529 The flood kit should include essential items, be stored in the refuge area and be as easily accessible
1530 as possible. The flood kit could contain:

- 1531 • Copies of insurance documents
- 1532 • A torch with spare batteries (or a wind-up torch)
- 1533 • Portable radio (wind-up preferred or store spare batteries)
- 1534 • Warm, waterproof clothing.
- 1535 • Rubber gloves
- 1536 • Wellingtons
- 1537 • Blankets
- 1538 • First aid kit with essential prescription medication/repeat prescription form
- 1539 • Bottled water and high energy food snacks (non-perishable and check use by dates)
- 1540 • A copy of the Flood response plan
- 1541 • List of important contact numbers
- 1542 • Wash kit and essential toiletries (such as toilet paper and wet wipes)
- 1543 • Children's essentials (such as milk, baby food, sterilised bottles, wipes, nappies, nappy bags,
1544 clothing, comforter, teddy or favourite toy)
- 1545 • Food and cages for pets
- 1546 • Laminated copy of the emergency card from the FRP
- 1547 • Plus, anything else you consider important.

1548 Dangers of flood water

1549 Include the dangers associated with flooding in your FEP. Do not assume that every flood event will
1550 be the same; just because flood water hasn't been deep or flowed fast in the past, it doesn't mean it
1551 won't in future. A brief guide is given below:

REMEMBER!

- **Don't walk through flowing water** – currents can be deceptive. Shallow and fast-moving water can knock you off your feet!
- **Don't swim through fast flowing water** – you may get swept away or struck by an object in the water.
- If you **have** to walk in standing water, **use a pole or stick** to ensure that you do not step into deep water, open manholes or ditches. Use the stick to 'feel' your way.
- **Don't drive through a flooded area.** You may not be able to see obstacles under the water or abrupt drop-offs. Even half a meter of flood water can carry a car away.
- **Avoid contact with water** as it may be contaminated with sewerage, chemicals, oil or other substances.

Re-occupation after a flood

Re-occupation of flooded premises should only be carried out following consultation with the emergency services and appropriate authorities. This is because of any residual hazards. A statement to this effect could usefully be included in the response plan.

When you can reoccupy, you shall need to:

- Safely throw away food that has been in contact with flood water – it could be contaminated.
- Open doors and windows to ventilate your property.
- Call your insurance company Emergency Helpline as soon as possible. Makes notes of what the insurers say and keep correspondence with the insurers.
- Keep a record of the flood damage (use photographs or videos).
- Commission immediate emergency pumping/repair work if necessary, to protect your property from further damage. Check that you can do this without your insurance company's approval.
- Keep receipts of work paid for.
- Where detailed or lengthy repairs needed, get advice. Your insurer or loss adjuster can give advice on reputable contractors/tradesmen. Always check references of tradesmen.
- Check with your insurer regarding cost of alternative accommodation, if you need to move out. Make sure the insurer knows where to contact you.

Cleaning up...

- Find out where you can get help to clean up. Look on the internet for suppliers of cleaning materials and equipment to dry out your property. As a guide, it can take a brick house one month per inch to dry out.
- Don't attempt to dry out photos or papers – place in a plastic bag and if possible store in a fridge
- The Citizens Advice Bureau may be able to help.
- **Don't think flooding will not happen again – restock supplies and review your plan!**

Advice and information

- List useful telephone numbers and website - including responsible persons, emergency contacts, utilities providers, insurance companies and sources of information such as the local radio station. A copy could be included in the flood kit.
- Provide residents/tenants with information on how to register with the Environment Agency's Floodline Warnings Direct service.

- Display notices within properties (translated where foreign visitors may be present), outlining procedures to be followed, escape routes and evacuation plans.
- Review your FRP regularly.

Chapter 4: Flood Response plan checklist

The following table is a summary of this FRP. Please use it as a checklist for when you produce your FRP. Include this checklist as part of your FRP, perhaps as an appendix. Please complete it with details such as page number or explanatory text. This checklist does not constitute your FRP – it is a summary and simply a checklist to help you produce a robust FRP.

Have you done these things?	
Liaised with neighbours about responding to flood event	
Registered for flood warnings	
Identified anyone who will need extra assistance	
Identified a safe refuge	
Identified a safe escape route	
Made a flood kit	
Does your FRP address these things?	
Description and location of site	
Date FRP produced	
Warning arrangements	
How instructions will be given	
What you can do to be pro-active	
Identify escape routes, local evacuation centre and local emergency coordinator	
How tenants/occupiers will be made aware of the FRP including the safe refuge, escape route and flood kit	
Actions at each level of flood alert	
What will be in your flood kit	
Dangers of flood water	
Re-occupation procedure	
List useful telephone numbers and website	
Review after a flood event	
Other things to address:	
How often will you review the FRP?	
How will you tell your tenants/occupiers about the FRP and escape routes?	
Where will important information be displayed?	
Have you put your flood kit together?	
Where is the flood kit stored?	

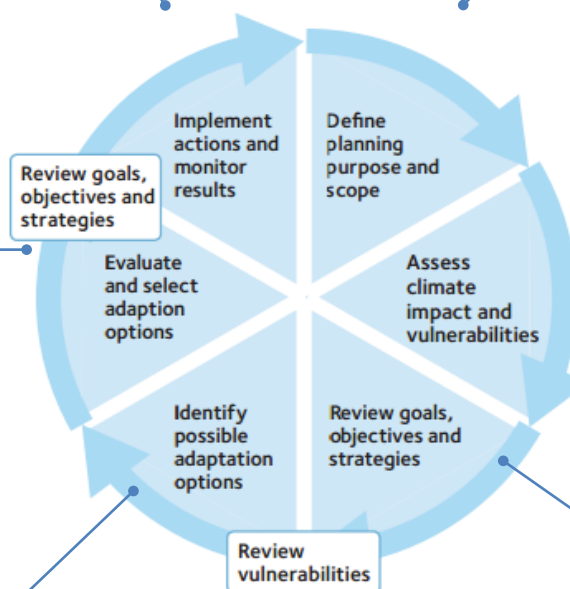
Appendix E: Climate smart planning cycle

It may be sensible to keep an accurate record of your options and decisions, so you can go back to the assumptions made if the adaptation choice is not working. The changes in the weather and climate can be recorded to give an accurate picture of any changes. Keep informed of changing predictions for climate change and monitor what happens to your development over the years. Different results to what was expected may suggest it would be sensible to go through the steps again to see what

Climate change predictions are based on what could happen, rather than knowing precisely what will happen. As such, do you want to consider the most likely changes, or be prepared for the most extreme conditions just in case? You probably need to understand the lifetime of your development and how things could change over that timescale.

Make the choice about which option to follow. This may be immediate action, or you can identify ‘triggers’ as to when you are going to act (e.g. you are willing to live with the driveway being flooded a few times a year at very high tides, but when it’s happening monthly it will be time to act).

Are there actions you can implement now that would help you cope with a new climate regime? Can you alter construction or management choices that minimise any risks? Can what you construct be altered easily in the future if predictions and/or on site experience is worse than you planned for? Are there different technologies that could be applied to lessen risks? If no options seem possible, you may wish to go back through the steps and modify your goals or objectives.



Taking the preferred projections (See the Met Office/UKCIP09 projections website for details) consider what the climate differences are likely to be and how they may impact on the proposed development. List, and possibly rank, the likely things that could create an adverse impact, as well as any opportunities a changing climate might offer for your development and how it is used.

What do you want to achieve? What will you have at the end of the timescale being considered? For example, how often will you use the development and at what time of year? Perhaps the flood impacts will be negligible or not manifesting themselves in the short-term. Be clear about what you would prefer to have in the future – for example, a development that never floods or one that floods a few times a year.

Appendix F: Flood Risk Assessment Tick Sheet

Flood Risk Assessments for Householder and other minor extensions in Flood Zones 2 & 3

Applications for planning permission within either Flood Zones 2 & 3 should be accompanied by a flood risk assessment. This guidance is for domestic applications and non-domestic extensions where the additional footprint created by the development does not exceed 250 sq. metres (minor development⁶⁶). It does NOT apply if an additional dwelling is being created e.g. a self-contained annex. This Tick Sheet is consistent with the Environment Agency's Standing Advice. It is a pragmatic and proportionate response to low risk developments in order to reduce the burden on applicants, the LPA and consultees.

Make sure that **floor levels are either no lower than existing floor levels or 300 millimetres (mm) above the estimated flood level**. If your floor levels aren't going to be 300mm above existing flood levels, you will need to consider appropriate flood resistance and resilience measures. If floor levels are proposed to be set lower than existing floor levels they should be above the known or modelled 1 in 100 annual probability river flood (1%) or 1 in 200 annual probability sea flood (0.5%) in any year.

Further information and guidance on flood resistance and resilience measures is available in the Flood Risk SPD and here <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3#extra-flood-resistance-and-resilience-measures> & <https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

State in your Flood Risk Assessment all levels in relation to Ordnance Datum (the height above average sea level). You may be able to get this information from the Ordnance Survey⁶⁷. If not, you'll need to get a land survey carried out by a qualified surveyor.

Applicants/Agents: Please complete the table overleaf and include it with the planning application submission. The table, together with a plan showing the finished floor levels and estimated flood levels, will form the Flood Risk Assessment (FRA) and will act as an assurance to the Local Planning Authority that flood risk issues have been adequately addressed.

You may be able to get the estimated flood level from the Environment Agency. Please contact enquiries@environment-agency.gov.uk. If not, you'll need a flood risk specialist to calculate this for you.

You can use the Tick Sheet over page or provide your written flood risk assessment in another format but it must include the relevant plans, surveys and assessments.

Any proposed works or structures, in, under, over or within 8m of the top of the bank of a main river, or 16m of a tidal main river, may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency. This was formerly called a Flood Defence Consent. Some activities⁶⁸ are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Also note that a Marine Management Organisation Marine Licence may be required for works that are carried out on tidal rivers.

Further details and guidance are available at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Or by contacting: floodriskpermit@environment-agency.gov.uk

⁶⁶ Minor development in relation to flood risk: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/what-is-meant-by-minor-development-in-relation-to-flood-risk/>

⁶⁷ OS MAPS <https://www.ordnancesurvey.co.uk/>

⁶⁸ Flood risk activities: environmental permits <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits#check-if-what-you-are-doing-is-an-excluded-activity>

Flood Risk Assessment

Flood Risk Assessments for Householder and other minor extensions in Flood Zones 2 & 3

Applicant to choose one or other of the flood mitigation measures below	Applicant to indicate their choice in the box below. Enter 'yes' or 'no'
Either; Floor levels within the proposed development will be set no lower than existing levels AND, flood resilient and/or flood resistant measures have been incorporated in the proposed development where appropriate	
Or; Floor levels within the proposed development will be set 300mm above the known or modelled 1 in 100 annual probability river flood (1%) or 1 in 200 annual probability sea flood (0.5%) in any year. This flood level is the extent of the Flood Zones. Please remember to include a plan showing the finished floor levels and the estimated flood levels.	

Site Address	
Proposal Description	
Estimated flood level (i.e. The 1 in 100 year flood level)	
Details of flood resilience and resistance measures	

Appendix G: Privacy notice

Personal data

The following is to explain your rights and give you the information you are entitled to under the Data Protection Act 2018. Our Data Protection Policy can be found here: http://www.broads-authority.gov.uk/data/assets/pdf_file/0003/1111485/Data-Protection-Policy-2018.pdf.

The Broads Authority will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will be made publicly available as part of the process. It will not however be sold or transferred to third parties other than for the purposes of the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Broads Authority is the data controller. The Data Protection Officer can be contacted at dpo@broads-authority.gov.uk or (01603) 610734.

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters. We will also contact you about later stages of the Local Plan process.

3. Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a Local Planning Authority, the Broads Authority may process personal data as necessary for the effective performance of a task carried out in the public interest, i.e. a consultation.

4. With whom we will be sharing your personal data

Your personal data will not be shared with any organisation outside of MHCLG. Only your name and organisation will be made public alongside your response to this consultation. Your personal data will not be transferred outside the EU.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for 16 years from the closure of the consultation in accordance with our Data and Information Retention Policy. A copy can be found here <http://www.broads-authority.gov.uk/about-us/privacy>.

6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a) to see what data we have about you
- b) to ask us to stop using your data, but keep it on record
- c) to ask to have all or some of your data deleted or corrected
- d) to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be used for any automated decision making.

Appendix H: SEA Screening

The Strategic Environmental Assessment (SEA) Directive is a European Union requirement that seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. Its aim is “to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”

With regards to a SPD requiring a SEA, the NPPG says:

Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the [Local Plan](#).

A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.

Before deciding whether significant environment effects are likely, the local planning authority should take into account the criteria specified in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 and consult the consultation bodies.

The following is an internal assessment relating to the requirement of the Flood Risk SPD to undergo a Strategic Environmental Assessment.

The Environmental Assessment of Plans and Programmes Regulations 2004 requirement	Assessment of the Flood Risk SPD
Environmental assessment for plans and programmes: first formal preparatory act on or after 21st July 2004	
Is on or after 21st July 2004.	Yes. The SPD will be completed in 2019.
The plan or programme sets the framework for future development consent of projects.	No. It elaborates on already adopted policy.
The plan or programme is the subject of a determination under regulation 9(1) or a direction under regulation 10(3) that it is likely to have significant environmental effects.	See assessment in this table.
CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF EFFECTS ON THE ENVIRONMENT	
1. The characteristics of plans and programmes, having regard, in particular, to	
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The SPD expands on adopted policy. It will be a material consideration in determining planning applications. The SPD does relate to location (in referring to flood zones 3a and 3b) and size (of replacement dwellings) as well as operating conditions (in relation to resilience and guidance for flood evacuation plans).
the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The SPD does not influence other plans, rather expands on adopted policy. That is to say, it has been influenced by other plans or programmes.
the relevance of the plan or programme for the integration of environmental considerations in	The adopted policy and the SPD (which expands on adopted policy) seek to promote sustainable development.

particular with a view to promoting sustainable development	
environmental problems relevant to the plan or programme	The SPD relates to adopted policies on flood risk. The environmental problem is flood risk.
the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD relates to adopted policies on flood risk. The environmental problem is flood risk.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to	
the probability, duration, frequency and reversibility of the effects	The SPD will not affect the probability, duration or frequency of the causes of flood events. That is down to the weather or tide in the main. The impact of flooding on development (and people) already in place is not likely to be affected by this SPD (unless an application is submitted to change the existing development in some form). The adopted policy (on which this SPD expands) could affect the scale of flooding and impact on flooding although the development in the Broads tends to be minor in scale. If the SPD is followed, this could be a positive effect when compared to a development that does not follow a revised SPD.
the cumulative nature of the effects	Flood risk can be increased because of other developments. The SPD refers to the issue of increasing flood risk elsewhere which is linked to cumulative effects.
the transboundary nature of the effects	The Broads Authority sits within six districts so by its very nature there are transboundary considerations, in relation to administrative boundaries. Flood plains are identified for watercourses so to some extent, the transboundary nature of fluvial flooding is known. The transboundary nature of surface water flooding is an area of work which the Lead Local Flood Authorities either have or are working on.
the risks to human health or the environment (for example, due to accidents)	The SPD seeks to elaborate on adopted policies relating to flood risk. Flood risk can affect human health and the environment. The contents of the SPD seek to reduce flood risk and therefore reduce impacts on human health and the environment.
the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The SPD will cover the Broads Authority which includes 6,000 permanent residents. There are also visitors throughout the year.
the value and vulnerability of the area likely to be affected due to— <ul style="list-style-type: none"> special natural characteristics or cultural heritage; 	The Broads is special in its natural characteristics and cultural heritage.

<ul style="list-style-type: none"> • exceeded environmental quality standards or limit values; or • intensive land-use; 	<p>Unsure if standards or limits have been exceeded in the Broads</p> <p>Not relevant</p>
<p>The effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>The area to which the SPD applies is the Broads with an equivalent status to that of a National Park.</p>

DRAFT

Broads Authority

31 January 2020

Agenda item number 17

Memorandum of Understanding between the Broads Charitable Trust and the Broads Authority

Report by Director of Strategic Services

Purpose

The Broads Charitable Trust and the Broads Authority propose to work collaboratively to attract external funding. A draft Memorandum of Understanding has been prepared.

Recommended decision

Approve the Memorandum of Understanding between the Broads Charitable Trust and the Broads Authority.

1. Introduction

- 1.1. The Broads Charitable Trust (BCT) and the Broads Authority (BA) propose to work collaboratively to attract funding to deliver public benefits in line with the BCT's objectives.
- 1.2. At their meeting on 25 November 2019, the BCT trustees approved a draft Memorandum of Understanding (Appendix 1) setting out the basis on which the BCT and the BA intend to collaborate.
- 1.3. The Water, Mills and Marshes programme (WMM) is included in the scope of this agreement, and the BCT has appointed a trustee to become a member of the WMM board.
- 1.4. In respect of any funding the BCT agrees to provide to the BA, an arm's length grant agreement will be agreed and entered into by the parties, setting out the conditions upon which the funding is granted by the BCT to the BA.

2. Financial implications

- 2.1. The BA will provide some officer time to respond to the obligations imposed by each grant agreement, including any reporting requirements. This will be covered by existing staff budgets.

- 2.2. The income from the grant agreements resulting from the Memorandum of Understanding will cover the expenses incurred for the implementation of specific projects such as WMM projects.

Author: Marie-Pierre Tighe

Date of report: 20 December 2019

Appendix 1 – Memorandum of Understanding between the Broads Charitable Trust and the Broads Authority

Appendix 1

Memorandum of Understanding
between

The Broads Charitable Trust (Registered charity No. 1124552)

and

The Broads Authority, 62-64 Thorpe Road, Norwich NR1 1RY

1. Purpose

- 1.1. The Broads Charitable Trust (BCT) and the Broads Authority (BA) have agreed to work collaboratively with the object of stimulating their cooperation in promoting improvements for people who work in, live in and visit the unique wetland of the Broads. This Memorandum of Understanding (MoU) sets out the basis on which they intend to collaborate with each other for this purpose.

2. Forms of cooperation

- 2.1. Within such fields as are mutually acceptable for the Parties, the following forms of cooperation, amongst others, may be pursued hereunder:
 - Identifying potential funders which would support projects benefiting the Broads
 - Developing bids to attract funding to deliver public benefits in line with BCT's objectives (Annex 1)
 - Joint communication on successful bids
 - Visits to projects
- 2.2. BCT may engage BA for assistance with the process of submitting the bids, but BCT will remain ultimately in control.
- 2.3. Any funding provided by BCT to BA will be provided via a separate grant agreement put in place between BCT and BA. Accordingly, BA will submit a request for funding from BCT in accordance with the terms and conditions of each grant agreement, including any reporting requirements (which will need to be consistent with the head funding agreement).

3. Scope of the cooperation between BCT and BA

- 3.1. The Water, Mills and Marshes programme (WMM) is included in the scope of this agreement, whereby BCT is a member of WMM board. BCT intends to contribute funding to the project, while BA is managing the overall programme and monitoring delivery. BCT trustees agree that the WMM objectives (see Annex 2) fit with BCT's own objectives. In respect of any funding that BCT agrees to provide to BA, an arm's length grant agreement will be agreed and entered into by the parties, setting out the conditions upon which the funding is granted by BCT to BA.
- 3.2. Specific additional cooperation projects could be added subject to agreement between the Parties.

4. Monitoring

- 4.1. For monitoring purposes, a BA officer will present progress reports to BCT every 6 months with information on how the funding provided by BCT has been spent in furtherance of BCT's charitable purposes and in accordance with any conditions set out in the relevant grant agreement.

5. Financial arrangements and decision making

- 5.1. Both Parties understand that financial arrangements between the Parties have to be negotiated and mutually agreed. The financial arrangements between the Parties will be negotiated for each grant agreement, and the principles for the amount of funding provided to BA is set out in Annex 3.
- 5.2. Both parties may seek financing of joint activities from internal and external sources available to them.

6. General coordinators

- 6.1. Each Party shall designate a contact point to oversee the implementation of any agreements arising out of this MoU. These officers are:
 - a) For BCT: BCT Trustee appointed to WMM board
 - b) For BA: Director of Strategic Services

7. Liability

- 7.1. Except for loss or damages caused through gross negligence or intent, the Parties shall have no liability to each other hereunder.

8. Legal relationship

- 8.1. This MoU is not intended to be legally binding, and no legal obligations or legal rights shall arise between the parties from this MoU. Nothing in this MoU is intended to, or shall be deemed to, constitute either party as the agent of the other party, nor

authorise either of the parties to make or enter into any commitments for or on behalf of the other party.

9. Commencement, renewal, termination

- 9.1. This MoU will be effective from the date of the last signature hereto and will remain in force for a time period of five (5) years, with a possibility for renewal at the end of the five-year period, subject to the Parties' written agreement. Either Party may terminate this MoU at any time by giving six (6) months' notice in writing to the other Party.
- 9.2. This MoU has been drawn up in two (2) original copies in the English language, each Party receiving one duly signed copy hereof.

Signatory for BCT

Signed:	
Date:	
Name of authorised signatory for Broads Charitable Trust	Simon Egan (BCT trustee)

Signatory for BA

Signed:	
Date:	
Name of authorised signatory for Broads Authority	John Packman (CEO)

Annex 1 – Broads Charitable Trust objectives

The Trust acts as a fundraising charity and works with other Broads-related charities and interested bodies to stimulate and support sustainable and high-quality projects with clear public and community benefits. Any projects the Trust supports or undertakes will be expected to contribute to one or more of the following aims:

1. Protect biodiversity
2. Conserve and enhance the natural environment, including wildlife
3. Provide appropriate facilities for residents and visitors
4. Maintain and improve the navigable waterways of the Broads
5. Promote the responsible use of land and water resources
6. Interpret the unique ecosystem that is the Broads
7. Create educational resources to promote better understanding
8. Inform and engage the interest of young people
9. Sustain community life in the Broads area
10. Maintain the cultural heritage of the Broads
11. Address the local consequences of climate change

Annex 2 – Water, Mills and Marshes vision

The vision for Water, Mills and Marshes reflects the needs of what is a most important and special landscape. It is detailed in the WMM Landscape Conservation Action Plan:

http://watermillsandmarshes.org.uk/wp-content/uploads/2017/10/LCAP_Part-1_web.pdf

Through the Landscape Partnership scheme, we will:

- facilitate and promote heritage and cultural skills training;
- improve physical access to and within the area;
- protect and enhance heritage assets at risk, particularly drainage mills;
- create and connect habitat corridors to strengthen ecological networks;
- discover, record and protect waterlogged archaeological assets;
- increase information and interpretative material about the area's history and special qualities; and

- improve land and water management regimes to adapt to climate change and development pressures.

The vision will be achieved through:

- Conserving and enhancing the area's biodiversity, land and water management and cultural, historical and archaeological assets at risk, strengthening and developing its local character and distinctiveness
- Reconnecting local people with their local landscape and its natural and cultural heritage, inspiring active participation through cultural and learning activities, oral history, volunteering, mass participation activities and a comprehensive events programme
- Improving access to enable greater interaction with the landscape and heritage by a wider audience
- Passing on declining specialist skills, traditions and techniques to students, communities, professionals and partners
- Ensuring that local people and communities have a deeper understanding of the marsh landscape, appreciating the forces and influences, as well as lifestyle and climate impacts that have shaped this vulnerable environment
- Providing a community grants scheme for small local organisations to allow them to plan and implement natural and cultural heritage projects that contribute to LPS objectives
- Enabling people to take an active part in legacy activities to sustain, manage and enhance the local and wider Broads landscape after the Landscape Partnership funding ends

Annex 3 – Principles of financial arrangements between the Parties

Principles of financial arrangements

Amount of money granted by the funder	Rate of funding provided to the Authority
Up to £50,000	95%
£50,000 to £100,000	97%
Above £100,000	To be discussed

Broads Authority

31 January 2020

Agenda item number 18

Risk management register and policy - updates

Report by Head of Governance

For information

The Authority's Corporate Risk Register and Risk Management Policy have been updated. The Audit and Risk Committee approved the revised documents on 19 November 2019.

1. Introduction

- 1.1. The Broads Authority's Corporate Risk Register (previously called the Strategic Risk Register) has been reviewed and updated, taking note of recommendations from the internal auditors. The register focuses on high level strategic risks that could threaten our core business and the way we operate.
- 1.2. At an operational level, we maintain more detailed Directorate Risk Registers for each of our three directorates (Operations, Strategic Services and the Chief Executive's Group), which identify risks that could threaten our day-to-day activities.
- 1.3. The Risk Management Policy has also been updated. The policy sets out our rules and standards for corporate and operational risk management, including the scoring matrix and definitions used in the Risk Registers.

2. Updates

- 2.1. The updated Corporate Risk Register (Appendix 1) identifies ten risks under the core areas of people, finance, assets, performance and reputation. Each risk was scored for likelihood and severity, and the two scores were multiplied together to produce an initial risk score. Each risk was then scored again with mitigation measures in place to produce a revised risk score. The revised risk scores show that eight risks are assessed as 'medium risk', two as 'low risk', and none as 'high risk'. In all cases, applying mitigation measures has reduced the initial risk scores.
- 2.2. The updated Risk Management Policy (Appendix 2) includes the internal auditors' suggestions to define the mechanism to move risks between the corporate and directorate registers as appropriate (Section 5), and to modify the Corporate Risk Register scoring matrix (Section 6, Table 1).

Author: Maria Conti

Date of report: 18 December 2019

Appendix 1 – Corporate Risk Register (v. Aug 2019, revised Nov 2019)

Appendix 2 – Risk Management Policy (revised Oct 2019)

Appendix 1 – Broads Authority - Corporate Risk Register

Impact area People, finance, assets, performance, reputation	Risk no.	Risk name Risk that may affect the BA	Risk description Impact on delivery of BA objectives, service delivery, reputation	Date entered on risk register	Initial likelihood Score 1-5	Initial severity Score 1-5	Initial risk score Likelihood x severity	Tasks to mitigate risk (controls/safeguards/precautions) What we have done to date, noting any other factors that may influence the risk	Revised likelihood Score 1-5	Revised severity Score 1-5	Revised risk score Likelihood x severity	Additional actions required What we plan to do within the next year	Risk owner Officer ultimately responsible for the risk
People	1	Loss of key staff knowledge and expertise	Loss of knowledge, expertise or working associations, due to key staff leaving the BA or not being available for long periods	19/8/2019	4	4	High risk 16	Plan in place for handover period when key staff leave BA or are absent for significant periods HR policies and procedures in place to monitor absence and to support staff retention Electronic data storage being reviewed to support access to any officer's files Business Continuity Plan in place with system back up	3	3	Medium risk 9	Continue Data Project to ensure access to all staff e-folders Draft resilience plan for key staff and services (by summer 2020) Review Business Continuity Plan (by end 2019)	Chief Executive
Reputation	2	Harmful actions undermining public confidence in BA	Damage caused by comments/actions by BA Members or Officers, with consequent harm to relationships with stakeholders or undermining of public confidence in BA	19/8/2019	2	4	Medium risk 8	Code of Conduct for Members in place containing Nolan Principles of Conduct Code of Conduct for Officers in HR policies Training on Code of Conduct provided to all Members Protocol on Member and Officer Relations in place (updated May 2017) Proactive communication policy with local media and social media in place	2	3	Medium risk 6	Review and rewrite constitutional and corporate documents to make them shorter and clearer	Chief Executive
Assets	3	Loss of key physical assets	Damage, loss or malfunction to key assets, impacting on BA functions/ duties and affecting public access or services (e.g. navigation, moorings, Mutford Lock, rail bridges, Port of Norwich)	19/8/2019	3	4	Medium risk 12	Asset Management Strategy in place Integrated Access Strategy and Moorings Strategy in place (updated 2019) Legal undertaking and regular meetings in place with Network Rail regarding rail bridge maintenance BA attendance at Network Rail meetings Insurance in place for equipment and buildings over £250. Cover includes business interruption. Landowner negotiations processes in place Programmed inspection regime in place and regular maintenance carried out	3	2	Medium risk 6	Implement action plan to consolidate network of mooring provision across system Engage in meetings with Norfolk County Council, New Anglia and Network Rail about Trowse bridge and rail swing bridges	Director of Operations
Finance	4	Reduction in income	Uncertainty on how BA will be funded from 1 April 2020 by DEFRA, as	19/8/2019	3	5	Medium risk 15	Regular contact with Government (DEFRA) to follow up on Comprehensive Spending Review	2	3	Medium risk 6	Model expenditure options depending on proposed grant settlement and toll	Chief Financial Officer

Impact area People, finance, assets, performance, reputation	Risk no.	Risk name Risk that may affect the BA	Risk description Impact on delivery of BA objectives, service delivery, reputation	Date entered on risk register	Initial likelihood Score 1-5	Initial severity Score 1-5	Initial risk score Likelihood x severity	Tasks to mitigate risk (controls/safeguards/precautions) What we have done to date, noting any other factors that may influence the risk	Revised likelihood Score 1-5	Revised severity Score 1-5	Revised risk score Likelihood x severity	Additional actions required What we plan to do within the next year	Risk owner Officer ultimately responsible for the risk
			well as toll income uncertainty. Any reduction would impact our ability to deliver our duties					Regular input to Government consultations Landscapes Review – positive proposals about maintaining at least current funding levels Prudent budgeting for Navigation and National Park expenditure. Reserves in place to mitigate against sudden drop in income. Some significant blocks of work delivered through external funds won by BA				increases. Negotiate with DEFRA when timings are known, including joint response from English National Parks	
Performance	5	Not meeting BA statutory purposes or the requirements of external legislation related to those statutory purposes	Underperformance in achieving, or conflict between, our statutory purposes, resulting in legal issues or adverse impacts on the Broads and stakeholders (e.g. contravening Habitats Directive, loss of navigation)	19/8/2019	3	5	Medium risk 15	Provision of external legal services and Monitoring Officer (MO) in place Constitutional documents in place (under review 2019/20) Strategic plans and Broads Local Plan subject to Sustainability Appraisal and Habitats Regulations Assessment Detailed environmental practices in place, including Environmental Standard Operating Procedures Collaborative working ongoing with key stakeholders to understand and address issues and risks Officer level project boards in place with Wildlife Trusts, Natural England and Environment Agency to monitor progress and ensure compliance with statutory regulations Scientific research and monitoring ongoing to assess impacts, and mitigation measures developed if potential harm identified.	2	2	Low risk 4	Review aquatic plant cutting regime and standards required Complete constitutional documents review Monitor external legal and MO services and implement new agreement with Birketts LLP	Chief Executive
Performance	6	Not meeting statutory duties as a local planning authority	Underperformance of planning function resulting in legal issues/ negative impacts	19/8/2019	3	4	Medium risk 12	Statutory duties identified as part of appraisal process with key staff Staff training in place Planning delivery monitored formally (Planning Committee review performance quarterly and appeals annually)	2	4	Medium risk 8	Continue to monitor delivery	Director of Strategic Services

Impact area People, finance, assets, performance, reputation	Risk no.	Risk name Risk that may affect the BA	Risk description Impact on delivery of BA objectives, service delivery, reputation	Date entered on risk register	Initial likelihood Score 1-5	Initial severity Score 1-5	Initial risk score Likelihood x severity	Tasks to mitigate risk (controls/safeguards/precautions) What we have done to date, noting any other factors that may influence the risk	Revised likelihood Score 1-5	Revised severity Score 1-5	Revised risk score Likelihood x severity	Additional actions required What we plan to do within the next year	Risk owner Officer ultimately responsible for the risk
People	7	Safety incidents resulting in death or serious injury	Death or serious injury to staff, volunteer or member of public while carrying out operational works	19/8/2019	5	5	High risk 25	Health and safety policies in place and reviewed regularly by H&S Committee and risk owners Safety Committee monitors and reviews incident reports and risk assessments reviewed and updated regularly All staff and volunteers trained in key H&S issues, regular tool box talks given before carrying out tasks Safety Observations - ONS system in place to catch near misses and learn from incidents. All accidents investigated. Regular audits used to check control measures. Insurance in place for legal expenses Quarterly reports on Health and Safety Monitoring assessed by Management Team	2	5	Medium risk 10	Monitor changes in H&S legislation Monitor industry best practice and implement changes where required	Director of Operations
Reputation	8	Disruption in key project partnerships	Failure to deliver projects on time and within budget leading to potential financial issues, lack of service delivery or adverse publicity	19/8/2019	3	4	Medium risk 12	Contractual arrangements in place for key partnerships (see Partnerships Register) Regular project progress reporting to BA members Proactive role maintained within formal and informal partnerships at officer and member level	3	3	Medium risk 9	Review and update Partnerships Register – by Nov 2019 Develop risk register for UK NP Comms Team	Chief Executive
Performance	9	Breach in data security or data protection, or loss of data	Failure by staff to follow IT and/or GDPR processes or protocols resulting in in-built security being bypassed and allowing data loss, data breach or cybercrime to BA systems	19/8/2019	4	4	High risk 16	Data/IT systems secured through firewalls, anti-virus software, password and security policies, online training for staff and HR policy Bi-annual internal audit of IT systems and processes carried out Training in cybercrime given to all budget holders Certified GDPR Data Protection Officer(s) and GDPR Compliance Plan in place, and data protection training given to all staff	2	4	Medium risk 8	Achieve cyber essentials accreditation Review GDPR Compliance Plan Monitor and review case law and keep up to date with GDPR and data protection information/ best practice	Director of Operations
Finance	10	Continuation of projects externally funded by EU post-Brexit	Failure to get reimbursement for expenses occurred for projects funded by EU in event of	19/8/2019	1	4	Low risk 4	Detailed Risk Register for CANAPE reviewed at least twice a year by Steering Group with entries related to Brexit	2	2	Low risk 4	None	Director of Strategic Services

Impact area People, finance, assets, performance, reputation	Risk no.	Risk name Risk that may affect the BA	Risk description Impact on delivery of BA objectives, service delivery, reputation	Date entered on risk register	Initial likelihood Score 1-5	Initial severity Score 1-5	Initial risk score Likelihood x severity	Tasks to mitigate risk (controls/safeguards/precautions) What we have done to date, noting any other factors that may influence the risk	Revised likelihood Score 1-5	Revised severity Score 1-5	Revised risk score Likelihood x severity	Additional actions required What we plan to do within the next year	Risk owner Officer ultimately responsible for the risk
			no-deal Brexit scenario					Regular contact made with Joint Secretariat of North Sea Programme Regular reports on CANAPE taken to BA members Treasury has guaranteed funding for all organisations where EU funded project was approved before Brexit					

Prepared by: Management Team, Head of Governance

Date updated: Revision 19 Aug 2019 (restructured Nov 2019)

Next update due: By 16 July 2020

Appendix 2 – Risk Management Policy

1. Introduction

- 1.1. This document sets out the Broads Authority's rules and standards for managing strategic and operational risk, and guides staff in assessing, monitoring and managing risk on a day-to-day basis.

2. Defining risk

- 2.1. In this context, 'risk' refers to an uncertain event, or set of events, which may affect the Authority's ability to operate its business or achieve its aims and objectives. An 'uncertain event' is one that might happen, rather than one that will definitely happen or is happening already.
- 2.2. Each risk has the key dimensions of 'likelihood' and 'severity'. Likelihood is the probability the event will happen, while severity is the impact the event would have if it happened.

3. Managing risk

- 3.1. The Authority must be able to consider the risks that may threaten or affect the running of its business and delivery of its aims and objectives, and make sure it has controls and mitigation measures in place to minimise those risks.
- 3.2. The international standard for risk management (ISO 31000) sets out useful guidance on risk management, emphasising that it should be integral to all processes and for all staff. Good principles for managing risk are that:
 - It needs to be systematic, structured and timely.
 - It is based on the best available information, including historical data, stakeholder and customer feedback, forecasting and expert judgment. It should be tailored to the organisation's internal and external context and risk profile.
 - It takes human and cultural factors into account, recognising that people's capabilities, behaviours and intentions can either help or hinder the organisation's objectives.
 - It is transparent and inclusive, needing the timely and appropriate involvement of stakeholders and decision makers at each stage, and ensuring proper representation of all those affected.
 - It needs to be iterative, dynamic and responsive to change, taking account of changes in the internal and external environment.
 - It needs to demonstrate continuous improvement.

3.3. Not having risk management procedures in place could result in a failure to identify and monitor risks, or apply appropriate and proportionate mitigation measures. It is also important to bear in mind:

- Our stakeholder and public expectations that we manage risk effectively;
- the demands of legislation and external bodies, such as regulators and auditors;
- the value of risk management in making informed decisions about the effective use of capital and resources, and in reducing costly mistakes or firefighting;
- the desire to make the organisation a better and safer place to work, and for others to work with.

4. Roles and responsibilities

Audit and Risk Committee

4.1. The Audit and Risk Committee oversees the development and operation of risk management at a strategic level, and regularly reviews the Corporate Risk Register.

Management Team

4.2. Management Team (MT) is responsible for monitoring and managing risk across the organisation and making sure we have effective policies and procedures in place. MT oversees the review of the Risk Management Policy and Corporate Risk Register, with support from the Head of Governance. Any significant corporate issues relating to risk management are brought to the Audit and Risk Committee's attention.

Directors

4.3. Directors are responsible for making sure risk management is embedded into the work of their Directorates, that risk owners and all other staff are aware of its importance, and that appropriate mitigation measures are in place. Directors are also responsible for their Directorate Risk Registers, which focus on day-to-day operational activities. They will bring MT's attention to any concerns or instances where ineffective risk management is impacting on the Authority's business or the achievement of its key aims and objectives.

Risk owners

4.4. Risk owners are responsible for monitoring and managing their assigned risks on a day-to-day basis. They will review their risks on a regular basis (at least every six months, or when circumstances change significantly) and make sure the registers are updated accordingly. Risk owners will bring their Director's attention to any concerns or instances where ineffective risk management may be impacting on the Authority's business or the achievement of its key aims and objectives.

Other staff

4.5. Risk management is not a specialist activity or only for nominated 'risk owners'. It is a core part of everyone's job, and should be embedded throughout the organisation and

its activities. A risk management assessment should be part of planning and implementing all activities, with risks identified and mitigation measures put in place.

5. Risk Registers

Types of register

- 5.1. The Authority maintains a strategic Corporate Risk Register and operational Directorate Risk Registers for Strategic Services, Operations and Chief Executive's Group.
- 5.2. The **Corporate Risk Register** sets out the 'across the board' risks that could threaten the Authority's core business and the way it operates. The Corporate Risk Register is maintained on the Authority's intranet.
- 5.3. **Directorate Risk Registers** identify risks that could threaten day-to-day operational activities. The Registers are maintained by each Director. Where a new risk identified within a Directorate has a revised risk score above 16 (high risk), it will automatically be referred to the Corporate Risk Register for monitoring by the Audit and Risk Committee and MT. If new mitigation measures put in place then reduce the risk's score to below 16 (moderate to low risk), the risk will be removed from the Corporate Risk Register, but retained on the Directorate register.
- 5.4. MT has overall responsibility for the registers, and risk owners are responsible for reviewing and updating their individual risks. Every risk should be reviewed at least six-monthly, or when there is a significant change in circumstances, with a note in the register of the date the risk was last reviewed.

Format

- 5.5. All registers have the following information:
 - Area impacted by the risk (people, finance, performance, reputation or assets)
 - Risk name and description
 - Date entered on risk register
 - Initial risk scores (likelihood and severity)
 - Tasks to mitigate the risk (controls/safeguards/precautions)
 - Revised risk scores (likelihood and severity)
 - Additional actions required
 - Risk owner (by job title)

6. Assessing risk tolerance levels

- 6.1. The Authority assesses risk against the matrix and scoring descriptions in Tables 1 to 4. For each risk, the dimension scores of **likelihood** and **severity** are multiplied to produce an **initial risk score**. When mitigation measures are identified, the two dimensions are

scored and multiplied again to produce a **revised risk score**. This score is categorised as being a low, medium or high **level of tolerance**.

Table 1

Risk scores matrix

Likelihood	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5
		1	2	3	4	5
Severity						

Table 2

Likelihood definitions

Rating	Definition	Value
Highly likely	The event is expected to occur	5
Probable	The event will probably occur	4
Possible	The event may occur at some time	3
Unlikely	The event is not expected to occur in normal circumstances	2
Rare	The event may occur only in exceptional circumstances	1

Table 3

Severity definitions

Schedule	Cost	Performance and quality	Value
<2 weeks delay	<1% of budget	Cosmetic impact only	1 Insignificant
2 weeks to 1 month's delay	1%-<2%	Some minor elements of objectives affected	2 Minor
1 month to <2 months delay	2%-<8%	Significant areas of some objectives affected	3 Moderate
2 months to <4 months delay	8%-<12%	Wide area impact on some objectives	4 Major
>4 months delay	>12% of budget	Significant failure resulting in the project not meeting its objectives	5 Extreme

Table 4

Risk level tolerance

Total score	Risk treatment
High 16-25 Red risk	Risks are so significant that risk treatment is mandatory
Medium 6-15 Amber risk	Risks require a cost benefit analysis to determine the most appropriate treatment
Low 1-5 Green risk	Risks can be regarded as negligible, or so small that no risk treatment is required

- 6.2. When a potential new action or objective is assessed for risk, MT will review the revised risk score suggested by the risk owner to make sure it is robust and reasonable.
- 6.3. Where a risk score is above the tolerance level of 16 (high risk), the Chief Executive will immediately bring the risk to the attention of the Chairman of the Authority and the Chairman of the Audit and Risk Committee.

7. Risk management tools

Risk identification

- 7.1. Identifying a new risk can happen at any time, but is most likely:
- when the Authority takes on a new responsibility, scheme or project;
 - as a result of an unforeseen incident or event; or
 - as part of the annual review of risks by MT or Directorate teams.
- 7.2. A number of tools can help with risk identification, including those outlined below.
- PESTLE looks at factors outside the organisation that can influence it, and stands for:
- Political – government policy and stability
 - Economic – employment rates, material costs and interest/exchange rates
 - Social – demographics, cultural trends and changes in lifestyle
 - Technology – innovation and development
 - Legal – employment, health and safety legislation and regulations
 - Environmental – climate, carbon footprint, sustainability, recycling, waste disposal
- APRICOT looks at factors within the organisation that may be affected, and stands for:
- Assets – land, buildings, contents, materials and equipment
 - People – safe working systems, health and welfare

- Reputation – poor media coverage, political embarrassment
- Information – IT failures
- Continuity of Operations – failure to deliver or poor service
- Targets – failure to meet strategic objectives and achieve value for money

Risk mitigation

- 7.3. Once a risk is identified, mitigation measures need to be considered. Initially, this can be defined simply as ‘tolerate, transfer, treat or terminate’.
- 7.4. A new risk should be reported to the appropriate Director as soon as possible by any officer so it can be entered in the relevant Directorate Risk Register. The Director will then assess whether the risk should be entered in the Corporate Risk Register.
- 7.5. When a new corporate risk is identified, MT will assess the mitigating measures in place or proposed, and whether these will manage the risk to ‘as low as reasonably practicable’. This process looks at whether the likelihood and severity of the risk is addressed adequately, and whether the Authority needs to enter into the risk, assuming it is optional, bearing in mind how the activity itself will further the Authority’s objectives and the level of risk associated with it.

8. Review timetable

- 8.1. In addition to the regular review by risk owners, MT will review the Corporate Risk Register every six months to consider whether:
 - the identified risks are appropriate and up-to-date
 - the actions and controls in place are adequate and appropriate
 - the revised risk score is appropriate
 - any additional action is needed to help mitigate the risk
 - any new risks should be added to the Register, either for new activities or for existing activities where the risk level may have increased.
- 8.2. The Corporate Risk Register will be reviewed by the Audit and Risk Committee twice a year. Where a risk score has increased, the reasons for the change will be set out.

Date of review: 17 October 2019

Date of next review: 17 October 2021

Contact officer: Head of Governance