

# Broads Authority

## Agenda 23 July 2021

10.00am

Top of the Terrace, Norwich City Football Club, Carrow Road,  
Norwich, NR1 1JE

John Packman, Chief Executive – 15 July 2021

### Introduction

1. **Appointment of Chair**

A nomination for Chair has been received for:

Bill Dickson proposed by Melanie Vigo di Gallidoro (and Tim Jickells), seconded by Nicky Talbot

2. **Appointment of Vice-Chair**

A nomination for Vice-Chair has been received for:

Matthew Bradbury proposed by Nicky Talbot, seconded by Bill Dickson

3. Chairman's announcements

4. To receive apologies for absence

5. Introduction of members and declarations of interest

6. To note whether any items have been proposed as matters of urgent business

7. Public question time – to note whether any questions have been raised by members of the public

8. **To receive and confirm the minutes of the Broads Authority meeting held on 30 April 2021** (Pages 4-17)

9. **Summary of actions and outstanding issues following decisions at previous meetings – to note the schedule** (Pages 18-26)

### Strategy and policy

10. **Farming in Protected Landscapes (FiPL)** (Pages 27-30)

Report by Chief Executive

11. **Annual Governance Statement 2020/21 and Code of Corporate Governance 2021**  
(Pages 31-64)  
Report by Head of Governance
12. **Draft Statement of Accounts 2020/21** (Pages 65-152)  
Report by Chief Financial Officer
13. **Strategic Direction update** (Pages 153-161)  
Report by Head of Governance
14. **Sustainability Appraisal Scoping Report – endorsing technical consultation** (Pages 162-275)  
Report by Planning Policy Officer
15. **Residential Moorings Guide for adoption** (Pages 276-325)  
Report by Planning Policy Officer
16. **Marketing & Viability Guide – approval of draft for consultation** (Pages 326-327)  
Report by Planning Policy Officer

## Governance

17. **Code of Conduct and declaration of interests** (Pages 328-387)  
Report by Monitoring Officer
18. **Appointment of members to committees and other bodies** (Pages 388-392)  
Report by Head of Governance

## Reports for information

19. **Broads Local Access Forum Annual Report 2020/21** (Pages 393-399)  
Report by Waterways and Recreation Officer
20. 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

21. To receive the minutes of the following meetings:  
[Navigation Committee on 14 January 2021](#)  
[Broads Local Access Forum – 10 March 2021](#)  
[Navigation Committee on 15 April 2021](#)  
[Planning Committee on 23 April 2021](#)  
[Planning Committee on 21 May 2021](#)

## Other matters

22. Other items of business

Items of business which the chairman decides should be considered as a matter of urgency pursuant to section 100B (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 24 September 2021** at 10.00am at Yare House, 62/64 Thorpe Road, Norwich

25. 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 Paragraph 3 of Part 1 of Schedule 12A to the Act, as amended by The Local Government (Access to Information) (Variation) Order 2006, and that the public interest in maintaining the exemption outweighs the public benefit in disclosing the information.

26. **To receive the Exempt Minutes from the Navigation Committee meeting on 16 January 2020** (Pages 400-401)

# Broads Authority

## Minutes of the meeting held on 30 April 2021

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## Present

Bill Dickson – in the Chair, Harry Blathwayt, Stephen Bolt, Matthew Bradbury, Andrée Gee, Gail Harris, Lana Hemsall, Tristram Hilborn, Tim Jickells, Bruce Keith, James Knight, Greg Munford, Simon Roberts, Matthew Shardlow, Vic Thomson and Melanie Vigo di Gallidoro

## In attendance

John Packman – Chief Executive, Hilary Slater – Monitoring Officer, Christopher Bing – Deputy Monitoring Officer, Maria Conti – Head of Governance, Emma Krelle – Chief Financial Officer, Rob Rogers – Director of Operations, Marie-Pierre Tighe – Director of Strategic Services, Essie Guds - meeting moderator, Sarah Mullarney – meeting moderator and Sara Utting – Governance Officer.

## 1. Welcome and apologies

The Chairman welcomed everyone to the meeting.

**Apologies** were received from Leslie Mogford, Simon Sparrow, Nicky Talbot and Fran Whymark.

## 2. Chairman's announcements

Openness of Local Government Bodies Regulations 2014 and provisions of The Local Authorities Police and Crime Panels (Coronavirus) Flexibility of Local Authority and Police and Crime Panel Meetings England and Wales) Regulations no. 392.

The Chairman reminded members that the meeting was being held under the provisions of the above regulations and in accordance with the Broads Authority's Standing Orders for remote meeting procedures agreed on 22 May 2020. The meeting was being live streamed and recorded and the Broads Authority retained the copyright. The minutes remained the record of the meeting.

### **Bruce Keith**

The Chair reported that this would be Bruce's last Broads Authority meeting, with his four-year term of office as a Secretary of State appointee ending on 30 June. Bruce had carried out a number of roles, such as Vice-Chair of the Planning Committee when he had chaired two meetings, including one very recently at extremely short notice, and had undertaken the role with complete professionalism. He was also an enthusiastic member of the Heritage Asset Review Group. His qualities included an ability to balance reliability, sound judgement and a focus on strategic issues and direction. His external appointments as the BA representative included the Norfolk Strategic Planning Forum and the Broads Charitable Trust, championing the execution of the Trust's Strategic Plan which was invaluable. Personally, he would be dismayed at losing Bruce, who he considered to be a very supportive colleague and was not afraid to speak his mind, but in an appropriate manner, when the occasion required, and was a pleasant, no-nonsense character who always contributed in a positive way. In conclusion, the Chair wished Bruce all the best in his burgeoning literary career and wished him the very best for the future.

Bruce thanked the Chair for his comments, stating that he had enjoyed his time with the Authority hugely. Projects such as CANAPE and Water Mills and Marshes were particular favourites but, in his view, it was the people who mattered the most and they had all been very friendly and welcoming.

The Chair of the Planning Committee thanked Bruce for his support at Planning Committee meetings and particularly for chairing a recent meeting with no advance notice.

### **Hilary Slater**

The Chair reported that this would be Hilary's last Broads Authority meeting, having first been appointed as the Authority's Monitoring Officer in June 2020. During her appointment, Hilary had been a truly worthy arbiter of standards, dealing with some really tricky issues. Hilary had been unflinching in providing excellent advice and guidance to the Authority and its officers. The Chair concluded that he was very sorry to lose Hilary but wished her all the very best for the future, following her retirement from East Suffolk Council.

Hilary thanked the Chair for his comments, saying that she had very much enjoyed working with the Authority which she considered was doing a fantastic job for which members should be proud. She also wished to thank the Chief Executive and his staff for their fantastic professional support, in particular the Governance Team. She had very much enjoyed her time working with the Authority.

### Norfolk Constructing Excellence Awards

The Chair reported that the innovative Landscape Partnership Scheme Project, led by Andrew Farrell, had won the Norfolk Constructing Excellence Awards, the second year running, with the Water Mills and Marshes Project coming first in the Preservation and Rejuvenation Section and second overall for the Halvergate drainage mill project. The project's success was down to the hard work of Andrew and his team in tackling the difficult task of restoring our windmills, iconic features of the Broadland landscape. He wished to congratulate the team and all those involved. This, together with other awards received, demonstrated the wealth of talent within the team at the Authority.

Lana Hemsall joined the meeting at 10.12am.

## 3. Appointment of two co-opted members from the Navigation Committee to the Broads Authority

At its meeting on 15 April 2021, the Navigation Committee appointed Nicky Talbot as Chair and Simon Sparrow as Vice-Chair and had recommended that both be appointed as the two co-opted members to the Broads Authority for one year.

Lana Hemsall proposed, seconded by Matthew Bradbury, and

**It was resolved unanimously to appoint Nicky Talbot and Simon Sparrow to the Broads Authority for one year, until 13 May 2022.**

## 4. Introduction of members and declarations of interest

Members indicated they had no further declarations of interest other than those already registered.

## 5. Items of urgent business

There were no items of urgent business.

## 6. Public question time

No public questions had been received.

## 7. Minutes of last meeting

The minutes of the meeting held on 19 March 2021 were approved as a correct record and would be signed by the Chairman.

## 8. Summary of actions and outstanding issues

Members received the latest summary of actions and outstanding issues following decisions of previous meetings. In addition, the Chief Executive provided the following update covering a range of issues. He identified the lead officer for each project update and encouraged members to contact them if they wished to find out more about a project.

We continue to live in strange times and managing the workload across the Authority remains challenging. Demands and opportunities were coming thick and fast and often there was very little time to react. The inexperience of officials in Defra and our auditors and their lack of knowledge about the unique status of the Broads and the Broads Authority placed more work on our own staff in checking and interpreting the material that is sent to us. A case of COVID among our auditors had put back the internal audit programme. Government decisions, for example on the Farming in Protected Landscapes programme, had also been delayed, which gave us more uncertainty.

Consistent with our cautious approach in response to the pandemic, this meeting was brought to today so it could be held remotely under the current regulations. That had put extra pressure on staff in preparing reports and the agenda for this meeting.

In terms of the final item in the Summary of Actions, the Head of Governance has been working with the Monitoring Officer (MO) on a report on governance matters, covering Disclosable Pecuniary Interests, appointment to outside bodies, and the standing agenda item on feedback from Members appointed to represent the Authority on outside bodies. The MO had circulated a briefing to all members on the DPI item and unfortunately there was insufficient time to complete the item on appointments, which left just the matter of feedback from Members for consideration today.

### **Page 17 - Pilot agri-environment scheme for the Broads - Test and Trials of ELMS (Environmental Land Management Scheme)**

#### **Contact - Andrea Kelly**

This continues to progress well and the trial Land Management Board is meeting regularly to look at key issues for the new Scheme.

### **Page 18 – Reference to Farming in Protected Landscapes (FIPL)**

#### **Contact – Chief Executive**

A £52.5 million programme was announced in November in the Agricultural Transition Plan. Further information was due to be provided in February with the programme starting on 1 April. This was always an ambitious target. No information was provided in February and as detailed in the SoP, the Authority was expecting it to be signed off last week. That did not happen and there was uncertainty on the timescale going forward. The Chief Executive would be leading on this matter until the position was clearer from Defra.

### **Page 18 - Landscapes Review**

#### **Lead officer – Chief Executive (with Chair)**

Both the Chair and Chief Executive had been very busy with colleagues in the other English



National Parks on this matter and the Chair had circulated a briefing note to members. A Written Ministerial Statement was initially proposed before Christmas and the Authority had been informed this was likely to be published in late May/early June, followed by a period of public consultation on the concept of a National Landscapes Service.

On Wednesday afternoon, the Chair and Chief Executive were given a further update from the civil servants. The current thinking on the Written Ministerial Statement is that the first part will contain a vision for protected areas with four priorities:

- (i) Nature – contributing to Nature Recovery and the Government’s commitment to protect 30% of land by 2030
- (ii) Climate – nature-based solutions helping the nation progress towards net zero and helping local communities adapt – for example in mitigating flooding.
- (iii) People and Communities – promoting access to nature and health and well-being;
- (iv) Place – promoting flourish and vibrant communities with strong local identities, thriving economies and supporting the agricultural transition.

The second part would indicate what the Government intends to do to achieve the vision. It will probably have three elements:

- (i) Increased investment in Protected Landscapes;
- (ii) More powers and protection; and
- (iii) Enabling local teams to do more.

Sight of the final statement and the details of the consultation were awaited. One option discussed between the Chair and Chief Executive was to arrange a workshop for all members to look at the implications when the documents were published.

## **Page 19 - Collaboration with Norfolk County Council**

### **Contact - Marie-Pierre Tighe**

Our work with both County Councils was going well. The Authority contributed to the development of the 2021-24 Norfolk Rural Strategy led by Norfolk County Council, to be launched in May.

The Authority was taking part to the newly created Norfolk Strategic Flooding Alliance and the Norfolk Sustainable Water Management Plan Steering Group.

The Norfolk and Suffolk Environment Plan Group was evolving into a Nature Recovery Partnership. Draft Terms of Reference had been circulated, and discussed with Natural England. There was strong support for a joint approach between Norfolk and Suffolk, and the Broads Authority was a key stakeholder.

- The Norfolk and Suffolk Nature Recovery Partnership brought together a wide range of organisations in the common goal of delivering nature recovery across Norfolk and

Suffolk, including its coast and associated marine waters, to the benefit of people and biodiversity, through securing healthier and more resilient natural systems.

- One key role would be to identify and develop new opportunities for securing investment in Norfolk and Suffolk's natural capital and nature recovery.
- This was aligned with the future statutory requirement to produce nature recovery strategies to create a nation's nature recovery network, which will be introduced in the Environment Bill, currently making its way through Parliament.
- The next meeting of the Norfolk and Suffolk Nature Recovery Partnership was scheduled for 13 May.

## Page 19 - Other collaboration with Norfolk County Council

### Contact – Rob Rogers

The Authority is working with Norfolk County Council, Network Rail, Abellio Greater Anglia and New Anglia on the future of Trowse Rail Bridge and the repairs to Carrow Bridge.

Swinging bridges had significant implications for the Authority and its users of the waterways. The closure of Haven Bridge had meant a major reorganisation of the Authority's maintenance programme. Contractors had been appointed to install replacement marker posts on Breydon water. However, they were stationed on the other side of the bridge and unable to get through. Given the importance of this task, the Authority's work programme was reprioritised to allow the Operations Team to commence the installation of the posts.

Two weeks ago, the Chief Executive briefed the Navigation Committee on Norfolk County Council's plans for the future maintenance of Carrow Bridge. The Director of Operations and Chief Executive had met with the County Council's Director of Operations who had explained that the plywood decking on Carrow Bridge was replaced by the County Council every six months, which involved drilling into the concrete base underneath. This concrete had reached its end of life and required substantial works to replace it. The County Council estimated it would take a minimum of three months to undertake the work, depending on the condition of the bridge. A road closure would be required for the duration of the works, which would cause serious disruption to the city.

The County Council's summary report also identified fixing the bridge in place, as a temporary solution, in order to undertake necessary investigations to find a permanent solution. The County Council's viewed a 'temporary period' as a minimum of five years.

At its recent meeting, the Navigation Committee was advised that additional information was required for the Committee to give a view on the future of the bridge; including the legal background, structural condition of the bridge, different repair options explored by the County Council and the cost implications. The County Council's Director of Operations had agreed to work with the Authority to supply this information so a more substantial report could be presented to members at the next committee meeting. This would then come to the Broads Authority for decision.

## Page 19 - UK's National Parks Communications Unit

### Contact – Ally Barber

Last week saw a meeting of the 15 UK National Park CEOs with a focus on two matters – climate change and in particular the arrangements for COP26 and an update on the work of the Communications Unit. It was pleasing to report that all were full of praise for the work of Ally Barber and Tobie Galvin. They were currently working on a campaign to try and influence the behaviour of young people in the 16-24 year-old age bracket as we emerged from lockdown. This followed on from the success in the Festival UK 2022 bidding process as one of 10 out of 300 winning teams to create a series of major events next year. This had attracted £5.7 million of investment to the National Parks and AONBs. The immediate task was to secure a further three years' funding for the Unit from the National Park Authorities.

## Page 22 - Responding to the climate emergency

### Contact – Harry Mach

The climate emergency had had a high profile in the news with the announcements by the President of the United States and our own Government's revised targets for greenhouse emissions for 2030. One issue the Authority had been discussing with the UK Parks was its collective targets for net zero with the suggestion that we should be aiming for 2030 for National Park Authorities and 2040 for National Parks.

Looking at the Authority's own emissions, it was exploring ways reduce the carbon budget of its operational work. A supply of Hydrotreated Vegetable Oil (HVO) had been secured and various plant and vessels would be run on this to check for any running issues with the older engines in use. As the fuel was certified as a direct diesel replacement, even capable of being mixed in the same tank, few issues were expected. The fuel gave a 90% reduction in carbon dioxide emissions, so could potentially be a very positive route, whilst other technological developments were brought to the marine and heavy plant engine markets, such as hydrogen fuel cells. As ever in the Broads, supply logistics were a major challenge, with the Authority ideally being one of many customers bulk purchasing in the Norfolk/Suffolk area to make the cost per litre more attractive.

Work was ongoing with Small World Consulting Limited to deliver Consumption Baseline Carbon figures for the Broads. This work had been pioneered by both the Lake District and the Broads Authority with the South Downs are using the same methodology and it was pleasing to note that seven other National Parks had agreed to joined. Last week Harry Mach was defining the precise boundary for the assessment.

Close work was also continuing with boating businesses, including work with New Anglia and Hethel Innovation on plans to promote the use of new technologies. An Electrifying the Broads bid was being developed for submission to the Clean Maritime Demonstration Competition.

The Authority was also part of the Norfolk Climate Change Partnership, which included all the Norfolk Local Authorities. The Partnership was working up a bid to the Community Renewal Fund for three projects to trial new technologies to aid decarbonisation.

## Page 22/23 - Visitor Services

In terms of Carlton Marshes, the concrete pads for the new pontoons were being installed next week. This would provide those on a boat with enhanced opportunities to use the long-distance footpath and visit the new Suffolk Wildlife Trust visitor centre.

## Page 23 - Response to the COVID-19 emergency

### Staff surveys

Two staff surveys had been conducted to find out how they were managing with the working conditions put in place in response to the COVID social distancing restrictions, and how they felt about future working arrangements. The first one was in August 2020, and the second one in March 2021. A total of 88 responses were received to the second survey, which provided a good representation of how teams across the organisation were feeling.

Some key points to note:

- The restrictions were impacting the working day for 92% of staff, with most seeing minor or medium changes.
- For those working from home:
  - The 3 most positive impacts were: more flexibility, better work/life balance, and not having to commute. This is the same picture as the 2020 survey.
  - On the other hand, 65% missed the interaction with colleagues, which was the main drawback identified by all. This was an increase from the 2020 survey, where 50% indicating missed the interaction with colleagues.
  - The 3 most liked ways to “feel connected with colleagues” continued to be: video calls, phone calls and team meetings.
  - The most significant challenges were: access to equipment and resources (eg printers and files), advice and contact with colleagues, and an increased workload. The issue of home schooling was also raised as a challenge in response to the situation with schools earlier in the year.
- Feedback from staff who joined the Authority since the first lockdown was that working from home was not the easiest set-up to get to know the organisation and colleagues.

### Looking ahead

- 83% of staff would be interested in including homeworking in future working arrangements, if their role allowed it.
- The most common response in terms of the preferred ratio for splitting time between office and home was for over 50% of time working from home.

### The approach going forward

- There was strong support for a hybrid system, with the flexibility to work both from home and in the office. The Authority would look at how to set-up those hybrid arrangements in more detail, with the support of HR.

### **Yare House**

The future of Yare House had been raised, in terms of space requirements. Members noted that the next break in the Authority's lease of the building was November 2022, and six months' notice would be required to vacate the building (ie by May 2022). The location and the building served the Authority well and Management Team had taken the view that there needed to be a better understanding of the Authority's needs before members were asked to take a decision on the premises. This would also include the need for meeting space for committees.

It was acknowledged that the past year had been particularly difficult for new members who had not had the opportunity to meet colleagues face to face, and the feedback from the recent annual review showed that many members missed this interaction both with other members and with officers.

The application to the High Court made by ADSO, LLG and Hertfordshire County Council in relation to virtual meeting provision for local authorities was dismissed on Wednesday. This meant committee meetings would have to be held in person from 7 May and staff were looking at suitable venues while Yare House could not fulfil the requirements for a Covid-safe meeting space due to the number of participants.

It was planned to hold the Member Annual Site Visit on 8 July (conditions permitting) and this would provide an excellent opportunity for engagement between members and with officers. The Governance Team would be contacting members to check their availability on that date before arrangements were progressed.

The Chief Executive concluded that, for the time being, there were no plans to move offices and the focus would be to remain cautious and put the health and wellbeing of the staff, volunteers and members as the top priority.

A member referred to the temporary closure of Carrow Bridge meaning it would be closed to river traffic, and questioned if Norwich yacht station would also be closed. The Chief Executive responded that he understood that the County Council planned to undertake maintenance works next summer and there was still some uncertainty over the effect of the closure. There could be considerable obstruction beneath the bridge during the period of the works which were expected to last three months, but could be longer, depending if any additional issues were discovered once works commenced.

Another member commented that reassurance was needed from the County Council, as Highway Authority for the city of Norwich, and that Norwich City Council would be fully involved in the discussions. The Chief Executive responded that he was unaware of what discussions had taken place between the County and City Councils on this issue but there was a County Council report in the public domain. He, together with Rob Rogers, had met once with the Director of Highways and Waste at the County Council. There were the wider

discussions on the development opportunities to the East of Norwich, in which the City Council was an active partner, which included discussions on both Trowse and Carrow bridges.

In terms of the Wherryman's Way footpath, a member commented that this should include reference to both Surlingham and Bramerton and it was important to look at other forms of funding, following the recent unsuccessful bid.

The Chair thanked the Chief Executive for his comprehensive report and encouraged members to contact the relevant officer direct if they wished for more detail on a particular item.

**The report was noted.**

## 9. Financial performance and direction

The Chief Financial Officer (CFO) introduced the report, which provided a strategic overview of current key financial issues including the Consolidated Income and Expenditure from 1 April 2020 to 31 March 2021 and the recommended carry forward requests. Due to the timescales involved, the figures in the report were provisional and verbal updates were provided as follows:

Table 1 – surplus was now £182,568 (reduction of £26,650) or 168.76% of latest available budget)

The transfer of interest to Earmarked Reserves (ER) was now complete.

Table 3 – closing balance on ER now £2,338,470 with Navigation proportion of £952,346.

Page 29 – current surplus was now £54,053 for National Park and £128,515 for Navigation.

Reserves closed at exactly £913,595 for both National Park and Navigation equating to 26.4% and 26.7% respectively. However, it was worth noting that £250,000 had been transferred this financial year to fund the safety package for the years 2021/22 and 2022/23. This had been agreed with Defra. When considering what the Navigation percentage would be without the transfer it would be down to 19.4%.

Table 5 – closing balance for 2021/22 reserves now £786,874 for National Park and £610,334 for Navigation equating to 22.3% and 16.4% respectively. Navigation – would reduce to 12.9% as £130,00 was ringfenced for use in 2022/23 to fund the safety package.

Income for 2021/22 – as at 28 April 2021, tolls income was £601,906 under the annual budget for private boats and £19,847 for hire boats, which was actually a good position compared to 2020/21.

A member questioned the change in Ranger time allocation between National Park and Navigation. The CFO responded that this was in part a result of the impact of Covid – there were more visitors so more navigational advice was needed and this split was a fair reflection of the activity undertaken. Detailed records were kept by the Rangers and it was likely this

trend would continue for the foreseeable future, but information on percentages was reviewed on an annual basis.

Matthew Bradbury proposed, seconded by Simon Roberts and

**It was resolved unanimously to**

- (i) note the income and expenditure figures and the draft year end position, and timetable and
- (ii) approve the recommended carry forward requests and agree they be added to the 2021/22 as additional expenditure.

## 10. Health & Safety – 2020 Annual Safety Report and 2021/22 Annual Safety Audit Programme

The Director of Operations presented the report on the annual review of marine accidents for 2020/21 and the annual safety audit programme for 2021/22. He stated that it had been a challenging year on the water and it was noted that the report from the Marine Accident Investigation Board was awaited.

**The report was noted.**

## 11. Appointment of Monitoring Officer

The Chief Executive introduced the report for the formal appointment of a new Monitoring Officer (MO), following the retirement of Hilary Slater from East Suffolk Council at the end of May. He thanked Hilary for her services as MO and the staunch support and advice she had provided to the Authority, through its Section 113 Agreement with East Suffolk Council. Mr Christopher Bing, currently the Deputy MO, would be acting MO at the Council pending its recruitment process.

A member commented that a long-term solution was needed, as they did not consider it helpful to have frequent staff changes and continuity was needed. The CE responded that the legal agreement with East Suffolk Council did provide continuity and that the service was working well.

Another member added their thanks to Hilary Slater and also took the opportunity to welcome Christopher Bing as her replacement.

Gail Harris proposed, seconded by Melanie Vigo di Gallidoro, and

**It was resolved by 15 votes for and with one abstention (due to the member having lost connection) to appoint Mr Christopher Bing as the Authority's Monitoring Officer with effect from 15 May 2021 and to formally thank Mrs Hilary Slater for her services.**

## 12. Agenda item on feedback from outside bodies

The Monitoring Officer introduced the report, which proposed alternatives for providing a more effective method for members to report to the Authority on the work of outside bodies to which the Authority appointed member representatives, following the discussions at the Broads Authority meeting in January.

Having considered the distinction between agenda items “for discussion” and those “for information only”, the legislative background and the current arrangements for members to raise issues with the Chair and Chief Executive, it was considered that it was not appropriate to continue with the standing item on feedback from outside bodies. The most appropriate option would be for each member representative to submit a brief written report, once or twice a year, on a rolling basis, about the work of the outside body. This would enable members and the public to see the report in advance of the meeting, when the agenda was published, and provide an opportunity to raise questions as appropriate. It was noted that this was the process a number of local authorities adopted and would provide the Authority with a more effective and transparent method than the current standing item on the agenda.

Melanie Vigo di Gallidoro proposed, seconded by Bruce Keith, and

**It was resolved by 15 votes for and with one abstention (due to the member having lost connection) to amend the current standing item on the agenda for member feedback on outside bodies as detailed above.**

## 13. Annual report on requests to waive Standing Orders in 2020/21

The Chief Financial Officer (CFO) introduced the report, which detailed the summary of instances where Standing Orders were waived by the Chief Executive for the 2021/22 financial year. It was noted that all waivers authorised under delegated powers must be reported to the Authority on an annual basis.

In response to a question on whether there was a maximum financial limit, the CFO responded that this was currently up to £150,000 and anything which exceeded this would need to be referred for member approval.

A member questioned if the £12,000 to design and build a website for National Parks UK was a shared cost which would be defrayed or the cost to the Broads Authority solely. The CFO responded this was a cost with the Authority, incurred on behalf of the UK National Parks. The Communications Team’s work was funded by an upfront contribution at the start of the financial year by each of the National Parks and National Parks Partnerships (NPP), which provided the team’s operational budget for the year. She confirmed that the cost was split across the 15 National Parks and National Park Partnerships. (See footnote<sup>1</sup> below).

**The report was noted.**



## **14. Summary of formal complaints for 2020/21**

Members noted the summary of formal complaints received by the Broads Authority in 2020/21 together with the outcome of those complaints.

## **15. 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.

## **16. Minutes to be received**

Members received the minutes of the following meetings:

Broads Local Access Forum – 2 December 2020

Planning Committee – 5 March 2021

Planning Committee – 26 March 2021

## **17. Feedback from members appointed to outside bodies**

Following the decision at minute 12 above, the Chair advised that this item was now no longer applicable in the format included on the agenda.

## **18. Other items of business**

There were no other items of business which the Chair decided should be considered as a matter of urgency pursuant to section 100B(4)(b) of the Local Government Act 1972.

## **19. Formal questions**

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

## **20. Date of next meeting**

The next meeting of the Authority would be held on Friday 23 July 2021 at 10.00am and members would be advised of the location in due course.

The meeting ended at 11:37am

Signed by

Chairman

Footnote<sup>1</sup> – Since the meeting, the CFO provided clarification that the UK team was also funded by National Park Partnerships. All of the parks pay an equal contribution but National Park Partnerships pays more so not a total equal split.

# Broads Authority

23 July 2021

Agenda item number 9

## Summary of actions and outstanding issues following decisions at previous meetings

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
Pilot agri-environment scheme for the Broads (Broads Test and Trial of ELMS)	16/03/2018	Andrea Kelly	Submission to Defra for pilot agri-environment scheme for the Broads, which builds on partnership work with NFU and local land managers and is prepared with assistance of local conservation NGOs.	<p><b>Oct 2019:</b> Defra awarded Broads Test and Trial (T&amp;T) contract. Sub-contracts awarded to Natural England, Norfolk Farming Wildlife Advisory Group and facilitator.</p> <p><b>Nov 2019:</b> Broads Test and Trial published on website. Project investigating payments, management interventions, monitoring and verification of interventions.</p> <p><b>13 Nov 2019:</b> First partnership workshop with 63 farmers and land managers hosted by BA, NFU, Natural England, Norfolk Farming Wildlife Advisory Group and facilitator, excellent participant feedback. <a href="https://www.broads-authority.gov.uk/looking-after/projects/environment-land-management-system">https://www.broads-authority.gov.uk/looking-after/projects/environment-land-management-system</a>. Workshop report circulated to Steering Group and participants and interested parties.</p> <p><b>10 Feb 2020:</b> Defra ELMs team and Broads farmer site visit.</p> <p><b>Dec 2019 - May 2020:</b></p> <p>Objective 2 - Developed detail and costs of management interventions and scheme tiers for grazing marsh and fen/reedbed habitats; reviewed Site Emission Tool (carbon calculator) from similar habitats to trial from June 2020.</p> <p>Objective 3 - Trialled self-assessment form for fen and fen meadow in liaison with Conservation Organisations and British Reed Growers Association.</p> <p>Objective 4 - Assessed local board roles and membership.</p> <p>Objective 5 - Mapped information to inform collaboration around the Broads.</p> <p><b>29 Apr 2020:</b> Submitted contract variation to Defra for extension from June-Oct and additional budget to collect data. Defra invited BA to submit costs for up to date fen management work.</p> <p><b>May 2020:</b> Preparing online surveys and pre-recorded presentations.</p> <p><b>Jun 2020:</b> Responded to Defra ELMS Policy Consultation and responding to Defra Peat Strategy Consultation. Signed new T&amp;T Defra contract. Sent two online surveys to over 300 farmers and land managers - 77 completed. Contributed to thematic webinar on advice provision to Defra policy team. Preparing presentation to T&amp;T thematic 15th July to Defra policy team. In discussion with partners and Defra on additional work to assess fen payments. Prepared grazing costs for verification with 10-15 farmers and land managers.</p> <p>Tested Site Emission Tool (carbon calculator) on one site and gaining agreement to test carbon savings on farmers land. Working with Oxford University Research Student to assess ELMS in Norfolk. Sept 2020: Analysed two online surveys. T&amp;T report written for approval by Steering Group. Outputs include Broads Tier Structure, grazing payments budget and Collaboration Plan.</p>	31/08/2021

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				<p>EPA presented conclusions to Defra ELM scheme Policy Team. Defra requested BA applies for contract extension for further ELM scheme work, focusing on advice provision, formation of Local Board and role of convenors.</p> <p><b>Oct 2020:</b> Full Report and Summary Action Plan published(<a href="https://www.broads-authority.gov.uk/looking-after/projects/environment-land-management-scheme">https://www.broads-authority.gov.uk/looking-after/projects/environment-land-management-scheme</a>). Held meeting with Defra ELM team leaders and policy officers. Extension and new contract being formalised with Defra to test and trial 'advice provision' by end Dec 2020 and 'local governance' by end March 2021. Advice online questionnaire drafted. Policy governance approach and role for investment gathering being discussed.</p> <p><b>Jan 2021:</b> Advice Provision Survey sent, analysed and Report published Broads-Test-Trials-Extension-Advice-Provision-Final.pdf (<a href="https://www.broads-authority.gov.uk">broads-authority.gov.uk</a>). c.60 responses from farmers (71%) and land managers. New Test &amp; Trial on setting up and trialling Local Governance proposal submitted to Defra for approval Jan 2021.</p> <p><b>Feb 2021:</b> New Test &amp; Trial approved by Defra Jan 2021. Partners will set up and trial the Broads Land Management Board and Local Convenor role and operate the Board via topic based seminars.</p> <p>Defra and Protected Landscape Farming Project is providing free advice on entering countryside stewardship -Countryside Stewardship in the Broads flyer (<a href="https://www.broads-authority.gov.uk">broads-authority.gov.uk</a>). The Farming Project is also working with 3 local AONBs and UEA to produce Protected Landscape Natural Capital Evidence Compendium for farmers and land managers to support their E.L.M.</p> <p><b>9 Mar 2021:</b> Defra guidance on Farming in Protect Landscapes scheme, due in Feb, still awaited.</p> <p><b>1 July 2021:</b> Launch of the Farming in Protected Lansdcapes (FiPL) programme Farming in Protected Landscapes (FIPL) (<a href="https://www.broads-authority.gov.uk">broads-authority.gov.uk</a>) (see separate report on today's agenda)</p>	
National Parks Review: Response	28/09/2018	John Packman	That the Chairs' Group, together with the Chief Executive, 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. Deadline response submission 18 December 2018. Chairs Group to meet 5 Dec 2018 to finalise response and consider points raised. Members also able to submit individual responses.	<p><b>Sept 2019:</b> Landscapes Review Final Report published 21 Sept. Awaiting Government response to review. <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf</a></p> <p><b>Nov 2019/Jan 2020:</b> Members received preliminary paper for discussion. Report on 31 Jan highlighted Review's 27 proposals and asked Members to consider BA priorities for more detailed discussion. Agreed to focus on where BA already taking action in line with Broads Plan, and where resources allow.</p> <p><b>Mar 2020:</b> Issues for future discussion: Climate change and carbon capture; Biodiversity and future of agriculture; Promoting wider participation with National Parks on health and wellbeing benefits; Explore Proposal 21 Welcoming new landscaping approaches in cities and the coast - e.g. Norwich City as a National Park City.</p> <p><b>May 2020:</b> Report and presentation on climate change to be given at BA meeting 24 July 2020.</p> <p><b>Oct 2020:</b> Awaiting Government response on Landscape Review.</p> <p><b>Nov 2020:</b> Defra's publication of The Ten Point Plan for a Green Industrial Revolution (<a href="https://www.publishing.service.gov.uk">publishing.service.gov.uk</a>), which includes this headline "New national parks and greater protections for England's iconic landscapes to improve access to nature and better protect the country's rich wildlife and biodiversity".</p> <p><b>April 2021:</b> Awaiting Government response on Landscapes Review.</p> <p><b>June 2021:</b> Written Ministerial Statement issued on 24 June Written statements - Written questions, answers and statements - UK Parliament, and response from National Park England Landscapes review - government response: National Parks England.</p>	24/07/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
Collaboration with Norfolk County Council	01/02/2019	John Packman	<p>That 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.</p> <p>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> <p>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.</p>	<p>Collaborative work ongoing with Norfolk County Council.</p> <p><b>4 Jul 2019:</b> BA member and officer site visit to Norfolk coast in association with Norfolk Coast Partnership. Project proposal for BA to be partner in Interreg EXPERIENCE project successful. Kick-off meeting (initially scheduled in Dec 2019 but postponed due to election purdah) in February 2020.</p> <p><b>May 2020:</b> Scoping Cooperation Agreement between BA and Norfolk County Council.</p> <p><b>June 2020:</b> BA supporting development of Norfolk and Suffolk Environment Plan, led by Norfolk and Suffolk County Councils. UEA developing asset inventory with set of indicators.</p> <p><b>July 2020:</b> Cooperation Agreement between BA and Norfolk County Council under review by nplaw. Norfolk Coast Partnership Management Group due in July to be replaced by series of topic-specific emails, including 2020-21 planned actions for AONB and new Management Plan.</p> <p><b>Sept 2020:</b> Awaiting feedback on final draft of Cooperation Agreement between BA and Norfolk County Council. Feedback provided to North Norfolk AONB on their draft Management Plan.</p> <p><b>Oct 2020:</b> Cooperation Agreement between BA and Norfolk County Council (NCC) signed. BA officer registered to bid writing course organised by NCC. BA contributing £1k to Norfolk Coast Biodiversity Audit.</p> <p><b>Dec 2020:</b> Natural Capital Evidence Compendium for Norfolk and Suffolk published online PowerPoint Presentation (<a href="http://norfolkbiodiversity.org">norfolkbiodiversity.org</a>) and PowerPoint Presentation (<a href="http://greensuffolk.org">greensuffolk.org</a>)</p> <p><b>Feb 2021:</b> NCC supporting Broads Natural Capital Evidence Compendium targeted for farmers and land managers to support their ELM plans.</p> <p><b>June 2021:</b> The recruitment of a Nature Recovery Partnership coordinator is underway by NCC and SCC (jointly). Workshop held on 25 June between Norfolk and Suffolk Nature Recovery Partnership and Water Resources East about integrating work related to water resources.</p>	22/05/2020
Hosting National Parks'	22/03/2019	Rob Leigh	BA hosting UK National Parks Communications	<b>1-3 Oct 2019:</b> BA hosted National Parks Heads of Communication Officers meeting.	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
Communications Unit			Service on basis set out in report, and Appendix 1 of report approved.	<p><b>Nov 2019:</b> Communications Strategy approved by English CEOs Group and Chairs Group. Internal roll out of National Parks branding/messaging launched. BA staff briefed on 16 Oct and Members on 22 Nov.</p> <p><b>Jan 2020:</b> Work ongoing to scope review of National Parks website. Ongoing campaign support includes photography competition and Discover National Parks Fortnight 4-19 April 2020. Workplan and steering group meetings scheduled.</p> <p><b>2-4 Mar 2020:</b> Heads of Communications meeting.</p> <p><b>July 2020:</b> Virtual meeting of all Heads of Communications arranged for 29 Sept.</p> <p><b>Aug 2020:</b> New website progressing, with expected launch Autumn 2020. Collaborative safe visiting (Covid safe) visitor messaging campaigns ongoing.</p> <p><b>Nov 2020:</b> New website launched. Other ongoing work includes a relaunch of the National Parks e-newsletter (Dec 2020), communications regarding COVID-19 and new visitor information, planning for a virtual Discover National Parks Fortnight in 2021.</p>	
Wherryman's Way footpath on River Chet	26/07/2019	Rob Rogers	Wherryman's Way footpath by River Chet included in priority actions for new Waterways and Recreation Officer. Discussions ongoing with Norfolk County Council.	<p>Work to be split into 2 phases over winter 2020 and 2021. Plan is to concentrate efforts in first year on Loddon FP4, Langley with Hardley FP9 and Loddon FP5.</p> <p>NCC to repair two bridges at Loddon FP4 by Sept 2020.</p> <p>Environmental officers to complete minor tree/shrub clearance by Oct 2020.</p> <p>BA operations team to dredge Chet for 3 months from Oct 2020 and dispose of material on sections of footpaths mentioned. They will return 6 months later to rebuild paths with new material. Similar work to continue in 2021 to restore rest of footpaths at eastern end of Hardley Flood.</p> <p><b>May 2020:</b> Project now part of a much larger programme of works in partnership with Norfolk County Council and CIL application; to include new circular routes, bank stabilisation, signs and infrastructure, and access for all resurfacing works. Programme improvements across entire Wherryman's Way beginning 2021.</p> <p><b>Oct 2020:</b> Funding application submitted Aug, been through first round approval and decision to be made in Dec.</p> <p><b>Dec 2020:</b> Application unsuccessful. Reframing bid with Norfolk CC colleagues to submit in a future funding round.</p> <p><b>Apr 2021:</b> BA to dredge River Chet and place sediment onto footpath winter 2021/2022. Arrangement made with Norfolk CC to return up to 18 months later to reshape footpath once sediment has dried.</p> <p><b>Jun 2021:</b> BA partnering up with NCC for CIL application to carry out additional works here and at Surlingham and Bramerton.</p>	31/12/2021
Draft planning documents for consultation	27/09/2019	Natalie Beal	Processes for consultation on Draft Marketing and Viability SPD and Residential Moorings Guide, and adoption of Flood Risk SPD and Statement of Community Involvement.	<p><b>Sept 2019:</b> Documents submitted for first stage public consultation from 30 Sept to 22 Nov.</p> <p><b>Jan 2020:</b> Statement of Community Involvement (SCI) and responses to consultation considered by Planning Committee on 6 Dec 2019 and adopted by BA on 31 Jan 2020.</p> <p><b>Jan-Mar 2020:</b> Flood Risk SPD and responses to consultation considered by Planning Committee on 10 Jan. Amended SPD approved by BA for 2nd round consultation from 31 Jan to 6 March. Planning Committee 6 Mar recommended that BA adopt SPD following minor amendments.</p> <p><b>May 2020:</b> Draft documents endorsed for consultation (under delegated powers in light of COVID-19 lockdown): Marketing and Viability SPD (Planning Committee 7 Feb &amp; 6 Mar), Residential Moorings Guide (Planning Committee 6 March), consultation period for both documents 16 March to 5 June.</p> <p><b>July 2020:</b> BA adopted amended SCI to reflect COVID-19 restrictions.</p> <p><b>25 Sept 2020:</b> BA endorsed joint statement with Environment Agency on Strategic Flood Risk Assessments.</p> <p><b>Oct 2020:</b> Draft Residential Moorings Guide and Peat Guide both out to public consultation.</p>	24/07/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				<p><b>Mar 2021:</b> Residential Moorings Guide went to Planning Committee (Feb) and due to go to BA (March) for adoption, but delayed to consider further comments from EA. Peat Guide went to Planning Committee (5 March) and on this agenda for adoption.</p> <p><b>Apr 2021:</b> Peat Guide adopted at March Broads Authority. Marketing &amp; Viability Guide being prepared for consultation. Residential Moorings Guide adoption delayed.</p> <p><b>July 2021:</b> Residential Moorings Guide (for adoption) and Marketing &amp; Viability Guide (for consultation) on this agenda. Statement of Community Involvement may be updated in the next few months to reflect the start of the Local Plan review.</p>	
Extinguishment of Public Rights of Way	27/09/2019	Lewis Treloar	To approve the preparation of the Public Extinguishment Orders for the PROWS which have been diverted under the Broads Flood Alleviation Project (BFAP).	<p><b>6 Jan 2020:</b> Consultation began for extinguishment of first bundle of footpaths (Cantley FP18, Stokesby FP6 and Mautby FP12)</p> <p><b>5 Feb 2020:</b> Consultation ended 3 Feb and Orders signed and sealed, with notices served to relevant stakeholders.</p> <p><b>3 Mar 2020:</b> One objection received a day before confirmation of the Orders was set to go ahead.</p> <p><b>18 Mar 2020:</b> Objection withdrawn following discussions.</p> <p><b>May 2020:</b> Confirmation agreed but progress postponed due to COVID-19 situation.</p> <p><b>Jul 2020:</b> Awaiting guidance from Highways Authority on when process can be finalised.</p> <p><b>Aug 2020:</b> Still no update from Defra.</p> <p><b>Oct 2020:</b> First bundle of footpaths have been confirmed and now await NCC to legally remove them from the definitive map. Work on extinguishing the next 3 paths to begin Nov 2020.</p> <p><b>Jan 2021:</b> Next bundle of footpaths surveyed but, due to Covid-19 lockdown restrictions, cannot be progressed further at this stage.</p> <p><b>Jun 2021:</b> Not a current priority, no further progress to report</p>	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 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.	<p><b>8 Oct 2019:</b> WRE Directors' Board meeting attended by Director of Strategic Services, who was appointed as Board member. On agenda: Board and governance matters, appointments, technical programme, engagement.</p> <p><b>15 Oct 2019:</b> WRE Strategic Advisory Group attended by Director of Strategic Services and Catchment Officer, engaging with wide range of stakeholders.</p> <p><b>Oct 2019:</b> WRE added to BA Partnerships Register.</p> <p><b>Dec 2019:</b> WRE Managing Director presented their work to Broadland Futures Initiative group.</p> <p><b>14 Jan 2020:</b> Director of Strategic Services attended WRE meeting. On agenda: Procurement policy and appointment of auditor, operational budget, 2020/21 business plan. Overall aim is to agree Water Management Plan by December 2021.</p> <p><b>11 March 2020:</b> Director of Strategic Services attended WRE meeting. Main discussion item was draft business plan.</p> <p><b>April 2020:</b> WRE hosted discussion with support from NALEP to discuss potential water related project opportunities in Norfolk and Suffolk. Next meeting 22 June 2020</p> <p><b>June 2020:</b> Board approved WRE 3-year business plan. <a href="https://wre.org.uk/wp-content/uploads/2020/07/WRE-Draft-3-Year-Business-Plan-2020-23-FINAL-for-publication.pdf">https://wre.org.uk/wp-content/uploads/2020/07/WRE-Draft-3-Year-Business-Plan-2020-23-FINAL-for-publication.pdf</a>.pagespeed.ce.gG1V1TGDOA.pdf</p> <p>WRE's vision is "for Eastern England to have sufficient water resources to support a flourishing economy, a thriving environment and the needs of its population, and for the region to be seen as an international exemplar for collaborative integrated water resource management."</p> <p><b>Sept 2020:</b> Next board meeting on 12 Oct 2020.</p>	30/09/2020

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				<p><b>Nov 2020:</b> WRE Membership review on BA agenda. Agreed for BA to remain a WRE member until Sept 2023.</p> <p><b>Dec 2020:</b> Board meeting held 15 Dec, with 6-month review of WRE business plan and presentations on "Future Fens" project and "Multi Objective Decision Making".</p> <p><b>Mar 2021:</b> Appointment of new independent chair, former Environment Agency chief executive Dr Paul Leinster CBE, taking over from Henry Cator.</p> <p><b>Apr 2021:</b> WRE joined forces with Norfolk County Council, partners and The Nature Conservancy to develop county-wide sustainable water management plan for Norfolk. Norfolk will be first of two European sites to pilot Water Fund, where nature-based solutions and other infrastructure will be amalgamated into an investable, long-term, proposition for private and public financing.</p> <p><b>June 2021:</b> Appointment of independent chair Paul Leinster at the board meeting on 21 June. Busy programme of work until the end of the year, towards a draft regional plan for consultation.</p>	
Responding to Climate Change Emergency	27/09/2019	John Packman	<p>To adopt Climate Change Emergency Statement for the Broads (first report Appendix 1) and principles outlined for BA to:</p> <p>Recognise climate emergency</p> <p>Work toward making the Broads Authority 'carbon neutral' by 2030, with further objective of reducing all carbon emissions to zero by 2040.</p> <p>Establish base line for CO2 emissions using a common 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</p>	<p><b>Sept 2019:</b> Principles agreed - first in series of items dealing with climate change.</p> <p><b>22 Nov 2019:</b> Presentation to BA from Asher Minns, Director of Tyndall Centre at UEA and update by CANAPE Project Manager/Carbon Reduction Projects Manager.</p> <p><b>10 Jan 2020:</b> Planning Committee report on planning policy response to climate change mitigation and adaptation.</p> <p><b>May 2020:</b> Progress report to BA prepared on Climate Change Action Plan for Broads Authority and Broads Area. Deferred to BA meeting in July due to COVID-19 situation.</p> <p><b>July 2020:</b> Report on agenda on Climate Change Action Plan - agreed to set target of 1.5 degree compliant emissions curve for Broads executive area, in line with Tyndall Centre recommendations, and use as basis for public engagement and working with partners.</p> <p><b>Sept 2020:</b> National Parks England received data from BEIS on emissions from National Parks and the Broads. Work underway to better understand these figures, in particular around boating emissions listed as several times higher than previous estimates.</p> <p>Yare House electricity supply switched to Green Tariff. BA investigating capacity of its equipment to use higher percentages of biofuel. These measures will achieve targeted savings for this year.</p> <p>With South Downs NPA, BA working with Smallworld Consulting Ltd to deliver Consumption Baseline for Broads Area by March 2021. From data provided by this and BEIS data, BA will establish savings needed in each year to achieve carbon neutrality.</p> <p><b>12 Mar 2021:</b> Facilitated presentation on climate change to the Norfolk Public Sector Leaders Board.</p>	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			<p>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> <p>Aspire to offsetting carbon emissions locally within the Broads by a Broads offsetting scheme.</p>		
Visitor Services Review (Exempt)	22/11/2019	Rob Leigh	<p>To continue to examine the short-term options presented and test different small-scale options if possible, and to defer considering a business case and site analysis for a Visitor and Education Centre.</p>	<p><b>Nov 2019:</b> Acle Bridge site included in strategic approach to visitor services in Visitor Services Review (exempt report) to BA on 22 Nov. In line with BA decision, current visitor services development focusing on sites other than Acle Bridge, e.g. Forum in Norwich.</p> <p><b>Mar 2020:</b> Negotiations with Norwich City Council continuing positively. Aiming for launch of new facility in Norwich Forum in April. BA committed financial support from existing visitor centre budgets towards staff presence and refurbishment works. Good progress made for visitor centre presence at Lowestoft rail station, aiming to be in place in April and funded from existing visitor centre budgets.</p> <p><b>May 2020:</b> Plans on hold due to COVID-19 situation.</p> <p><b>July 2020:</b> Plans for refurbishment of new combined Norwich / Broads/ Jarrold visitor centre at Norwich Forum on hold until close of season 2020; likely to be in done in time for 2021 season. May be possible to have Broads presence within visitor centre from late July 2021; awaiting update from Norwich City Council on reopening plans.</p> <p>Lowestoft Rail Station Broads National Park signs and Suffolk Wildlife Trust Carlton Marshes visitor centre display on hold due to COVID-19.</p> <p>Existing TICs at How Hill and Hoveton reopened on 4 July. Boat trips expected to be running again by end of July.</p> <p><b>Sept 2020:</b> Ra trip boat awaiting repair to control unit, which has delayed trips restarting. Visitor centres: Norwich City Council trialling reopening Norwich Forum with reduced capacity; working towards refurbishment for 2021 season but uncertainty due to C-19 and Jarrolds reorganisation. Broads National Park display completed at Lowestoft train station TIC (run by Community Rail Partnership). Suffolk Wildlife Trust, Carlton Marshes - agreed to install Broads National Park displays before official opening Spring 2021 (soft opening Autumn 2020).</p> <p><b>Jan 2021:</b> Ranworth TIC to reopen April 2021 as Broads National Park information centre with Liana boat trip running from staithe. Ra will move to Hoveton.</p> <p>Investigating possibility of installing Broads National Park display on outside area of Norwich Forum from Summer 2021 to Spring 2022. Project would be funded by Intereg EXPERIENCE project. Work progressing with Norfolk County Council to secure funding and procure exhibition specialist. Discussions ongoing regarding on inside space of Forum information centre.</p>	31/03/2021



Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				<b>April 2021:</b> Ranworth TIC reopened.	
Response to the COVID-19 emergency and the financial position of the Broads Authority and local businesses	25/06/2020	John Packman	That the Authority supports the approach for hire boat charges in 2020/21 outlined in the report following consultation with the Navigation Committee on 11 June 2020. To authorise the Chief Executive to negotiate and sign a Change Control Notice to the Authority's Funding Agreement with Defra on the lines set out in paragraph 2.2. of the report, following consultation with the Chairman and Vice-Chairman of the Authority and the Chair and Vice-Chair of the Navigation Committee, and subsequent circulation of the document to members for comment.	<b>July 2020:</b> Chief Executive gave verbal update at 24 July BA meeting. Hire boat operators informed of arrangements agreed by BA on 1 July 2020. Survey of hire boat operators carried out on impacts of Covid-19 on their businesses. 3 Sept 2020: Update to Navigation Committee on BA financial position and hire boat operators survey results; NC endorsed recommendations to BA as in report on today's agenda. <b>Nov 2020:</b> Second hire boat operators survey carried out. Member briefing on tolls 5 Oct. Update report to Navigation Committee 22 Oct and recommendations in report to BA on today's agenda. <b>Jan 2021:</b> BA Management Team and Sections Heads continuing weekly COVID Management Group meetings to review Government guidance and financial position and prepare briefing for members, staff and volunteers. Finance report on today's BA agenda outlines latest financial information. <b>Mar 2021:</b> BA provided verbal update at BA meeting on 19 March, including recruitment of new Rangers and completion of nine animated safety videos. <b>April 2021:</b> Initial training of Rangers completed. Animated videos circulated and received positive reviews.	03/09/2020
The question of a Disclosable Pecuniary Interest regarding the setting of tolls	29/01/2021	John Packman	The Monitoring Officer offered to obtain a second opinion regarding her advice, previously given, that members who were Directors or Chief Executives of a hire boat company had a Disclosable Pecuniary Interest regarding the agenda item on the setting of navigation charges.	<b>Mar 2021:</b> Monitoring Officer given necessary instructions seeking a second opinion and is awaiting the further advice. <b>19 April 2021:</b> Monitoring Officer circulated legal opinion to all Members with a view to having further discussion with the three Members affected before reporting to the next meeting. <b>July 2021:</b> Monitoring Officer report on this agenda.	19/03/2021
Member appointments to outside bodies	20/11/2020	John Packman	To review the appointment of members to outside bodies with a view to preventing a situation when any conflict arose in the	Head of Governance and Monitoring Officer working on a report for members but this had been delayed due to other priorities and pressures. <b>July 2021:</b> Report from Monitoring Officer on reviewing our Code of Conduct on today's agenda.	23/07/2021

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
			member's position as a Trustee versus their obligation as an Authority member		

Date of report: 09 July 2021

# Broads Authority

23 July 2021

Agenda item number 10

## Farming in Protected Landscapes (FiPL)

Report by Chief Executive

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### Purpose

This report provides an update to the Broads Authority on the new Farming in Protected Landscapes (FiPL) programme, and seeks the necessary delegations to administer the funding.

### Broads Plan context

Aspiration 2 is to 'Protect, conserve and enhance water quality and land and habitat condition to benefit priority species, recognising natural environmental change and retaining a thriving and sustainable agricultural industry.' Other aspirations in the Broads Plan will be of relevance depending on the projects to be funded.

### Recommended decision

- (i) To note the progress in the delivery of the Farming in Protected Landscapes (FiPL) programme, and in particular the agreement to work in collaboration with the Norfolk Coast AONB.
  - (ii) To approve the delegations to officers and establishment of a Local Assessment Panel; namely, that the Chief Executive will be responsible for making decisions on grant applications below £5,000, and the Local Assessment Panel will make recommendations on grant applications above £5,000 for implementation by the Authority.
  - (iii) To approve the appointment of Norfolk FWAG, the RSPB and Norfolk Rivers Trust as deliverers of advice on FiPL to farmers and land managers.
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## 1. Introduction

- 1.1. The Farming in Protected Landscapes (FiPL) programme was first announced by the Government in November 2020. It is designed to provide additional investment to assist farmers to work in partnership with the 10 National Parks and 34 AONBs in England, to deliver bigger and better outcomes for the environment for people and for places. There have been significant delays in launching the programme, and the detailed guidance was received on 17 June for a start date of 1 July.
- 1.2. FiPL is announced as a three-year programme, with commitment only for year 1 (2021/22) at this stage. The total commitment throughout England is £22.5 million in

2021/22, which has been divided across the 44 Protected Landscapes. The Broads Authority has a provisional overall allocation for the financial year 2021/22 of £280,661.

- 1.3. Protected landscapes have received considerable advice and guidance from Defra (the National Framework) on how to administer the programme. It includes the application form (17 pages) and the scoring system, which have to be used to bring a level of consistency across the country.
- 1.4. The objectives of the grant aid to farmers and landowners are to deliver more for:
  - **Climate** – supporting the delivery of net zero through nature and nature-based solutions to help communities mitigate and adapt to climate change
  - **Nature** – supporting their leading role in the delivery of the Nature Recovery Network and achieving the Government’s commitment to protect 30% of land by 2030
  - **People** – providing a natural health service that will improve the nation’s public health and wellbeing through increased access to nature across all parts of society, as part of our green recovery
  - **Place** – supporting these landscapes as centres of excellence and green innovation that are flourishing places to live and work, each with a strong identity and cultural heritage, and high recognition as attractive visitor destinations
- 1.5. To qualify for this year’s expenditure, the grant applications have to be processed (using a Local Assessment Panel for grants over £5,000), the funding awarded, the work carried out, invoiced and the grant paid, all by 31 March 2022.

## 2. Progress to date

- 2.1. Against the tight timescale, the following operational decisions have been made, following consultation with the Broads Land Management Board, which was formed as part of the Test & Trial on Environment Land Management.
- 2.2. **Collaboration with the AONBs:** The programme has provided a real opportunity to work more closely with the three AONBs in Norfolk and Suffolk – Norfolk Coast, Suffolk Coast and Heaths/Dedham Vale. We have all agreed to work together at a strategic level on the programme, exchanging ideas, intelligence and experience. A deeper form of collaboration has been agreed with the Norfolk Coast AONB: we will share a single Local Assessment Panel and the Broads Authority will provide administrative support related to the receipt of applications and administration of the joint Local Assessment Panel.
- 2.3. **Assessment Panel:** The Broads Authority will be the Accountable Body for FiPL and will be audited on its expenditure. According to Defra’s National Framework, grants under £5,000 will be dealt with by a senior member of the Protected Landscape team (the

Broads Authority's Chief Executive). Grants over £5,000 have to be considered by a Local Assessment Panel which includes farmers and land managers, Natural England and the Broads Authority. The current composition of the Broads Land Management Board includes such representatives, and they have the experience to process grants. At their meeting in June, the Board agreed to act as the Local Assessment Panel for FiPL, making recommendations to the Broads Authority and Norfolk Coast AONB on the applications above £5,000, with some modification to its membership to include representatives from the Norfolk Coast.

- 2.4. **Area for eligibility:** Applications will be accepted from the whole catchment area. This is because some activities in the catchment area may have a direct benefit in the Broads, such as reducing sediment and nutrient load, reducing flood risk and improving water resources. Other projects, such as heritage and access improvements, would be more likely to be successful if they were located in the Broads Authority executive area. All applications will be assessed against a set of criteria, which includes an assessment of whether the project outcomes “deliver under the four themes of Climate, Nature, People and Place and also fit with the Protected Landscape Management Plan”.
- 2.5. **Engagement model:** The Authority has a history of working in partnership with a number of providers of advice to farmers and landowners, in addition to providing directly itself. With the support of the farming community, we have agreed with the principle to continue with this approach and engage with farmers and landowners through existing farming advice networks, using resources within Norfolk Farming and Wildlife Advisory Group (FWAG), Norfolk Rivers Trust, and the RSPB. Broads Authority officers will also continue to provide advice on this agenda. Collectively they have the necessary contacts to engage with farmers, and the networks exist, which is a key factor given the constrained timescale for spend.
- 2.6. **Maximum and minimum size of grant:** Following consultation with the Land Management Board and the Norfolk Coast AONB, a maximum level for grants has been set at £75,000 and a minimum level of £2,000.
- 2.7. The website [Farming in Protected Landscapes \(broads-authority.gov.uk\)](https://broads-authority.gov.uk) was live from 1 July and includes the application form and the guidance for applicants.

### 3. Financial arrangements

- 3.1. The Broads Authority has a provisional overall allocation for the financial year 2021/22 of £280,661, of which a maximum of £22,281 may be spent on administration, and a maximum of £37,877 may be spent on advice and guidance. The minimum grant spend is £220,504.
- 3.2. The money will be received in three parts throughout the year, with the first amount due to be received in July 2021.
- 3.3. The Broads Authority and Norfolk County Council (for the AONB Partnership) will be the Accountable Bodies for the expenditure. As mentioned above, the Defra guidance

states that a senior member of the Protected Landscapes team will be responsible for determining applications for grant below £5,000: The Chief Executive of the National Park Authority for the Broads Authority. A Local Assessment Panel will determine grants for applications above £5,000.

- 3.4. It is the intention that part of the advice funding of £37,877 will be used to support the Authority in providing advice to farmers and land managers. It is also proposed to use the advice funding to support our partners (RSPB, Norfolk FWAG and the Norfolk Rivers Trust) in their delivery of advice to farmers and land managers.
- 3.5. Given the urgency of getting the programme up and running, we are proposing to appoint these three agencies, and to set up contractual arrangements to provide the necessary services (for example completion of application form, monitoring). The recommendation to the Authority is to approve the appointment of Norfolk FWAG, the RSPB and Norfolk Rivers Trust as deliverers of FiPL advice to farmers and land managers, using FiPL advice funding. This would be classified as a waiver under our Standing Orders Relating to Contracts.

## 4. Risk implications

- 4.1. The FiPL programme will be added to the Strategic Services Risk Register. While there are risks associated with its delivery, it is unlikely that FiPL will need to be escalated to the Corporate Risk Register, given the relatively modest amount of money involved (£280,000 compared to CANAPE and Water, Mills and Marshes budgets in excess of £5 million). This will be kept under review.
- 4.2. We have minimised the financial and reputational risks through working with our existing partners and the Broads Land Management Board. The collaboration with the AONBs should assist this through learning from each other and sharing best practice.

## 5. Conclusion

- 5.1. Delivering the FiPL programme of grants against the timetable prescribed will be a challenge, but we have got off to a good start with the help of our partners and the Land Management Board. The programme also provides us with opportunities to deepen our engagement with the farming and land-owning community, and pump prime projects in the Broads and wider catchment area.

Author: John Packman

Date of report: 07 July 2021

Background papers: Defra's National Framework for the FiPL programme

[Broads Plan](#) strategic actions: Multiple

# Broads Authority

23 July 2021

Agenda item number 11

## Annual Governance Statement 2020/21 and Code of Corporate Governance 2021

Report by Head of Governance

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### Summary

Every year the Broads Authority reviews its governance and internal control systems, including risk management, and publishes an Annual Governance Statement and action plan, supported by a Code of Corporate Governance, to show how it is complying with the principles of good governance. The Annual Governance Statement 2020/21 and Code of Corporate Governance 2021 are appended to this report.

### Recommendation

To approve the Annual Governance Statement (AGS) 2020/21 and to note, subject to the implementation of improvements identified in the action plan, that the Authority's systems of governance and internal control are considered to be adequate and effective.

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## 1. Introduction

- 1.1. As a public body, the Broads Authority is responsible for making sure it has strong and up-to-date governance and internal control systems that comply with the principles of 'good governance'. Under the Accounts and Audit Regulations 2015, we must publish an Annual Governance Statement (Appendix 1) on the effectiveness of our systems during the year, and an action plan to address any identified weaknesses. The Statement accompanies the annual Statement of Accounts and must be published by 30 September following the financial year to which it relates.
- 1.2. The Statement is guided by the 'Delivering Good Governance in Local Government: Framework', which includes principles on integrity, ethical values and the rule of law; stakeholder engagement; sustainable economic, social and environmental benefits; leadership and resources; risk and performance; and transparency, reporting and review. Our internal and external audit, internal review and other reports, and the Code of Corporate Governance all provide evidence for the Statement.
- 1.3. The Audit and Risk Committee (ARC) will review the Statement on 20 July and present any suggested amendments or recommendations to today's meeting. Once the

Authority approves the Statement, it is signed by the Chair and Chief Executive and the Action Plan 2021/22 is implemented.

## 2. Code of Corporate Governance

- 2.1. The Code of Corporate Governance helps us to develop our governance framework based on best practice and external guidance. The Code is updated annually, with significant changes reported in the Annual Governance Statement and any actions included in the Action Plan. The Code is signed by the Chair and Chief Executive and published on the Broads Authority website on the [how we work](#) page.

## 3. Audit opinion

- 3.1 The Head of Internal Audit's overall audit opinion in relation to the framework of governance, risk management and control at the Broads Authority in 2020/21 is **reasonable**, with all of the four audits (Key Controls and Assurance, Planning, Corporate Governance & Risk Management and the Port Marine Safety Code) concluding with a reasonable (positive) assurance grading. The Authority's Management Team accepted the recommendations raised and assigned responsibilities and deadline dates, as shown in the Annual Governance Statement action plan (Appendix 1).
- 3.2 In providing the opinion, the Authority's risk management framework and supporting processes, the relative materiality of the issues arising from the internal audit work during the year, and management's progress in addressing any control weaknesses identified from this were taken into account. The opinion was discussed with the Section 17 Officer prior to publication.

Author: Maria Conti

Date of report: 9 July 2021

Appendix 1 – Draft Annual Governance Statement 2020/21 and Code of Corporate Governance 2021



DRAFT

# Annual Governance Statement 2020/21 & Action Plan 2021/22 and Code of Corporate Governance 2021

Published xxxxx 2021

DRAFT

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## About this Statement

As a public body, the Broads Authority is responsible for making sure its governance and internal control systems are robust, up-to-date and in line with the principles of good governance. This is about conducting our business in accordance with the law and with proper standards, using public money wisely and efficiently, and having the right arrangements in place to protect our assets and meet our strategic aims. It is also about our members and officers representing the shared values and culture of the organisation.

To show how we are complying with good governance, we prepare an **Annual Governance Statement**<sup>1</sup> and publish it alongside our annual Statement of Accounts. The Statement is guided by '[Delivering Good Governance in Local Government](#)', which includes principles on integrity, ethical values and the rule of law; stakeholder engagement; sustainable economic, social and environmental benefits; leadership and resources; risk and performance; and transparency, reporting and review.

The Statement includes an annual action plan to address any weaknesses identified by internal and external audit, self-assessment and other reporting including our [Code of Corporate Governance](#) (Appendix 2).

This Annual Governance Statement was adopted on xxxx 2021. Our action plan 2021/22 and a review of last year's action plan are at Appendices 1(a) and 1(b).

## 1. Our governance framework

### 1.1. Purposes and duties

The Broads Authority is a statutory body with similar responsibilities to those of the English, Welsh and Scottish National Park Authorities<sup>2</sup>. It is the local planning authority, and a harbour and navigation authority. It has a duty to manage the Broads to conserve and enhance its natural beauty, wildlife and cultural heritage, to promote opportunities for the public to understand and enjoy its special qualities, and to protect the interests of navigation.

In managing the area, the Authority must have regard to the national importance of the Broads for its natural beauty and opportunities for open-air recreation, the desirability of protecting its natural resources from damage, and the needs of agriculture and forestry and economic and social interests of those who live or work in the area. The Authority also has the duty to maintain the navigation area to such standard as appears to be reasonably required and to develop and improve it as it thinks fit.

### 1.2. Strategy and policy

The [Broads Plan](#) is the key partnership strategy for the Broads, setting out a long-term vision and short-term objectives to benefit of the environment, local communities and visitors. The

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<sup>1</sup> Regulation 6(1)(a) and (b) of the Accounts and Audit Regulations 2015

<sup>2</sup> The Broads Authority was established under the Norfolk and Suffolk Broads Act 1988. Further provisions for the management of the area were made through the Broads Authority Act 2009.

current Plan was adopted in March 2017, and a review is underway in 2021/22. We also publish regular [Broads Plan progress update reports](#).

Sitting under the Broads Plan are more detailed [guiding strategies](#), generally focusing on a single theme and covering a short-term period of 3-5 years.

The [Broads Local Plan](#) (adopted in 2019) sets out the policies used in determining planning applications for the plan period up to 2036. We also produce supporting supplementary planning documents such as the [Flood Risk SPD](#), and [planning design guidance](#), to help with the interpretation and implementation of policies. The Local Plan is subject to regular review, and the current review is underway.

Our [Annual Business Plan](#) outlines our work priorities for the coming year and summarises last year's progress. The Plan is a link between the strategies for the Broads and our Directorate work plans. The [Annual Business Plan 2021/22](#) outlines our work plans for 2021/22 and 3-year financial strategy for 2021/22 to 2023/24.

Each year we also identify a small set of strategic priorities, focused on Authority-led projects that have high resource needs or a very large impact on the Broads, or that are politically sensitive. This helps us target our resources and make the most of partnership working and external funding opportunities. We report on their progress at each [Broads Authority](#) meeting.

## 2. External factors influencing our governance arrangements

### 2.1. Coronavirus (Covid-19) pandemic

Government measures in place at the start of 2020/21 to respond to the Covid-19 crisis affected the Broads Authority's operations throughout the year, including its governance processes. Under the provisions of the [Coronavirus Act 2020](#), temporary standing orders for remote meeting procedure rules were in place from 22 May 2020 to 7 May 2021, and all committee meetings were held remotely during that period using video conferencing to run and livestream proceedings. The Authority's annual meeting in 2020 was cancelled, with existing member appointments remaining in place until the annual meeting in July 2021. As Covid-19 regulations did not permit face-to-face gatherings, some scheduled committee meetings in April/May 2020 were cancelled pending the remote meeting rules.

The main impact to the Authority in 2020/21 was the loss of income from tolls, especially from the hire boat industry, due to the periods of national lockdown imposed by Covid-19. As at 31 March 2021, toll income was £119,916 below the annual budget. The loss of income was mitigated through in-year savings and the delay of some practical works. In early 2020/21, the Authority worked closely with Defra officials to gain an agreement for financial support to offset this loss, and to provide support to the local tourism industry.

In March 2020 the Authority established a Business Continuity Plan in response to the pandemic challenges, and the majority of staff began working from home, where their role allowed. Risk assessments were undertaken for all sections and services within the

Authority, and measures were put in place to enable safe working. Most operations were able to continue during 2020/21; staff unable to carry out their normal duties were assigned other tasks and no staff were furloughed. Two staff surveys were conducted in 2020/21 to assess how staff were managing with the new working arrangements and to get their views on longer-term arrangements (when Covid restrictions are lifted). The outcome of the surveys was reported to staff, volunteers and members and will inform Management Team decisions, including the development of hybrid working arrangements.

## 2.2. Brexit

Leaving the European Union was largely overshadowed by the Covid-19 crisis. However, it remains a significant change for the country and will impact on the Authority, such as closing off a source of funding for joint projects with European partners. The timescale for our EU-funded project CANAPE was extended beyond the Brexit leave date, which will enable this partnership project to be completed. Preparations for importing EU goods were also completed, although minor when compared to purchases made within the UK. There have been some minor delays in purchasing items such as wood and metal that are normally sourced by our UK suppliers from the EU.

## 2.3. Landscapes Review

The [Landscapes Review Final Report](#) was published in September 2019, setting out 27 proposals to protect and improve England's protected landscapes. The Government's Written Ministerial Statement on 24 June 2021 stated that it would be working closely with its partners over the coming months, including National Park Authorities, to address the Review's recommendations in full and consult on draft proposals later in the year. We will also consider the Review's key points as we carry out the Broads Plan review in 2021/22.

# 3. Committees, staffing and financial arrangements

## 3.1. Committees

The Broads Authority has unique governance arrangements, reflecting the interests of both national and local stakeholders. Of its 21 members, ten are appointed by the Secretary of State, nine are locally elected County and District Councillors, and two are co-opted from the Navigation Committee. Other than Planning Committee and those matters specifically delegated to the Chief Executive, all matters are dealt with by the full Broads Authority as the prime decision maker. Routine decision making is delegated by members to officers of the Authority through the Scheme of Delegated Powers.

The [Broads Authority](#) (the full Board) meets six times a year. Two of the scheduled meeting dates can be allocated for site visits or workshops if required, to give members more time to interact informally outside the main business meetings and to see what is happening out in the Broads. There is a transparent process for the annual appointment of Chairs and Vice-Chairs, committee membership and appointments to outside bodies, which allows members to express their preferences for serving on particular committees and outside bodies. The Chairs' Group gives all Chairs and Vice-Chairs an active role in maintaining an overview of the work of the various committees, and supporting the Chair and Chief Executive.

The [Audit and Risk Committee](#) is an advisory committee, meeting three times a year. It is responsible for examining our governance, internal control and risk management framework, and taking a strategic view on whether our allocated resources are being used effectively.

Our functions as a Local Planning Authority are carried out by the [Planning Committee](#), with powers delegated to officers in line with national legislation. It is a decision-making committee and normally meets every four weeks. [Planning decisions](#), whether made at Committee or through delegated powers, are published on our website.

The [Navigation Committee](#) advises the Authority's on significant matters affecting the navigation area. While it does not make decisions, if the Authority does not accept the Committee's recommendations it must give reasons. There are five meetings a year, and members are also invited to the Authority's site visits and workshops.

The [Broads Local Access Forum](#) is a semi-independent body that advises the Authority on improving public access to land within the Broads executive area. The Forum meets at least twice a year.

The Authority has two **Independent Persons**, appointed for a 4-year period, who are regularly consulted to help the Authority achieve high ethical standards. The current postholders were appointed in January 2021 until the annual meeting in July 2024 (the appointments were delayed by the cancellation of the 2020 annual meeting and an extension to the previous terms of office). One of the Independent Persons was also appointed to the Water Skiing and Wakeboarding Appeals Panel for the same term. This role includes being consulted on the appointments of members of those panels under Schedule 3 para 3(c) of the Broads Authority Act 2009.

### 3.2. Officers

The Authority has 132.5 full-time equivalent staff. There are four statutory officers who carry out specific duties. They are the Head of Paid Service (Chief Executive), Section 17 Officer (Chief Financial Officer), Navigation Officer (Head of Ranger Services) and Monitoring Officer.

The Chief Executive, Chief Financial Officer, Director of Strategic Services and Director of Operations make up the Management Team. There are eight Section Heads, covering the following sections: Construction, Maintenance & Ecology; Communications; Governance; Human Resources; ICT & Collector of Tolls; Planning; Ranger Services; and Safety Management. The Management Team meets weekly and liaises regularly with the Section Heads through the Management Forum. We are also required to have a Data Protection Officer, and this role is currently held by the Director of Operations as a qualified Data Practitioner.

### 3.3. Financial arrangements

It is considered that the Authority's financial management arrangements conform with CIPFA's [Statement on the Role of the Chief Financial Officer in Local Government](#) (2016). As

a key member of the Management Team, the Chief Financial Officer is actively involved in material business decisions to help the Authority develop, resource and implement its strategic plans sustainably and in the public interest.

We have a number of procedures in place to make sure we obtain best value for money in all we do, and we review them all on a regular basis. The Financial Regulations, reviewed in March 2018, were updated to reflect that the Section 17 Officer and Treasury is now managed in-house. Our Counter Fraud, Corruption and Bribery Strategy was updated in March 2018 and our Standing Orders Relating to Contracts in June 2020. We also reviewed our Procurement Strategy in July 2020 and our Capital, Treasury and Investment Strategy in March 2021. Work is underway to review the Authority's compliance against CIPFA's Financial Management Code.

We monitor the effectiveness of our internal financial control systems through the consideration of regular internal audits, performance management and budget monitoring reports, and through reporting to ARC.

#### **4. Decision making and openness**

Our arrangements for decision making are set out in publicly available documents, published on our website at [Constitutional documents \(broads-authority.gov.uk\)](https://broads-authority.gov.uk). These include standing orders, terms of reference of committees, codes of conduct, scheme of delegated powers and protocol on member and officer relations. In 2019/2020 we commissioned Birketts LLP to review a number of our constitutional documents to make sure they are fit for purpose, in line with best practice and legislation, and easy to understand. The progress of this work was delayed by Covid-19 and rescheduled work priorities but to date, revisions of the Social Media Policy and Scheme of Delegated Powers have been adopted by the Authority. As noted above, temporary Standing Orders were adopted to enable the Authority to hold all its committee meetings remotely from 22 May 2020 to 7 May 2021. Work is ongoing in 2021/22 to complete the review of remaining documents including the Code of Conduct for members (informed by the Local Government Association's new 'Model Councillor Code of Conduct' (update 17 May 2021) and our Standing Orders for Authority proceedings.

Our committees each have distinct terms of reference. Meetings are held in public, apart from agenda items that are exempt under legislative guidance, and members of the public may ask questions. Our committee meetings are audio recorded and the public may request a copy of the recording. While meetings were held remotely, the proceedings were livestreamed for public viewing via a link on the Authority's website.

Staff roles and responsibilities are defined through job descriptions and regularly updated policies and procedures, including an officer code of conduct and annual performance appraisals. In 2019/2020 we started to use the Best Companies Employee Survey. Our first Best Companies Index score was classed as 'good', which in terms of accreditation means we are 'one to watch'. We plan to run the next survey at the end of 2021, funding permitting, and aim to improve our baseline score.

The Freedom of Information Act (FOIA) and the Environmental Information Regulations (EIR) give rights of public access to information held by public authorities, including the Broads Authority. Our [Publication Scheme](#) highlights the information we publish, how we make it available, and our charging policy. Our commitment to protecting people's privacy and processing personal data in accordance with data protection legislation is set out within our [Data Protection Policy](#).

## 5. Ethics and integrity

Under the Localism Act 2011 we have the duty to promote and maintain high standards, and we work to embed this throughout our governance and internal control systems. The seven principles of public life (known as the Nolan Principles) are incorporated in the Members' Code of Conduct (currently under review). Our Independent Persons provide external scrutiny of our standards processes.

We also have our own set of corporate core values (below), which are promoted to officers and members through posters and screen savers, codes of conduct and protocols, recruitment and appraisal processes, and development programmes.

### Our core values

- **We show commitment** - Working together for a common purpose; Showing flexibility, trust and enthusiasm; Delivering on our promises
- **We are caring** - Setting realistic and properly resourced workloads; Supporting each other to get things done; Giving praise and daring to challenge
- **We are exemplary** – Being visible, approachable and professional; Making sound judgements on strong evidence; Aiming higher, smarter and always inspiring
- **We are open and honest** – Being fair and consistent in our words and actions; Always willing to ask, listen and respond; Doing what's right and being accountable
- **We are sustainable** – Looking after our resources wisely; Understanding the impact of our choices; Doing work that adds real value

## 6. Engaging with stakeholders

We encourage our partners, interest and user groups and local communities to engage with us in various ways. This includes drop in events such as partnership working groups and Parish Forums, direct contact such as officers or members attending user group meetings, public events, digital and social media, and formal written consultations. We also seek public opinion through surveys and the user analysis of our website and Facebook and Twitter feeds.

[Broads Engage](#) brings together many of the ways people can hear about and have a say on the use and management of the Broads. Due to Covid-19 social distancing requirements, we did not hold face-to-face engagement events during 2020/21. However, we continued to



engage with stakeholders through remote means, including a virtual exhibition for the emerging Broadland Futures Initiative, and online consultations and surveys.

## 7. Managing risk and performance

The Audit and Risk Committee's (ARC) responsibilities include gaining assurances, from a range of measures and reports, that the Authority is obtaining value for money in the use of its resources, and that risk and performance are being actively managed to achieve best results.

We have a **Corporate Risk Register (CRR)** and three **Directorate Risk Registers (DRRs)**, together with a Risk Management Policy. The registers are reviewed twice a year by Management Team, and updates to the CRR are reported to ARC. Any mitigated risk on a DRR that scores as a 'high risk' is referred to the CRR for monitoring. The Risk Management Policy is reviewed and updated every two years, and is next due for review in January 2022.

Our **Business Continuity Plan** provides critical information to enable the Authority to continue operating during an unplanned significant event, including loss of premises, IT/telecommunications systems and utilities; national lockdown (e.g. pandemic) and major travel disruption. The plan relates to events that impact all or most of the Authority's operations and that require immediate action. Measures to respond to other identified and predictable business risks (such as significant loss of income or key staff) are covered elsewhere, including within our risk registers and individual project plans.

An incident response plan was triggered in March 2020 in response to the Covid-19 pandemic, and remained in place throughout 2020/21. The plan included an actions log drawn from the weekly 'Covid response group' meetings (Management Team and Section Heads). A recorded briefing from the meetings was made available to all staff, members and volunteers, together with regular guidance on maintaining Covid-safe working practices.

We have **internal financial controls** to reflect good practice and make sure our finances are managed securely to minimise risk. These include approved budgets, separation of duties and authorised signatures. We also maintain a database of all our land and property assets and an **Asset Management Strategy** that includes an asset disposal policy, to help us plan our maintenance and replacement programme and reduce the risk of unexpected costs.

Our **performance** across our operations is assessed at regular Management Team meetings, with financial reports and budgets considered monthly and reports provided to Members at each Authority meeting.

There is a **whistleblowing policy** for our staff, and the Monitoring Officer has a duty to write a report if the Authority or any of its committees proposes action that would be unlawful or amount to maladministration.

## 8. Internal and external audit

Our **internal and external auditors** are the main independent sources of assurance on the operation of our governance framework and the Statement of Accounts.

An external provider reviews the effectiveness of our **internal control systems**, which includes our **internal audit function**. This helps to emphasise audit's key role and its connection to governance, risk management and internal control. The broad categories for internal audit are annual opinion, corporate governance, fundamental financial systems, service area audits and significant computer systems. The Head of Internal Audit (HIA) develops an annual **strategic audit plan** using a risk-based approach. The annual opinion is given on the overall adequacy and effectiveness of the Authority's internal control environment, highlighting significant issues.

The Management Team responds to each recommendation in the internal audit report, stating whether it is agreed and what action will be taken. The ARC receives a summary of internal audit work during the year and progress on implementing audit recommendations. Any significant concerns are reported up to the Broads Authority. The Authority is also informed of the work of the appointed External Auditors, including the Annual Audit letter from the External Auditors.

The **HIA's overall audit opinion** in relation to the framework of governance, risk management and control at the Broads Authority in 2020/21 is **reasonable**, with all of the four audits (Key Controls and Assurance, Planning, Corporate Governance & Risk Management and the Port Marine Safety Code) concluding with a reasonable (positive) assurance grading. The Authority's Management Team accepted the recommendations raised and assigned responsibilities and deadline dates, as shown in Appendix 1(a) below.

In providing the opinion, the Authority's risk management framework and supporting processes, the relative materiality of the issues arising from the internal audit work during the year, and management's progress in addressing any control weaknesses identified from this were taken into account. The opinion was discussed with the Section 17 Officer prior to publication.

## 9. Action Plans

Our Annual Governance Statement Action Plan 2021/22 and a summary of progress against last year's action plan are at Appendix 1. We are satisfied the Plan will address the identified weaknesses, and will report back on its implementation as part of our next Statement.

Signed ..... (Chair of the Authority)

Signed..... (Chief Executive)

Date .....

## Appendix 1(a) - Audit recommendations: Action Plan 2021/22

**Table 1**

Actions arising from 2020/21 audit and outstanding actions from previous audits

Audit recommendation	Lead officer	Target/status
<b>Communications and branding</b>		
<p><b>R2: Branding strategies, guidelines, procedures</b>            BA Communications Policy be updated to include the roles and responsibilities for overseeing management of correct branding. This should be included within a separate branding section, which the policy does not currently have.</p>	Head of Comms	31/10/19  Updated to 31/10/21 (see R5 below)
<p><b>R5: Use of logos</b>            A review and update of the communications page on BA's intranet be undertaken once National Parks branding strategy and associated documents, incl. local Broads National Park strategy and BA Communications Policy, are finalised. This should be relaunched with staff, incl. provision of staff and member training in relation to branding, incorporating use of both BA logo and Broads National Parks logo. Comms intranet page should include comms team details, branding strategies and comms policy, and BA New Signs Guide.</p>	Head of Comms	31/10/19  Updated to 31/10/21 to complete overarching strategy (other actions completed)
<b>Corporate governance and risk management</b>		
<p><b>R1: Decision making</b>            The actions/key messages log is fully populated from the Covid-19 Incident Response Team minutes held to date.</p>	Head of Governance	31/05/21  Action completed

Audit recommendation	Lead officer	Target/status
<p><b>R2: Change to committee meetings</b> In relation to the document management system (DMS), the following is undertaken:</p> <ul style="list-style-type: none"> <li>• Notes are added to deferred items to explain which committee date the item has been deferred to; and</li> <li>• To review if there is a way to match up/link the items on the forward plan to the generated items area.</li> </ul>	Head of Governance	<p>31/07/21</p> <p>Notes added to deferred items.</p> <p>Further DMS updates dependent on ICT resources.</p>
<p><b>R3: Decision making</b> All members are contacted to ask them to confirm that their Declaration of Interests is complete, up to date and accurate for the 2020/21 financial year.</p>	Head of Governance	<p>30/4/21</p> <p>Action completed.</p>
<p><b>R4: Use of emergency powers</b> The summary of progress table to be updated to include the delegated power used in respect of the Residential Moorings Guide second round consultation and this is reported to the BA.</p>	Head of Governance	<p>31/05/21</p> <p>Action completed.</p>
<b>Financial systems</b>		
The Accounts Payable procedures, in particular new suppliers, should be reviewed annually.	Financial Accountant	30/09/21
<b>Planning</b>		
<p><b>R1: Enforcement</b> Complaints received to be supported by evidence retained on file and acknowledged within three working days as stated in the Local Enforcement Plan.</p>	Head of Planning	<p>01/04/21</p> <p>Process in place for enforcement cases receipt, recording and process.</p>
<p><b>R2: Enforcement</b> Complainants be provided updates of enforcement investigation carried out by the Authority within 20 working days in accordance with the Local Enforcement Plan.</p>	Head of Planning	<p>01/04/21</p> <p>Process in place for enforcement cases receipt, recording and process.</p>
<p><b>R3: Planning applications</b> The monthly planning fees reconciliation be reviewed by a senior officer, other than the one</p>	Head of Planning	<p>01/05/21</p> <p>Process set up for Senior Planning Officer</p>

Audit recommendation	Lead officer	Target/status
preparing it, then signed and dated by preparer and reviewer on completion to evidence this.		to review and check monthly planning fees reconciliation sheet.
<b>R4: Enforcement</b> The process for new enforcements be completed incl. the timescale for completing each stage of the enforcement process.	Head of Planning	01/05/21 Process written for enforcement cases receipt, recording and process.
<b>R5: Enforcement</b> The date the complaint is received by the BA to be recorded in the Uniform and Idox system.	Head of Planning	01/04/21 Process written for enforcement cases receipt, recording and process.
<b>R6: Enforcement</b> Performance indicators be put in place for responding to complaints and investigating enforcement cases.	Head of Planning	01/05/21 Updated to 31/07/21 PIs agreed: <ul style="list-style-type: none"> <li>• Acknowledgement to complainant within 3 days</li> <li>• Update to complainant within 20 days</li> <li>• Report on performance indicators to Mgt Team quarterly</li> </ul>
<b>Port Marine Safety Code</b>		
<b>R5: Governance</b> The PMSC Performance Indicators (PIs) published within the Authority's PMSC and those published on the Authority's website be reviewed to ensure they are consistent with each other and reflect all areas of the PMSC. The website should also be updated to reflect the latest annual PI outturns.	Head of Safety Management	Action completed.

Audit recommendation	Lead officer	Target/status
<b>R6: Governance</b> The three yearly statement of compliance with the code be signed and retained on file for future reference.	Head of Safety Management	Sept 2021
<b>R9: Pilotage</b> The General Direction for larger vehicles and navigation on works guidance be finalised.	Head of Ranger Services	Dec 2021
<b>R11: Governance</b> PMSC related documents and files, location and storage (both electronic and hardcopy) is reviewed to ensure these can be accessible to relevant members of staff on a timely basis.	Head of Safety Management	Oct 2021
<b>R12: Governance</b> BA PMSC be updated to reflect inclusion of consultation with employees forum (or equivalent) and health and safety committee.	Head of Safety Management	Action completed.
<b>R14: Governance</b> Documents referenced within BA PMSC be reviewed to ascertain their location and appraise if still relevant to up-to-date SMS, taking account of national PMSC and Guide to Good Practice for Marine Operations.	Head of Safety Management	Dec 2021
<b>R15: Governance</b> All relevant employees to read and sign copy of PMSC on annual basis.	Head of Safety Management	Dec 2021
<b>R18: Pilotage</b> Pilotage Policy be amended to reflect that it will be updated each time it is used, as opposed to annually, and PMSC be updated to reflect this.	Head of Ranger Services	Dec 2021
<b>Procurement</b>		
<b>R7:</b> Procurement training is provided to all relevant members of staff, and Members, where applicable.	Chief Financial Officer	By 30/06/20 Updated to 31/08/21

## Appendix 1(b) - Audit recommendations: Progress against Action Plan 2020/21

**Table 1**

Actions arising from 2019/20 audit and any outstanding actions from previous audits

Audit recommendation	Lead officer	Target date	Progress
<b>Accountability and monitoring of performance</b>			
<p>Report annual National Park Authority 'family' indicators composite data to Management Team to compare and address any adverse areas of performance. Review how indicators align to Broads Plan and Annual Business Plan priorities and whether meaningful targets can be set for each indicator. Publish annual NPA family indicator outturn data relating to Broads Authority on BA website.</p> <p>Clarify how DEFRA uses and publicises family indicator data.</p> <p>Consider whether State of the Park indicators (where BA is data source) can be collected annually and reported in annual business planning process.</p>	Head of Governance	By 31/08/20	<p>Data reported to MT and published at <a href="http://How we work (broads-authority.gov.uk)"><u>How we work (broads-authority.gov.uk)</u></a></p> <p>NPA family indicator data part of DEFRA examination of 'Metrics and Measures – Measuring the delivery of the 25 Year Environment Plan.'</p> <p>SOPR indicators assessed as part of Broads Plan review process.</p>
Complete Operations Directorate Risk Register as part of Individual Performance Review process.	Director of Operations	By 31/05/20	Action completed.
<b>Communications and branding</b>			
Continue updating of BA Communications Policy and guidance, and roll out of associated member and officer training.	Head of Comms	(c/f from 2019/20)	c/f to 2021/22 action plan
<b>Corporate Governance and Risk Management</b>			
The Broads Authority Business Continuity Plan is reviewed and updated to take into account the	Head of Governance	31/08/20	Action completed. Plan reviewed

<b>Audit recommendation</b>	<b>Lead officer</b>	<b>Target date</b>	<b>Progress</b>
recent organisational re-structure and to ensure major projects such as the WMM project are provided for.			annually or after significant event.
Adopt revised constitutional documents following external review by Birketts LLP.	Chief Executive		Work delayed by C-19 but in progress.
<b>Human Resources</b>			
Continue preparation of report on equality assessment of employment policies and practices (Equalities Working Group)	Head of HR	By 31/03/21	Work delayed by C-19 – work within wider policy review exercise Aug-Oct 2021.
<b>Procurement</b>			
Review procurement strategy and Standing Orders Relating to Contracts to ensure both documents are up to date whilst reflecting current practices and revised job titles. In addition, the procurement strategy provides guidance on high risk/high value contracts and additional risks associated with such contracts.  Refresher training to be rolled out to all relevant staff.	Chief Financial Officer	By 31/08/20	Standing Orders Relating to Contracts and the Procurement Strategy updated and adopted in July 2021.  Procurement training delayed until 31/08/21.
Review standard terms and conditions for contracts (goods and services) to provide template for all contracts over £5,000 in conjunction with the Authority's legal provider.	Chief Financial Officer	By 31/07/20	Action completed. Template contracts available for goods, services, engineering short construction and professional services.
<b>Risk Management</b>			
Define specific risk appetite statement within Risk Management Policy to complement risk tolerance levels, to provide more definite basis over level of risk BA is prepared to	Head of Governance		Action completed.



Audit recommendation	Lead officer	Target date	Progress
<p>accept and which risks require additional action/mitigation.</p> <p>Assign target risk score to show risk level BA is aiming for. Report any risks sitting over tolerance/risk appetite and monitor until mitigated below tolerance levels.</p>			
<p>Ensure links to BA website pages in Annual Business Plans (ABP) are correct and update where necessary.</p>	<p>Head of Governance</p>		<p>Action completed.</p>

DRAFT

# Broads Authority

## Code of Corporate Governance 2021

The Code of Corporate Governance helps the Broads Authority, as a public body, to develop its governance framework based on good practice and external guidance, and to demonstrate compliance with the principles of good governance.

Good governance is about making sure we do the right things, in the right way and for the right people in a timely, inclusive, open, honest and accountable manner. It is the systems and processes, and the values and principles, which direct and control what we do and how we relate to our communities. A key focus for good governance within the public sector is to achieve sustainable results that benefit the economy, the environment and society.

Our Code of Corporate Governance is based on the core principles in the CIPFA/SOLACE Framework [Delivering Good Governance in Local Government](#). We also have our own set of core values to underpin the behaviour of our Members and staff, who share responsibility for good governance.

We review and update the Code every year through consultation with senior staff, the Head of Internal Audit and the Chair of the Audit and Risk Committee. Any significant areas of concern raised in the review are referred to our Management Team or to the appropriate committee for comment or decision.

The Chief Executive is delegated to make necessary changes to the Code as a result of the review to keep it up-to-date. Significant changes to the Code are reported to the Authority in July as part of the Annual Governance Statement, and any new or outstanding actions are included in the Statement's Action Plan for the following year. The Code is approved by the Authority and signed by the Chair and Chief Executive.

..... (Chair of the Authority)

..... (Chief Executive)

Date: xx July 2021

## Broads Authority Code of Corporate Governance: Schedule (May 2021)

This schedule represents what we do, or intend to with immediate effect, to demonstrate our compliance with the principles of good governance in local government. The core principles and sub-principles are taken from the CIPFA/ SOLACE Framework [Delivering Good Governance in Local Government](#) (2016). We will review our performance against the Code during 2021/22 and report the results to the Audit and Risk Committee and subsequently to the Broads Authority in July 2021 as part of the Annual Governance Statement.

**Table 1**

Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law

Sub-principles	Our evidence to support this principle
<p><b>Behaving with integrity</b></p> <p>Behaving with integrity and leading a culture where acting in the public interest is visibly and consistently demonstrated, thereby protecting the reputation of the organisation</p> <p>Establishing and communicating specific standard operating principles or values for the organisation and its staff, building on the Seven Principles of Public Life (the Nolan Principles)</p> <p>Leading by example, embedding the above principles in effective, up-to-date policies and processes and using them as a framework for decision making and other actions</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Appointment of Independent Persons</li> <li>• Audit and Risk Committee oversight</li> <li>• BA Core Values</li> <li>• Codes of Conduct for Employees (HR Policy 2), Members and Planning Committee Members</li> <li>• Declaration of Gifts and Hospitality for Members and Officers</li> <li>• Disciplinary Procedures for Officers (HR Policy 11)</li> <li>• Financial Regulations, Contract Standing Orders and Procurement Strategy</li> <li>• Guide for Local Authority appointees to the Broads Authority</li> <li>• Internal and External Audit</li> <li>• Local Protocol on Member and Officer Relations</li> <li>• Member and Officer induction and annual appraisals</li> <li>• Members Counter Fraud, Corruption and Bribery Strategy &amp; Response Plan</li> <li>• Register of Interests for Members and declarations of interests made at meetings and recorded in minutes</li> <li>• Related party declarations note as part of the Statement of Accounts.</li> <li>• Safeguarding Policy (HR Policy 22)</li> <li>• Social Media Policy</li> </ul>

	<ul style="list-style-type: none"> <li>• Standing Orders for the regulation of Authority proceedings</li> <li>• Standing Orders Relating to Contracts</li> <li>• Terms of Reference of Committees</li> <li>• Whistleblowing Policy for Officers (HR Policy 15)</li> </ul>
<p>Demonstrating strong commitment to ethical values</p> <p>Establishing, monitoring and maintaining the organisation's ethical standards and performance</p> <p>Underpinning personal behaviour with ethical values that permeate all aspects of the organisation's culture and operation</p> <p>Developing and maintaining robust policies and procedures that place emphasis on agreed ethical values</p> <p>Making sure external providers of services on behalf of the organisation act with integrity and in compliance with ethical standards expected by the organisation</p>	<ul style="list-style-type: none"> <li>• Annual performance appraisal for Members and Officers</li> <li>• BA Core Values</li> <li>• Best Companies Index employee survey</li> <li>• Codes of Conduct for Employees (HR Policy 2), Members and Planning Committee Members</li> <li>• Equality Policy (HR Policy 1)</li> <li>• Guide for Local Authority appointees to the Broads Authority</li> <li>• Procurement Strategy and procedures</li> <li>• Recruitment &amp; Selection Policy (HR Policy 16) and procedures</li> <li>• Use of Independent Persons in complaints procedures</li> <li>• Whistleblowing Policy for Officers (HR Policy 15)</li> </ul>
<p><b>Respecting the rule of law</b></p> <p>Demonstrating a strong commitment to the rule of the law as well as adhering to relevant laws and regulations</p> <p>Making sure statutory officers, other key post holders and members are able to fulfil their responsibilities in accordance with legislative and regulatory requirements</p> <p>Making the best use of the full powers available for the benefit of citizens, communities and other stakeholders</p> <p>Dealing effectively with breaches of legal and regulatory provisions</p>	<ul style="list-style-type: none"> <li>• Codes of Conduct for Employees (HR Policy 2), for Members, and for Planning Committee Members and Officers</li> <li>• Committee structure in place with Terms of Reference, including powers reserved to the BA</li> <li>• Compliance with CIPFA's statement on the role of the Chief Finance Officer in Local Govt (CIPFA 2015)</li> <li>• Counter Fraud, Corruption and Bribery Strategy and Response Plan</li> <li>• Disciplinary Procedures for Officers (HR Policy 11)</li> <li>• Financial Regulations, Contract Standing Orders and Procurement Strategy</li> <li>• Internal and external audit</li> <li>• Job descriptions and recruitment process for officers</li> <li>• Member induction programme and development protocol</li> </ul>

<p>Dealing effectively with corruption and misuse of power</p>	<ul style="list-style-type: none"> <li>• Monitoring Officer appointed by BA</li> <li>• Provision of legal advice to Members and Officers</li> <li>• Register of Member and Officer interests and related party interests</li> <li>• Role descriptions for Members</li> <li>• Scheme of Powers Delegated to Officers</li> <li>• Statutory Officers appointed by the Authority</li> <li>• Whistleblowing Policy for Officers (HR Policy 15)</li> </ul>
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**Table 2**

Principle B: Ensuring openness and comprehensive stakeholder engagement

Sub-principles	Our evidence to support this principle
<p><b>Ensuring openness</b></p> <p>Demonstrating, documenting and communicating the organisation’s commitment to openness</p> <p>Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness - if that is not the case, a justification for the reasoning for keeping a decision confidential is provided</p> <p>Providing clear reasoning and evidence for decisions, in both public records and explanations to stakeholders, being explicit about the criteria, rationale and considerations used. In due course, making sure the impact and outcomes of those decisions are clear</p> <p>Using formal and informal consultation and engagement to determine the most appropriate and effective interventions or courses of action</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement</li> <li>• BA Core Values</li> <li>• BA website (includes public information about Members and their roles, Officer roles, and how the public can input to and influence BA decisions)</li> <li>• Broads Engage stakeholder events and promotion</li> <li>• Broads Local Plan - formal consultation stages (set out in Statement of Community Involvement)</li> <li>• Chairman’s briefings</li> <li>• Committee meetings held in public and audio recordings of meetings available to public on request</li> <li>• Corporate Partnerships Register</li> <li>• Fair and transparent data processing through privacy notices</li> <li>• Financial Regulations and Standing Orders Relating to Contracts</li> <li>• Financial statements</li> <li>• Information published in respect of expenditure over £250</li> <li>• Member Allowance Scheme</li> <li>• Public consultation processes for strategic plan reviews (e.g. Broads Plan, guiding strategies)</li> <li>• Public question time at committee meetings</li> <li>• Publication of agendas and reports in line with Local Government Act 1972 requirements</li> </ul>

	<ul style="list-style-type: none"> <li>• Record of decisions in committee minutes</li> <li>• Use of Transparency Regulations 2015</li> </ul>
<p><b>Comprehensive stakeholder engagement</b></p> <p>Engaging effectively with all stakeholders, making sure the purpose and aims for each stakeholder relationship are clear so outcomes are successful and sustainable</p> <p>Developing formal and informal partnerships to encourage more efficient use of resources and more effective outcomes</p> <p>Basing partnerships on trust, shared commitment to change, culture that promotes and accepts challenge among partners, and clear awareness of the added value of partnership working</p> <p>Establishing a clear policy on the type of issues the organisation will meaningfully consult on or involve communities, individuals, service users and other stakeholders to make sure the service (or other) provision is contributing towards intended outcomes</p> <p>Having effective communication methods and making sure members and officers are clear on their roles in community engagement</p> <p>Encouraging, collecting and evaluating the views and experiences of stakeholders of different backgrounds, including reference to future needs</p> <p>Implementing effective feedback mechanisms to show how stakeholder views have been considered</p>	<ul style="list-style-type: none"> <li>- Annual Business Plan, Annual Report and visitor publications (e.g. Broadcaster), social media accounts</li> <li>- Appointment process to Navigation Committee and Broads Local Access Forum</li> <li>- Broads Briefing monthly newsletter from CEO</li> <li>- Broads Engage stakeholder events (e.g. workshops, Parish Forums), feedback processes and promotion</li> <li>- Broads Local Access Forum</li> <li>- Broads Local Plan - formal consultation stages (set out in Statement of Community Involvement)</li> <li>- Broads Plan 6-monthly progress update report (and continual progress monitoring on e-system)</li> <li>- Broadsheet (toll payer newsletter)</li> <li>- KPI annual reporting as part of NPA monitoring process to Defra</li> <li>- Learning resources on BA website, including Broads Curriculum materials for schools</li> <li>- Navigation Committee</li> <li>- Notices to Mariners</li> <li>- Public questions time at committee meetings</li> <li>- Regular meetings between Chairs and CEOs of BA and constituent local authorities</li> <li>- Regular officer level liaison with partner organisations</li> <li>- Visitor and user surveys</li> </ul>

<p>Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity</p> <p>Taking account of the impact of decisions on future generations of tax payers and service users</p>	
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**Table 3**

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits

Sub-principles	Our evidence to support this principle
<p><b>Defining outcomes</b></p> <p>Having a clear vision statement of the organisation’s purpose and intended outcomes, with performance indicators, that provide the basis for its overall strategy, planning and other decisions</p> <p>Specifying the intended impact on/ changes for stakeholders in the short and longer term</p> <p>Delivering defined outcomes sustainably basis within available resources</p> <p>Identifying and managing risks to achieving outcomes</p> <p>Managing service user expectations with regard to setting priorities and making the best use of available resources</p>	<ul style="list-style-type: none"> <li>• Annual Business Plan</li> <li>• BA guiding level strategies (e.g. Integrated Access, Sediment Management, Education, Biodiversity)</li> <li>• Broads Local Plan (spatial planning policy)</li> <li>• Broads Plan (key partnership strategy for the Broads, reviewed on 5-yearly cycle)</li> <li>• Corporate and Directorate Risk Registers</li> <li>• Corporate Partnerships Register</li> <li>• Norfolk &amp; Suffolk Broads Act 1998 (BA statutory purposes)</li> </ul>
<p><b>Considering social, economic and environmental benefits</b></p> <p>Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision</p>	<ul style="list-style-type: none"> <li>• Broads Local Plan</li> <li>• Broads Plan and guiding level strategies</li> <li>• Equalities Working Group</li> <li>• Norfolk &amp; Suffolk Broads Act 1998 (BA statutory purposes)</li> <li>• Project Development Group procedures</li> <li>• Public consultation for strategic plan reviews</li> </ul>

<p>Taking a longer-term view in decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints</p> <p>Determining the wider public interest associated with balancing conflicting interests in achieving the various economic, social and environmental benefits, through consultation where possible, to ensure appropriate trade-offs</p> <p>Ensuring fair access to services</p>	
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**Table 4**

Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes

<b>Sub-principles</b>	<b>Our evidence to support this principle</b>
<p><b>Determining interventions</b></p> <p>Making sure decision makers receive objective and rigorous analyses of various options showing how intended outcomes would be achieved and associated risks, to achieve best value.</p> <p>Considering stakeholder feedback when making decisions about service improvements, or where services are no longer required, to prioritise competing demands and limited resources such as people, skills and land, and bearing in mind future impacts.</p>	<ul style="list-style-type: none"> <li>• BA and partner/stakeholder working groups</li> <li>• Budget setting process</li> <li>• Chairman's briefing sessions</li> <li>• Chairs' Group</li> <li>• Financial Regulations and Standing Orders Relating to Contracts</li> <li>• Member working groups</li> <li>• Project boards for large partnership projects (e.g. CANAPE and Water, Mills &amp; Marshes)</li> <li>• Public consultation responses informing strategic plan and policy reviews (e.g. Broads Plan, Broads Local Plan)</li> </ul>
<p><b>Planning interventions</b></p> <p>Establishing and implementing robust planning and control cycles</p>	<ul style="list-style-type: none"> <li>• Annual budget processes approved by BA with consultation by Navigation Committee</li> <li>• Financial Monitoring</li> <li>• Financial Strategy</li> </ul>



<p>that cover strategic and operational plans, priorities and targets</p> <p>Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered</p> <p>Considering and monitoring risks facing each partner when working collaboratively, including shared risks</p> <p>Having flexible and agile arrangements so mechanisms for delivering goods and services can adapt to changing circumstances</p> <p>Establishing appropriate key performance indicators (KPIs) as part of the planning process to identify how the performance of services and projects is to be measured</p> <p>Ensuring capacity exists to generate the information required to review service quality regularly</p> <p>Preparing budgets in accordance with objectives, strategies and the medium-term financial plan</p> <p>Informing medium- and long-term resource planning by drawing up realistic estimates of revenue and capital expenditure, aimed at developing a sustainable funding strategy</p>	<ul style="list-style-type: none"> <li>• Key Performance Indicator (KPI) annual reporting as part of National Park Authority monitoring process to Defra</li> <li>• Performance reporting to Committees</li> <li>• Regular monitoring undertaken by budget holders and Management Team and reported to committee</li> <li>• Review cycles for Broads Plan, guiding strategies (e.g. Integrated Access Strategy, Biodiversity &amp; Water Strategy) and Broads Local Plan</li> <li>• Risk management (see principle F)</li> <li>• Corporate Risk Register review by Audit &amp; Risk Committee</li> </ul>
<p><b>Optimising achievement of outcomes</b></p> <p>Ensuring the medium-term financial strategy integrates and balances service priorities, affordability and other resource constraints</p> <p>Ensuring the budgeting process is all-inclusive, taking into account</p>	<ul style="list-style-type: none"> <li>• Annual setting of tolls in consultation with Navigation Committee and Member Working Group</li> <li>• Asset Management Strategy</li> <li>• Budget and 3-year Financial Strategy agreed by BA</li> <li>• Budget reports, management procedures and training</li> <li>• Budgets monitored by Audit &amp; Risk Committee and BA</li> <li>• Capital, Treasury and Investment Strategy</li> <li>• Procurement Strategy and reference guide</li> </ul>

<p>the full cost of operations over the medium and longer term</p> <p>Ensuring the medium-term financial strategy sets the context for ongoing decisions on significant delivery issues, or responses to changes in the external environment that may arise during the budgetary period, to achieve outcomes while optimising resource use</p> <p>Ensuring 'social value' through service planning and commissioning</p>	<ul style="list-style-type: none"> <li>• Standing Orders Relating to Contracts</li> </ul>
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**Table 5**

Principle E: Developing the Authority's capacity, including the capacity of its leadership and the individuals within it

<b>Sub-principles</b>	<b>Our evidence to support this principle</b>
<p><b>Developing capacity</b></p> <p>Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness</p> <p>Improving resource use through techniques such as benchmarking</p> <p>Recognising the benefits of partnerships and collaborative working where added value can be achieved</p> <p>Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources</p>	<ul style="list-style-type: none"> <li>• Annual presentation to BA on major partnerships</li> <li>• Health and Safety policies and procedures</li> <li>• ICT Corporate Group review of ICT performance</li> <li>• Management Team decision in recruitment processes</li> <li>• Member and Officer induction and appraisal programmes</li> <li>• Strategic Risk Register review</li> <li>• Whistleblowing Policy for Officers (HR Policy 15)</li> </ul>
<p><b>Developing leadership capacity</b></p> <p>Developing protocols to ensure elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship, and</p>	<ul style="list-style-type: none"> <li>• Chief Finance Officer compliance with CIPFA Statement on the Role of the Chief Finance Officer in Local Government</li> <li>• Conditions of employment and HR policies</li> </ul>

<p>that a shared understanding of roles and objectives is maintained</p> <p>Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body</p> <p>Ensuring the Chair and Chief Executive Officer have clearly defined and distinctive leadership roles within a structure whereby the CEO leads in implementing strategy and managing the delivery of services and other outputs set by members, and each provides a check and a balance for each other's authority</p> <p>Developing the capabilities of members and senior management to achieve effective leadership, and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks</p> <p>Having structures in place to encourage public participation</p> <p>Considering the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections</p> <p>Holding staff to account through regular performance reviews that take account of training or development needs</p> <p>Maintaining the health and wellbeing of the workforce and helping individuals to maintain their own physical and mental wellbeing</p>	<ul style="list-style-type: none"> <li>• Contract management in respect of externally provided services</li> <li>• Data Protection Officer in place</li> <li>• Financial Regulations and Standing Orders</li> <li>• Member and Officer appraisal programmes, Member Development Protocol</li> <li>• Member workshops on key issues</li> <li>• Monitoring Officer appointed by BA</li> <li>• Scheme of Powers Delegated to Officers</li> <li>• Standing Orders for the Regulation of Authority Proceedings</li> <li>• Terms of Reference for Committees</li> </ul>
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**Table 6**

Principle F: Managing risks and performance through robust internal controls and strong public finance management

Sub-principles	Our evidence to support this principle
<p><b>Managing risk</b></p> <p>Recognising risk management is integral to all activities and must be considered in all aspects of decision making</p> <p>Implementing robust and integrated risk management arrangements and making sure they work effectively</p> <p>Allocating clear responsibilities for managing individual risks</p>	<ul style="list-style-type: none"> <li>• Business Continuity Plan</li> <li>• Corporate Risk Register (reviewed every 6 months and reported to Audit and Risk Committee)</li> <li>• Counter Fraud, Corruption and Bribery Strategy and Response Plan</li> <li>• Risk analysis in BA reports</li> <li>• Risk Management Policy</li> </ul>
<p><b>Managing performance</b></p> <p>Effectively monitor service delivery including planning, specification, execution and independent post implementation review</p> <p>Making decisions based on relevant, clear objective analysis and advice, pointing out the implications and risks inherent in the organisation’s financial, social and environmental position and outlook</p> <p>Ensuring an effective scrutiny or oversight function is in place that provides constructive challenge and debate on policies and objectives before, during and after decisions are made. This will help enhance the performance of the organisation and any other organisation (or committee system) for which it is responsible</p> <p>Effectively and constructively challenging and policies and objectives to support balanced and effective decision making</p> <p>Providing members and senior management with regular reports on</p>	<ul style="list-style-type: none"> <li>• Audit and Risk Committee</li> <li>• Capital, Treasury and Investment Policy</li> <li>• Chairs’ Group</li> <li>• Financial Monitoring</li> <li>• Financial Regulations and procedures</li> <li>• Management Team and Section Head reviews of Directorate work plans and budgets</li> <li>• Procurement Strategy</li> <li>• Regular finance reports to BA, Audit &amp; Risk Committee and Navigation Committee</li> <li>• Risk and financial implications in reports to BA</li> <li>• Standing Orders Relating to Contracts</li> <li>• Statement of Accounts follows budget headings</li> <li>• Terms of Reference for Committees</li> </ul>

<p>service delivery plans and on progress towards outcome achievement</p> <p>Ensuring consistency between specification stages (such as budgets) and post implementation reporting (such as financial statements)</p>	
<p><b>Developing robust internal control</b></p> <p>Aligning the risk management strategy and policies on internal control with achieving objectives</p> <p>Regularly evaluating and monitoring risk management and internal control</p> <p>Having effective counter fraud and anti-corruption arrangements in place</p> <p>Making sure that additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor</p> <p>Having an audit committee or equivalent group/function, independent of the executive and accountable to the governing body</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Annual Internal Audit plans include key controls and corporate governance</li> <li>• Annual Report and Opinion provided by Head of Internal Audit with ref to governance, risk management and internal control arrangements</li> <li>• Audit and Risk Committee</li> <li>• Best Companies Index employee survey</li> <li>• Capital, Treasury and Investment Strategy</li> <li>• Codes of Conduct for Employees (HR Policy 2), for Members, and for Planning Committee Members Standing Orders Relating to Contracts</li> <li>• Counter Fraud, Corruption and Bribery Strategy and Response Plan</li> <li>• Disciplinary Procedures for Officers (HR Policy 11)</li> <li>• Effective internal audit function resourced and maintained</li> <li>• Financial Regulations, Contract Standing Orders and Procurement Strategy</li> <li>• Internal and external annual audit processes</li> <li>• Local Protocol on Member and Officer Relations</li> <li>• Procurement Strategy</li> <li>• Publication of reports and meeting minutes showing declarations of interest made</li> <li>• Risk Owners (e.g. reporting to Corporate Risk Register)</li> <li>• Scheme of Delegation of Powers to Officers</li> <li>• Standing Orders Relating to Contracts</li> <li>• Training for Members</li> </ul>
<p><b>Managing data</b></p> <p>Having effective arrangements in place for the safe collection, storage, use and</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement</li> <li>• Data and Information Retention Policy</li> </ul>

<p>sharing of data, including processes to safeguard personal data</p> <p>Having effective arrangements in place and operating when sharing data with other bodies</p> <p>Regularly reviewing and auditing the quality and accuracy of data used in decision making and performance monitoring</p>	<ul style="list-style-type: none"> <li>• Data Asset Register, privacy notices and Protection policy</li> <li>• Data Protection Officer (qualified Data Practitioner), data protection training to Members and Officers</li> <li>• Encryption of portable devices</li> <li>• IT security arrangements</li> <li>• Review of contracts to ensure data security provisions are incorporated</li> <li>• Statement of Accounts narrative report</li> </ul>
<p><b>Having strong public financial management</b></p> <p>Ensuring financial management supports both long-term achievement of outcomes and short-term financial and operational performance</p> <p>Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls</p>	<ul style="list-style-type: none"> <li>• 3-year Financial Strategy</li> <li>• Annual budget and budget management procedures</li> <li>• Annual Business Plan</li> <li>• Annual Statement of Accounts</li> <li>• Asset Management Strategy</li> <li>• Capital, Treasury and Investment Strategy Chief Finance Officer compliance with the CIPFA Statement on the Role of the Chief Finance Officer in Local Government</li> <li>• Earmarked reserves for long-term replacement of assets</li> <li>• External Audit reports</li> <li>• Financial Regulations and procedures</li> <li>• Financial statements</li> <li>• Reports to BA include financial and risk considerations</li> </ul>

**Table 7**

Principle G: Implement good practice in transparency, reporting and audit to deliver effective accountability

<b>Sub-principles</b>	<b>Our evidence to support this principle</b>
<p><b>Implementing good practice in transparency</b></p> <p>Writing and communicating reports for public and other stakeholders in fair, balanced and understandable</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Information published in respect of expenditure over £250</li> <li>• Monthly data published on BA website in line with Local Government Transparency Code</li> </ul>

<p>style, appropriate to the intended audience and easy to access and interrogate</p> <p>Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny, while not being too onerous to provide or for users to understand</p>	<ul style="list-style-type: none"> <li>• Record of delegated decisions</li> <li>• Scheme of Delegation of Powers to Officers</li> </ul>
<p><b>Implementing good practice in reporting</b></p> <p>Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way</p> <p>Ensuring members and senior management own the results reported</p> <p>Ensuring robust arrangements for assessing the extent to which principles in this Framework have been applied, and publishing the results on this assessment, including action plan for improvement and evidence to demonstrate good governance (AGS)</p> <p>Apply Framework to jointly managed or shared service organisations as appropriate</p> <p>Ensure performance information that accompanies the financial statements on a consistent and timely basis and the statements allow for comparison with other, similar organisations</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Broads Plan 6-monthly progress reports</li> <li>• S17 officer reporting requirements</li> <li>• Statements of Accounts narrative report</li> <li>• Strategic Direction reports (BA annual strategic priorities)</li> </ul>
<p><b>Developing assurance and effective accountability</b></p> <p>Acting upon recommendations for corrective action made by external audit</p> <p>Ensuring an effective internal audit service with direct access to</p>	<ul style="list-style-type: none"> <li>• Annual Governance Statement and Action Plan</li> <li>• Attendance of internal and external auditors at Audit and Risk Committee (ARC)</li> <li>• Audit actions formally logged, followed up and reported to ARC</li> <li>• Best Companies Index employee survey</li> </ul>

members is in place, providing assurance with regard to governance arrangements, and acting upon recommendations

Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations

Gaining assurance on risks associated with delivering services through third parties and evidencing this in the AGS

When working in partnership, make sure arrangements for accountability are clear and the need for wider public accountability is recognised and met.

- Corporate and Directorate Risk Registers
- Follow up of internal audit recommendations by Chief Finance Officer and periodically reported to ARC
- Head of Internal Audit compliance with CIPFA Statement on the Role of the Head of Internal Audit
- Internal audit function delivered by contract and meets PSIAS requirements
- Peer Review (2017) and Action Plan (reviewed 2019/20)

(end of document)



# Broads Authority

23 July 2021

Agenda item number 12

## Draft Statement of Accounts 2020/21

Report by Chief Financial Officer

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### Summary

This report provides an update on the Broads Authority's Statement of Accounts and its audit for the year ended 31 March 2021.

### Recommendation

To note the report.

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### 1. Introduction

1.1. In the Financial Performance and Direction report to the Broads Authority on 30 April, draft figures for 2020/21 provided for a consolidated surplus of £209,219. It was updated verbally at that meeting that some additional year end adjustments had been made and the surplus had decreased slightly to £182,568. These figures were then used in the production of the draft Statement of Accounts, which were signed and published on the Authority's website on 17 June. This was slightly later than indicated in the above report, due mainly to additional land valuations having to be completed by the property consultants.

### 2. Changes to the 2020/21 Accounts

2.1. There have been no significant changes to this year's accounts. The cashflow statement has been restated for 2019/20 to reflect the correct treatment of the proceeds of the

property, plant and equipment sale. This can be found on page 19 of the Statement of Accounts and affects the second line in the table (Adjustments to net surplus or deficit on the provision of services for non-cash movements) and the fifth line (Investing Activities). This also means that note 21 (page 53) has been restated. The restatement has not affected the closing position.

2.2. Tables 1 and 2 below have been produced to help members understand the additional adjustments made at year end.

**Table 1**

Summary Income and Expenditure 2020/21

<b>Income and Expenditure</b>	<b>Operations £000's</b>	<b>Strategic Services £000's</b>	<b>Chief Executive £000's</b>	<b>HLF &amp; CANAPE £000's</b>	<b>Corporate Amounts £000's</b>	<b>Total £000's</b>
Fees, charges and other service income	(156)	(443)	(30)	(628)	(3,408)	(4,665)
Contribution from reserves	0	0	0	0	(176)	(176)
Government Grants	0	0	0	0	(3,414)	(3,414)
<b>Total Income</b>	<b>(156)</b>	<b>(443)</b>	<b>(30)</b>	<b>(628)</b>	<b>(6,998)</b>	<b>(8,255)</b>
Employee expenses	2,209	1,445	819	160	131	4,764
Other services expenses	1,607	457	673	571	0	3,308
<b>Total Expenditure</b>	<b>3,816</b>	<b>1,902</b>	<b>1,492</b>	<b>731</b>	<b>131</b>	<b>8,072</b>
<b>Net Expenditure</b>	<b>3,660</b>	<b>1,459</b>	<b>1,462</b>	<b>103</b>	<b>(6,867)</b>	<b>(183)</b>

**Table 2**

Summary of adjustments

<b>Adjustments</b>	<b>Amounts £000's</b>
Net Expenditure	(183)
Amounts in the Comprehensive Income and Expenditure Statement (CIES) not reported to management	771
Amounts included in Table 1 not in the CIES	2,977
<b>Cost of Services in the CIES</b>	<b>3,565</b>

- 2.3. Items in the amounts included in the CIES not reported to management include year-end adjustments for the Pension Scheme. The Accounts are adjusted to reflect the difference between the actual costs as assessed by the Actuary and the contributions paid over during the year. Further adjustments are also made for untaken staff leave, depreciation and movements on the revaluations of fixed assets.
- 2.4. The main adjustments in the third line, which is within the analysis above but not the Comprehensive Income and Expenditure Statement, are the removal of the DEFRA grant, interest and investment income and interest payable. These items are added back in the lines under the cost of services. Further adjustments relate to the accounting treatment of capital expenditure, reserve expenditure and finance leases.
- 2.5. Table 3 below analyses these adjustments in more detail and agrees back to the Comprehensive Income and Expenditure Statement on page 16 in the Statement of Accounts.

**Table 3**

## Detailed adjustments

<b>Income and Expenditure type</b>	<b>Service Analysis £000's</b>	<b>Not reported to Management £000's</b>	<b>Not included in the CIES £000's</b>	<b>Net Cost of Services £000's</b>	<b>Other operating expenditure, financing &amp; investment income and Government Grant £000's</b>	<b>Deficit on the Provision of Services £000's</b>
Fees, charges and other service income	(4,643)	0	0	(4,643)	0	(4,643)
Interest and investment income	(22)	0	22	0	(22)	(22)
Contributions from earmarked reserves	(176)	0	(207)	(383)	0	(383)
Government Grants	(3,414)	0	3,414	0	(3,414)	(3,414)
<b>Total Income</b>	<b>(8,255)</b>	<b>0</b>	<b>3,229</b>	<b>(5,026)</b>	<b>(3,436)</b>	<b>(8,462)</b>
Employee expenses	4,764	419	0	5,183	205	5,388
Other service expenses	3,279	0	(223)	3,056	0	3,056
Depreciation, amortisation & revaluation	0	352	0	352	0	352
Interest payments	29	0	(29)	0	29	29
Gain on disposal of Assets	0	0	0	0	(9)	(9)
<b>Total Operating Expenditure</b>	<b>8,072</b>	<b>771</b>	<b>(252)</b>	<b>8,591</b>	<b>225</b>	<b>8,816</b>
<b>(Surplus)/Deficit on the Provision of Services</b>	<b>(183)</b>	<b>771</b>	<b>2,977</b>	<b>3,565</b>	<b>(3,211)</b>	<b>354</b>

### **3. Balance Sheet**

- 3.1. This year the Balance Sheet has continued to remain at a net liability position; at the end of 2020/21 it was £4,413,000. This is an increase from the 2019/20 position of £221,000. As with previous years, the cause of this is the movement in the Pension Fund liability, which has increased by £4,631,000. The pension fluctuations are due to the changes in financial assumptions as calculated by the actuary. The fund also seeks to maintain contributions at a consistent rate to minimise the impact on the Authority's cash flows. The Authority makes additional contributions to the fund to reduce the deficit over the next 20 years. Funding levels are monitored on an annual basis, while the contributions and the annual deficit payments are recalculated as part of triennial valuation. Additional information about the Pension Fund Assets and Liabilities can be found within the Statement of Accounts under Note 31.
- 3.2. The bottom section of the Balance Sheet on page 18 splits the reserves between useable and unusable reserves. The useable reserves can be used to fund future operating expenditure, while the unusable reserves are kept to manage accounting processes such as unrealised gains or acquisitions of Fixed Assets and the movements on the Pension Reserve.
- 3.3. The closing position on the National Park (General), Navigation and Earmarked reserves remain at the same levels as verbally reported on 30 April 2021. The individual balances that make up the Earmarked reserve can be found within the Statement of Accounts under note 10, page 40. The year end balances of the reserves are:
  - National Park £913,595;
  - Navigation £913,595;
  - Earmarked £2,338,470, of which £952,346 relates to Navigation.

### **4. Annual Governance Statement**

- 4.1. The Accounts and Audit (England) Regulations 2015 contain a requirement that an Annual Governance Statement, prepared in accordance with proper practices in relation to internal control, must be approved by the relevant body and must accompany the Statement of Accounts. The Annual Governance Statement is item 11 on this agenda.

### **5. Audit of the Statement of Accounts**

- 5.1. The Authority's external auditors, Ernst & Young (EY) are scheduled to carry out the audit between 19 July and 13 August. A verbal update on its initial progress will be provided to the Audit and Risk Committee on 20 July.
- 5.2. At this stage, it is still anticipated that the final Statement of Accounts will be presented to the Audit and Risk Committee on 21 September for consideration prior to approval by the Broads Authority on 24 September, subject to any amendments.

## 6. Financial implications

- 6.1. The Statement of Accounts for 2020/21 shows revenue reserves of £1,827,190 (National Park (general) reserves £913,595, Navigation reserves £913,595) that are considered to be adequate. The National Park reserve at the end of 2020/21 stands at 27% of net expenditure, while the Navigation reserve is 28%. This is higher than the Financial Strategy forecast for the end of 2020/21. This is in part due to two reasons, the transfer of £250,000 between the two reserves and the carry forwards.
- 6.2. The impact of COVID-19 has seen increased numbers of visitors to the Broads due to the increased popularity of a 'staycation'. To increase the safety of visitors, it was agreed with DEFRA that a transfer would be made at the end of the financial year to cover the costs of these additional safety measures over the next two years. However, it should be noted that once the £250,000 is spent during 2021/22 and 2022/23 this reduces the reserve balance to 13% at the end of 2022/23 based on the current Financial Strategy.
- 6.3. The carry forwards of £93,392 (national park £15,421, navigation £77,971) approved at the April meeting was effectively expenditure that should have been occurred in 2020/21 but, for reasons beyond the Authority's control, meant they were delayed until 2021/22.
- 6.4. The outturn figures for 2020/21 and the 2021/22 level of tolls received will be assessed for their impact on the overall level of reserves, and will be taken into account in future budgeting proposals and when making decisions about income and expenditure in 2021/22.

Author: Emma Krelle

Date of report: 18 June 2021

Appendix 1 – Draft Statement of Accounts 2020/21

# Broads Authority

## Draft Statement of Accounts 2020/21

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# Narrative report

## Introduction

The purpose of the Narrative Report is to provide information on the Authority, its main objectives and strategies and the principal risks that it faces. It also provides commentary on how the Authority has used its resources to achieve its outcomes in line with its objectives and strategies.

## About the Broads Authority

The Broads Authority was established by the Norfolk and Suffolk Broads Act 1988.

Its duties, as subsequently amended by the Natural Environment and Rural Communities Act 2006, are to manage the Broads for the purpose of:

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

This brought the first two purposes into line with those of the English National Park Authorities, as recommended in the Department for Environment, Food and Rural Affairs (Defra) report 'Review of English Park Authorities' published in July 2002.

In discharging its function, the Authority should have regard to:

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

In respect of its navigation area the Authority is required to:

- maintain the navigation area for the purposes of navigation to such a standard as appears to it to be reasonably required; and
- take such steps to improve and develop it as it thinks fit.

The Broads Authority Act 2009 amended the 1988 Act and is primarily concerned with augmenting the Authority's powers to ensure safety on the Broads, including the application of the Boat Safety Scheme and compulsory third-party insurance. It also made provision for the transfer of responsibility for the navigation in Breydon Water to the Authority which was implemented in 2012. The 2009 Act removed the need for the Authority to maintain a separate navigation account and contained provisions which require the Authority to ensure

that, taking one year with another, expenditure on navigation matters is equal to navigation income.

The Broads Plan is the key management plan for the Broads. It sets out a long-term vision for the benefit of the natural and cultural environment, local communities and visitors. Although the Authority is responsible for its production it is a plan for the whole of the Broads, and its success very much depends on a common vision, strong partnership working and the best use of shared resources. The current plan covers the period 2017-22 and is publicly available via the website. A six-monthly newsletter is produced to provide updates and can also be found in the link below.

<https://www.broads-authority.gov.uk/about-us/how-we-work/strategy>

The Authority's Strategic Priorities are set annually by the members in line with objectives in the Broads Plan. Progress against the Strategic Priorities is reported regularly to the Authority and details of 2020/21 can be found in the link below:

[Strategic direction: Draft Annual Business Plan 2021/22 and strategic priorities update \(broads-authority.gov.uk\)](#)

All decisions are supported by the Authority's core values. These are enduring beliefs or ideals about what is good or desirable and what is not. They are:

- Sustainable - we take the long-term view, are passionate about our environment and its ability to provide for a vibrant local economy and the well-being of local people;
- Exemplary - we strive for excellence in all we do. We are ambitious, innovative and lead by example;
- Commitment - we are committed to making a difference to the Broads for the benefit of all, and will have the courage of our convictions when faced with difficult issues;
- Caring - we are considerate and respectful of each other, working together to provide the best service we can; and
- Open and Honest - we are open, honest and inclusive in our communication and in making decisions. We are approachable and available, reaching out to all groups.

The Authority is funded from two major sources; National Park Grant from Defra and Navigation Toll Income. These are approximately equal to each other and are used to fund the activities (including staffing) across the organisation.

## Governance

The Annual Governance Statement provides details of progress against the current year and provides the new financial year action plan. This will be considered by the Authority on 23 July and will be available via the link below:

[Broads Authority - 23 July 2021 \(broads-authority.gov.uk\)](#)

In 2018 the Government commissioned a review of National Parks and Areas of Outstanding Natural Beauty (AONBs) looking at coverage of designations, how designated areas deliver their responsibilities, how designated areas are financed, and whether there is scope for expansion. The review team, led by Julian Glover, visited the Broads in November 2018. The team's report "Landscapes Review" was published in September 2019. The Government response is expected this year. The Authority received a paper at its January 2020 committee identifying some short-term priorities. A link to the committee report can be found below that also contains a link to the final report.

[https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0026/263807/Landscape-Review-Response-with-Appendix-Glover-report-Recommendations-31-01-20.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0026/263807/Landscape-Review-Response-with-Appendix-Glover-report-Recommendations-31-01-20.pdf)

## Operational model

The Authority consists of the Chief Executive team and two Directorates; Operations and Strategic Services. The total number of staff employed by the Authority gives a head count of 156 or 139.2 Full Time Equivalents (FTE) as at 31 March 2021. This is split 79 (74.5 FTE) Operations, 52 (44.1 FTE) Strategic Services and 25 (20.6 FTE) Chief Executive. Due to the seasonal nature of the Authority's activities the levels of staff vary throughout the year and the year-end position may vary depending on when Easter falls.

The Chief Executive is supported by the Governance Team who service the Authority's various committees; and the Chief Financial Officer who is responsible for the Asset Management, IT, Collection of Tolls, Finance and Insurance team.

The Operations Directorate consists of; the Construction, Maintenance and Environment team who carry out the practical work on the Broads, from dredging to the maintenance and refurbishment of moorings and land based sites and project managing the National Heritage Lottery Fund (NHLF) project 'Water, Mills and Marshes'; the Ranger team who patrol the waterways enforcing our byelaws to small scale practical works and Safety Management that has health and safety responsibility for all staff and visitor safety on and near the water.

The Strategic Services Directorate consists of; Planning - responsible for all planning applications, enforcement and the Local Plan within the Authority's executive area; Communications - responsible for all publications, events and visitor services; HR - supporting all of the Authority's employees; Volunteer Services which support volunteering opportunities across all areas of the Authority; and other strategic priorities; the management of the European Regional Development Fund (ERDF) INTERREG project 'Creating A New Approach to Peatland Ecosystems' (CANAPE).

The Authority's income is supplemented by income from planning fees, contributions from landowners and the Rural Payments Agency towards fen management, Visitor Centres and Yacht Station sales and external funding such as HLF and ERDF.

## Risks

Uncertainty exists about future years' settlements and their duration. The impact of COVID-19 on the income the Authority receives from its toll payers was significantly less than originally expected. The loss of income was balanced through in-year savings. Cuts to the National Park Grant in years 2010/11 to 2015/16 has meant the Authority has already restructured from four Directorates to two. If there were future reductions to the National Park Grant beyond 2022/23 it would mean difficult decisions would need to be made to determine future services. This uncertainty is further emphasised by the outcome of the Comprehensive Spending Review due in the autumn, although this would be offset if Defra provided a three-year settlement. The current level of National Park reserves means that such impact would be cushioned in the short term until the longer vision of services is determined; however, this is not sustainable in the longer term.

Risks are reviewed on a regular basis with actions being taken to mitigate any possible impacts. Reports to the Authority highlight risks on potential new areas of activity. The Audit and Risk Committee receive detailed reports on the current risks with details of the individual risks, risk owner and actions. A link to the latest report can be found below.

[Corporate-Risk-Register-update.pdf \(broads-authority.gov.uk\)](#)

### Review of Corporate Risk Register

Following a recommendation from internal audit's Corporate Governance and Risk Management review the risk register and policy was reviewed and updated during 2019/20. The risk register is now split between the Corporate risk register, focusing on risks that are strategic, and Directorates' risk registers, focusing on operational day to day risk. The Corporate risk register continues to be reviewed bi-annually by the Audit and Risk committee with the option for significant risks being reported to the Broads Authority.

## Opportunities

External funding opportunities continue to be investigated and supported by National Parks Partnership LLP (NPP). NPP continues to promote corporate partnerships for the UK National Parks with the aim to make a significant, sustainable and discernible contribution to the improved quality of UK National Parks and the benefits they offer for generations to come. The UK National Parks also continue to investigate efficiencies through joint procurement and services and also to create resilience amongst the Parks. 2019/20 saw the creation of the UK National Parks Communication Team hosted by the Authority. This service is jointly funded by all 15 UK National Parks and seeks to promote a shared sense of identity.

The Authority has already been successful in gaining external funding from; the NHLF for Water, Mills and Marshes, ERDF for CANAPE, WEG, ELMs, EXPERIENCE, Generation Green and Columbia providing clothing to all front-line staff for five years from 2017/18.

Prior to the outbreak of COVID-19 opportunities were being explored for a Visitor Services presence at the Norwich Forum, but this has evolved into an external display in Norwich City centre, which would make it easier to adapt with potential social distancing requirements.

The external display project will be partly funded through the Interreg EXPERIENCE project led by Norfolk County Council, and it is hoped that this will be progressed in 2021/22. This would fill the gap in visitor information provision since the Visitor Centre at Whitlingham Country Park was closed due to the Trust wishing to take back responsibility for the Park. The displays at Lowestoft Train Station were completed during the summer, and Ranworth Visitor Centre reopened to the public on 12 April 2021. More opportunities for additional signs at train stations will be developed in coordination with the Community Rail Partnership.

### **Strategy and resource allocation**

The current Financial Strategy was drawn up having regard to the Authority's grant settlement and the priorities in the Broads Plan. It sets out a prudent strategy for managing the limited resources available in order to build on the work underway across the organisation and to continue to deliver the Authority's key priorities over the next three years. The focus in developing the Financial Strategy has been to deliver the maximum possible efficiencies and savings in order to minimise the impact on front-line activity. The Authority recognises that without its employees continued commitment and hard work this would not be possible.

In developing the Financial Strategy, a number of assumptions have been made in respect of National Park Grant allocations, future boat numbers and the level of staff pay inflation. The Strategy follows the general principle that the Authority should seek to maintain the general (National Park) reserve at a minimum of £100,000 plus 10% of net expenditure, and the navigation reserves at a minimum of 10% of net expenditure. It also expects that General and Navigation income and expenditure should be broadly in balance across the life of the Financial Strategy. The outbreak of COVID during 2020 has seen the Authority committed to review its reserves policy during 2021 to ensure that the set minimums are appropriate in order to survive any future pandemics.

On 20 November 2007, the Authority took out a £290,000 loan from the Public Works Loan Board (PWLB). The repayment period of the loan is 20 years at a fixed interest rate of 4.82%, repayable by equal instalments of principal. The Public Works Loan Board has advised that the fair value of the debt as at 31 March 2021 is £109,892.

The purpose of this loan was to finance the purchase of the Dockyard Operation from May Gurney to enable the Authority to continue to dredge the Broads in an economical and efficient manner.

During 2020/21, the Authority took out a further loan from the PWLB for £105,000. The purpose of the loan was to fund the purchase of a new JCB excavator. These types of purchases have typically been financed by finance leases in the past, but the fixed rate of interest at 2% made the loan the cheapest option. The loan is to be repaid over five years, repayable by annuity. The PWLB has advised that the fair value of the debt as 31 March 2021 is £110,894.

## Performance

Performance is assessed against progress made towards the Broads Plan, Strategic Priorities and the Budget with regular updates being provided to the Authority.

### General (National Park) Income and Expenditure

The Authority received National Park Grant of £3,414k from Defra (£3,414k in 2019/20). In addition to this, the income received from external grant support, sales, fees, charges and interest totalled £1,098k (£1,315k in 2019/20). Total income for 2020/21 was £4,512k (£4,729k in 2019/20).

The Authority set a budget for 2020/21 with a forecast deficit of £56k (£78k deficit for 2019/20). This deficit was to be balanced through the use of reserves. The Authority monitors its budget throughout the year against a forecast outturn which is updated on a monthly basis. The final forecast outturn for the year 2020/21 indicated an anticipated surplus of £43k. The actual outturn saw a surplus of £54k (a favourable variance of £11k). The Authority has a policy for carry forward requests in respect of underspends. This year there has been an increased number of requests due to the COVID-19 outbreak. These were considered and approved by the Authority on 30 April for £15k (£23k for 2019/20) and added to the 2021/22 budget.

### Navigation Income and Expenditure

Income from tolls was £3,333k (£3,375k in 2019/20), other income received for the year from external grant support, yacht stations charges, sales of tide tables, works licences and other miscellaneous services was £223k, (£322k in 2019/20) and interest was £11k (£25k in 2019/20). Total income for 2020/21 was £3,567k (£3,722k in 2019/20).

The Authority set a budget with a forecast deficit of £210k for 2020/21 (deficit of £32k for 2019/20). This deficit was to be balanced through the use of reserves. The Authority monitors its budget throughout the year against a forecast outturn which is updated on a monthly basis. The final forecast outturn for 2020/21, which took account of approved budget changes, indicated an anticipated deficit of £103k. The actual outturn saw a surplus of £129k (a favourable variance of £231k). The Authority has a policy for carry forward requests in respect of underspends. This year there has been an increased number of requests due to the COVID-19 outbreak. These were considered and approved by the Authority on 30 April for £78k (£88k for 2019/20) and added to the 2021/22 budget.

The Statement of Accounts consolidates these results and the combined figures are found in the Comprehensive Income and Expenditure Statement (CIES) and the Expenditure Funding Analysis (EFA). The CIES can be found on page 16 and the EFA on page 15.

## Outlook

2021/22 continues to focus on the successful delivery of our two external funded projects from the NHLF and ERDF. Although both projects are claimed in arrears the impact on the Authority's cash flows is minimal. However, there is some uncertainty on future exchange rates which are difficult to forecast for the ERDF grant which is contracted in Euros. The use of a prudent exchange rate during the application phase should minimise any future impact.

The budget for Navigation is projecting a deficit of £300k in 2021/22 (after taking into account carry forward requests), with reserves at 16% of net expenditure at the end of the year. For General (National Park) funding there is a projected deficit of £123k (after taking into account carry forwards requests) in 2021/22, with reserves at 22.2% of net expenditure. Both the National Park and Navigation deficits will be balanced through the use of reserves.

The Strategy also covers capital expenditure with the majority being funded from Earmarked Reserves and the rest from National Park Grant and Navigation income.

There are a significant number of variables – and some unknown quantities, such as future inflation – which could impact on these figures. The Financial Strategy will therefore be reviewed and updated by the Authority, having regard to any changes in circumstances and the annual outturn figures, at its meeting in January 2022. The annual toll increase for 2021/22 was set at 4% for all vessels. When setting the future strategy, the Authority will continue to consult with the Navigation Committee. 2021/22 continues to focus on the development of partnership work. This incorporates an external display project in Norwich. Work will also continue with partners to help shape the future of payments to farmers and land managers post Brexit, which will include a new scheme administered by the Broads Authority (Farming in Protected Landscapes). Climate change remains a threat to the Broads. Broadland Futures Initiative, in collaboration with the Environment Agency, will continue the engagement work with stakeholders.

### Changes to the 2020/21 Accounts

The cashflow statement has been restated for 2019/20 to reflect the correct treatment for the proceeds of the property, plant and equipment sale. This has also meant that note 21, cashflow statement for investing activities has also been restated.

### The accounting statements

The Broads Authority's accounts for the year 2020/21 are set out on pages 12 to 77. They consist of:

#### **Statement of Responsibilities for the Statement of Accounts**

#### **Statement of Corporate Governance**

**Expenditure and Funding Analysis** – This statement shows how annual expenditure is used and funded from resources (government grants and rents) in comparison with those resources consumed or earned in accordance with generally accepted accounting practices. It also shows how this expenditure is allocated for decision making purposes between the Authority's directorates. Income and expenditure accounted for under generally accepted accounting practices is presented more fully in the Comprehensive Income and Expenditure Statement. The Expenditure and Funding Analysis is a note to the Financial Statements, however its position next to the Comprehensive Income and Expenditure Statement is to provide a link from the figures reported under Performance within the Narrative Report.



**Comprehensive Income & Expenditure Statement** – This statement shows the accounting cost in the year of providing services in accordance with generally accepted accounting practices.

**Movement in Reserves Statement** – This statement shows the movement in the year on the different reserves held by the Authority, analysed into ‘usable’ reserves and ‘other’ reserves. The ‘surplus / deficit on the provision of services’ line shows the true economic cost of providing the Authority’s services, more details of which are shown in the Comprehensive Income & Expenditure Statement. The ‘net increase / decrease before transfers to earmarked reserves’ line shows the statutory General Fund balance before any discretionary transfers to or from earmarked reserves undertaken by the Authority.

**Balance Sheet** – The Balance Sheet shows the value as at the Balance Sheet date of the assets and liabilities recognised by the Authority. Reserves are reported in two categories. The first category of reserves are ‘usable’ reserves, i.e. those reserves that the Authority may use to provide services, subject to the need to maintain a prudent level of reserves and any statutory limitations on their use (for example the Capital Receipts Reserve may only be used to fund capital expenditure or repay debt). The second category of reserves is those that the Authority is not able to use to provide services. This category of reserves includes reserves that hold unrealised gains and losses (for example the Revaluation Reserve), where amounts would only become available to provide services if the assets are sold, and reserves that hold timing differences shown in the Movement of Reserves Statement line ‘adjustments between accounting basis and funding basis under regulations’.

**Cash Flow Statement** – The Cash Flow Statement shows the changes in cash and cash equivalents of the Authority during the reporting period. The statement shows how the Authority generates and uses cash and cash equivalents by classifying cash flows as operating, investing and financing activities. The amount of net cash flows arising from operating activities is a key indicator of the extent to which the operations of the Authority are funded by way of tolls and grant income or from the recipients of services provided by the Authority. Investing activities represent the extent to which cash outflows have been made for resources which are intended to contribute to the Authority’s future service delivery. Cash flows arising from financing activities are useful in predicting claims on future cash flows by providers of capital (i.e. borrowing) to the Authority.

These accounts are supported by the Statement of Accounting Policies in Note 1, which follows the Accounting Statements, and various notes to the accounts.

The information included in these accounts incorporates spending relating to the Broads Navigation. The Navigation income and expenditure is separately accounted for in the records to ensure the proper control of income from toll payers and to ensure it is spent primarily to benefit the users of the navigation. Navigation income and expenditure is shown in full at note 35 on page 77.

# Statement of Responsibilities for the Statement of Accounts

## The Authority's Responsibilities

The Authority is required to:

- a) Make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this Authority, that officer is the Chief Financial Officer.
- b) Manage its affairs to secure economic, efficient and effective use of resources and safeguard its assets.
- c) Approve the statement of accounts.

## The Chief Financial Officer's Responsibilities

The Chief Financial Officer is responsible for the preparation of the Authority's Statement of Accounts in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 (the Code).

In preparing this Statement of Accounts, the Chief Financial Officer has:

- selected suitable accounting policies and then applied them consistently;
- made judgements and estimates that were reasonable and prudent; and
- complied with the Local Authority Code.

The Chief Financial Officer has also:

- kept proper accounting records which were up-to-date; and
- taken reasonable steps for the prevention and detection of fraud and other irregularities.

## Chief Financial Officer's Certificate

I certify that the Statement of Accounts gives a true and fair view of the financial position of the Broads Authority at 31 March 2021 and its income and expenditure for the year ended 31 March 2021.

Emma Krelle (Chief Financial Officer)

## Certificate of Committee Resolution

I confirm that these accounts were approved by The Broads Authority at its meeting held (insert date).

Signed on behalf of The Broads Authority:

(Chair of meeting approving the accounts)

Date

# Independent Auditor's Report to the Members of the Broads Authority

## Expenditure and Funding Analysis

This statement shows how funding available to the Authority for the year has been used in providing services in accordance with generally accepted accounting practices.

2019/20 Net expenditure chargeable to the General and navigation fund balances £000	2019/20 adjustments between the funding and accounting basis £000	2019/20 Net expenditure in the comprehensive income and expenditure statement £000	Function	2020/21 Net expenditure chargeable to the General and navigation fund balances £000	2020/21 adjustments between the funding and accounting basis £000	2020/21 Net expenditure in the comprehensive income and expenditure statement £000
1,257	207	1,464	Operations	1,303	132	1,435
1,286	210	1,496	Strategic Services	1,064	139	1,203
720	63	783	Chief Executive	757	42	799
57	(26)	31	Corporate Amounts	74	0	74
(232)	424	192	Broads Navigation Account	(170)	224	54
<b>3,088</b>	<b>878</b>	<b>3,966</b>	<b>Net cost of services (subtotal)</b>	<b>3,028</b>	<b>537</b>	<b>3,565</b>
(3,463)	269	(3,194)	Other income and expenditure	(3,417)	206	(3,211)
<b>(375)</b>	<b>1,147</b>	<b>772</b>	<b>Surplus or (Deficit)</b>	<b>(389)</b>	<b>743</b>	<b>354</b>
<b>(1,490)</b>			Opening general and navigation fund balance	<b>(1,658)</b>		
<b>(375)</b>			Less/plus surplus or (deficit) on general and navigation balance in year	<b>(389)</b>		
<b>207</b>			Transfer (to)/from earmarked reserves	<b>220</b>		
<b>(1,658)</b>			<b>Closing general and navigation fund balance at 31 March</b>	<b>(1,827)</b>		

The Expenditure and Funding Analysis is a note to the Financial Statements; however, it is positioned here as it provides a link from the figures reported under Performance within the Narrative Report to the Comprehensive Income and Expenditure Statement.

## Comprehensive Income and Expenditure statement

This statement shows the accounting cost in the year of providing services in accordance with generally accepted accounting practices.

2019/20 Gross expenditure £000	2019/20 Income £000	2019/20 Net expenditure/ (income) £000	Description	Note	2020/21 Gross expenditure £000	2020/21 Income £000	2020/21 Net expenditure/ (income) £000
2,187	(723)	1,464	Operations		2,002	(567)	1,435
2,026	(530)	1,496	Strategic Services		1,685	(482)	1,203
821	(38)	783	Chief Executive		821	(22)	799
31	0	31	Corporate Items		74	0	74
3,884	(3,692)	192	Broads Navigation Account	35	3,594	(3,540)	54
<b>8,949</b>	<b>(4,983)</b>	<b>3,966</b>	<b>Cost of services (subtotal)</b>		<b>8,176</b>	<b>(4,611)</b>	<b>3,565</b>
		12	(Gains)/Losses on the disposal of non-current assets				(9)
		262	Financing and investment income and expenditure	11			212
		(3,414)	DEFRA National Park grant income				(3,414)
		(54)	Donated Asset	26			0
		<b>772</b>	<b>(Surplus) or deficit on provision of services (subtotal)</b>				<b>354</b>
		(118)	(Surplus) or deficit on revaluation of fixed assets				(175)
		(3,052)	Actuarial (gains)/losses on pension assets/liabilities				4,014
		(3,170)	Other comprehensive income and expenditure (subtotal)				3,839
		<b>(2,398)</b>	<b>Total comprehensive income and expenditure</b>				<b>4,193</b>

## Movement in reserves statement

This statement shows the movement in the year on the different reserves held by the Authority, analysed into 'usable' reserves (i.e. those that can be applied to fund expenditure) and 'other' reserves. The 'surplus or (deficit) on the provision of services' line shows the true economic cost of providing the Authority's services, more details of which are shown in the Comprehensive Income and Expenditure Statement.

2019/20	General fund and navigation fund balance £000	Capital receipts reserve £000	Earmarked reserves £000	Total useable reserves £000	Unusable reserves £000	Total Authority reserves £000
Balance at 31 March 2019 (A)	1,490	405	1,911	3,806	(6,425)	(2,619)
Total comprehensive income and expenditure	(772)	0	0	(772)	3,170	2,398
Adjustments between accounting basis and funding basis under regulations (Note 9)	1,147	0	0	1,147	(1,147)	0
Transfers to or from Earmarked reserves (Note 10)	(207)	0	207	0	0	0
Increase or (decrease in 2019/20 (B) (subtotal)	168	0	207	375	2,023	2,398
<b>Balance at 31 March 2020 (=A+B)</b>	<b>1,658</b>	<b>405</b>	<b>2,118</b>	<b>4,181</b>	<b>(4,402)</b>	<b>(221)</b>

2020/21	General fund and navigation fund balance £000	Capital receipts reserve £000	Earmarked reserves £000	Total useable reserves £000	Unusable reserves £000	Total Authority reserves £000
Balance at 31 March 2020 (A)	1,658	405	2,118	4,181	(4,402)	(221)
Total comprehensive income and expenditure	(354)	0	0	(354)	(3,838)	(4,192)
Adjustments between accounting basis and funding basis under regulations (Note 9)	743	0	0	743	(743)	0
Transfers to or from Earmarked reserves (Note 10)	(220)	0	220	0	0	0
Increase or (decrease in 2020/21 (B) (subtotal)	169	0	220	389	(4,581)	(4,192)
<b>Balance at 31 March 2020 (=A+B)</b>	<b>1,827</b>	<b>405</b>	<b>2,338</b>	<b>4,570</b>	<b>(8,983)</b>	<b>(4,413)</b>

## Balance sheet

The Balance Sheet shows the value as at the Balance Sheet date of the assets and liabilities recognised by the Authority. The net assets of the Authority (assets less liabilities) are matched by the reserves held by the Authority.

As at 31 March 20 £000	Category	Note	As at 31 March 21 £000
4,592	Property, plant & equipment	12	4,706
18	Intangible Assets		9
<b>4,610</b>	<b>Long term assets (subtotal)</b>		<b>4,715</b>
4,010	Short term investments		3,003
114	Inventories	13	112
2,250	Short term debtors	14	959
681	Cash and cash equivalents	15	2,374
<b>7,055</b>	<b>Current assets (subtotal)</b>		<b>6,448</b>
(15)	Short term borrowing		(35)
(2,782)	Short term creditors	16	(1,800)
(107)	Provisions	17	(114)
<b>(2,904)</b>	<b>Current liabilities (subtotal)</b>		<b>(1,949)</b>
(94)	Long term borrowing		(164)
(8,888)	Other long-term liabilities	29, 31	(13,463)
<b>(8,982)</b>	<b>Long term liabilities (subtotal)</b>		<b>(13,627)</b>
<b>(221)</b>	<b>Net assets (liabilities)</b>		<b>(4,413)</b>
-	<b>Useable reserves</b>	-	-
1,115	General account fund balance		913
543	Navigation account fund balance		914
405	Capital receipts reserve		405
2,118	Earmarked reserves	10	2,338
-	<b>Unusable reserves</b>	19	-
1,771	Revaluation reserve		1,880
2,618	Capital adjustment account		2,566
(8,731)	Pension reserve		(13,362)
(60)	Accumulated absence reserve		(67)
<b>(221)</b>	<b>Total reserves</b>		<b>(4,413)</b>

Emma Krelle (Chief Financial Officer)

17 June 2021



## Cash Flow statement

The Cash Flow Statement shows the changes in cash and cash equivalents of the Authority during the reporting period. The statement shows how the Authority generates and uses cash and cash equivalents by classifying cash flows as operating, investing and financing activities.

<b>Restated 2019/20 £000</b>	<b>Revenue activities</b>	<b>Note</b>	<b>2020/21 £000</b>
(772)	Net surplus or (deficit) on the provision of services		(354)
999	Adjustments to net surplus or deficit on the provision of services for non-cash movements		1,303
(4)	Adjust for items in the net surplus or deficit on the provision of services that are investing and financing activities		(31)
223	Net cash flows from operating activities (subtotal)	20	918
(668)	Investing activities	21	727
(72)	Financing activities	22	48
(517)	Net increase or (decrease) in cash and cash equivalents (subtotal)		1,693
1,198	Cash and cash equivalents at the beginning of the reporting period		681
<b>681</b>	<b>Cash and cash equivalents at the end of the reporting period</b>	15	<b>2,374</b>

# Notes to the Statement of Accounts

## 1. Accounting policies

### i. General principles

The Statement of Accounts summarises the Authority's transactions for the 2020/21 financial year and its position at the year end of 31 March 2021. The Authority is required to prepare an annual Statement of Accounts by the Accounts and Audit (England) Regulations 2015, which those regulations require to be prepared in accordance with proper accounting practices. These practices primarily comprise the Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 and the Service Reporting Code of Practice 2020/21, supported by International Financial Reporting Standards (IFRS). The accounting convention adopted in the Statement of Accounts is principally historical cost, modified by the revaluation of certain categories of non-current assets and financial instruments.

### ii. Accruals of Income and Expenditure

Activity is accounted for in the year that it takes place, not simply when cash payments are made or received. In particular:

- Revenue from contracts with service recipients, whether for services or the provision of goods, is recognised when (or as) the goods or services are transferred to the service recipient in accordance with the performance obligations in the contract.
- Supplies are recorded as expenditure when they are consumed – where there is a gap between the date supplies are received and their consumption, they are carried as inventories on the Balance Sheet.
- Expenses in relation to services received (including services provided by employees) are recorded as expenditure when the services are received rather than when payments are made.
- Interest receivable on investments and payable on borrowings is accounted for respectively as income and expenditure on the basis of the effective interest rate for the relevant financial instrument rather than the cash flows fixed or determined by the contract.
- Where revenue and expenditure have been recognised but cash has not been received or paid, a debtor or creditor for the relevant amounts is recorded in the Balance Sheet. Where debts may not be settled, the balance of debtors is written down and a charge made to revenue for the income that might not be collected.

### iii. Cash and cash equivalents

Cash is represented by cash in hand and deposits with financial institutions repayable without penalty on notice of not more than 24 hours. Cash equivalents are investments that mature in 7 days or less from the date of acquisition and that are readily convertible to known amounts of cash with insignificant risk of change in value.

In the Cash Flow Statement, cash and cash equivalents are shown net of bank overdrafts that are repayable on demand and form an integral part of the Authority's cash management.

**iv. Exceptional items**

When items of income and expense are material, their nature and amount is disclosed separately, either on the face of the Comprehensive Income and Expenditure Statement or in the notes to the accounts, depending on how significant the items are to an understanding of the Authority's financial performance.

**v. Prior period adjustments, changes in accounting policies and estimates and errors**

Prior period adjustments may arise as a result of a change in accounting policies or to correct a material error. Changes in accounting estimates are accounted for prospectively, i.e. in the current and future years affected by the change and do not give rise to a prior period adjustment.

Changes in accounting policies are only made when required by proper accounting practices or the change provides more reliable or relevant information about the effect of transactions, other events and conditions on the Authority's financial position or financial performance. Where a change is made, it is applied retrospectively (unless stated otherwise) by adjusting opening balances and comparative amounts for the prior period as if the new policy had always been applied.

Material errors discovered in prior period figures are corrected retrospectively by amending opening balances and comparative amounts for the prior period.

**vi. Charges to revenue for non-current assets**

Services, support services and trading accounts are debited with the following amounts to record the cost of holding fixed assets during the year:

- depreciation attributable to the assets used by the relevant service;
- revaluation and impairment losses on assets used by the service where there
- are no accumulated gains in the Revaluation Reserve against which the losses
- can be written off; and
- amortisation of intangible fixed assets attributable to the service.

**vii. Employee Benefits**

**Benefits payable during employment**

Short-term employee benefits are those due to be settled within 12 months of the year-end. They include such benefits as wages and salaries, paid annual leave and paid sick leave, bonuses and non-monetary benefits (e.g. cars) for current employees and are recognised as an expense for services in the year in which employees render service to the Authority. An accrual is made for the cost of holiday entitlements (or any form of leave, e.g. time off in

lieu) earned by employees but not taken before the year-end which employees can carry forward into the next financial year. The accrual is made at the wage and salary rates applicable in the following accounting year, being the period in which the employee takes the benefit. The accrual is charged to Surplus or Deficit on the Provision of Services, but then reversed out through the Movement in Reserves Statement so that holiday benefits are charged to revenue in the financial year in which the holiday absence occurs.

### **Termination benefits**

Termination benefits are amounts payable as a result of a decision by the Authority to terminate an officer's employment before the normal retirement date or an officer's decision to accept voluntary redundancy and are charged on an accruals basis to the appropriate service line in the Comprehensive Income and Expenditure Statement when the Authority is demonstrably committed to the termination of the employment of an officer or group of officers or making an offer to encourage voluntary redundancy.

Where termination benefits involve the enhancement of pensions, statutory provisions require the General Fund balance to be charged with the amount payable by the Authority to the pension fund or pensioner in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement, appropriations are required to and from the Pensions Reserve to remove the notional debits and credits for pension enhancement termination benefits and replace them with debits for the cash paid to the pension fund and pensioners and any such amounts payable but unpaid at the year-end.

### **Post-employment benefits**

Employees of the Broads Authority are members of Norfolk Pension Fund for civilian employees (the Local Government Pension Scheme), administered by Norfolk County Council. This is a funded defined benefit final salary scheme, meaning that the Authority and employees pay contributions into a fund, calculated at a level intended to balance the pension liabilities with investment assets.

### **viii. Events after the balance sheet date**

Events after the Balance Sheet date are those events, both favourable and unfavourable, that occur between the end of the reporting period and the date when the Statement of Accounts is authorised for issue. Two types of events can be identified:

- Those that provide evidence of conditions that existed at the end of the reporting period - the Statement of Accounts is adjusted to reflect such events.
- Those that are indicative of conditions that arose after the reporting period – the Statement of Accounts is not adjusted to reflect such events, but where a category of events would have a material effect, disclosure is made in the notes of the nature of the events and their estimated financial effect.

Events taking place after the date of authorisation for issue are not reflected in the Statement of Accounts.

## **ix. Fair value measurement**

The Authority measures some of its non-financial assets such as investment properties and some of its financial instruments such as borrowings at fair value at each reporting date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement assumes that the transaction to sell the asset or transfer the liability takes place either:

- In the principal market for the asset or liability, or
- In the absence of a principal market, in the most advantageous market for the asset or liability.

The Authority measures the fair value of an asset or liability using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

When measuring the fair value of a non-financial asset, the Authority considers a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Authority uses valuation techniques that are appropriate in the circumstances and for which sufficient data is available, maximising the use of relevant observable inputs and minimising the use of unobservable inputs.

Inputs to the valuation techniques in respect of assets and liabilities for which fair value is measured or disclosed in the Authority's financial statements are categorised within the fair value hierarchy, as follows:

- Level 1 – quotes prices (unadjusted) in active markets for identical assets or liabilities that the Authority can access at the measurement date;
- Level 2 – inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly or indirectly;
- Level 3 – unobservable inputs for the asset or liability.

## **x. Financial instruments**

### **Financial liabilities**

Financial liabilities are recognised on the Balance Sheet when the Authority becomes party to the contractual provisions of a financial instrument and are initially measured at fair value and carried at their amortised cost. Annual charges to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement (CIES) for interest payable are based on the carrying amount of the liability, multiplied by the effective rate of interest for the instrument. The effective interest is the rate that

exactly discounts estimated future cash payments over the life of the instrument to the amount at which it was originally recognised.

Long term loans are shown in the balance sheet as the capital element outstanding at the year-end, split between amounts due within the current year and amounts due outside the year. Any interest paid is taken directly to the income and expenditure account. The 'fair value' of any loans is disclosed in the notes to the accounts with accompanying explanations.

### **Financial assets**

Financial assets are classified based on a classification and measurement approach that reflects the business model for holding the financial assets and their cashflow characteristics.

There are three main classes of financial assets measured at:

- amortised cost
- fair value through profit or loss (FVPL), and
- fair value through other comprehensive income (FVOCI)

The authority's business model is to hold investments to collect contractual cash flows. Financial assets are therefore classified as amortised cost, except for those whose contractual payments are not solely payment of principal and interest (i.e. where the cash flows do not take the form of a basic debt instrument).

### **Financial assets measured at amortised cost**

Financial assets measured at amortised cost are recognised on the Balance Sheet when the authority becomes a party to the contractual provisions of a financial instrument and are initially measured at fair value. They are subsequently measured at their amortised cost. Annual credits to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement (CIES) for interest receivable are based on the carrying amount of the asset multiplied by the effective rate of interest for Statements the instrument. For most of the financial assets held by the authority, this means that the amount presented in the Balance Sheet is the outstanding principal receivable (plus accrued interest) and interest credited to the CIES is the amount receivable for the year in the loan agreement.

Any gains and losses that arise on the derecognition of an asset are credited or debited to the Financing and Investment Income and Expenditure line in the CIES.

### **Expected Credit Loss Model**

The authority recognises expected credit losses on all of its financial assets held at amortised cost, either on a 12-month or lifetime basis. The expected credit loss model also applies to lease receivables and contract assets. Only lifetime losses are recognised for trade receivables (debtors) held by the authority.

The Authority has not made any material loans.

#### **xi. Foreign currency translation**

Where the Authority has entered into a transaction denominated in a foreign currency, the transaction is converted into sterling at the exchange rate applicable on the date the transaction was effective. Where amounts in foreign currency are outstanding at the year-end, they are reconverted at the spot exchange rate at 31 March. Resulting gains or losses are recognised in the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement

#### **xii. Government Grants and Contributions**

Whether paid on account, by instalments or in arrears, government grants and third-party contributions and donations are recognised as due to the Authority when there is reasonable assurance that:

- the Authority will comply with the conditions attached to the payments; and
- the grants or contributions will be received.

Amounts recognised as due to the Authority are not credited to the Comprehensive Income and Expenditure Statement until conditions attached to the grant or contribution have been satisfied. Conditions are stipulations that specify that the future economic benefits or service potential embodied in the asset acquired using the grant or contribution are required to be consumed by the recipient as specified, or future economic benefits or service potential must be returned to the transferor.

Monies advanced as grants and contributions for which conditions have not been satisfied are carried in the Balance Sheet as creditors. When conditions are satisfied, the grant or contribution is credited to the relevant service line (attributable revenue grants and contributions) or Taxation and Non-Specific Grant Income (non-ringfenced revenue grants and all capital grants) in the Comprehensive Income and Expenditure Statement.

Where capital grants are credited to the Comprehensive Income and Expenditure Statement, they are reversed out of the General Fund Balance in the Movement in Reserves Statement.

Where the grant has yet to be used to finance capital expenditure, it is posted to the Capital Grants Unapplied reserve. Where it has been applied, it is posted to the Capital Adjustment Account. Amounts in the Capital Grants Unapplied reserve are transferred to the Capital Adjustment Account once they have been applied to fund capital expenditure.

#### **xiii. Intangible assets**

Expenditure on non-monetary assets that do not have physical substance but are controlled by the Authority as a result of past events is capitalised when it is expected that future economic benefits or service potential will flow from the intangible asset to the Authority.

Internally generated assets are capitalised where it is demonstrable that the project is technically feasible and is intended to be completed (with adequate resources being

available) and the Authority will be able to generate future economic benefits or deliver service potential by being able to sell or use the asset. Expenditure is capitalised where it can be measured reliably as attributable to the asset and is restricted to that incurred during the development phase (research expenditure cannot be capitalised).

Expenditure on the development of websites is not capitalised if the website is solely or primarily intended to promote or advertise the Authority's goods or services.

Intangible assets are measured initially at cost. Amounts are only revalued where the fair value of the assets held by the Authority can be determined by reference to an active market. In practice, no intangible asset held by the Authority meets this criterion, and they are therefore carried at amortised cost. The depreciable amount of an intangible asset is amortised over its useful life to the relevant service line(s) in the Comprehensive Income and Expenditure Statement. An asset is tested for impairment whenever there is an indication that the asset might be impaired – any losses recognised are posted to the relevant service line(s) in the Comprehensive Income and Expenditure Statement. Any gain or loss arising on the disposal or abandonment of an intangible asset is posted to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement.

Where expenditure on intangible assets qualifies as capital expenditure for statutory purposes, amortisation, impairment losses and disposal gains and losses are not permitted to have an impact on the General Fund Balance. The gains and losses are therefore reversed out of the General Fund Balance in the Movement in Reserves Statement and posted to the Capital Adjustment Account and (for any sale proceeds greater than £10,000) the Capital Receipts Reserve.

#### **xiv. Inventories**

Inventories are included in the Balance Sheet at the lower of cost or net realisable value. The cost of inventories is assigned using the FIFO (first-in, first-out) costing formula.

#### **xv. Leases**

Leases are classified as finance leases where the terms of the lease transfer substantially all the risks and rewards incidental to ownership of the property, plant or equipment from the lessor to the lessee. All other leases are classified as operating leases.

Where a lease covers both land and buildings, the land and buildings elements are considered separately for classification.

Arrangements that do not have the legal status of a lease but convey a right to use an asset in return for payment are accounted for under this policy where fulfilment of the arrangement is dependent on the use of specific assets.

The Authority as lessee

##### **Finance leases**

Property, Plant and Equipment held under finance leases is recognised on the Balance Sheet at the commencement of the lease at its fair value measured at the lease's inception (or the



present value of the minimum lease payments, if lower). The asset recognised is matched by a liability for the obligation to pay the lessor. Initial direct costs of the Authority are added to the carrying amount of the asset. Premiums paid on entry into a lease are applied to writing down the lease liability. Contingent rents are charged as expenses in the periods in which they are incurred.

Lease payments are apportioned between:

- a charge for the acquisition of the interest in the property, plant or equipment – applied to write down the lease liability; and
- a finance charge (debited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement).

Property, Plant and Equipment recognised under finance leases is accounted for using the policies applied generally to such assets, subject to depreciation being charged over the lease term if this is shorter than the asset's estimated useful life (where ownership of the asset does not transfer to the Authority at the end of the lease period).

Depreciation and revaluation and impairment losses are therefore substituted by a revenue contribution in the General Fund Balance, by way of an adjusting transaction with the Capital Adjustment Account in the Movement in Reserves Statement.

### **Operating leases**

Rentals paid under operating leases are charged to the Comprehensive Income and Expenditure Statement as an expense of the services benefitting from use of the leased property, plant or equipment. Charges are made on a straight-line basis over the life of the lease, even if this does not match the pattern of payments (e.g. there is a rent-free period at the commencement of the lease).

The Authority as lessor

### **Operating leases**

Where the Authority grants an operating lease over a property or an item of plant or equipment, the asset is retained in the Balance Sheet. Rental income is credited to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement. Credits are made on a straight-line basis over the life of the lease, even if this does not match the pattern of payments (e.g. there is a premium paid at the commencement of the lease). Initial direct costs incurred in negotiating and arranging the lease are added to the carrying amount of the relevant asset and charged as an expense over the lease term on the same basis as rental income.

## **xvi. Property, Plant and Equipment**

Assets that have physical substance and are held for use in the production or supply of goods or services, for rental to others, or for administrative purposes, and that are expected to be used during more than one financial year are classified as Property, Plant and Equipment.

## **Recognition**

Expenditure on the acquisition, creation or enhancement of Property, Plant and Equipment is capitalised on an accrual's basis, provided that it is probable that the future economic benefits or service potential associated with the item will flow to the Authority and the cost of the item can be measured reliably. Expenditure that maintains but does not add to an asset's potential to deliver future economic benefits or service potential (i.e. repairs and maintenance) is charged as an expense when it is incurred. A de minimis limit of £5,000 is used to recognise fixed assets.

## **Measurement**

Assets are initially measured at cost, comprising:

- the purchase price; and
- any costs attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

The Authority does not capitalise borrowing costs incurred whilst assets are under construction.

The cost of assets acquired other than by purchase is deemed to be its fair value, unless the acquisition does not have commercial substance (i.e. it will not lead to a variation in the cash flows of the Authority). In the latter case, where an asset is acquired via an exchange, the cost of the acquisition is the carrying amount of the asset given up by the Authority.

Donated assets are measured initially at fair value. The difference between fair value and any consideration paid is credited to the Taxation and Non-Specific Grant Income line of the Comprehensive Income and Expenditure Statement, unless the donation has been made conditionally. Until conditions are satisfied, the gain is held in the Donated Assets Account. Where gains are credited to the Comprehensive Income and Expenditure Statement, they are reversed out of the General Fund Balance to the Capital Adjustment Account in the Movement in Reserves Statement.

Assets are then carried in the Balance Sheet using the following measurement bases:

- infrastructure, community assets and assets under construction – depreciated historical cost.
- all other assets – current value, determined as the amount that would be paid for the asset in its existing use (existing use value – EUV).

Where there is no market-based evidence of current value because of the specialist nature of an asset, depreciated replacement cost (DRC) is used as an estimate of current value.

Where non-property assets that have short useful lives or low values (or both), depreciated historical cost basis is used as a proxy for current value.

Assets included in the Balance Sheet at current value are revalued sufficiently regularly to ensure that their carrying amount is not materially different from their current value at the

year-end, but as a minimum every five years. Increases in valuations are matched by credits to the Revaluation Reserve to recognise unrealised gains. Exceptionally, gains might be credited to the Comprehensive Income and Expenditure Statement where they arise from the reversal of a loss previously charged to a service.

Where decreases in value are identified, they are accounted for by:

- where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains).
- where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

The Revaluation Reserve contains revaluation gains recognised since 1 April 2007 only, the date of its formal implementation. Gains arising before that date have been consolidated into the Capital Adjustment Account.

### **Impairment**

Assets are assessed at each year-end as to whether there is any indication that an asset may be impaired. Where indications exist and any possible differences are estimated to be material, the recoverable amount of the asset is estimated and, where this is less than the carrying amount of the asset, an impairment loss is recognised for the shortfall.

Where impairment losses are identified, they are accounted for by:

- where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains).
- where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

Where an impairment loss is reversed subsequently, the reversal is credited to the relevant service line(s) in the Comprehensive Income and Expenditure Statement, up to the amount of the original loss, adjusted for depreciation that would have been charged if the loss had not been recognised.

### **Depreciation**

Depreciation is provided for on all Property, Plant and Equipment assets by the systematic allocation of their depreciable amounts over their useful lives. An exception is made for assets without a determinable finite useful life (i.e. freehold land and certain Community Assets) and assets that are not yet available for use (i.e. assets under construction).

Depreciation is calculated on the following bases:

- dwellings and other buildings – straight-line allocation between 5 and 50 years, as advised by a professional valuer;
- vehicles, plant, furniture and equipment – straight-line allocation between 5 and 10 years, as advised by a suitably qualified officer; and
- infrastructure – straight-line allocation between 20 and 25 years, as advised by a suitably qualified officer.

Where an asset has been acquired under a finance lease arrangement, and the lease term is shorter than the asset's estimated useful life, the asset is depreciated over the lease term.

Where an item of Property, Plant and Equipment asset has major components whose cost is significant in relation to the total cost of the item, the components are depreciated separately.

Revaluation gains are also depreciated, with an amount equal to the difference between current value depreciation charged on assets and the depreciation that would have been chargeable based on their historical cost being transferred each year from the Revaluation Reserve to the Capital Adjustment Account.

Receipts below £5,000 arising from the sale of fixed assets are allocated to revenue. The Broads Authority has a policy of not depreciating assets in the first year of ownership.

#### **Disposals and non-current assets**

Assets that are to be abandoned or scrapped are not reclassified as Assets Held for Sale. When an asset is disposed of or decommissioned, the carrying amount of the asset in the Balance Sheet (whether Property, Plant or Equipment) is written off to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement as part of the gain or loss on disposal. Receipts from disposals (if any) are credited to the same line in the Comprehensive Income and Expenditure Statement also as part of the gain or loss on disposal (i.e. netted off against the carrying value of the asset at the time of disposal). Any revaluation gains accumulated for the asset in the Revaluation Reserve are transferred to the Capital Adjustment Account.

Amounts received for a disposal in excess of £10,000 are categorised as capital receipts. The balance of receipts is required to be credited to the Capital Receipts Reserve, and can then only be used for new capital investment, or set aside to reduce the Authority's underlying need to borrow (the capital financing requirement) (England and Wales). Receipts are appropriated to the Reserve from the General Fund Balance in the Movement in Reserves Statement.

The written-off value of disposals is not a charge against the general fund, as the cost of fixed assets is fully provided for under separate arrangements for capital financing. Amounts are appropriated to the Capital Adjustment Account from the General Fund Balance in the Movement in Reserves Statement.

## **xvii. Provisions, contingent liabilities and contingent assets**

### **Provisions**

Provisions are made where an event has taken place that gives the Authority a legal or constructive obligation that probably requires settlement by a transfer of economic benefits or service potential, and a reliable estimate can be made of the amount of the obligation. For instance, the Authority may be involved in a court case that could eventually result in the making of a settlement or the payment of compensation.

Provisions are charged as an expense to the appropriate service line in the Comprehensive Income and Expenditure Statement in the year that the Authority becomes aware of the obligation, and are measured at the best estimate at the balance sheet date of the expenditure required to settle the obligation, considering relevant risks and uncertainties.

When payments are eventually made, they are charged to the provision carried in the Balance Sheet. Estimated settlements are reviewed at the end of each financial year – where it becomes less than probable that a transfer of economic benefits will now be required (or a lower settlement than anticipated is made), the provision is reversed and credited back to the relevant service.

Where some or all of the payment required to settle a provision is expected to be recovered from another party (e.g. from an insurance claim), this is only recognised as income for the relevant service if it is virtually certain that reimbursement will be received if the Authority settles the obligation.

### **Contingent liabilities**

A contingent liability arises where an event has taken place that gives the Authority a possible obligation whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the Authority. Contingent liabilities also arise in circumstances where a provision would otherwise be made but either it is not probable that an outflow of resources will be required or the amount of the obligation cannot be measured reliably.

Contingent liabilities are not recognised in the Balance Sheet but are disclosed in a note (note 32) to the accounts.

### **Contingent assets**

A contingent asset arises where an event has taken place that gives the Authority a possible asset whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the Authority.

Contingent assets are not recognised in the Balance Sheet but disclosed in a note to the accounts where it is probable that there will be an inflow of economic benefits or service potential.

## **xviii. Reserves**

The Authority sets aside specific amounts as reserves for future policy purposes or to cover contingencies. Reserves are created by appropriating amounts out of the General Fund Balance in the Movement in Reserves Statement. When expenditure to be financed from a reserve is incurred, it is charged to the appropriate service in that year to score against the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement.

Certain reserves are kept to manage the accounting processes for non-current assets, financial instruments and retirement and employee benefits and do not represent useable resources for the Authority – these reserves are explained in the relevant policies.

## **xix. Operating segments**

In accordance with IFRS 8 and the Code, the Broads Authority keeps the general fund and navigation fund separately. Under the Code, the Authority has prepared a single income and expenditure account for 2020/21, however in note 35 to the accounts the navigation income and expenditure is shown.

## **xx. Allocation of costs**

Salary, vehicle and other revenue costs are reallocated within the general expenditure to major projects that are grant aided partially or wholly by sources other than Defra grant. The method of allocation is kept as simple as possible and is either made on usage, such as number of hours spent on a project, or estimated on a percentage basis.

Recharges between the general and navigation funds are based on staff time and usage.

## **xxi. Revenue expenditure funded from capital under statute**

Expenditure incurred during the year that may be capitalised under statutory provisions but that does not result in the creation of a non-current asset has been charged as expenditure to the relevant service in the Comprehensive Income and Expenditure Statement in the year.

## **xxii. VAT**

VAT payable is included as an expense only to the extent that it is not recoverable from Her Majesty's Revenue and Customs. VAT receivable is excluded from income.

## **2. Accounting Standards that have been issued but have not yet been adopted**

The 2021/22 Code of Practice on Local Authority Accounting adopts the following amendments to International Accounting Standards and International Financial Reporting Standards, which will be required from 1 April 2021:

- In response to the Covid-19 pandemic, CIPFA/LASAAC has further delayed the implementation of IFRS 16 Leases until 1 April 2022. This will be a significant change in Local Authority Accounting. Its introduction will remove the distinction between operating and finance leases for lessees. The standard will require assets to be

recognised on the balance sheet as well as the liability for outstanding lease payments. This will apply where the right to use the asset exceeds 12 months and it is not considered low value. This will be a significant change to the Authority as it holds a number of operating leases relating to land that is used for moorings.

### 3. Critical judgements in applying accounting policies

In applying the accounting policies set out in note 1, the Authority has had to make certain judgements about complex transactions or those involving uncertainty about future events. The critical judgements made in the Statement of Accounts are:

- Despite the one-year settlement from DEFRA for 2021/22 there remains a degree of uncertainty about the longer-term levels of funding for National Parks. However, the Authority has determined that this uncertainty is not yet sufficient to provide an indication that the assets of the Authority might be impaired as a result of a need to close facilities and reduce levels of service provision.
- The Authority is a member of Whitlingham Charitable Trust of which there are four members. The Authority can appoint up to four trustees and there shall be no more than nine in total. The Trust is limited by guarantee in which each member agrees to contribute £1 in the event of it being wound up. Whitlingham Charitable Trust was established to manage and maintain Whitlingham Country Park for public benefit. The Authority does not have a controlling influence, and it does not have any share equity, or any share in profits or losses. It is considered therefore that International Accounting Standard (IAS) 28 – Accounting for Investments in Associates - does not apply as the charity has no formal equity structure, and the Authority does not derive any financial benefit from the Trust.

### 4. Assumptions made about the future and other major sources of estimation uncertainty

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the amounts reported for assets and liabilities as at the balance sheet date and the amounts reported for the revenues and expenses during the year. However, the nature of estimation means that actual outcomes could differ from those estimates. The key judgements and estimation uncertainty that have a significant risk of causing material adjustment to the carrying amounts of assets and liabilities within the next financial year are:

Item	Uncertainties	Effect if actual results differ from assumptions
Property plant and equipment	Assets are depreciated over useful lives that are dependent on assumptions about the level of repairs and maintenance that will be incurred in relation to individual assets. The current economic climate makes it	If the useful life of assets is reduced, depreciation increases and the carrying amount of the assets fall. It is estimated that the annual depreciation charge would

Item	Uncertainties	Effect if actual results differ from assumptions
	uncertain that the Authority will be able to sustain its current spending on repairs and maintenance, bringing into doubt the useful lives assigned to assets.	increase by £59,000 for every year that useful lives had to be reduced.
Pensions liability	Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. A firm of consulting actuaries is engaged to provide the Authority with expert advice about the assumptions to be applied.	The effects on the net pension's liability of changes in individual assumptions can be measured. For instance, a 0.5% decrease in the discount rate assumption would result in an increase in the pension liability of £4,445,000. Further details are set out in the sensitivity analysis in note 31.

## 5. Material items of income and expenditure

There are no material items of expense in relation to 2021/22 which are not disclosed elsewhere within the Statement of Accounts.

## 6. Events after the balance sheet date

The Statement of Accounts was authorised for issue by the Chief Financial Officer on 17 June 2021. Events that occur after this date are not reflected in the financial statements or notes.



## 7. Note to the expenditure and funding analysis

Adjustments from General and Navigation Fund to arrive at the Comprehensive Income and Expenditure Statement Amount

2019/20 Adjustments for capital purposes (Note 1) £000	2019/20 Net change for the pension's adjustments (Note 2) £000	2019/20 Other differences (Note 3) £000	2019/20 Total adjustments £000	Description	2020/21 Adjustments for capital purposes (Note 1) £000	2020/21 Net change for the pension's adjustments (Note 2) £000	2020/21 Other differences (Note 3) £000	2020/21 Total adjustments £000
38	162	7	207	Operations	51	83	(2)	132
24	191	(5)	210	Strategic Services	31	103	5	139
(5)	65	3	63	Chief Executive	4	37	1	42
0	(26)	0	(26)	Corporate Items	0	0	0	0
107	310	7	424	Broads Navigation Account	33	188	3	224
164	702	12	878	Net Cost of Services (subtotal)	119	411	7	537
0	269	0	269	Other income and expenditure from the Expenditure and Funding analysis	0	206	0	206
<b>164</b>	<b>971</b>	<b>12</b>	<b>1,147</b>	Difference between General and Navigation Fund surplus or deficit and comprehensive Income and Expenditure Statement Surplus of Deficit on the Provision of Services	<b>119</b>	<b>617</b>	<b>7</b>	<b>743</b>

## Note

1. Adjustments for capital purposes – this column adds in depreciation and impairment and revaluation gains and losses in the services line, and for:
  - Other operating expenditure – adjusts for capital disposal with a transfer of income on disposal of assets and the amounts written off for those assets.
  - Financing and investment income and expenditure – the statutory charges for capital financing i.e. Minimum Revenue Provision and other revenue contributions are deducted from other income and expenditure as these are not chargeable under generally accepted accounting practices.
2. Net change for the removal of pension contribution and the addition of IAS 19 Employee Benefits pension related expenditure and income:
  - For services this represents the removal of the employer pension contributions made by the authority as allowed by statute and the replacement with current service costs and past service costs.
  - For Financing and investment income and expenditure – the net interest on the defined benefit liability is charged to the CIES.
3. Other differences between amounts debited/credited to the Comprehensive Income and Expenditure Statement and amounts payable/receivable to be recognised under statute including accumulated absences.

Income received on a segmental basis is analysed below:

<b>Service</b>	<b>2019/20 Income from services (£000)</b>	<b>2020/21 Income from services (£000)</b>
Operations	(723)	(567)
Strategic Services	(530)	(482)
Chief Executive	(38)	(22)
Corporate items	0	0
Specialist ringfenced account (navigation)	(3,692)	(3,540)
<b>Total income analysed on a segmental basis</b>	<b>(4,983)</b>	<b>(4,611)</b>

## 8a. Expenditure and income analysed by nature

The Authority's expenditure and income is analysed as follows:

<b>Expenditure</b>	<b>2019/20 £000</b>	<b>2020/21 £000</b>
Employee benefits expenses	5,647	5,388
Other services expenses	3,621	3,055
Depreciation, amortisation, impairment	452	352
Interest payments	42	29
Expenditure in relation to investment properties	0	0
Loss/(gain) on the disposal of assets	12	(9)
<b>Total expenditure</b>	<b>9,774</b>	<b>8,815</b>

<b>Income</b>	<b>2019/20 £000</b>	<b>2020/21 £000</b>
Fees, charges and other service income	(4,988)	(4,642)
Interest and investment income	(49)	(22)
Contributions from reserves	(497)	(383)
Government grants and contributions	(3,468)	(3,414)
Total income (subtotal)	(9,002)	(8,461)
<b>Surplus or deficit on the provision of services</b>	<b>772</b>	<b>354</b>

In addition to the amounts reported within the Comprehensive Income and Expenditure Statement the breakdown above also includes income and expenditure funded from the earmarked reserves.

## 8b. Revenue from contracts with service recipients

Amounts included in the Comprehensive Income and Expenditure Statement for contracts with service recipients:

<b>Contract Revenue</b>	<b>2019/20 £000</b>	<b>2020/21 £000</b>
Revenue from contracts with service recipients	324	66
<b>Total included in comprehensive income and expenditure</b>	<b>324</b>	<b>66</b>

Amounts included in the Balance Sheet for contracts with service recipients

<b>Outstanding Revenue</b>	<b>2019/20 £000</b>	<b>2020/21 £000</b>
Receivables, which are included in debtors (Note 14)	14	0
<b>Total included in net assets</b>	<b>14</b>	<b>0</b>

## 9. Adjustments between accounting basis and funding basis under regulations

This note details the adjustments that are made to the total comprehensive income and expenditure recognised by the Authority in the year in accordance with proper accounting practice to the resources that are specified by statutory provisions as being available to the Authority to meet future capital and revenue expenditure.

2019/20 General fund and navigation fund £000	2019/20 Capital receipts reserve £000	2019/20 Movement in unusable reserves £000	Adjustments	2020/21 General fund and navigation fund £000	2020/21 Capital receipts reserve £000	2020/21 Movement in unusable reserves £000
			<b>Adjustments primarily involving the Capital Adjustment Account:</b>			
			<b>Reversal of items debited or credited to the Comprehensive Expenditure and Income Statement:</b>			
0	0	0	Transfer of non-current asset sale proceeds from revenue to Capital Receipts Reserve	0	0	0
(54)	0	54	Donated Asset	0	0	0
392	0	(392)	Charges for depreciation and impairment of non-current assets	342	0	(342)
51	0	(51)	Revaluation losses on property, plant and equipment	1	0	(1)
9	0	(9)	Amortisation of intangible assets	9	0	(9)
16	0	(16)	Amounts of non-current assets written off on disposal or sale as part of the gain/loss on disposal to the Comprehensive Income and Expenditure Statement	21	0	(21)
			<b>Insertion of items not debited or credited to the Comprehensive Income and Expenditure Statement:</b>			
(72)	0	72	Statutory provision for the financing of capital investment	(58)	0	58
(8)	0	8	Derecognition of finance lease liability	0	0	0
(170)	0	170	Capital expenditure charged against the General Fund	(197)	0	197
			<b>Adjustments involving the Capital Receipts Reserve:</b>			
0	0	0	Cash receipts from disposal of investment property	0	0	0
			<b>Adjustments involving the Pensions Reserve:</b>			
1,715	0	(1,715)	Reversal of items relating to post-employment benefits debited or credited to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement (see note 31)	1,390	0	(1,390)
(744)	0	744	Employer's pension contributions and direct payments to pensioners payable in the year	(773)	0	773
			<b>Adjustments involving the accumulated Absences Account:</b>			
12	0	(12)	Adjustments in relation to short-term compensated absences	8	0	(8)
			<b>Adjustments involving the Capital Grant Unapplied Account:</b>			
0	0	0	Capital grants and contributions unapplied credited to the Comprehensive Income and Expenditure Statement	0	0	0
<b>1,147</b>	<b>0</b>	<b>(1,147)</b>	<b>Total adjustments</b>	<b>743</b>	<b>0</b>	<b>(743)</b>

## 10. Transfers to/from earmarked reserves

This note presents details of the amounts set aside in earmarked reserves to provide financing for future expenditure and the amounts posted back from earmarked reserves to meet expenditure in 2020/21. A description of each of the earmarked reserves follows in the table below.

Reserve Name	Balance at 31 March 2019 £000	Transfers in 2019/20 £000	Transfers out 2019/20 £000	Balance at 31 March 2020 £000	Transfers in 2020/21 £000	Transfers out 2020/21 £000	Balance at 31 March 2021 £000
Property	(570)	(93)	0	(663)	(68)	0	(731)
Plant, vessels and equipment	(275)	(173)	99	(349)	(121)	124	(346)
Premises	(196)	(83)	32	(247)	(1)	36	(212)
Planning delivery grant	(269)	(29)	78	(220)	(12)	4	(228)
Upper Thurne Enhancement Scheme	(120)	(26)	0	(146)	(25)	6	(165)
Section 106 Agreements	(103)	(6)	65	(44)	0	10	(34)
Heritage Lottery Fund	(90)	(522)	600	(12)	(565)	545	(32)
Catchment Partnership	(90)	(31)	46	(75)	(57)	57	(75)
CANAPE	(187)	(232)	107	(312)	(165)	86	(391)
Computer Software	(11)	(11)	0	(22)	(10)	1	(31)
UK National Park Communications	0	(28)	0	(28)	(147)	128	(47)
Match Funding	0	0	0	0	(46)	0	(46)
<b>Total</b>	<b>(1,911)</b>	<b>(1,234)</b>	<b>1,027</b>	<b>(2,118)</b>	<b>(1,217)</b>	<b>997</b>	<b>(2,338)</b>

Included in the closing balance of £2,338k, £952k relates to Navigation funded reserves.

Earmarked reserves

**Property**

A reserve account set up to provide for the ongoing maintenance of the Authority's major assets, moorings and operational property assets, including Mutford Lock.

**Plant, Vessels and Equipment**

Reserve established to provide for the maintenance and replacement of the Authority's plant and equipment, including launches, construction and maintenance vessels and equipment, pool vehicles and fen management equipment.

**Premises**

A reserve account established to provide for the maintenance and development of the Authority's Dockyard facility and other buildings throughout the Broads.

**Planning Delivery Grant**

Balance of Defra and OPDM grants awarded to deliver the planning service.

**Upper Thurne Enhancement Scheme**

Reserve established to hold the balance of ring-fenced Environment Agency funding for enhancement works in the Upper Thurne.

**Section 106 Agreements**

A reserve account established to hold ring-fenced developers' contributions relating to planning application conditions.

**Heritage Lottery Fund**

A reserve account established for the Landscape Partnership project funded by the Heritage Lottery Fund.

**Catchment Partnership**

A reserve account set up to hold ring-fenced income from various partners within the Catchment Partnership.

**CANAPE**

A reserve account set up for European grant part funded project relating to the Creating A New Approach to Peatland Ecosystems.

**Computer Software**

A reserve account set up to provide for the ongoing replacement of Authority's Computer Software.

**UK National Parks Communications**

A reserve account set up to hold ring-fenced income from the 15 National Parks to fund the UK Communications Team.

**Match Funding**

A reserve account set up for European grant funded project EXPERIENCE.

## 11. Financing and investment income and expenditure

2019/20 £000	Expenditure and income detail	2020/21 £000
42	Interest payable and similar charges	28
269	Net interest on the net defined benefit liability (asset)	206
(49)	Interest receivable and similar income	(22)
<b>262</b>	<b>Total</b>	<b>212</b>

## 12. Property, plant and equipment

### Movements on balances 2019/20

Cost or valuation	Land and buildings £000	Vehicles, plant, furniture & equipment £000	Infrastructure assets £000	Community assets £000	Assets under construction £000	Total property, plant and equipment £000
At 1 April 2019	2,893	3,459	302	323	60	7,037
Additions	0	125	13	0	32	170
Donated Assets	54	0	0	0	0	54
Revaluation increases/(decreased) recognised in the Revaluation reserve	112	(442)	0	0	0	(330)
Revaluation increases/(decreases) recognised in the Surplus/Deficit on the Provision of Services	(62)	(5)	0	0	0	(67)



<b>Cost or valuation</b>	<b>Land and buildings £000</b>	<b>Vehicles, plant, furniture &amp; equipment £000</b>	<b>Infrastructure assets £000</b>	<b>Community assets £000</b>	<b>Assets under construction £000</b>	<b>Total property, plant and equipment £000</b>
Derecognition-disposals	0	(38)	0	0	0	(38)
<b>At 31 March 2020</b>	<b>2,997</b>	<b>3,099</b>	<b>315</b>	<b>323</b>	<b>92</b>	<b>6,826</b>

<b>Accumulated depreciation and impairment</b>	<b>Land and Buildings £000</b>	<b>Vehicles Plant, Furniture &amp; Equipment £000</b>	<b>Infrastructure Assets £000</b>	<b>Community Assets £000</b>	<b>Assets Under Construction £000</b>	<b>Total Property, Plant and Equipment £000</b>
At 1 April 2019	52	2,038	238	0	0	2,328
depreciation charge	24	353	15	0	0	392
derecognition – disposals	0	(22)	0	0	0	(22)
depreciation written out to the Revaluation Reserve	(6)	(442)	0	0	0	(448)
Revaluation increases/(decreases) recognised in the Surplus/Deficit on the Provision of Services	(12)	(4)	0	0	0	(16)
<b>At 31 March 2020</b>	<b>58</b>	<b>1,923</b>	<b>253</b>	<b>0</b>	<b>0</b>	<b>2,234</b>

<b>Net Book Value</b>	<b>Land and Buildings £000</b>	<b>Vehicles, Plant, Furniture &amp; Equipment £000</b>	<b>Infrastructure Assets £000</b>	<b>Community Assets £000</b>	<b>Assets Under Construction £000</b>	<b>Total Property, Plant and Equipment</b>
<b>At 31 March 2020</b>	<b>2,939</b>	<b>1,176</b>	<b>62</b>	<b>323</b>	<b>92</b>	<b>4,592</b>
At 31 March 2019	2,841	1,421	64	323	60	4,709

#### Movements on balances 2020/21

<b>Cost or valuation</b>	<b>Land and buildings £000</b>	<b>Vehicles, plant, furniture &amp; equipment £000</b>	<b>Infrastructure assets £000</b>	<b>Community assets £000</b>	<b>Assets under construction £000</b>	<b>Total property, plant and equipment £000</b>
At 1 April 2020	2,997	3,099	315	323	92	6,826
Additions	0	174	0	0	128	302
Revaluation increases/(decreased) recognised in the Revaluation reserve	112	(73)	0	0	0	39
Revaluation increases/(decreases) recognised in the Surplus/Deficit on the Provision of Services	1	0	0	0	0	1
Derecognition-disposals	(3)	(70)	0	0	0	(73)
Reclassification	0	92	0	0	(92)	0
<b>At 31 March 2021</b>	<b>3,107</b>	<b>3,222</b>	<b>315</b>	<b>323</b>	<b>128</b>	<b>7,095</b>

<b>Accumulated depreciation and impairment</b>	<b>Land and Buildings £000</b>	<b>Vehicles Plant, Furniture &amp; Equipment £000</b>	<b>Infrastructure Assets £000</b>	<b>Community Assets £000</b>	<b>Assets Under Construction £000</b>	<b>Total Property, Plant and Equipment £000</b>
At 1 April 2020	58	1,923	253	0	0	2,234
depreciation charge	27	297	17	0	0	341
derecognition – disposals	(3)	(49)	0	0	0	(52)
depreciation written out to the Revaluation Reserve	(32)	(102)	0	0	0	(134)
<b>At 31 March 2021</b>	<b>50</b>	<b>2,069</b>	<b>270</b>	<b>0</b>	<b>0</b>	<b>2,389</b>

<b>Net Book Value</b>	<b>Land and Buildings £000</b>	<b>Vehicles, Plant, Furniture &amp; Equipment £000</b>	<b>Infrastructure Assets £000</b>	<b>Community Assets £000</b>	<b>Assets Under Construction £000</b>	<b>Total Property, Plant and Equipment</b>
<b>At 31 March 2021</b>	<b>3,057</b>	<b>1,153</b>	<b>45</b>	<b>323</b>	<b>128</b>	<b>4,706</b>
At 31 March 2020	2,939	1,176	62	323	92	4,592

## Depreciation

The following useful lives and depreciation rates have been used in the calculation of depreciation:

Category of Asset	Depreciation method	Depreciation period
Operational Land and Buildings	Straight line. (The split between land and buildings is determined by the Authority's property consultant)	Between 5 to 50 years as per professional advice
Community Land	Not depreciated	Not depreciated
Infrastructure Asset	Straight line	Between 20 to 25 years
Vehicles, Vessels and Equipment	Straight line	Between 5 to 10 Years
Computer and Office Equipment	Straight line	5 years

## Capital Commitments

The Authority has no capital commitments as at the balance sheet date.

## Impairments

In accordance with IAS 36 and the Code, Directors have undertaken an annual impairment review. No assets were considered to be impaired.

## Revaluations

The Authority carries out a rolling programme that ensures that all Property, Plant and Equipment required to be measured at current value is revalued every five years. Valuations were carried out internally and externally. Valuations of land and buildings were carried out externally by NPS Property Consultants Ltd, in accordance with methodologies and bases for estimation set out in the professional standards of the Royal Institution of Chartered Surveyors. Valuations of vehicles, plant, furniture and equipment are based on current prices where there is an active second-hand market or latest list prices adjusted for the condition of the asset.

Significant assumptions applied in estimating the current values are:

- Property, Plant and Equipment of a specialised nature were valued on the basis of what it would cost to reinstate the service, suitably adjusted to reflect for age, wear and tear and obsolescence of the existing asset.
- Infrastructure Assets and Community Assets have been valued at historic cost rather than fair value.
- Property leases have been split between finance and operating leases and valued accordingly depending upon whether the Authority is lessor or lessee.

<b>Financial Year</b>	<b>Land and buildings £000</b>	<b>Vehicles, plant, furniture &amp; equipment £000</b>	<b>Infrastructure assets £000</b>	<b>Community assets £000</b>	<b>Assets under construction £000</b>	<b>Total £000</b>
Carried at historical cost	0	0	33	323	0	356
Valued at current value as at 31 March 2021	528	272	0	0	128	928
31 March 2020	899	163	12	0	0	1,074
31 March 2019	1,378	236	0	0	0	1,614
31 March 2018	252	316	0	0	0	568
31 March 2017	0	166	0	0	0	166
<b>Total cost or valuation</b>	<b>3,057</b>	<b>1,153</b>	<b>45</b>	<b>323</b>	<b>128</b>	<b>4,706</b>

### 13. Inventories

Description	Consumable stores 2019/20 £000	Consumable stores 2020/21 £000	Maintenance materials 2019/20 £000	Maintenance materials 2020/21 £000	Total 2019/20 £000	Total 2020/21 £000
Balance outstanding at start of year	36	31	52	83	88	114
Purchases	24	30	144	113	168	143
Recognised as an expense in year	(29)	(22)	(113)	(123)	(142)	(145)
Written off balances	0	0	0	0	0	0
<b>Balances outstanding at year end</b>	<b>31</b>	<b>39</b>	<b>83</b>	<b>73</b>	<b>114</b>	<b>112</b>

### 14. Debtors

31 March 2020 £000	Debtor types	31 March 2021 £000
1,265	Trade receivables	73
825	Prepayments and accrued income	763
160	Other receivable amounts	123
<b>2,250</b>	<b>Total</b>	<b>959</b>

### 15. Cash and cash equivalents

The balance of cash and cash equivalents is made up of the following elements

31 March 2020 £000	Cash and cash equivalent types	31 March 2021 £000
2	Cash held by the Broads Authority	2
679	Bank current accounts	2,372
<b>681</b>	<b>Total cash and cash equivalents</b>	<b>2,374</b>

## 16. Creditors

31 March 2020 £000	Creditor types	31 March 2021 £000
279	Trade payables	199
2,301	Accruals and income in advance	1,385
202	Other payable amounts	216
<b>2,782</b>	<b>Total</b>	<b>1,800</b>

## 17. Provisions

2019/20 Accumulated absences provision £000	2019/20 Whitlingham Dilapidations provision £000	2019/20 Total £000	Description	2020/21 Accumulated absences provision £000	2020/21 Whitlingham Dilapidations provision £000	2020/20 1Total £000
47	0	47	Balance at 1 April	60	47	107
60	47	107	Additional provisions made in year	67	0	67
(47)	0	(47)	Settlements or cancellation of provision made at end of proceeding year	(60)	0	(60)
<b>60</b>	<b>47</b>	<b>107</b>	<b>Balance at 31 March</b>	<b>67</b>	<b>47</b>	<b>114</b>

The Whitlingham Dilapidations Provision relates to end of lease dilapidations as assessed by Whitlingham Charitable Trust. COVID-19 the has delayed the settlement with the Trust.

For more information on the Accumulated Absence Account, see note 19.

## 18. Usable reserves

Movements in the Authority's usable reserves are detailed in the Movement in Reserves Statement.

## 19. Unusable reserves

31 March 2020 £000	Description	31 March 2021 £000
1,771	Revaluation reserve	1,880
2,618	Capital Adjustment Account	2,566
(8,731)	Pensions Reserve	(13,362)
(60)	Accumulated Absences Account	(67)
<b>(4,402)</b>	<b>Total unusable reserves</b>	<b>(8,983)</b>

### Revaluation reserve

The Revaluation Reserve contains the gains made by the Authority arising from increases in the value of its Property, Plant and Equipment (and Intangible Assets). The balance is reduced when assets with accumulated gains are:

- revalued downwards or impaired and the gains are lost;
- used in the provision of services and the gains are consumed through depreciation; or
- disposed of and the gains are realised.

The Reserve contains only revaluation gains accumulated since 1 April 2007, the date that the Reserve was created. Accumulated gains arising before that date are consolidated into the balance on the Capital Adjustment Account.

2019/20 £000	Description	2020/21 £000
1,950	Balance at 1 April	1,771
132	Upward revaluation of assets	181
(14)	Downward revaluation of assets	(6)
118	Surplus or deficit on revaluation of non-current assets not posted to the Surplus or Deficit on Provision of Services (subtotal)	175
(297)	Difference between current value depreciation and historical cost depreciation	(66)
(179)	Amount written off to the Capital Adjustment Account (subtotal)	0
<b>1,771</b>	<b>Balance at 31 March</b>	<b>1,880</b>



### Capital Adjustment Account

The Capital Adjustment Account absorbs the timing differences arising from the different arrangements for accounting for the consumption of non-current assets and for financing the acquisition, construction or enhancement of those assets under statutory provisions. The Account is debited with the cost of acquisition, construction or enhancement as depreciation, impairment losses and amortisations are charged to the Comprehensive Income and Expenditure Statement (with reconciling postings from the Revaluation Reserve to convert current value figures to a historical cost basis). The Account is credited with the amounts set aside by the Authority as finance for the costs of acquisition, construction and enhancement.

The Account contains accumulated gains and losses on Investment Properties and gains recognised on donated assets that have yet to be consumed by the Authority. The Account also contains revaluation gains accumulated on Property, Plant and Equipment before 1 April 2007, the date that the Revaluation Reserve was created to hold such gains. Note 9 provides details of the source of all the transactions posted to the Account, apart from those involving the Revaluation Reserve.

2019/20 £000	Description	2020/21 £000
2,484	Balance at 1 April	2,618
0	Reversal of items relating to capital expenditure debited or credited to the Comprehensive Income and Expenditure Statement: Transfer of non-current asset sale proceeds from revenue to Capital Receipts Reserve	0
(392)	Charges for depreciation and impairment of non-current assets	(342)
(51)	Revaluation losses on property plant & equipment	(1)
54	Movement in the Donated Assets	0
(9)	Amortisation of intangible assets	(9)
(16)	Amounts of non-current assets written off on disposal or sale as part of the gain/loss in disposal to the comprehensive income and expenditure statement	(21)
297	Adjusting amounts written out of the revaluation reserve	66
(117)	Net written out amount of the cost of non-current assets consumed in the year (subtotal)	(307)
72	Capital financing applied in the year: Statutory provision for the financing of capital investment charges against the general fund removal of finance lease liability for assets returned in year	57

2019/20 £000	Description	2020/21 £000
9	Derecognition of finance lease liability	0
170	Capital expenditure charges against the General Fund	198
<b>2,618</b>	<b>Balance at 31 March</b>	<b>2,566</b>

#### Pensions Reserve

The Pensions Reserve absorbs the timing differences arising from the different arrangements for accounting for post-employment benefits and for funding benefits in accordance with statutory provisions. The Authority accounts for post-employment benefits in the Comprehensive Income and Expenditure Statement as the benefits are earned by employees accruing years of service, updating the liabilities recognised to reflect inflation, changing assumptions and investment returns on any resources set aside to meet the costs. However, statutory arrangements require benefits earned to be financed as the Authority makes employer's contributions to pension funds or eventually pays any pensions for which it is directly responsible. The debit balance on the Pensions Reserve therefore shows a substantial shortfall in the benefits earned by past and current employees and the resources the Authority has set aside to meet them. The statutory arrangements will ensure that funding will have been set aside by the time the benefits come to be paid.

2019/20 £000	Description	2020/21 £000
(10,812)	Balance at 1 April	(8,731)
3,052	Remeasurements of the net defined benefit liability/(asset)	(4,014)
(1,715)	Reversal of items relating to retirement benefits debited or credited to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement	(1,390)
744	Employer's pension contributions and direct payments to pensioners payable in the year	773
<b>(8,731)</b>	<b>Balance at 31 March</b>	<b>(13,362)</b>

#### Accumulated Absences Account

The Accumulated Absences Account absorbs the differences that would otherwise arise on the General Fund balance from accruing for compensated absences earned but not taken in the year, e.g. annual leave entitlement carried forward at 31 March. Statutory arrangements require that the impact on the General Fund balance is neutralised by transfers to or from the Account.

2019/20 £000	Description	2020/21 £000
(47)	Balance at 1 April	(60)
47	Settlement or cancellation of accrual made at the end of the preceding year	60
(60)	Amounts accrued at the end of the current year	(67)
0	Amount by which officer remuneration charged to the Comprehensive Income and Expenditure Statement on an accruals basis is different from remuneration chargeable in the year in accordance with statutory requirements	0
<b>(60)</b>	<b>Balance at 31 March</b>	<b>(67)</b>

## 20. Cash Flow Statement – Operating Activities

The cash flows from operating activities include the following items:

2019/20 £000	Operating activity	2020/21 £000
(49)	Interest received	(29)
42	Interest paid	29
(7)	<b>Net cash flows from operating activities</b>	<b>0</b>

## 21. Cash flow statement – investing activities

Restated 2019/20 £000	Investing activity	2020/21 £000
(170)	Purchase of property, plant and equipment, investment property and intangible assets	(302)
(502)	Purchase of short-term investments	(1,001)
0	Proceeds from short term investments	2,000
4	Proceeds from the sale of property, plant and equipment, investment property and intangible assets	30
(668)	<b>Net cash flows from investing activities</b>	<b>727</b>

## 22. Cash flow statement – financing activities

2019/20 £000	Financing activity	2020/21 £000
0	Cash receipts of short- and long-term borrowing	105

2019/20 £000	Financing activity	2020/21 £000
(57)	Cash payments for the reduction of the outstanding liabilities relating to finance leases	(42)
(15)	Repayments of short- and long-term borrowing	(15)
(72)	<b>Net cash flows from financing activities</b>	<b>48</b>

### 23. Members' allowances

The Authority paid the following amounts to Members of the Authority during the year:

2019/20 £000	Member payment type	2020/21 £000
39	Allowances	40
7	Expenses	0
<b>46</b>	<b>Total</b>	<b>40</b>

### 24. Officers' remuneration

The remuneration paid to the Authority's senior employees as follows:

Job Title	Year	Salary, fees and allowances £000	Bonuses £000	Expenses allowances £000	Pension contribution £000	Total £000
Chief Executive	2019/20	88	0	0	16	105
	2020/21	91	0	0	16	107
Director of Strategic Services	2019/20	59	0	0	11	70
	2020/21	62	0	0	11	73
Director of Operations	2019/20	59	0	0	11	70
	2020/21	62	0	0	11	73

The number of employees receiving more than £50,000 remuneration for the year (excluding employer's pension contributions) is shown below:

<b>Number of employees 2019/20</b>	<b>Remuneration amount band</b>	<b>Number of employees 2020/21</b>
0	£50,000 - £54,999	0
2	£55,000 - £59,999	0
0	£60,000 - £64,999	2
0	£65,000 - £69,999	0
0	£70,000 - £74,999	0
0	£75,000 - £79,999	0
0	£80,000 - £84,999	0
1	£85,000 - £89,999	0
0	£90,000 - £94,999	1

## Exit packages

The number and cost of exit packages agreed, analysed between compulsory redundancies and other departures, are disclosed in the table below:

Exit package cost band	Number of compulsory redundancies 2019/20	Number of compulsory redundancies 2020/21	Number of other departures agreed 2019/20	Number of other departures agreed 2020/21	Total number of exit packages by cost band 2019/20	Total number of exit packages by cost band 2020/21	Total cost of exit packages in each band 2019/20 £000	Total cost of exit packages in each band 2020/21 £000
£0-£20,000	1	0	0	0	1	0	12	0
£20,001-£40,000	1	0	0	0	1	0	24	0
<b>Total</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>36</b>	<b>0</b>

The total cost in the table above for exit packages have been charges to the authority's comprehensive income and expenditure statement in the previous year.

## 25. External audit costs

The Broads authority has incurred the following fees relating to audit of the Statement of Accounts, certification of grant claims and statutory inspections and to non-audit services provided by the Authority's external auditors

2019/20 £000	Type of external audit cost	2020/21 £000
11	Fees payable to external auditors with regard to external audit services carried out by the appointed auditor for the year	11
11	<b>Total</b>	<b>11</b>

## 26. Grant income

The Authority credited the following grants, contributions and donations to the Comprehensive Income and Expenditure Statement:

2019/20 £000	Grant Name	2020/21 £000
3,414	Credited to taxation and non-specific grant income:	
	Defra National Park Grant	3,414
54	Donated Asset (Acle WC)	0
495	Credited to serves:	452
	Heritage Lottery Fund – Landscape Partnership Scheme	
95	CANAPE - ERDF	163
24	Defra Environment Land Management Scheme	33
26	Water Environment Grant	15
0	Covid-19 Business Grant	20
<b>4,108</b>	<b>Total</b>	<b>4,097</b>

## 27. Related parties

The Broads Authority is required to disclose material transactions with related parties, bodies or individuals that have the potential to control or influence the Authority or to be controlled or influenced by the Authority. Disclosure of these transactions allows readers to assess the extent to which the Authority might have been constrained in its ability to operate independently or might have secured the ability to limit another party's ability to bargain freely with the Authority.

### Central Government

Central government has effective control over the general operations of the Authority – it is responsible for providing the statutory framework within which the Authority operates, provides the majority of funding in the form of grants and prescribes the terms of many of the transactions that the Authority has with other parties.

### Members

Members of the Broads Authority have direct control over the Authority's financial and operating policies. Members of the Navigation Committee have a consultative role in respect of navigation matters. The Authority wrote to all Members requesting details of any related party transactions. Details of Members' expenses are included in note 23.

A number of members of the Broads Authority are appointed by Local Authorities within the Broads area. The Authority transacts with these other Local Authorities for items such as rates in the normal course of business. There were no material transactions with Local Authorities which are not disclosed elsewhere within the Statement of Accounts.

Mr Andrew Hamilton is a member of the Navigation Committee and is Director of 'Eastwood Whelpton Ltd'. Eastwood Whelpton Ltd paid £9,986 (£10,989 2019/20) navigation tolls to the Broads Authority in 2020/21.

Mr James Knight is a member of the Broads Authority and Planning Committee and is a Director of 'Waveney River Centre (2003) Ltd'. Waveney River Centre (2003) Ltd paid £16,177 (£18,032 2019/20) navigation tolls to the Broads Authority in 2020/21. The Authority also made fuel purchases of £383 (£1,294 in 2019/20) and used mooring facilities of £2,500 during 2020/21 which were prepaid in advance (£2,400 2019/20). No amounts were outstanding at 31 March 2021. Mr Knight is also Director of 'Norfolk Broads Direct' who paid £127,063 navigation tolls in 2020/21. Mr Knight took no part in the decision-making process associated with these contracts.

Mr Greg Munford is a member of the Broads Authority, Navigation Committee and Audit & risk Committee and is Director of 'Richardsons Leisure Ltd'. Richardsons Leisure Ltd and 'Horning Pleasurecraft Ltd' paid £342,276 (£384,802 2019/20) navigation tolls to the Broads Authority in 2020/21. Richardson Leisure Ltd also provided the Authority their animations for use in the Broads online safety videos. These were provided free of charge.

Mr Simon Sparrow is a member of the Broads Authority and Navigation Committee and is Director of 'Hippersons Boatyard Ltd'. Hippersons Boatyard Ltd paid £4,674 (£4,652 2019/20) navigation tolls to the Broads Authority in 2020/21. The Authority also made fuel purchases of £72 during 2019/20 but none in 2020/21. Mr Sparrow took no part in the decision-making process associated with this contract.

#### Officers

The Chief Executive represents the Broads Authority on the board of the Whitlingham Charitable Trust. Officer remuneration is detailed in note 24.

#### Whitlingham Charitable Trust

During 2019/20 Authority provided administration services for Whitlingham Charitable Trust of £36,632. This arrangement came to an end on 31 March 2020. The balance outstanding at 31 March 2020 was £6,953.

The Broads Authority provided a recharge service for purchase invoices and salaries of £1,058 (£72,832 in 2019/20). The balance outstanding at 31 March 2021 was £72 (£6,914 at 31 March 2020).

The Whitlingham Charitable Trust also invoiced the Authority £864 (£864 in 2019/20) for rental income for moorings. No amounts were outstanding at 31 March 2021 (£864 in 2019/20).

During 2019/20 The Whitlingham Charitable Trust also invoiced the Authority £15,880 for rental income for the lease of the visitor centre and moorings, and £4,339 for income collected on behalf of the Trust. The lease for the visitor centre and the collection of income on behalf of the Trust ceased on 31 March 2020 at the same time as the administration services. The balance outstanding at 31 March 2020 was £864.



## Birketts LLP

Birketts LLP provides legal services to the Broads Authority. The Authority paid £98,169 for legal services in 2020/21 (£54,866 2019/20). No amounts were outstanding at 31 March 2021 (£8,656 2019/20). Steven Bell is a Senior Associate at Birketts LLP and served as Monitoring Officer to the Broads Authority until June 2020.

## Other Public Bodies

East Suffolk Council provides Hilary Slater who serves as Monitoring Officer to the Broads Authority. Hilary Slater replaced Steven Bell and was appointed in June 2020. East Suffolk Council recharges the Authority for this service and paid £12,449 in 2020/21. £2,277 was outstanding at 31 March 2021.

The Authority recharged Broadland District Council for staff time of £4,260 during 2020/21 (£5,667 in 2019/20). No amounts were outstanding at 31 March 2021 (Nil 2019/20).

Norfolk County Council provides legal services to the Broads Authority via its legal practice, NPLaw. The Authority paid £22,638 for legal services in 2020/21 (£34,155 in 2019/20). £2,575 was outstanding at 31 March 2021 (£1,491 2019/20).

Norfolk County Council also provides payroll services to the Broads Authority. The Authority paid £5,519 for this in 2020/21 (£9,291 in 2019/20). No amounts were outstanding at 31 March 2021 (£2,295 2019/20).

The Authority recharged Norfolk County Council for staff time of £1,295 during 2020/21 (£2,520 in 2019/20). No amounts were outstanding at 31 March 2021 (Nil 2019/20).

## 28. Capital expenditure and capital financing

The total amount of capital expenditure incurred in the year is shown in the table below (including the value of assets acquired under finance leases and PFI/PP contracts), together with the resources that have been used to finance it. Where capital expenditure is to be financed in future years by charges to revenue as assets are used by the Authority, the expenditure results in an increase in the Capital Financing Requirement (CFR), a measure of the capital expenditure incurred historically by the Authority that has yet to be financed. The CFR is analysed in the second part of this note.

2019/20 £000	Description	2020/21 £000
294	Opening Capital Finance Requirement	222
224	<b>Capital investment:</b> Property, plant and equipment	302
	<b>Sources of finance</b>	
(170)	Sums set aside from revenue: Direct revenue contributions	(198)
(54)	Donated Asset	0
(72)	MRP	(57)

2019/20 £000	Description	2020/21 £000
222	<b>Closing capital finance requirement</b>	269
(72)	<b>Explanation of movements in year</b> Increase/(decrease) in underlying need to borrow (unsupported by government financial assistance)	47
<b>(72)</b>	<b>Increase/(decrease) in capital financing requirement</b>	<b>47</b>

## 29. Leases

Authority as lessee

### Finance Leases

The Authority has a number of vehicles, plant and office equipment acquired under finance leases. The assets acquired under these leases are carried as Property, Plant and Equipment in the Balance Sheet at the following net amounts:

2019/20 £000	Asset Type	2020/21 £000
0	Other Land and Buildings	0
128	Vehicles, Plant, Furniture and Equipment	85
<b>128</b>	<b>Total</b>	<b>85</b>

The Authority is committed to making minimum payments under these leases comprising settlement of the long-term liability for the interest in the property acquired by the Authority and finance costs that will be payable by the Authority in future years while the liability remains outstanding. The minimum lease payments are made up of the following amounts:

2019/20 £000	Time periods	2020/21 £000
43	Finance lease liabilities (net present value of minimum lease payments): Current	43
72	Non-current	29
4	Finance costs payable in future years	2
<b>119</b>	<b>Minimum lease payments</b>	<b>74</b>

The minimum lease payments will be payable over the following periods:

Time periods	Minimum lease payments 31 March 2020 £000	Minimum lease payments 31 March 2021 £000	Finance lease liabilities 31 March 2020 £000	Finance lease liabilities 31 March 2021 £000
Not later than one year	45	45	43	43
Later than one year and not later than 5 years	74	29	72	29
Later than 5 years	0	0	0	0
<b>Total</b>	<b>119</b>	<b>74</b>	<b>115</b>	<b>72</b>

The minimum lease payments do not include rents that are contingent on events taking place after the lease was entered into, such as adjustments following rent reviews. In 2020/21, no (£nil) contingent rents were payable by the Authority (2019/20 £nil).

### Operating Leases

The Authority has also established operating leases in relation to land and buildings with typical lives between 5 and 20 years. The future minimum lease payments due under noncancelable leases in future years are:

2019/20 £000	Time period	2020/21 £000
141	Not later than one year	138
280	Later than one year and not later than 5 years	163
207	Later than 5 years	190
<b>628</b>	<b>Total</b>	<b>491</b>

The expenditure charged to the Comprehensive Income and Expenditure Statement during the year in relation to these leases was:

2019/20 £000	Expenditure	2020/21 £000
162	Minimum lease payments	161
<b>162</b>	<b>Total</b>	<b>161</b>

## Authority as Lessor

### Finance Leases

The Authority has no leased-out property on a finance lease.

### Operating Leases

The Authority leases out land and property under operating leases for the following purposes:

- For the provision of community services, such as tourism services; and
- For an outdoor education and study centre.

The future minimum lease payments receivable under non-cancellable operating leases in future years are:

2019/20 £000	Time Period	2020/21 £000
0	Not later than one year	2
0	Later than one year and not later than 5 years	6
0	Later than 5 years	1
<b>0</b>	<b>Total</b>	<b>9</b>

The minimum lease payments receivable do not include rents that are contingent on events taking place after the lease was entered into, such as adjustments following rent reviews.

## 30. Termination benefits

The Authority terminated the contracts of two employees who were made redundant at the beginning of 2019/20 as part of the Broads Authority's organisational restructuring. In terminating these contracts, the Authority incurred liabilities of £36,315, of which £nil related to enhanced pension benefits. No additional liabilities relating to termination benefits were incurred during 2019/20 and 2020/21 and no provision for any future redundancy payments was established in the year.

## 31. Defined Benefit Pension Schemes

### Participation in Pension Schemes

As part of the terms and conditions of employment of its officers and other employees, the Broads Authority makes contributions towards the cost of post-employment benefits. Although these benefits will not actually be payable until employees retire, the Authority has a commitment to make future payments and thus these need to be disclosed as a future entitlement. The Authority participates in one pension scheme:

- The Norfolk Pension Fund for civilian employees (the Local Government Pension Scheme), administered locally by Norfolk County Council. This is a funded defined benefit final salary scheme, meaning that the Authority and employees pay contributions into a fund, calculated at a level intended to balance the pension liabilities with investment assets.

### Guaranteed minimum pension

Guaranteed minimum pension (GMP) was accrued by members of the Local Government Pension Scheme (LGPS) between 6 April 1978 and 5 April 1997. The value of GMP is inherently unequal between males and females for a number of reasons, including a higher retirement age for men and GMP accruing at a faster rate for women. However overall equality of benefits was achieved for public service schemes through the interaction between scheme pensions and the State Second Pension. The introduction of the new Single State Pension in April 2016 disrupted this arrangement and brought uncertainty over the ongoing indexation of GMPs, which could lead to inequalities between men and women's benefits.

As an interim solution to avoid this problem, GMP rules were changed so that the responsibility for ensuring GMPs kept pace with inflation passed in full to pension schemes themselves for members reaching state pension age between 6 April 2016 and 5 April 2021. This new responsibility leads to increased costs for schemes (including the LGPS) and hence scheme employers.

The fund's actuary has carried out calculations in order to estimate the impact that the GMP indexation changes will have on the liabilities of the Broads Authority for financial reporting purposes. The estimate assumes that the permanent solution eventually agreed will be equivalent in cost to extending the interim solution to all members reaching state pension age from 6 April 2016 onwards.

### The McCloud Judgement

When the LGPS benefit structure was reformed in 2014, transitional protections were applied to certain older members close to normal retirement age. The benefits accrued from 1 April 2014 by these members are subject to an 'underpin' which means that they cannot be lower than what they would have received under the previous benefit structure. The underpin ensures that these members do not lose out from the introduction of the new scheme, by effectively giving them the better of the benefits from the old and new schemes.

In December 2018 the Court of Appeal upheld a ruling ("McCloud/Sargeant") that similar transitional protections in the Judges' and Firefighters' Pension Schemes were unlawful on the grounds of age discrimination. The implications of the ruling are expected to apply to the LGPS (and other public service schemes) as well. The UK Government requested leave to appeal to the Supreme Court but this was denied.

The impact of the ruling is uncertain. It is looking likely that benefits accrued from 2014 may need to be enhanced so that all members, regardless of age, will benefit from the underpin. However, restitution may be achieved in a different way, for example by paying compensation. In either case, the clear expectation is that many more members would see an enhanced benefit rather than just those currently subject to these protections. In this outcome, there would likely be a retrospective increase to members' benefits, which in turn would give rise to a past service cost for the Fund employers when the outcome is known.

Quantifying the impact at this stage is very difficult because it will depend on the compensation awarded, members' future salary increases, length of service and retirement age, and whether (and when) members withdraw from active service. Salary increases in particular can vary significantly from year to year and from member to member depending on factors such as budget restraint, job performance and career progression. The Government Actuary's Department (GAD) has estimated that the impact for the LGPS as a whole could be to increase active member liabilities by 3.2%, based on a given set of actuarial assumptions. A full description of the data, methodology and assumptions underlying these estimates is given in GAD's paper, dated 10 June 2019.

The effect of the judgement has been included in the pension liabilities recognised in the balance sheet.

#### Transactions relating to Post-Employment Benefits

The Authority recognises the cost of retirement benefits in the reported cost of services when they are earned by employees, rather than when the benefits are eventually paid as pensions. However, the charge the Authority is required to make against tolls and Defra grant is based on the cash payable in the year, so the real cost of post-employment benefits is reversed out via the Movement in Reserves Statement. The following transactions have been made in the Comprehensive Income and Expenditure Statement and via the Movement in Reserves Statement during the year:

2019/20 £000	Transaction	2020/21 £000
	Comprehensive Income and Expenditure Statement	
	Cost of services:	
1,493	• current service cost	1,184
(47)	• past service cost	0
	Financing and investment income and expenditure	
269	• net interest expense	206
<b>1,715</b>	<b>Total post-employment benefits charged to the surplus or deficit on the provision of services</b>	<b>1,390</b>
	Other post-employment benefits charged to the Comprehensive Income and Expenditure Statement:	
2,276	• return on plan assets (excluding the amount included in the net interest expense)	(5,287)
(996)	• actuarial gains and losses arising on changes in demographic assumptions	451
(3,145)	• actuarial gains and losses arising on changes in financial assumptions	9,189
(1,187)	• other experience	(339)
<b>(3,052)</b>	<b>Total post-employment benefits charged to the Comprehensive Income and Expenditure Statement</b>	<b>4,014</b>

2019/20 £000	Transaction	2020/21 £000
1,715	Movement in Reserves Statement <ul style="list-style-type: none"> <li>reversal of net charges made to the surplus or deficit on the provision of services for post-employment benefits in accordance with the Code</li> </ul>	1,390
(744)	Actual amount charged against the General Fund balance for pensions in the year: <ul style="list-style-type: none"> <li>employers' contributions payable to scheme</li> </ul>	(773)

### Pension Assets and Liabilities Recognised in the Balance Sheet

The amount included in the Balance Sheet arising from the Authority's obligation in respect of its defined benefit plan is as follows:

2019/20 £000	Type	2020/21 £000
(33,852)	Present value of the defined benefit obligation	(44,513)
25,121	Fair value of plan assets	31,151
<b>(8,731)</b>	<b>Net liability arising from defined benefit obligation</b>	<b>(13,362)</b>

### Reconciliation of the Movements in the Fair Value of Scheme (Plan) Assets

2019/20 £000	Movements	2020/21 £000
26,828	Opening fair value of scheme assets	25,121
644	Interest income	579
(2,276)	Remeasurement gain / (loss): <ul style="list-style-type: none"> <li>The return on plan assets, excluding the amount included in the net interest expense</li> </ul>	5,287
744	Contributions from employer	773
222	Contributions from employees into the scheme	230
(1,041)	Benefits paid	(839)
<b>25,121</b>	<b>Closing fair value of scheme assets</b>	<b>31,151</b>

### Reconciliation of Present Value of the Scheme Liabilities (Defined Benefit Obligation)

2019/20 £000	Movements	2020/21 £000
37,640	Balance at 1 April	33,852
1,493	Current service cost	1,184
913	Interest cost	785

<b>2019/20 £000</b>	<b>Movements</b>	<b>2020/21 £000</b>
222	Contributions from scheme participants	230
(996)	Remeasurement (gains) and losses: <ul style="list-style-type: none"> <li>• Actuarial gains / losses from changes in demographic assumptions</li> </ul>	451
(3,145)	<ul style="list-style-type: none"> <li>• Actuarial gains / losses arising from changes in financial assumptions</li> </ul>	9,189
(1,187)	<ul style="list-style-type: none"> <li>• Other</li> </ul>	(339)
(47)	<ul style="list-style-type: none"> <li>• Past Service Cost</li> </ul>	0
(1,041)	Benefits paid	(839)
<b>33,852</b>	<b>Balance at 31 March</b>	<b>44,513</b>



## Local Government Pension Scheme Assets

Local Government Pension Scheme assets comprised:

Fair value of scheme assets 2019/20 £000				Fair value of scheme assets 2020/21 £000		
Quoted prices in active markets	Quoted prices not in active markets	Total	Asset type	Quoted prices in active markets	Quoted prices not in active markets	Total
-	664.6	664.6	Cash and cash equivalents: <ul style="list-style-type: none"> <li>All cash and cash equivalents</li> </ul>	485.9	-	485.9
930.9	-	930.9	Equity instruments: <ul style="list-style-type: none"> <li>Consumer</li> </ul>	-	-	-
738.1	-	738.1	<ul style="list-style-type: none"> <li>Manufacturing</li> </ul>	-	-	-
225.1	-	225.1	<ul style="list-style-type: none"> <li>Energy and utilities</li> </ul>	-	-	-
631.0	-	631.0	<ul style="list-style-type: none"> <li>Financial institutions</li> </ul>	-	-	-
583.1	-	583.1	<ul style="list-style-type: none"> <li>Health and care</li> </ul>	-	-	-
775.3	-	775.3	<ul style="list-style-type: none"> <li>Information technology</li> </ul>	-	-	-
0.4	-	0.4	<ul style="list-style-type: none"> <li>Other</li> </ul>	-	-	-
-	-	-	Bonds (Debt securities): <ul style="list-style-type: none"> <li>Corporate bonds (investment grade)</li> </ul>	-	-	-
-	-	-	<ul style="list-style-type: none"> <li>Corporate bonds (non-investment grade)</li> </ul>	-	-	-
291.9	-	291.9	<ul style="list-style-type: none"> <li>UK Government</li> </ul>	354.6	-	354.6
-	1,511.8	1,511.8	Private equity: <ul style="list-style-type: none"> <li>All private equity</li> </ul>	-	1,976.5	1,976.5

Fair value of scheme assets 2019/20 £000				Fair value of scheme assets 2020/21 £000		
-	2,161.5	2,161.5	Property:	-	2,477.0	2,477.0
-	495.0	495.0	• UK property	-	630.0	630.0
			• Overseas property			
7,260.7	-	7,260.7	Other investment funds and unit trusts:	13,882.5	-	13,882.5
8,185.2	-	8,185.2	• Equities	9,248.1	-	9,248.1
-	701.6	701.6	• Bonds	-	1,970.2	1,970.2
-	-	-	• Infrastructure	-	114.7	114.7
			• Other			
-	-	-	Derivatives	-	-	-
-	(35.2)	(35.2)	• Other derivatives	11.5	-	11.5
			• Foreign exchange			
<b>19,621.7</b>	<b>5,499.3</b>	<b>25,121.0</b>	<b>Total</b>	<b>23,982.6</b>	<b>7,168.4</b>	<b>31,151.0</b>

### Basis for estimating assets and liabilities

Liabilities have been assessed on an actuarial basis using the projected unit method, an estimate of the pensions that will be payable in future years dependent on assumptions about mortality rates, salary levels, etc. The Fund liabilities have been assessed by Hymans Robertson, an independent firm of actuaries, estimates for the fund being based on the latest full valuation of the scheme as at 31 March 2019.

The principal assumptions used by the actuary have been:

31 March 2020	Assumption	31 March 2021
	Long term expected rate of return on assets in the scheme:	
2.3%	• Equity investments	2.0%
2.3%	• Bonds	2.0%
2.3%	• Property	2.0%
2.3%	• Cash	2.0%
	Mortality assumptions:	
	Longevity at 65 for current pensioners:	
21.7 years	• Men	21.9 years
23.9 years	• Women	24.3 years
	Longevity at 65 for future pensioners:	
22.8 years	• Men	23.2 years
25.5 years	• Women	26.2 years
1.9%	Rate of inflation	2.85%
2.6%	Rate of increase in salaries	3.55%
1.9%	Rate of increase in pensions	2.85%
2.3%	Rate for discounting scheme liabilities	2.0%
	Take up of option to convert annual pension into retirement lump sum:	
50%	Pre- April 2008 service	50%
75%	Post- April 2008 service	75%

\*The expected rates of return are set equal to the discount rate (per the revised version of IAS19).

The estimation of the defined benefit obligation is sensitive to the actuarial assumptions set out in the table above. The sensitivity analyses below have been determined based on reasonably possible changes of the assumptions at the end of the reporting period and assumes for each other change that the assumption analysed changes while all the other assumptions remain constant. The assumptions in longevity, for example, assume that life expectancy increases or decreases for men and women. In practice, this is unlikely to occur, and changes in some of the assumptions may be interrelated. The estimations in the sensitivity analysis have followed the accounting policies for the scheme, i.e. on an actuarial

basis using the projected unit credit method. The methods and types of assumptions used in preparing the sensitivity analysis below are consistent with those adopted in the previous period.

#### Sensitivity analysis – impact on the defined benefit obligation in the scheme

<b>Change in assumptions at 31 March 2021</b>	<b>Approximate % increase to employer liability</b>	<b>Approximate monetary amount £000</b>
0.5% decrease in real discount rate	10%	4,445
1-year increase in member life expectancy	3-5%	Dependent on revised assumption
0.5% increase in the salary increase rate	1%	326
0.5% increase in the pension increase rate	9%	4,034

#### Techniques used to manage risk

The Pensions Committee of Norfolk County Council considers long term liabilities when setting its investment strategy but does not follow a specific liability matching investment approach having taken appropriate professional advice. The Committee has agreed an asset allocation benchmark, a performance target and various controls on the Fund's investments. These reflect their views on the appropriate balance between maximising the long-term return on investments and minimising short-term volatility and risk. The Committee monitors and reviews the performance of investments and the overall strategy on a regular basis, supported by advice from professional advisers as required. A large proportion of the Fund's assets relate to equities (51% of scheme assets) and bonds (31%). These percentages are materially the same as the previous year. The scheme also invests in properties as part of the diversification of the scheme's investments.

Further details of the Fund's investment approach are outlined in the Statement of Investment Principles and Funding Strategy Statement that are published on the Fund's website [www.norfolkpensionfund.org](http://www.norfolkpensionfund.org).

#### Impact on the Authority's cash flows

The objectives of the scheme are to keep employers' contributions at as constant a rate as possible. The Administering Authority has agreed a strategy with the scheme's actuary to achieve a funding level of 100% over the next 20 years. Funding levels are monitored on an annual basis. The next triennial valuation will take place on 31 March 2022.

The scheme will need to take account of the national changes to the scheme under the Public Pension Services Act 2013. Under the Act, the Local Government Pension Scheme in England and Wales may not provide benefits in relation to service after 31 March 2014. The Act provides for scheme regulations to be made within a common framework, to establish

new career average revalued earnings schemes to pay pensions and other benefits to certain public servants.

The Authority anticipates paying contributions of approximately £760,000 to the scheme in 2021/22.

### **32. Contingent Liabilities**

The Authority has identified one material contingent liability:

#### **Postwick Tip**

The Authority uses a site "Postwick Tip," which is included in the Authority's Fixed Asset Register, for the treatment of sediment material from dredging operations. This natural treatment process involves the drying of sediment so that mercury content is absorbed. As such there would be no clean-up costs at the end of the site's life. However, if the Authority were to stop using the site, there would be a cost of £33,000 to surrender the license. There is currently no expectation that the Authority will cease using the site. The Authority's use of the site is the subject of a bond / financial provision to the Environment Agency in the amount of £6.4m. This covers the estimated cost of restoration which could arise if there were to be a catastrophic event at the site. Defra are the guarantors for this bond and the Authority would not itself anticipate making any payment under the terms of this agreement.

### 33. Financial Instruments

The following categories of financial instrument are carried in the Balance Sheet:

#### Financial Assets

Type	Non-Current Investments 31 March 2020 £000	Non-Current Investments 31 March 2021 £000	Non-Current Debtors 31 March 2020 £000	Non-Current Debtors 31 March 2021 £000	Current Investments 31 March 2020 £000	Current Investments 31 March 2021 £000	Current Debtors 31 March 2020 £000	Current Debtors 31 March 2021 £000	Total 31 March 2020 £000	Total 31 March 2021 £000
Amortised Cost	0	0	0	0	4,689	5,375	2,015	722	6,704	6,097
<b>Total financial assets</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4,689</b>	<b>5,375</b>	<b>2,015</b>	<b>722</b>	<b>6,704</b>	<b>6,097</b>
Non-financial assets	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4,689</b>	<b>5,375</b>	<b>2,015</b>	<b>722</b>	<b>6,704</b>	<b>6,097</b>

## Financial Liabilities

Type	Non-Current Borrowings 31 March 2020 £000	Non-Current Borrowings 31 March 2021 £000	Non-Current Creditors 31 March 2020 £000	Non-Current Creditors 31 March 2021 £000	Current Borrowings 31 March 2020 £000	Current Borrowings 31 March 2021 £000	Current Creditors 31 March 2020 £000	Current Creditors 31 March 2021 £000	Total 31 March 2020 £000	Total 31 March 2021 £000
Amortised Cost	167	193	0	0	57	78	2,740	1,757	2,964	2,028
<b>Total financial liabilities</b>	<b>167</b>	<b>193</b>	<b>0</b>	<b>0</b>	<b>57</b>	<b>78</b>	<b>2,740</b>	<b>1,757</b>	<b>2,964</b>	<b>2,028</b>
Non-financial liabilities	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>167</b>	<b>193</b>	<b>0</b>	<b>0</b>	<b>57</b>	<b>78</b>	<b>2,740</b>	<b>1,757</b>	<b>2,964</b>	<b>2,028</b>

## Income, Expense Gains and Losses

Interest Type	Surplus or Deficit on the Provision of Services 2019/20 £000	Other Comprehensive Income and Expenditure 2019/20 £000	Total 2019/20 £000	Surplus or Deficit on the Provision of Services 2020/21 £000	Other Comprehensive Income and Expenditure 2020/21 £000	Total 2020/21 £000
Interest Expense	42	0	42	29	0	29

<b>Interest Type</b>	<b>Surplus or Deficit on the Provision of Services 2019/20 £000</b>	<b>Other Comprehensive Income and Expenditure 2019/20 £000</b>	<b>Total 2019/20 £000</b>	<b>Surplus or Deficit on the Provision of Services 2020/21 £000</b>	<b>Other Comprehensive Income and Expenditure 2020/21 £000</b>	<b>Total 2020/21 £000</b>
Interest Income	(49)	0	(49)	(22)	0	(22)

#### Fair Values of Assets and Liabilities

Financial liabilities, financial assets represented by loans and receivables and long-term debtors and creditors are carried in the Balance Sheet at amortised cost. Their fair value can be assessed by calculating the present value of the cash flows that will take place over the remaining term of the instruments. These valuations are all classified as Level 2, where market prices are not available, with valuation techniques using inputs based significantly on observable market data. The following assumptions should be noted:

- Fixed interest rate of 4.82% over the 20-year PWLB loan;
- Fixed interest rate of 2% over the 5-year PWLB loan;
- No early repayment or impairment is recognised; and
- The fair value of trade and other receivables is taken to be invoices or billed amount.



The fair values calculated are as follows:

<b>Financial Liabilities held at amortised cost:</b>	<b>31 March 2020 Carrying Amount £000</b>	<b>31 March 2020 Fair Value £000</b>	<b>31 March 2021 Carrying Amount £000</b>	<b>31 March 2021 Fair Value £000</b>
PWLB	109	130	199	221
Finance Leases	115	115	72	72
Short Term Creditors	2,740	2,740	1,757	1,757
<b>Total</b>	<b>2,964</b>	<b>2,985</b>	<b>2,028</b>	<b>2,050</b>

The fair value of borrowings is higher than the carrying amount because the authority's PWLB loan is at a fixed interest rate where the interest rate payable is higher than the prevailing rates at the Balance Sheet date. This shows a notional future loss (based on economic conditions as at 31 March 2021) arising from a commitment to pay interest to lenders above the current market rate. Refinancing the loan at lower interest rates would outweigh the early repayment fee.

<b>Financial assets held at amortised cost:</b>	<b>31 March 2020 Carrying Amount £000</b>	<b>31 March 2020 Fair Value £000</b>	<b>31 March 2021 Carrying Amount £000</b>	<b>31 March 2021 Fair Value £000</b>
Fixed term investments	4,010	4,010	3,003	3,003
Cash at banks	679	679	2,372	2,372
Short Term debtors	2,015	2,015	722	722
<b>Total</b>	<b>6,704</b>	<b>6,704</b>	<b>6,097</b>	<b>6,097</b>

Short term debtors and creditors are carried at cost as this is fair approximation of their value.

### 34. Nature and Extent of Risks Arising from Financial Instruments

The Authority's activities expose it to a variety of financial risks:

**Credit Risk:** The possibility that other parties might fail to pay amounts due to the Authority.

**Liquidity Risk:** The possibility that the Authority might not have funds available to meet its commitments to make payments.

**Market Risk** The possibility that financial loss might arise for the Authority as a result of changes in such measures as interest rates and stock market investments.

**Foreign Exchange Risk:** The possibility that financial loss might arise for the Authority as a result of changes in the exchange rate (GBP and Euro).

The Broads Authority's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise potential adverse effects on the resources available to fund services.

#### **Credit Risk**

Credit risk arises from deposits with banks and financial institutions, as well as credit exposures to customers. Deposits are only made in line with the Treasury Management Strategy which requires that deposits are not made with banks and financial institutions unless they are highly rated. Therefore, the Broads Authority does not consider there to be any quantifiable risk in relation to investments.

The Authority's standard terms and conditions for payment of invoices are 30 days from invoice date. The Authority does not allow credit for customers, and only a small proportion of invoices were overdue and outstanding as at 31 March 2020 for which a bad debt provision had not been put in place.

#### **Liquidity Risk**

A one-year funding agreement from DEFRA means the Broads Authority has some certainty over 2020/21. Longer term uncertainty still remains and future changes in government brings further uncertainty whether future multi-year funding will be available. Given the significant cash balances there is no significant risk that it will be unable to meet its commitments under financial instruments. All financial liabilities are due to be repaid within one to five years with the exception of the 20-year PWLB loan. Therefore, there is no risk of having to borrow at unfavourable rates in future to replenish borrowings.

#### **Market Risk**

With the exception of the PWLB loan, the Broads Authority is debt free. Excess cash is invested at variable or fixed money market rates depending on forecasts for interest rates under the period of review.

#### **Foreign Exchange Risk**

The Authority's Annual Investment and Capital Financing Strategy for 2020/21 states that if the Authority enters into any contractual arrangements above £100,000 which involve foreign currency, the advice of the Chief Financial Officer will be sought on the advisability of hedging the exchange risk before entering into the contract.

### 35. Navigation Income and Expenditure Account

2019/20 Gross expenditure £000	2019/20 Income £000	2019/20 Net expenditure/ (income) £000	Description	2020/21 Gross expenditure £000	2020/21 Income £000	2020/21 Net expenditure/ (income) £000
2,587	(87)	2,500	Operations	2,366	(19)	2,347
580	(160)	420	Strategic Services	488	(128)	360
700	(14)	686	Chief Executive	691	(8)	683
17	0	17	Corporate Items	49	0	49
0	(3,431)	(3,431)	Navigation Income (Tolls)	0	(3,385)	(3,385)
<b>3,884</b>	<b>(3,692)</b>	<b>192</b>	<b>Cost of services (subtotal)</b>	<b>3,594</b>	<b>(3,540)</b>	<b>54</b>
		(4)	(Gains)/Losses on the disposal of non-current assets			2
		123	Financing and investment income and expenditure			102
		(54)	Donated Asset			0
		<b>257</b>	<b>(Surplus) or deficit on provision of services (subtotal)</b>			<b>158</b>
		(96)	(Surplus) or deficit on revaluation of fixed assets			(144)
		(1,350)	Actuarial (gains)/losses on pension assets/liabilities			1,832
		(1,446)	Other comprehensive income and expenditure (subtotal)			1,688
		<b>(1,189)</b>	<b>Total comprehensive income and expenditure</b>			<b>1,846</b>

## Glossary of Terms

### **Accounting period**

The period of time covered by the accounts, a period of twelve months commencing on 1 April. The end of the accounting period is the Balance Sheet date.

### **Accounting policies**

The basis on which an organisation's financial statements are based to ensure that those statements 'present fairly' the financial position and transactions of that organisation. Accounting concepts include 'materiality', 'accruals', 'going concern' and 'primacy of legislative requirements'.

### **Accruals**

Sums included in the final accounts to recognise revenue and capital income and expenditure earned or incurred in the financial year, but for which actual payment had not been received or made as at 31 March.

### **Actuarial gains and losses**

These may arise on both defined benefit pension scheme liabilities and assets. A gain represents a positive difference between the actuarial assumptions and actual experience (e.g. liabilities during the period were lower than estimated). A loss represents a negative difference between the actuarial assumptions and actual experience (e.g. liabilities during the period were higher than estimated).

### **Amortisation**

The measure of the wearing out, consumption, or other reduction in the useful economic life of an intangible long-term asset.

### **Amortised cost**

This is cost that has been adjusted for amortisation.

### **Asset**

An item owned by the Authority which has a value, for example, premises, vehicles, equipment, cash.

### **Budget**

The statement of the Authority's policy expressed in financial terms usually for the current or forthcoming financial year. The Revenue Budget covers running expenses (see also: revenue income and expenditure), and the Capital Budget plans for asset acquisitions and replacements (see also: capital income and expenditure).

### **Capital income and expenditure**

Expenditure on the acquisition of a long-term asset, which lasts normally for more than one year, or expenditure which adds to the life or value of an existing long-term asset.

### **Capital financing**

Funds raised to pay for capital expenditure. There are various methods of financing capital expenditure including borrowing, leasing, direct revenue financing, usable capital receipts, capital grants, capital contributions, revenue reserves and earmarked reserves.

**Cash equivalents**

These are short term, highly liquid investments that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value. Cash equivalents are held for the purpose of meeting short term cash commitments rather than for investment purposes.

**Chartered institute of public finance and accountancy (CIPFA)**

The Chartered Institute of Public Finance and Accountancy (CIPFA) is the professional accountancy institute that sets the standards for the public sector. CIPFA publishes the Accounting Codes of Practice for local government.

**Code of practice on local authority accounting (the Code)**

Based on International Financial Reporting Standards, the Code aims to achieve consistent financial reporting between all English local authorities and National Park Authorities. It is based on generally accepted accounting standards and practices.

**Community assets**

Community assets are assets that the Authority intends to hold for an unlimited period of time, have no determinable finite useful life and may have restrictions on their disposal.

**Contingent liabilities**

Potential costs that the Authority may incur in the future because of something that happened in the past.

**Creditors**

Amounts owed by the Authority for goods and services provided for which payment has not been made at the end of the financial year.

**Current value**

This is the cost of an asset if bought in the current year.

**Debtors**

Sums of money due to the Authority but not received at the end of the financial year.

**Deficit**

Arises when expenditure exceeds income or when expenditure exceeds available budget.

**Depreciation**

The measure of the wearing out, consumption, or other reduction in the useful economic life of a long-term asset.

**Expected return on pension assets**

For a funded defined benefit scheme, this is the average rate of return, including both income and changes in fair value but net of scheme expenses, which is expected over the remaining life of the related obligation on the actual assets held by the scheme.

**Fair value**

The price at which the Authority could buy or sell an asset in a transaction with another organisation, less any grants received towards buying or using that asset.

**Financial asset**

A right to future economic benefits.

**Financial instrument**

Any contract that gives rise to a financial asset in one organisation and a financial liability in another.

**Financial liability**

An obligation to transfer economic benefits.

**Finance lease**

A lease which transfers all of the risks and rewards of ownership of a long-term asset to the lessee. Where these leases are entered into, the assets acquired have to be included with the Authority's long-term assets in the balance sheet at the market value of the asset involved (see also: operating lease).

**Long term assets**

Assets that yield benefits to the Authority and the services it provides for a period of more than one year.

**Government grants**

Grants paid by the Government. These can be for general expenditure or a particular service or initiative.

**Historic cost**

The cost of an asset when originally bought.

**Ias19 retirement benefits**

An International Financial Reporting Standard which requires local authorities to reflect the true value of the assets and liabilities relating to the Pension Fund in their financial statements.

**Impairment**

A reduction in the value of a long-term asset to below its carrying amount in the Balance Sheet. Impairment of an asset is caused either by a consumption of economic benefits e.g. physical damage (fire at a building) or a deterioration in the quality of the service provided by the asset, or by a general fall in prices of that particular asset or type of asset.

**Infrastructure assets**

Long term assets that are inalienable, expenditure on which is recoverable only by continued use of the asset created. Examples of infrastructure assets are highways and footpaths.

**Intangible assets**

Intangible assets are non-financial long-term assets that do not have physical substance but are identifiable and are controlled by the Authority through custody or legal rights.

**International financial reporting standards (ifrs)**

International Financial Reporting Standards (IFRS) are issued by the International Accounting

Standards Board. All local authorities apply international accounting regulations when preparing accounts. The Authority's accounts follow these standards where they apply to local authorities.

**Investment properties**

Assets that the Authority owns but which are not used in the direct delivery of services.

**Liability**

An obligation to transfer economic benefits. Current liabilities are usually payable within one year.

**Market price**

This is the price at which another organisation is prepared to buy or sell an asset.

**Minimum revenue provision (mrp)**

The minimum sum charged to the Authority's revenue account each year to provide for the repayment of loans.

**Net book value**

The amount at which long term assets are included in the Balance Sheet, i.e. their historical costs or current value less the cumulative amounts provided for depreciation.

**Non-distributed costs**

These are specific overheads relating to unused assets and certain pension costs for employees' service in previous years. These are not allocated to service departments because they do not relate to the in-year cost of providing the service.

**Operating lease**

A lease whereby the ownership of the asset remains with the leasing company and an annual rent is charged to the relevant service. The assets involved are not included within the Authority's long-term assets in the balance sheet (see also: finance lease).

**Outturn**

The actual amount spent in the financial year.

**Pension fund**

A fund which makes pension payments on retirement of its participants.

**Provision**

An amount set aside to provide for a liability, which is likely to be incurred, but where the exact amount and the date on which it will arise are uncertain.

**Reserves**

An amount set aside for a specific purpose in one financial year and carried forward to meet expenditure in future years.

**Revenue income and expenditure**

Expenditure which relates to day to day expenses, such as salaries and wages, general

running expenses and the minimum revenue provision. Revenue income includes charges made for goods and services.

**Surplus**

Arises when income exceeds expenditure or when expenditure is less than available budget.

**Value added tax (vat)**

A tax on consumer expenditure, collected on business transactions at each stage in the supply, but ultimately borne by the final customer.

**Variance / variation**

A difference between budgeted income or expenditure and actual outturn, also referred to as an 'over-' or 'underspend'.



# Broads Authority

23 July 2021

Agenda item number 13

## Strategic direction update

Report by Head of Governance

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### Purpose

This report sets out the latest progress in implementing the Authority's annual strategic priorities, and starts the process for considering next year's priorities. The report also presents a draft timetable for the Broads Plan review.

### Recommended decision

- (i) To note the progress in implementing this year's strategic priorities;
  - (ii) To consider how members wish to engage in setting strategic priorities for 2022/23; and
  - (iii) To note the proposed timetable for the Broads Plan review.
- 

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## 1. Strategic priorities 2021/22 - update

- 1.1. Each year the Broads Authority identifies a small set of strategic priorities, which focus on projects that have high resource needs or a very large impact on the Broads, or that are politically sensitive. Setting these priorities helps target the Authority's resources and make the most of partnership working and external funding opportunities. Priorities are set each financial year, although some large-scale projects carry across several years.
- 1.2. The first update on our agreed strategic priorities for 2021/22 is in Table 1.

**Table 1**

Strategic priorities 2021/22 – progress update

Themes, aims and milestones	Progress	Lead officers
<p><b>1. Broads strategy and policy review</b></p> <p><b>(a) Broads Plan</b></p> <p>Aim: To refresh the Plan’s strategic actions, assessing the Government’s response to the Landscapes Review and its implications for protected landscape management plans.</p> <p>Milestones:</p> <ul style="list-style-type: none"> <li>(i) Produce Sustainability Appraisal Scoping Report (by Autumn 2021)</li> <li>(ii) Prepare first draft Plan for consultation (by Nov 2021)</li> <li>(iii) Prepare final draft Plan for consultation (by Mar 2022)</li> </ul>	<p>Status: <b>On track</b></p> <p>Review timetable - see Table 2 in this report</p> <p>(i) SA Scoping Report on today’s agenda</p>	<p>Head of Governance</p>
<p><b>(b) Local Plan for the Broads</b></p> <p>Aim: To review and update the Broads planning policy framework</p> <p>Milestones:</p> <ul style="list-style-type: none"> <li>(i) Produce Sustainability Appraisal Scoping Report (by Autumn 2021)</li> <li>(ii) Produce Issues and Options version of Local Plan ready for consultation in 2022</li> <li>(iii) Produce evidence base on various topics including housing need (2021 and early 2022)</li> </ul>	<p>Status: <b>On track</b></p> <p>(i) SA Scoping Report on today’s agenda</p>	<p>Planning Policy Officer</p>

Themes, aims and milestones	Progress	Lead officers
<p><b>2. <a href="#">CANAPE project</a></b> (Creating A New Approach to Peatland Ecosystems)</p> <p>Aim: To implement CANAPE work packages 3 and 4 to agreed schedules.</p> <p>Milestones:</p> <ul style="list-style-type: none"> <li>(i) Complete Chara Bay construction work (April 2021)</li> <li>(ii) Develop and contribute to the CANAPE Conference (Oct 2021)</li> <li>(iii) Begin construction work at paludiculture demonstration site at Horsey (Aug 2021)</li> </ul>	<p>Status: <b>Some delays</b></p> <ul style="list-style-type: none"> <li>(i) Planting of reed at Chara Bay not possible over winter 2020/21 due to high water levels - finishing work moved to winter 2021/22.</li> <li>(ii) Planning for CANAPE conference ongoing, with bookings opening shortly.</li> <li>(iii) Planning underway for Horsey construction, with initial designs and costings produced and contractors appointed.</li> <li>(iv) Final peat survey with QMUL produced and shared with farmers and land managers at Broads Land Managers Board and Natural England peat team, providing valuable new insight into carbon storage in the Broads.</li> </ul>	<p>CANAPE Project Manager</p>
<p><b>3. Environment Land Management scheme (ELM)</b></p> <p>Aim: To implement sustainable wetland and lowland grazing options within ELM scheme.</p> <p>Milestones:</p> <ul style="list-style-type: none"> <li>(i) Conduct and write up 3 farmer seminars with advisory group testing role of local land management boards (Apr-Jul 2021)</li> <li>(ii) Conduct survey on role of local conveners in ELM scheme (Mar-May 2021)</li> <li>(iii) Hold collaboration workshop (May 2021)</li> </ul>	<p>Status: <b>On track</b></p> <p>ELM Test and Trial:</p> <ul style="list-style-type: none"> <li>(i) 3 farmer seminars tested role of Broads Land Management Board, exploring local prioritisation, long-term water and carbon management and private financing.</li> <li>(ii) 9 face-to-face farmer and land manager discussions completed/ written up on role of local conveners in ELM scheme.</li> <li>(iii) Finalised Operating Procedures for Broads Land Management Board and updated to administer Farming in Protected Landscapes (FiPL) programme with Norfolk Coast Partnership - to create</li> </ul>	<p>Environment Policy Adviser</p>

Themes, aims and milestones	Progress	Lead officers
<p>(iv) Finalise Operating Procedures for Broads land management board (Jul 2021)</p> <p>(v) Complete final report and Defra handover meeting/presentation (Jul 2021)</p>	<p>Broads and Norfolk Coast Land Management Board.</p> <p>(iv) Draft report on Test and Trial prepared for Board and Defra handover meeting being set.</p> <p><a href="#">Farming in Protected Landscapes:</a></p> <p>(v) Coordination of advice and information to potential applicants about the FiPL Programme.</p>	
<p><b>4. Responding to climate change</b></p> <p><b><a href="#">(a) Broadland Futures Initiative</a></b></p> <p>Aim: To implement the joint programme of work with the Environment Agency and other partners to develop longer-term integrated flood risk management for Broadland.</p> <p>Milestones:</p> <p>(i) Hold virtual exhibition and online survey (Jan-Apr 2021)</p> <p>(ii) Hold first meeting of Elected Members Forum (Spring 2021)</p> <p>(iii) Various technical deliverables from consultant (throughout 2021/22)</p>	<p>Status: <b>On track</b></p> <p>(i) Action completed.</p> <p>(ii) First meeting of Elected Members Forum held in March 2021.</p> <p>(iii) On track.</p>	<p>Director of Strategic Services</p>
<p><b>(b) Climate Change Action Plan</b></p> <p>Aim: To reduce the carbon footprint of the Broads Authority and the Broads Executive Area ('Broads Area').</p> <p>Milestones:</p>	<p>Status: <b>Some delays</b></p> <p>(i) Difficulty in obtaining data is delaying Smallworld delivery to end July/early Aug. Many National Park Authorities lined up to take part and benefit from trailblazer work BA is doing.</p>	<p>Carbon Reduction Project Manager</p>

Themes, aims and milestones	Progress	Lead officers
<ul style="list-style-type: none"> <li>(i) Broads Area carbon baseline (Smallworld Consulting Ltd) (June 2021)</li> <li>(ii) Broads Authority footprint for 2020/21 (Jun 2021)</li> <li>(iii) Solar power at Dockyard (Oct 2021)</li> <li>(iv) Consultation and consensus building on sustainable propulsion in the Broads (ongoing)</li> </ul>	<ul style="list-style-type: none"> <li>(ii) Calculating BA footprint underway with staff survey to understand impact of homeworking, and other data gathering.</li> <li>(iii) Reviewing solar power options - primary barrier is initial capital cost.</li> <li>(iv) Survey of boat owners launched to gather views on green boating and usage data to inform decisions about infrastructure.</li> </ul> <p>Bid submitted to Clean Maritime Demonstration Fund for feasibility study of zero emission hire cruiser, incl. boat design and infrastructure needs.</p>	
<p><b>5. Safety in the Broads</b></p> <p>Aim: To manage and monitor safety in the Broads for Authority staff and volunteers and for Broads users.</p> <p>Milestones:</p> <ul style="list-style-type: none"> <li>(i) Recruit and train new Rangers (April 2021)</li> <li>(ii) Prepare and make available 9 training videos (April 2021)</li> <li>(iii) Develop survey approach of visitors to assess handover procedure and effectiveness of videos (Summer 2021)</li> <li>(iv) Review MAIB report when published</li> </ul>	<p>Status: <b>On track</b></p> <ul style="list-style-type: none"> <li>(i) New Rangers recruited and trained by end of April 2021.</li> <li>(ii) Videos produced and widely circulated on line, via social media and through boatyards April 2021.</li> <li>(iii) Survey developed and data being recorded. Survey available to public online and Rangers set targets to carry out 30 surveys each with hirers. Survey data to be collated and reviewed at end of season.</li> <li>(iv) MAIB report not yet out – revised date is Autumn 2021.</li> </ul>	<p>Head of Ranger Services</p>
<p><b>6. <a href="#">Water, Mills and Marshes Landscape Partnership Scheme</a></b></p> <p>Aim: To implement partnership projects to agreed schedules.</p>	<p>Status: <b>On track</b></p> <p>Quarterly returns submitted on time and paid by NLHF. App projects progressing well to adjusted plans.</p>	<p>WMM Programme Manager</p>

Themes, aims and milestones	Progress	Lead officers
<p><b>Milestones:</b></p> <ul style="list-style-type: none"> <li>(i) Monitor and report progress (Sept/Mar)</li> <li>(ii) Submit quarterly claims to National Lottery Heritage Fund (Apr/Jul/Oct/Jan)</li> <li>(iii) Implement fundraising plan with partners (May)</li> <li>(iv) Hold Broads Hidden Heritage Conference (Nov)</li> </ul>	<p>Recognised with awards from Norfolk Constructing Excellence Club: 1st in Preservation and Rejuvenation category and 2<sup>nd</sup> overall for projects across construction industry in Norfolk. Awards based on quality of heritage building work by our two apprentices at 6-Mile House Mill in 2020.</p> <p>Works underway to restore Highs Mill, Halvergate; access route to Stones Mill surveyed; millwright recruited to assist with works at Muttons Mill and sails removed from mill.</p> <p>Working with Somerleyton Estate to redevelop Herringfleet Hills open access area, with new accessible signage, benches and replacement of car parking charge with optional donation to support Smock Mill Trust.</p> <p>Working with NCC Historic Environment Team to create new maintenance and management system on their database for mills project legacy.</p> <p>Module led with NUA Year 3 illustration students on Broads environment and newsletter of their works published. Evidence and case study provided to <a href="#">Research Excellence Framework</a>.</p> <p>Submitted multiple applications for project funding with project partners; funding received to deliver EXPERIENCE project on behalf of NCC.</p> <p>Planning underway for public engagement events incl. Heritage Open Days in Sept 2021.</p>	

Themes, aims and milestones	Progress	Lead officers
	<p>Burgh Castle Almanac received external funding from Community Fund to continue beyond WMM scope.</p> <p>Digital engagement continuing on website and social media, with great response for new #WalksWednesday, promoting different Broads trail every week.</p> <p>Legacy Planning ongoing, with new legacy partners recruited to continue works beyond project funding.</p>	

## 2. Setting strategic priorities for 2022/23

- 2.1. The role of strategic priorities in our strategic ‘golden thread’ is set out in Appendix 1.
- 2.2. The Management Team has identified the need to engage members in early discussion on the strategic priorities for 2022/23, so they can feed into the budget setting process. Members’ views are invited on how they wish to participate in this process.
- 2.3. It is important to remember that much of the Authority’s resources is already committed into the future, in providing statutory services such as planning and tolls, and undertaking essential works such as maintenance of the waterways.
- 2.4. The Management Team’s initial draft ideas for next year’s strategic priorities are listed below, as a starting point for members’ consideration:
  - CANAPE (Creating A New Approach to Peatland Ecosystems)
  - Water, Mills and Marshes Landscape Partnership Scheme
  - Responding to climate change (Broadland Futures Initiative and Climate Change Action Plan)
  - Broads strategy and policy review (Broads Plan and Local Plan)
  - Farming in Protected Landscapes
  - Nature Recovery Networks (and other potential impact from the Environment Bill)
  - Tolls system replacement
  - Safety in the Broads and Hire Boat Licensing Review
  - Response to the Government’s proposals on the Landscapes Review (subject to Government’s consultation)

### 3. Broads Plan review timetable

- 3.1. The draft summary timetable for the Broads Plan review is at Table 2. The Plan is subject to Sustainability Appraisal/Strategic Environment Assessment and Appropriate Assessment and these processes will be built into the timetable at the appropriate plan drafting stages and brought to the Authority alongside the emerging Broads Plan.

**Table 2**

Broads Plan review timetable

Dates	Actions
June to Sept 2021	Roll out plan template of priority partnership actions - lead officers to update plan in liaison with external delivery partners  Prepare report for with early thoughts for members' consideration
Sept – Oct 2021	Hold member workshop session to discuss emerging draft plan (BA meeting 24 Sept or separate workshop meeting – tbc)  Complete first draft plan ready for consultation
19 Nov 2021	Seek Authority approval of first draft plan for consultation
End Nov 2021 – end Jan 2022	Consult on first draft plan
Feb 2022	Assess consultation responses and prepare revised draft plan
18 Mar 2022	Report to Authority (possible workshop session if required) seeking approval of revised draft plan for consultation
21 Mar- end Apr 2022	Consult on revised draft plan
May-June 2022	Assess consultation responses and prepare final plan
15 July 2022	Report to Authority seeking approval to adopt final plan. (Substantial changes should not emerge at 2nd consultation stage – if they do, then use this Authority meeting to consider those changes, and move adoption to a subsequent meeting).

Author: Maria Conti

Date of report: 09 July 2021

[Broads Plan](#) strategic actions: All

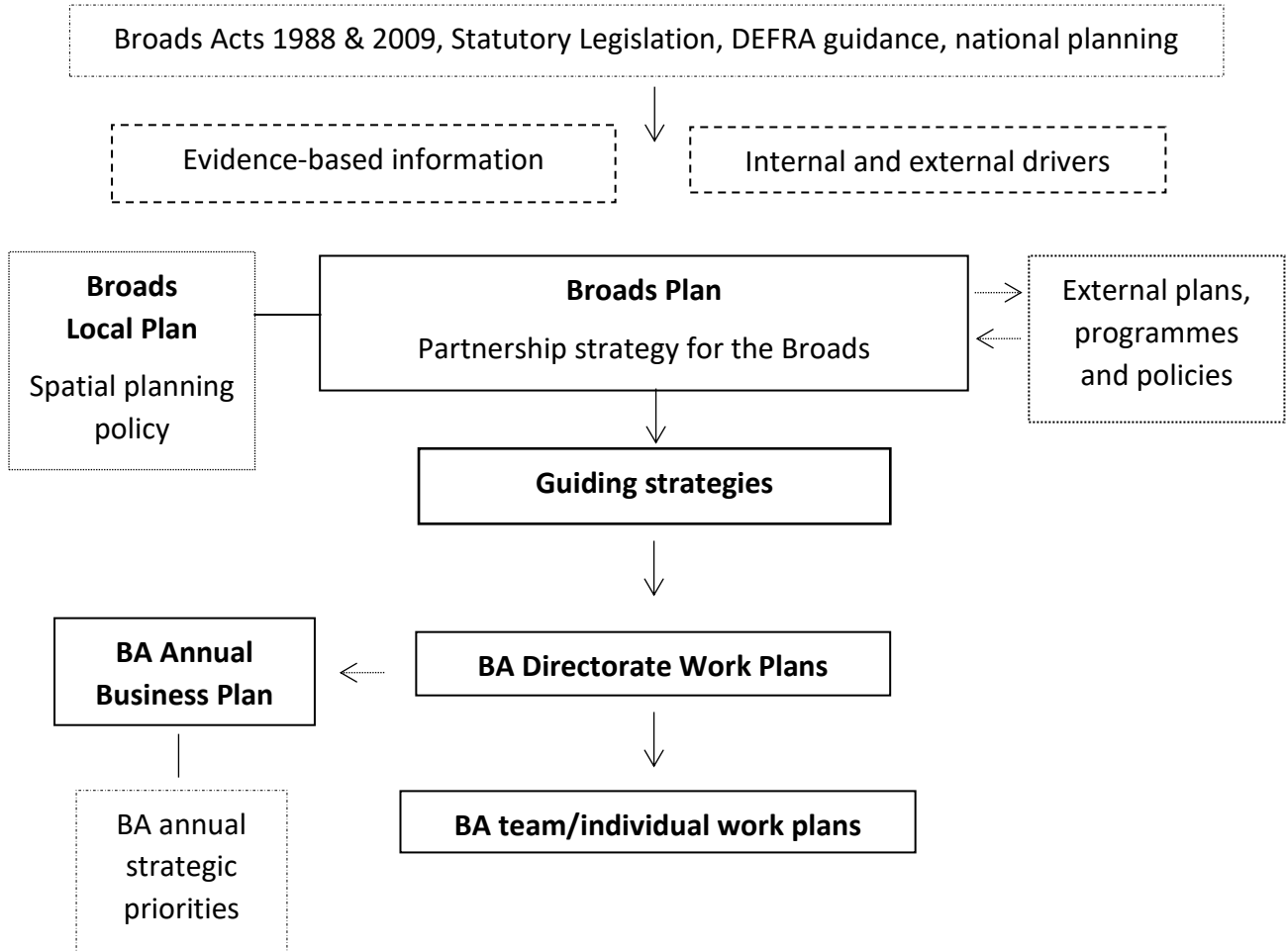
Appendix 1 - Strategic 'golden thread'



# Appendix 1 – ‘Golden thread’ strategic framework

**Fig. 1**

‘Golden thread’ strategic framework



# Broads Authority

23 July 2021

Agenda item number 14

## Sustainability Appraisal Scoping Report- endorsing technical consultation

Report by Planning Policy Officer

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### Summary

One of the first tasks in producing the Local Plan for the Broads is to prepare a Sustainability Appraisal (SA) Scoping Report. This sets the framework for assessing policy approaches as the Local Plan progresses. The SA Scoping Report appended to this report will also set the framework for assessing the strategic objectives in the Broads Plan, which is under review in 2021/22. The SA Scoping Report must be sent to the Environment Bodies for technical consultation.

### Recommendation

To approve the SA Scoping Report for technical consultation.

---

## 1. Introduction

- 1.1. The Local Plan for the Broads and the Broads Plan are under review. One of the first tasks in the review process for both plans is to produce a Sustainability Appraisal (SA) Scoping Report. This includes a literature review of relevant documents, sets out the baseline data, identifies sustainability issues and sets a framework for assessing policies of the Local Plan and the strategic objectives of the Broads Plan. A key aim of the scoping procedure is to help ensure the SA process is proportionate and relevant to the plans being assessed.
- 1.2. Regulations require the SA Scoping Report to be sent to the Environment Bodies (see para 3.1 below) for technical consultation. The Authority also consults a number of other organisations, as noted below.

## 2. About Sustainability Appraisals

- 2.1. The National Planning Policy Guidance (NPPG) says that Sustainability Appraisal<sup>1</sup> is ‘an opportunity to consider ways by which the plan can contribute to improvements in

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<sup>1</sup> [Strategic environmental assessment and sustainability appraisal - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal)

environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have.’

- 2.2. While the Broads Plan is not a planning policy document, it needs a SA because it is a ‘plan or programme’. The stages of reviewing the Broads Plan are not all in line with those of the Local Plan review, but the [required SA stages](#) will be met for both plans.
- 2.3. The NPPG says: ‘The scoping stage (Stage A) needs to identify the scope and level of detail of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives. Although the scoping stage is a key stage in the process, a formal scoping report is not required by law but is a useful way of presenting information at the scoping stage. A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the plan being assessed’.

### 3. Feedback from Planning Committee

- 3.1. The SA Scoping Report was presented to Planning Committee on 18 June and the following observations were made:
  - Some of the tables need an introduction, e.g. the assessment of the objectives against the UN Sustainable Development Goals.  
Officer response: Three tables now have introductory wording.
  - There is the potential for some SA Objectives to contradict each other or conflict.  
Officer response: The table at Appendix 6 assesses SA Objectives against each other and identifies areas where there could be conflict, and these are explained in the text following the table. Essentially, this observation is planning in a nutshell – balancing the gains and losses, and positives and negatives of policies and schemes, and this is what the SA will do – assess policies, identify issues, seek positives to be maximised and negatives to be addressed.

### 4. Consultation

- 4.1. The consultation on the SA Scoping Report is a technical consultation. The Authority is required to consult the Environment Bodies: Natural England, Environment Agency and Historic England.
- 4.2. In the spirit of Duty to Cooperate, we will also consult our constituent District and County Councils: Norfolk County Council, Suffolk County Council, North Norfolk District Council, East Suffolk Council, Great Yarmouth Borough Council, Norwich City Council, South Norfolk District Council and Broadland District Council.
- 4.3. We will also consult the RSPB, New Anglia LEP, Norfolk and Suffolk Nature Recovery Partnership and the Marine Management Organisation.

4.4. The consultation will run for 5 weeks, likely to be from 23 July to 27 August 2021. All comments received will be considered in taking the SA processes forward for the Local Plan and the Broads Plan.

Author: Natalie Beal

Date of report: 18 June 2021

Appendix 1 – Sustainability Appraisal Scoping Report

Appendix 2 – SA Literature Review

Appendix 3a – SA Baseline data

Appendix 3b – SA Baseline data map bundle

Appendix 3c – SA Norfolk Geodiversity Audit database for the Broads

# Sustainability appraisal scoping report

Broads Plan and Local Plan for the Broads

June 2021

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## 1. Executive Summary

The Norfolk and Suffolk Broads is Britain's largest protected wetland and third largest inland waterway, with the status of a national park. It is also home to some of the rarest plants and animals in the UK. The Broads is an internationally important wetland and a nationally designated protected landscape of the highest order, and is also part of the family of UK National Parks. The designated Broads executive area straddles parts of Norfolk and Suffolk, and is the geographical scope of the Broads Plan and the Local Plan for the Broads.

The Broads Plan is a high-level primary strategy and a key influence on other guiding-level strategic plans (e.g. specific topic strategies such as the Integrated Access Strategy, Biodiversity and Water Strategy, Sustainable Tourism Strategy). The Plan is reviewed at least every five years, and it is anticipated that the next version of the Broads Plan will be a light touch revision of the 2017 Plan, starting in 2021.

The Broads Authority is the Local Planning Authority for the Broads. The Local Plan for the Broads was adopted in 2019, and the Authority has started its review.

One of the first stages of producing the Plans is to prepare and consult on a Sustainability Appraisal Scoping Report. A key aim of the scoping procedure is to help ensure the SA process is proportionate and relevant to the plan being assessed.

A literature review has been undertaken. Documents reviewed range from national level to county level documents and Broads-specific publications. The documents are listed and covered in more detail in the Literature Review at [Appendix 2](#).

The existing environmental, economic and social characteristics of the area likely to be affected by the Broads Plan and Local Plan are set out at [Appendix 3a](#), [3b](#) and [3c](#).

[Section 6](#) identifies some of the principal sustainability challenges and opportunities in the area which are potentially relevant to the Broads Plan and Local Plan.

To help predict and evaluate effects, SA Objectives have been produced with associated decision-making criteria to assist in assessing each Broads Plan strategic action and each Local Plan policy. The proposed SA Objectives are set out in [section 7](#). More detail is provided at Appendices [4](#), [5](#) and [6](#).

The Authority is undertaking consultation of the statutory environmental bodies and other selected organisations on this draft SA Scoping Report during the **period xxxxx to 4pm on xxxxx**.

## 2. Introduction

### 2.1. The Broads Plan

The Act places a requirement on the Broads Authority to produce a Management Plan for the Broads and to review it at least once in every five years. The existing [Broads Plan](#) was adopted in 2017 and covers the period up to 2022. The plan may be viewed on the Authority's website at [Strategy \(broads-authority.gov.uk\)](http://strategy.broads-authority.gov.uk).

It is anticipated that the next version of the Broads Plan will be a light touch revision of the 2017 Plan, starting in 2021.

The Broads Plan is a high-level primary strategy and a key influence on other guiding-level strategic plans (e.g. specific topic strategies such as the Integrated Access Strategy, Biodiversity and Water Strategy, Sustainable Tourism Strategy). While not a spatial development plan, the Broads Plan is likely to have significant effects on environmental topics such that it would require Strategic Environmental Assessment. The Authority will undertake the wider appraisal process of Sustainability Appraisal to investigate and inform the plan-making process.

### 2.2. The Local Plan for the Broads

The Broads Authority is the Local Planning Authority for the Broads. [The Local Plan for the Broads](#) was adopted in 2019. The Authority has started reviewing the Local Plan.

### 2.3. Review of the Broads Plan and the Local Plan for the Broads

The review process for both the Broads Plan and the Local Plan for the Broads will be informed by a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). Government guidance<sup>1</sup> recommends that SA incorporates the requirements for SEA and to the same level of detail.

One of the first stages of producing the Plans is to prepare and consult on a Sustainability Appraisal Scoping Report. A key aim of the scoping procedure is to help ensure the SA process is proportionate and relevant to the plan being assessed.

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

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

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<sup>1</sup> <https://www.gov.uk/government/collections/planning-practice-guidance>



This SA Scoping Report will apply to both the Broads Plan and the Local Plan for the Broads. The next steps of the SA process will be specific to each Plan.

The Broads Plan review process will review and update strategic actions from the Broads Plan adopted in 2017. It will also research the potential for a strategic response to some other local issues.

The Local Plan process will review, carry forward and update relevant policies from the Local Plan for the Broads, adopted in 2019. It will also research the potential for a policy response to some other local issues. The Authority will use the SA to help identify and choose between potential options for the policies and site allocations.

This SA Scoping Report is intended to form the basis of the SA for both plans. This report is being sent to the statutory environmental bodies Environment Agency, Natural England and English Heritage to obtain their views on it.

#### 2.4. Consultation

The Authority is undertaking consultation of the statutory environmental bodies and other selected organisations on this draft SA Scoping Report during the period xxxxx to 4pm on xxxxx. The report will be sent to the following consultation bodies:

- English Heritage
- Natural England
- Environment Agency

In the spirit of Duty to Cooperate, the constituent District and County Councils will also be consulted:

- Norfolk County Council
- Suffolk County Council
- North Norfolk District Council
- East Suffolk Council
- Great Yarmouth Borough Council
- Norwich City Council
- South Norfolk District Council
- Broadland District Council

The Authority will also consult the RSPB, New Anglia LEP, Norfolk and Suffolk Nature Recovery Partnership, and the Marine Management Organisation.

All comments received will be considered in taking the SA processes forward.

The Authority is particularly seeking responses to the following key questions:

- a) Is the proposed SA framework appropriate?

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- b) Is the scoping and baseline information adequate?
- c) Have all relevant plans and programmes been identified?
- d) Is any significant environmental, social or economic baseline data missing or inaccurate?
- e) Are there any additional sustainability problems or opportunities in the Broads?
- f) Is the scope of the SA proportionate?

### 3. Background

#### 3.1. The Broads and the Broads Authority

The Norfolk and Suffolk Broads is Britain's largest protected wetland and third largest inland waterway, with the status of a national park. It is also home to some of the rarest plants and animals in the UK. The Broads area is an internationally important wetland and a nationally designated protected landscape of the highest order, and part of the family of UK National Parks. The designated Broads executive area straddles parts of Norfolk and Suffolk, and is the geographical scope of the Broads Plan and the Local Plan for the Broads.

There is an interactive webpage about the Broads at [Journey \(broads-authority.gov.uk\)](https://broads-authority.gov.uk) and a map of the Broads with information on page 2 of [Broadcaster 2021 \(yudu.com\)](https://www.yudu.com/broadcaster-2021).

The Broads Authority has a statutory duty to manage the Broads for the following three purposes, none of which takes precedence:

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

Additionally, in discharging its functions, the Authority must have regard to:

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

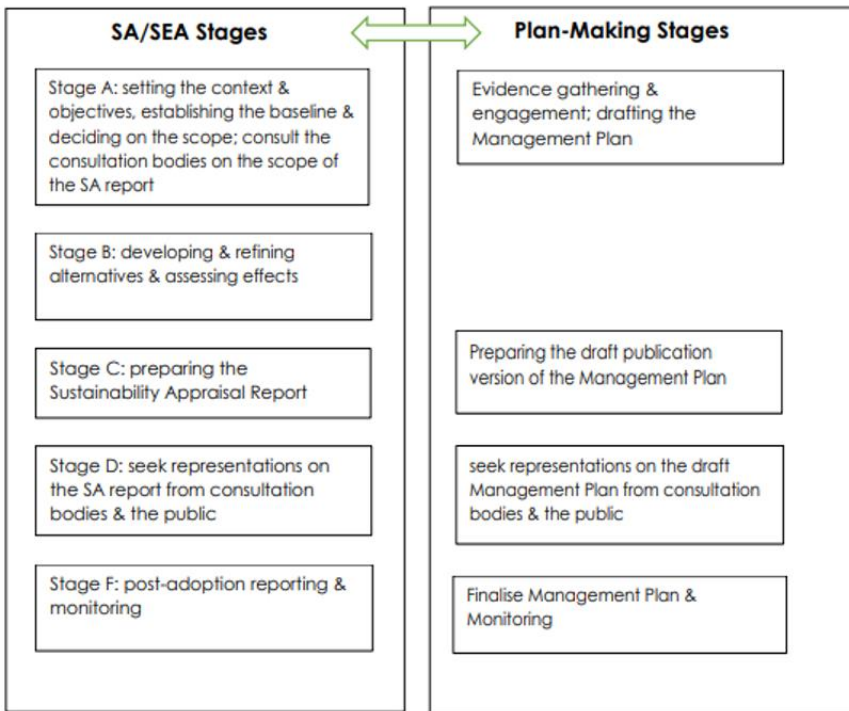
The Broads Authority is the local planning authority for the Broads, responsible for producing and updating the Local Plan that guides development in the area. The area includes parts of Broadland District, South Norfolk District, North Norfolk District, Great Yarmouth Borough, Norwich City and East Suffolk. The councils for those areas do not have planning powers in the Broads area, but retain all other local authority powers and responsibilities.

### 3.2. Sustainability Appraisal

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

The keys stages and tasks (see Figure 1) for conducting the SA for Local Plans are set out in the National Planning Practice Guidance<sup>2</sup>. These key stages and tasks are also applicable to the SA process for the Broads Plan. This Scoping Report is stage A of the process.

**Figure 1:** SA and plan-making stages



The SA will include the Strategic Environmental Assessment (SEA) required by European Directive and UK Regulations.

<sup>2</sup> NPPG: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

### 3.3. The context of the Sustainability Appraisal

The Broads Plan and the Local Plan are the two important statutory documents that guide activity, decision-making and investment in the Broads. Both have the same overall objective to help deliver the purposes set out in the Broads Act. The Local Plan sets the policies that guide planning decisions about development and the use of the land. The Broads Plan is a broader strategic plan that sets out the long-term vision for the Broads and provides the framework for partnership working.

The next version of the Broads Plan will follow the same format as the 2017 Broads Plan, with a long-term vision and strategic actions under key themes. The next version will update the actions where relevant, and provide some information about the forces of change, including the Government's 25 Year Environment Plan<sup>3</sup> (2018), nature recovery<sup>4</sup> (2020), changes to the agri-environment payment scheme, and the Landscapes Review<sup>5</sup> (2019) that recommends specific proposals to improve and strengthen management plans. The Broads Plan will be prepared in the spirit of these changes, but it is noted that its recommendations will require agreement by Government, legislative changes, and new funding. The Broads Plan also include links to other plans and strategies.

The Local Plan works within the context of broader strategies and policies, especially those of the Broads Plan and the National Planning Policy Framework. The Local Plan SA will examine whether the effects of the specific sites/areas allocations and policies therein, individually or collectively, give rise to sustainability benefits or dis-benefits.

The task of the SA is firstly to assess the short, medium and long-term social, environmental and economic effects of the individual policy options and then assess the combined effects, in these terms, of the policies of the whole area.

The stages of SA for the Local Plan process are shown in Fig. 1.

### 3.4. Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) involves the systematic identification and subsequent evaluation of the environmental impacts of a strategic action such as a plan or programme. The objective of the SEA process is to provide for a high level of protection of the environment, and to integrate environmental considerations into the preparation and adoption of plans. The relevant requirements and considerations are set out in the assessment of the effects of certain plans and programmes on the environment directive and national regulations.

SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004<sup>6</sup>, which implement the requirements of the European

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<sup>3</sup> [25 Year Environment Plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/25-year-environment-plan)

<sup>4</sup> [Nature Recovery Network - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/nature-recovery-network)

<sup>5</sup> [Landscapes review: National Parks and AONBs - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/landscapes-review-national-parks-and-aonbs)

<sup>6</sup> The Environmental Assessment of Plans and Programmes Regulations 2004:  
<http://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

Directive 2001/42/EC<sup>7</sup> on the assessment of the effects of certain plans and programmes on the environment. SA ensures that potential environmental effects are given full consideration alongside social and economic issues.

### 3.5. Habitats Regulation Assessment

Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora, and the UK regulations that give effect to this, require an 'Appropriate Assessment' (AA) or habitats Regulations Assessment (HRA) of the potential impacts of land-use plans (this includes the Broads Plan and the Local Plan for the Broads) on European designated habitat sites to ascertain whether they would adversely affect the integrity of such sites. Where significant adverse effects are identified, alternative options must be examined to avoid any potential damaging effects.

While any effect of the strategic actions or policies of the Plans on European Designated habitats is obviously a component of the SA/SEA of the document, the specific requirements and process of an Appropriate Assessment differ, and so the Appropriate Assessment/Habitats Regulations Assessment will be carried out in parallel and reported separately.

### 3.6. Planning White Paper

We are aware of the Planning White Paper proposals to remove the need for sustainability appraisals. However, we have produced this SA Scoping Report to meet the regulatory requirements in place at the time of writing.

### 3.7. Brexit

The United Kingdom has left the EU, and SAs are linked to European Union Directives/Regulations. However, the requirement to undertake a SA is currently still in place and therefore this SA Scoping Report has been produced.

## 4. Other relevant policies, plans and programmes and sustainability objectives

### 4.1. Section introduction

The Environmental Assessment of Plans and Programmes Regulations 2004 says, at schedule 2, Information for Environmental Reports:

"5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation."

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<sup>7</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment:  
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32001L0042:EN:NOT>

A literature review has been undertaken. Documents reviewed range from National Level documents to County-level documents and Broads-specific publications.

With the area of the Broads covering many other Local Authorities, as well as numerous environmental designations, many different documents covering a plethora of topics have been reviewed. The documents are listed are covered in more detail in the Literature Review at [Appendix 2](#).

**Question 1: Are there any other documents that you think are relevant? If so, please provide their titles and hyperlinks.**

## 5. Baseline information

### 5.1. The Broads Authority Executive Area

The Broads covers nearly 303 square kilometres and has a resident population of nearly 6,300 people (2011 census). It is predominantly a rural area and includes parts of Norfolk and Suffolk counties, six districts and 93 parishes. The boundary of the Broads is very tightly drawn around the flood plains and lower reaches of the three main rivers – the Bure, Yare and Waveney. There are no major settlements wholly within the Broads, only a few hamlets and small villages, but the boundary does include parts of many villages, some towns (such as Great Yarmouth, Lowestoft, Beccles, and Bungay) and a city (Norwich). The baseline information at [Appendix 3a](#), [3b](#) and [3c](#) provide more detail of the current state of the Broads. For a map of the Broads visit page 2 of the [Broadcaster 2021 \(yudu.com\)](#).

### 5.2. The special qualities of the Broads

The special qualities of the Broads that the Broads Plan and Local Plan seek to protect or enhance (as appropriate) are well known. The following list is based on public consultation for the Broads Plan 2017, the Broads Climate Change Adaptation Plan and the Broads Landscape Character Assessment. Together, these special qualities help create the distinctiveness of the Broads' landscape.

- a) Rivers and open water bodies ('broads')
- b) Fens, reed beds and wet woodlands
- c) Grazing marshes and dyke networks
- d) Flood plains, estuary and coast
- e) Navigable, lock-free waterways
- f) Special wildlife
- g) Countryside access on land and water
- h) Views, remoteness, tranquillity, wildness and 'big skies'
- i) The people, the visitors, the activities
- j) History: Earth heritage, heritage assets, archaeology, historic structures

- k) Cultural assets, skills and traditions.
- l) People’s interactions with the landscape
- m) The settlements
- n) Variety of patterns and textures of the landscape

**Question 2: Do you think these are the special qualities of the Broads? Do you have any other suggestions?**

### 5.3. The environmental, economic and social characteristics of the Broads

The existing environmental, economic and social characteristics of the area likely to be affected by the Broads Plan and Local Plan are set out at [Appendix 3a](#), [3b](#) and [3c](#).

**Question 3: Do you have any comments on the baseline data? Are there any other documents that you think are relevant? If so, please provide their titles and hyperlinks.**

## 6. Sustainability issues and problems

### 6.1. Introduction

The Strategic Environment Assessment (SEA) requires the assessment of: ‘The environment characteristics of areas likely to be significantly affected and any existing environmental problems which are relevant to the plan or programme’.

This section identifies some of the principal sustainability challenges and opportunities in the area which are potentially relevant to the Broads Plan and Broads Local Plan.

### 6.2. Strengths

- a) Extensive, diverse and very highly valued landscape, habitats, flora, fauna and cultural and heritage assets.
- b) A unique wetland and low-lying area and status equivalent to a National Park.
- c) Formal nature conservation designations of the Broads and many areas within it provide relatively high levels of policy protection or conservation.
- d) Farmed and managed landscape, the majority being privately owned.
- e) A short undeveloped stretch of coastline.
- f) High levels of tranquillity through much of the Broads; in particular, a sense of remoteness in some parts despite these being located close to concentrations of housing and industry. Also, most of the area has intrinsic dark skies.
- g) Attractive environment, providing the basis for most of the Broads’ economy and recreation for residents and visitors.
- h) Britain’s largest protected wetland and third largest inland waterway.

- i) High level of interaction with the surrounding area, with complementary provision of facilities and opportunities. For example, employment and development opportunities and community facilities in surrounding districts, towns and in Norwich also serve Broads' residents, while the Broads provides recreational and business opportunities to those from the wider area.
- j) Thriving hire boat industry contributing to the local economy.
- k) Many organisations and individuals caring for or promoting the value of various aspects of the Broads.
- l) Importance of the Broads for the identity and recreation of a much wider area.
- m) The age profile of the area shows more older people than in the surrounding area. Older people are often motivated, educated and experienced and play an important role in the community.
- n) Substantial, engaged community of private boat owners.
- o) Local boating clubs and classes that enable local people (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors.
- p) Many heritage assets, including conservation areas and drainage mills.
- q) The international significance of the paleo-archaeological remains within the Broads and the unusually well-preserved organic remains.
- r) A wealth of archaeological deposits that are not well represented elsewhere within the country.
- s) Good collaborative working with stakeholders and interest groups.
- t) An area providing many ecosystem services, as evidenced in the Norfolk and Suffolk natural capital assets compendium<sup>8</sup>.
- u) Peatland areas and opportunities for improved wetland areas.

### 6.3. Weaknesses

- a) Many of the protected habitats failing to meet target ecological conditions and/or vulnerable to change as a result of, for example, fragmentation, inappropriate water and land management and pressure from nearby development.
- b) Lowland grazing economics poor and may be at risk of farm subsidy changes.
- c) Some areas of fen and some lakes in decline and reliant on grants for Nature Recovery.

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<sup>8</sup> [Norfolk and Suffolk Natural Capital Assets Evidence Compendium | Norfolk Biodiversity Information Service \(nbis.org.uk\)](https://www.nbis.org.uk)



- d) Almost the whole of the Broads area subject to, or at risk of, flooding.
- e) Some listed buildings and other heritage assets at risk, and particular problems in finding compatible and beneficial uses that could help secure the restoration and maintenance of heritage assets such as wind pumps/drainage mills.
- f) Continuing (though declining) problems of water quality in the rivers; ground water quality problems.
- g) Difficulty of modernising and adapting existing buildings and uses, and accommodating new ones, due to flood prone nature of the area.
- h) Decline in traditional industries such as millwrights and reed and sedge cutters.
- i) High reliance on tourism, which can leave the economy vulnerable and mean a loss of resilience as a result of changes to the holiday/recreational patterns. Indeed, the access restrictions as a result of COVID19 has had a large impact on tourism (as well as many other sectors of the local and national economy).
- j) Car dependence of local communities and businesses and fragmentation of settlements.
- k) Depleted local community and/or visitor facilities, often through displacement by higher value activities (principally housing).
- l) Tensions and perceptions of incompatibility between interests of conservation, farming, development, recreation, tourism, navigation and local communities, and between local interests and the national value of the Broads.
- m) The ageing population could lead to imbalance in the community.
- n) Lack of housing that is affordable resulting in some people having to commute to places of work.
- o) Deficiencies of moorings in some places to meet the needs of various waterspace users.
- p) Some low bridges which prevent larger boats from passing, and some narrow waterways which could limit potential for navigation.
- q) Some boats unable to navigate as intended due to operational issues of some swing bridges, particular when the weather is hot.
- r) Increasing pressures for land use change around areas of settlement.
- s) Resourcing difficulties for organisations that help to manage the environmental assets.
- t) Lack of certainty of how the new framework for agricultural subsidies will support Nature Recovery.
- u) Lack of public transport in rural areas

- v) Rural connectivity – some areas not covered by broadband.
- w) Unsustainable wildfowling.
- x) Increased risk of salinisation of previously freshwater wetlands.

#### 6.4. Opportunities

- a) Climate change:
  - i. Likely impacts that may create opportunities such as changes in flora, fauna and landscape, patterns of recreation and changes in agriculture and its practices.
  - ii. Adaption through erecting, raising and strengthening flood defenses, realignment in more flood prone locations to make more space for water and linking wildlife habitats to provide resilience.
  - iii. Evolving low carbon lifestyles, construction and patterns of land use and settlement.
- b) Maintaining the recovery and improvement of water quality achieved over the last few decades by long term and ongoing investment across a range of agencies, particularly water companies.
- c) Potential to put in place environmental and recreational management measures as part of the implementation of major housing and employment growth outside but close to the Broads area.
- d) Potential for restoration and enhancement zones towards nature recovery within and surrounding the Broads, including to connect up to coastal and other biodiversity rich wetland areas.
- e) Potential for revival in the use of the area’s rivers and railways for freight and passenger traffic.
- f) Changes in patterns of recreation and expectations of visitors.
- g) Potential for complementary and mutually supportive actions and benefits across environmental, recreational, navigation, and local community issues.
- h) Provision of jobs, facilities, services and homes for local residents through the development plans of constituent Local Authorities.
- i) The status of the Broads as equivalent to a National Park – held in high regard with most stakeholders.
- j) Private investment opportunities for carbon, water quality and potentially Biodiversity Net Gain.
- k) Training opportunities for traditional skills and crafts.
- l) Encouraging sustainability through the design of buildings as well as innovative designs, new technologies and building in resilience.

- m) Opportunities to encourage both local residents and visitors to join one of the many boating clubs, take part in organised events, go on formal sailing courses and gain recognised Royal Yachting Association (RYA) qualifications.
- n) Opportunities to Improve awareness of general public and residents of the special qualities of the Broads (see section 5.2).
- o) Many train stations in/near to the Broads.
- p) Highway improvements and the benefits to the community and economy they could bring.
- q) Flat land favoring healthy travel modes and active travel opportunities.
- r) As a consequence of the COVID19 pandemic, more people will /may holiday in the UK and in the Broads and become aware of the special qualities of the Broads. Businesses could appropriately diversify and become more resilient.
- s) More home-based working lessening carbon impacts while retaining wealth in the locality.

## 6.5. Threats

- a) Climate change - likely impacts that may be threats:
  - i. Increased frequency and severity of all sources of flooding
  - ii. Increased risk of coastal inundation
  - iii. Increased frequency and severity of drought, with impact on water resources available to all sectors
  - iv. Severe drought would affect the ability to graze marshes with livestock
  - v. Changes in water quality and quantity
  - vi. Increased frequency and severity of saline incursion into fresh water systems
  - vii. Loss of freshwater dependant flora, fauna and landscape in some areas
  - viii. Changes in patterns of recreation
  - ix. Changes in agriculture and its practices
- b) Redundancy/degradation of infrastructure and material assets
- c) Erosion of the special character of the area's landscape and built heritage through:
  - i. Loss of archaeology built/landscape and cultural heritage assets.
  - ii. Saline intrusion.
  - iii. Coastal erosion.
  - iv. Incremental 'suburbanisation' and other changes, including through domestic and holiday home extensions/enlargements and paraphernalia:

1. Metalling of unmade tracks;
  2. 'Horsiculture' – proliferation of pony paddocks, stables, Manèges, etc.;
  3. Road, rail and navigation improvements/changes;
  4. Proliferation of advertisements.
- d) Potential landscape and economic effects of change, including that driven by market changes (e.g. food prices, bio-fuel).
- e) Changes in patterns of recreation, including impacts of decline in hire boat fleet and growth of private boat ownership; higher expectation of facilities for leisure plots, holiday chalets and other accommodation.
- f) Declining boatyard and boatbuilding industry.
- g) Loss of swing bridges to fixed bridges.
- h) Major housing and employment growth planned for nearby areas, and associated potential impacts such as:
- i. Water quality and quantity loss arising from effluent input and water supply extraction.
  - ii. Increased recreational pressure, on both visitor 'honeypots' and remoter, more tranquil and sensitive localities.
  - iii. Traffic growth impacting on reduced safe cycling and horse riding routes.
- i) Changes to economies, practices and ways of life that sustained local and traditional industries and skills (such as millwrights, reed and sedge cutters and boat builders) that generated and sustained the landscapes we see today.
- j) Unsympathetic design, construction and alterations.
- k) Loss of local community and/or visitor facilities, often through displacement by higher value activities (principally housing).
- l) High house prices in the rural areas could affect the willingness of some to train in traditional skills such as reed and sedge cutting as they would need to commute.
- m) Recent and likely future cuts in budgets and consequent challenges organisations face in light of reduced funds.
- n) Palaeo-environmental and organic archaeological remains are especially vulnerable and significant in the Broads.
- o) Potential damage to protected wildlife sites through activities in the Broads and more development in the wider area.
- p) Major highway improvements and the threat to the special qualities of the Broads that could result.

- q) Further loss of moorings.
- r) Vulnerability of subsidised public transport services within the Broads Authority Executive Area (bus and rail).
- s) Drying out of wetland and oxidation of peat, leading to loss of finite environmental and archaeological archives as well as release of stored carbon.
- t) Coastal protection work, which may alter the dynamics of marine erosion and sediment transport.
- u) COVID19 impacts on health and the economy.

**Question 4: Do you have any comments on this SWOT analysis?**

## 7. Developing the sustainability appraisal framework

### 7.1. Sustainability Appraisal Objectives

The National Planning Policy Guidance says: The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.

To help predict and evaluate effects, SA Objectives have been produced with associated decision-making criteria to assist in assessing each Broads Plan strategic action and each Local Plan policy. The proposed SA Objectives are set out below. More detail is provided at Appendices [4](#), [5](#) and [6](#).

#### Environmental SA Objectives

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

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

ENV3: To protect and enhance biodiversity and geodiversity.

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

ENV5: To adapt to and mitigate against the impacts of climate change.

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

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

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

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

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

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

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

#### Social SA Objectives

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

SOC2: To reduce poverty, inequality and social exclusion.

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

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

SOC5: To maximise opportunities for new/ additional employment.

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

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

#### Economic SA Objectives

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

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

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

**Question 5: Do you have any comments on the proposed SA Objectives?**

**Question 6: Do you have any comments on the decision-making questions?**

## 7.2. UN Sustainable Development Goals

As we develop the SA Framework, we have considered the UN Sustainable Development Goals. The [Sustainable Development Goals](#) (SDGs) are a call for action by all countries – poor, rich and middle-income – to promote prosperity while protecting the planet. They recognise that ending poverty must go hand-in-hand with strategies that build economic growth and address a range of social needs including education, health, social protection, and job opportunities, while tackling climate change and environmental protection. The SDGs, set in 2015 by the United Nations General Assembly, are intended to be achieved by the year 2030.

The SDGs are shown at [Appendix 4](#), together with the assessment of each of the proposed Sustainability Appraisal Objectives against each UN SDG.

## **8. Subsequent versions of the SA**

### **8.1. Comments on Scoping Report**

All comments received on the SA Scoping Report for the Broads Plan and the Local Plan will be considered and a table setting out how the comments have informed the Sustainability Appraisal approach will be included in subsequent SAs. Some comments will result in changes to the SA and others will not, and the reasons for these decisions will be set out clearly.

### **8.2. Compatibility of the SA Objectives and plan objectives**

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

### **8.3. Reasonable alternatives**

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

### **8.4. Short, medium and long-term effects**

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

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

### **8.5. Permanent and temporary effects**

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

### **8.6. Positive and negative effects**

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

### **8.7. Secondary effects**

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

### **8.8. Cumulative effects**

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

### **8.9. Synergistic effects**

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

### **8.10. Update to the literature review**

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

### **8.11. Broads Plan production**

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

- First Draft – to accompany the First Draft of the Broads Plan
- Final Draft – to accompany the Final Draft of the Broads Plan

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

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

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



## Appendix 1: Compliance with the SEA Directive and NPPG

The National Planning Policy Guidance says:

### What is required at the scoping stage?

The scoping stage (Stage A) must identify the scope and level of detail of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives.

Although the scoping stage is a requirement of the process, a formal scoping report is not required by law but is a useful way of presenting information at the scoping stage. A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the Local Plan being assessed.

When deciding on the scope and level of detail of the information that must be included in the report, the plan-maker must consult the consultation bodies. Where a consultation body decides to respond, it should do so within five weeks of receipt of the request.

(See regulation 12(5) and 12(6) of the Environmental Assessment of Plans and Programmes Regulations 2004.)

Content requirements for Strategic Environmental Assessment	Where covered in this Sustainability Appraisal Scoping Report
Context of the assessment	<a href="#">Section 5</a> and <a href="#">Appendix 3a</a> , <a href="#">3b</a> and <a href="#">3c</a> , Baseline Data <a href="#">Section 6</a> , Sustainability Issues
Objectives and Approach of the Assessment	The proposed SA Objectives are set out in <a href="#">section 7</a> . More detail is provided at Appendices <a href="#">4</a> , <a href="#">5</a> and <a href="#">6</a> .
Identify relevant environmental, economic and social issues	<a href="#">Appendix 2</a> : Literature Review
Consult consultation bodies	<a href="#">Section 2.4</a> of the main report

## Appendix 2: Literature review

See separate document <for the purposes of Planning Committee and Broads Authority, see report; a link will be added to this section when consulted on>

### **Appendix 3a: Baseline data**

See separate document <for the purposes of Planning Committee and Broads Authority, see report; a link will be added to this section when consulted on>

### **Appendix 3b: Baseline data map bundle**

See separate document <for the purposes of Planning Committee and Broads Authority, see report; a link will be added to this section when consulted on>

### **Appendix 3c Norfolk geodiversity audit database for Broads**

See separate document <for the purposes of Planning Committee and Broads Authority, see report; a link will be added to this section when consulted on>

## Appendix 4: Sustainable Development Goals

### UN Sustainable Development Goals



More detail on the SDGs is shown below.

#### No poverty

End poverty in all its forms everywhere

<https://sdgs.un.org/goals/goal1>

#### Zero hunger

End hunger, achieve food security and improved nutrition and promote sustainable agriculture

<https://sdgs.un.org/goals/goal2>

#### Good health and well-being

Ensure healthy lives and promote well-being for all at all ages

<https://sdgs.un.org/goals/goal3>

#### Quality education

Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

<https://sdgs.un.org/goals/goal4>

#### Gender equality

Achieve gender equality and empower all women and girls

<https://sdgs.un.org/goals/goal5>

**Clean water and sanitation**

Ensure availability and sustainable management of water and sanitation for all

<https://sdgs.un.org/goals/goal6>

**Affordable and clean energy**

Ensure access to affordable, reliable, sustainable and modern energy for all

<https://sdgs.un.org/goals/goal7>

**Decent work and economic growth**

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

<https://sdgs.un.org/goals/goal8>

**Industry, innovation and infrastructure**

Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

<https://sdgs.un.org/goals/goal9>

**Reduced inequalities**

Reduce inequality within and among countries

<https://sdgs.un.org/goals/goal10>

**Sustainable cities and communities**

Make cities and human settlements inclusive, safe, resilient and sustainable

<https://sdgs.un.org/goals/goal11>

**Responsible consumption and production**

Ensure sustainable consumption and production patterns

<https://sdgs.un.org/goals/goal12>

**Climate action**

Take urgent action to combat climate change and its impacts.

<https://sdgs.un.org/goals/goal13>

**Life below water**

Conserve and sustainably use the oceans, seas and marine resources for sustainable development

<https://sdgs.un.org/goals/goal14>

**Life on land**

Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

<https://sdgs.un.org/goals/goal15>

**Peace, justice and strong institutions**

Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

<https://sdgs.un.org/goals/goal16>

**Partnerships for the goals**

Strengthen the means of implementation and revitalize the global partnership for sustainable development

<https://sdgs.un.org/goals/goal17>

SA Objectives and the UN Sustainable Development Goals

Objectives	No poverty	Zero hunger	Good health and well-being	Quality education	Gender equality	Clean water and sanitation	Affordable and clean energy	Decent work and economic growth	Industry, innovation and infrastructure	Reduced inequalities	Sustainable cities and communities	Responsible consumption and production	Climate action	Life below water	Life on land	Peace, justice and strong institutions	Partnerships for the goals
ENV1: To reduce the adverse effects of traffic (on roads and water).			X					X	X		X		X	X	X		
ENV2: To safeguard a sustainable supply of water, to improve water quality and to use water efficiently.						X					X	X		x			
ENV3: To protect and enhance biodiversity and geodiversity.			X			X					X		X	X	X		
ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.			X								X						
ENV5: To adapt to and mitigate against the impacts of climate change.			X				X				X	X	X				
ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.			X								X		X				

Objectives	No poverty	Zero hunger	Good health and well-being	Quality education	Gender equality	Clean water and sanitation	Affordable and clean energy	Decent work and economic growth	Industry, innovation and infrastructure	Reduced inequalities	Sustainable cities and communities	Responsible consumption and production	Climate action	Life below water	Life on land	Peace, justice and strong institutions	Partnerships for the goals
ENV7: To manage resources sustainably through the effective use of land, energy and materials.			X								X	X			X		
ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.											X	X					
ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings											X				X		
ENV10: To achieve the highest quality of design that is innovative, imaginative, and sustainable and reflects local distinctiveness.			X								X				x		
ENV11: To improve air quality and minimise noise, vibration and light pollution.			X								X	X					



Objectives	No poverty	Zero hunger	Good health and well-being	Quality education	Gender equality	Clean water and sanitation	Affordable and clean energy	Decent work and economic growth	Industry, innovation and infrastructure	Reduced inequalities	Sustainable cities and communities	Responsible consumption and production	Climate action	Life below water	Life on land	Peace, justice and strong institutions	Partnerships for the goals
ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape							X		X		X	X	X				
SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.	X	X	X								X						
SCO2: To reduce poverty, inequality and social exclusion.	X	X	X		X					X	X						
SOC3: To improve education and skills including those related to local traditional industries.				X				X	X	X	x						
SOC4: To enable suitable stock of housing meeting local needs including affordability.	X		X								X						
SOC5: To maximise opportunities for								X	X		x						

Objectives	No poverty	Zero hunger	Good health and well-being	Quality education	Gender equality	Clean water and sanitation	Affordable and clean energy	Decent work and economic growth	Industry, innovation and infrastructure	Reduced inequalities	Sustainable cities and communities	Responsible consumption and production	Climate action	Life below water	Life on land	Peace, justice and strong institutions	Partnerships for the goals
new/ additional employment																	
SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.			X						X		X		x				
SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.			X							X	X					x	
ECO1 To support a flourishing and sustainable economy and improve economic performance in rural areas.								X	X		X						
ECO2: To ensure the economy actively contributes to social and								X	X		X						

Objectives	No poverty	Zero hunger	Good health and well-being	Quality education	Gender equality	Clean water and sanitation	Affordable and clean energy	Decent work and economic growth	Industry, innovation and infrastructure	Reduced inequalities	Sustainable cities and communities	Responsible consumption and production	Climate action	Life below water	Life on land	Peace, justice and strong institutions	Partnerships for the goals
environmental well-being.																	
ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.								X			X						
Total	3	2	13	1	1	2	2	6	7	3	22	6	6	3	5	1	0

It should be noted that no SA Objectives relate to partnerships for the Goals. This may not be relevant to the Sustainability Appraisal per se, but there are many partners involved in managing and protecting the Broads.

Some of the UN Sustainable Development Goals may only relate to 1 or 2 SA Objectives. It is considered that this is acceptable as that particular Goal is relevant to at least one SA Objective.

## Appendix 5: Sustainability Appraisal Framework

When answering the questions in assessing policies, these responses will be used:

Positive impact: + or ++

Not appropriate: N/A

Neutral: 0

Negative impact: - or –

Uncertain/depends on implementation: ?

Please note that where this table refers to key services, these are what is considered key services. This reflects the [HEELA methodology](#), combined with DM37 of the 2019 Local Plan.

- A primary school
- A secondary school
- A local healthcare service (doctors' surgery)
- Retail and service provision for day to day needs (district/local shopping centre, village shop)
- Local employment opportunities which are defined as follows, which reflect areas with potentially a number of and variety of job opportunities:
  - o Existing employment areas allocated/identified in our districts' Local Plans; or
  - o City, Town or District Centre as identified in the Local Plan for the Broads or our District's Local Plan. We note that this means such centres count towards two of the three key services test; or
  - o These sites that are allocated in the Local Plan for the Broads: BRU2, BRU4, CAN1, HOR6, POT1, STA1, TSA3.
- A peak-time public transport service to and from a higher order settlement (peak time for the purposes of this criterion will be 7-9am and 4-6pm)

SA Objective	SEA General Theme	Reason	Decision making criteria/prompting questions
ENV1: To reduce the adverse effects of traffic (on roads and water).	Climate change, air and pollution.	Modes of transport can impact local air quality, heritage, health and carbon emissions.	<ul style="list-style-type: none"> <li>• How does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> <li>○ Walking, cycling, public transport?</li> <li>○ Air quality?</li> <li>○ Amenity?</li> <li>○ Single occupancy car use?</li> <li>○ Use of waterways?</li> <li>○ Access to special qualities of the Broads by sustainable transport modes?</li> <li>○ The net impact of transport infrastructure such as road signage, lighting, conspicuous structures and parking?</li> </ul> </li> <li>• What is the resulting impact of traffic on <ul style="list-style-type: none"> <li>○ Heritage?</li> <li>○ Landscape?</li> <li>○ People?</li> <li>○ Water?</li> </ul> </li> <li>• Is the allocation within walking distance<sup>9</sup> of key services<sup>10</sup>?</li> <li>• Will routes be <ul style="list-style-type: none"> <li>○ functional and accessible for all?</li> <li>○ safe and attractive public spaces?</li> </ul> </li> <li>• Does it consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles?</li> </ul>
ENV2: To safeguard a sustainable supply of water, to improve water quality and to use water efficiently.	Land, water and soil resources.	Water quality in the Broads is critical to the area's value for wildlife, and to its appeal for recreation providing a higher value tourism economy. Anglia Water Services estimate that the Norwich and the Broads (Norwich) resource zone will be in deficit by 2045.	<ul style="list-style-type: none"> <li>• How does the policy/allocation/strategic action affect <ul style="list-style-type: none"> <li>○ Water quality?</li> <li>○ Water quantity?</li> <li>○ Surface water run off? Does it reduce run-off rates? Does it increase water absorption / management?</li> <li>○ Wastewater?</li> <li>○ Drainage?</li> <li>○ Pathways for pollutants?</li> </ul> </li> </ul>
ENV3: To protect and enhance biodiversity and geodiversity.	Biodiversity.	One of the statutory purposes of the Broads Authority is to Conserve and enhance the natural beauty and wildlife of the Broads. It is one of the most important freshwater wetlands in Europe and over 25% of the 300km of the nationally protected landscape has a European designation for its nature conservation interest, including three Special Areas of Conservation and two Special Protection Areas; large parts are designated as an internationally important wetland under the Ramsar convention. Soils in the Broads contain and	<ul style="list-style-type: none"> <li>• How does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> <li>○ The ability to retain and maintain soil carbon?</li> <li>○ Geological interests?</li> <li>○ The potential for managed accessible geological feature exposures?</li> <li>○ County Wildlife Sites?</li> <li>○ Local and National Nature Reserves?</li> <li>○ Ramsar Sites?</li> <li>○ SPAs, SACs?</li> <li>○ SSSIs?</li> </ul> </li> </ul>

<sup>9</sup> Manual for Streets says this is 10 minutes/800m

SA Objective	SEA General Theme	Reason	Decision making criteria/prompting questions
		continue to store large amounts of carbon and archaeological remains.	<ul style="list-style-type: none"> <li>○ BAP Priority Species and habitats?</li> <li>○ Habitat connectivity and Ecological Networks?</li> <li>○ Trees and hedgerows?</li> <li>○ Waterbodies?</li> <li>○ Green Infrastructure?</li> </ul>
ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.	Cultural heritage, landscape and townscape.	It is the tranquil character or the characteristic of the Broads together with its expansive character of open undeveloped skylines, which are among the primary special qualities underpinning the national designation of the Broads. The open distinctive landscape comprises a complex and interlinked mosaic of wetland habitats including open water, reedbeds, carr woodland, grazing marsh and fen meadow. Human interaction has helped shape the Broads.	<ul style="list-style-type: none"> <li>● How does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> <li>○ The setting of the Broads?</li> <li>○ The perception of the Broads?</li> <li>○ The Landscape Character?</li> <li>○ Cultural heritage and heritage assets?</li> <li>○ Dark skies and tranquillity?</li> <li>○ The special qualities of the Broads<sup>11</sup>?</li> <li>○ Landscape features?</li> <li>○ Peat?</li> <li>○ Conservation Areas?</li> <li>○ Designated and undesignated heritage assets?</li> <li>○ The quality and local distinctiveness of the Broads towns/villages/buildings?</li> <li>○ Open Space?</li> <li>○ Green Infrastructure?</li> <li>○ Harmful incremental change?</li> </ul> </li> </ul>
ENV5: To adapt to and mitigate against the impacts of climate change.	Climate change, air and pollution.	The Broads is an ever changing, living landscape, shaped over centuries by the interaction between people, the environment and the climate. While these dynamic processes will continue, sea level rise and the predicted more rapid changes to the climate pose considerable challenges and opportunities to this easterly, low-lying wetland.	<ul style="list-style-type: none"> <li>● How does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> <li>○ Emissions of greenhouse gases?</li> <li>○ Sequestering carbon dioxide?</li> <li>○ Single occupancy car use?</li> <li>○ HGV/delivery movements?</li> <li>○ Public transport?</li> <li>○ Cycling/walking?</li> <li>○ Boat emissions?</li> <li>○ The ability of communities to adapt?</li> <li>○ The ability of habitats and species to adapt?</li> <li>○ Peat?</li> <li>○ Energy use?</li> <li>○ Open Space?</li> <li>○ Green Infrastructure?</li> </ul> </li> </ul>
ENV6: To avoid, reduce and manage flood risk and to become more resilient	Land, water and soil resources. Climate change, air and pollution.	80% of the Broads Executive Area is at risk of flooding. There are well-known impacts of flooding to people, the environment and the economy. The coastal area of the Broads is at risk of saline incursion	<ul style="list-style-type: none"> <li>● Is flood risk avoided?</li> <li>● Is flood risk managed/mitigated?</li> <li>● How does the allocation/policy/strategic action affect flooding:</li> </ul>

<sup>11</sup> Taken from the Climate Change Adaptation Plan: Open water in lakes and rivers, Breydon Water (estuary), Fens / reed beds, Grazing marshes and ditches, Wet woodlands, Historic buildings, especially mills, Boating and the riverside economy, Farmland (including rights of way), Open landscapes, big skies and tranquillity and the coast.

SA Objective	SEA General Theme	Reason	Decision making criteria/prompting questions
to flood risk and coastal change.		further up the rivers during spring tides and storm surges, drought and flooding events as well as erosion or breach of the sea defences.	<ul style="list-style-type: none"> <li>○ On site?</li> <li>○ In the vicinity?</li> <li>○ Elsewhere?</li> <li>● Is the allocation in the area of highest risk of flooding?</li> <li>● Is the allocation appropriate to the flood risk on site?</li> <li>● Does the policy consider different sources of flooding<sup>12</sup>?</li> <li>● What is the impact of climate change on flood risk?</li> <li>● Can flood risk be reduced?</li> <li>● How vulnerable is the proposed land use<sup>13</sup>?</li> <li>● Does it reduce run-off rates?</li> <li>● Does it increase water absorption / management?</li> <li>● Does the allocation/policy/strategic action affect risk to people or property?</li> <li>● Does the policy affect opportunities for future coastal management?</li> <li>● Does the allocation/policy/strategic action restrict choice for managing the coast in the future?</li> <li>● Does the allocation/policy/strategic action consider the effect of or potential for damage (e.g. to a structure)?</li> </ul>
ENV7: To manage resources sustainably through the effective use of land, energy and materials.	Land, water and soil resources.	The efficient and effective use of resources is a key consideration in plan making, especially with regards to not sterilising mineral resources, the re-use of Brownfield land appropriately and reducing energy consumption.	<ul style="list-style-type: none"> <li>● Is the allocation on: <ul style="list-style-type: none"> <li>○ Brownfield Land?</li> <li>○ Greenfield Land?</li> </ul> </li> <li>● Does the allocation use land effectively?</li> <li>● Does the allocation/policy/strategic action affect energy efficiency?</li> <li>● Are there any safeguarded mineral sites?</li> <li>● Will it prevent the sterilisation of known or suspected mineral resources by development?</li> <li>● Does the policy consider origin of resource/where resource derived from?</li> </ul>
ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.	Population and human health. Climate change, air and pollution.	National and local policy aims to reduce the amount of waste produced and to reduce the amount and proportion of waste disposed of to landfill, in accordance with the waste hierarchy, to meet the Landfill Directive targets.	<ul style="list-style-type: none"> <li>● Does the policy help reduce waste, reuse waste or recycle/compost?</li> </ul>
ENV9: To conserve and where appropriate enhance the cultural heritage and archaeological importance of the area.	Cultural heritage, landscape and townscape.	The cultural heritage includes the landscape and built environment, archaeology, conservation areas, and local skills, crafts and traditions. The Broads is of significant cultural value. Its landscape reflects historic patterns of human activity over thousands of years, and contains features particular to the area.	<ul style="list-style-type: none"> <li>● Does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> <li>○ The quality and local distinctiveness of the Broads towns/villages/buildings?</li> <li>○ Designated and undesignated heritage assets?</li> <li>○ Conservation Areas?</li> <li>○ Archaeology?</li> <li>○ Local culture and traditions?</li> <li>○ The wider cultural heritage of the broads?</li> </ul> </li> </ul>

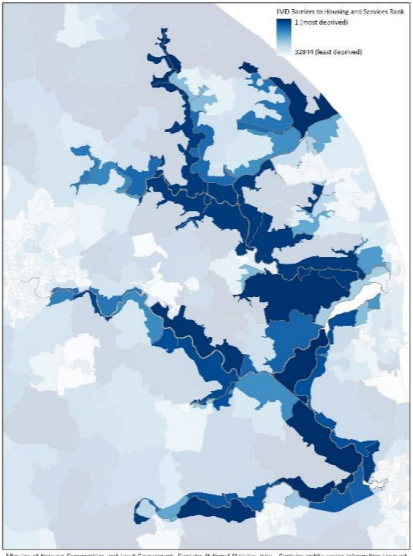
<sup>12</sup> Including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

<sup>13</sup> <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	SEA General Theme	Reason	Decision making criteria/prompting questions
			<ul style="list-style-type: none"> <li>○ The history, traditions, customs and the spaces and places these rely upon or relate to?</li> </ul>
ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.	Cultural heritage, landscape and townscape.	Design is crucial in a protected landscape like the Broads. Development needs to take account of the characteristics of the site as well as what is distinctive in the wider Broads setting.	<ul style="list-style-type: none"> <li>● Does the allocation/policy/strategic action <ul style="list-style-type: none"> <li>○ Appreciate what is special about the site?</li> <li>○ Relate to the site's setting in the landscape/townscape?</li> <li>○ Appreciate the rich cultural heritage of the area?</li> </ul> </li> <li>● Are these issues considered? <ul style="list-style-type: none"> <li>○ local character (including landscape setting)</li> <li>○ safe, connected and efficient streets</li> <li>○ a network of greenspaces (including parks) and public places</li> <li>○ crime prevention</li> <li>○ security and lighting measures in the context of dark skies</li> <li>○ access and inclusion</li> <li>○ efficient use of natural resources</li> <li>○ cohesive &amp; vibrant neighbourhoods</li> <li>○ layout – the way in which buildings and spaces relate to each other</li> <li>○ form – the shape of buildings</li> <li>○ scale – the size of buildings</li> <li>○ detailing – the important smaller elements of building and spaces</li> <li>○ materials – what a building is made from</li> <li>○ sensitive design of road infrastructure? (E.g. reduced signage road markings, use of local materials and alternative traffic calming methods).</li> </ul> </li> </ul>
ENV11: To improve air quality and minimise noise, vibration and light pollution.	Population and human health. Climate change, air and pollution.	Air quality, noise and light can affect health, well-being and biodiversity.	<ul style="list-style-type: none"> <li>● Does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> <li>○ Air quality?</li> <li>○ Noise production?</li> <li>○ Vibration?</li> <li>○ Light pollution/dark skies?</li> </ul> </li> <li>● How does the allocation/policy/strategic action relate to Air Quality Management Areas?</li> <li>● Would the allocation make additional noise or be sensitive to the prevailing acoustic environment?</li> <li>● Have cumulative impacts of development/change been considered?</li> <li>● Does the allocation/policy/strategic action affect the tranquillity of the Broads?</li> </ul>
ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape	Climate change, air and pollution. Cultural heritage, landscape and townscape.	National policy seeks renewable energy generation to reduce carbon emissions and potentially have economic benefits, but generating equipment and supporting infrastructure can affect landscape character	<ul style="list-style-type: none"> <li>● Does the allocation/policy/strategic action affect <ul style="list-style-type: none"> <li>○ Renewable/low carbon energy generation?</li> <li>○ Renewable/low carbon energy transmission?</li> <li>○ The setting of the Broads?</li> <li>○ The perception of the Broads?</li> <li>○ The Landscape Character?</li> <li>○ The special qualities of the Broads?</li> </ul> </li> </ul>



SA Objective	SEA General Theme	Reason	Decision making criteria/prompting questions
			<ul style="list-style-type: none"> <li>Have Cumulative impacts of renewable/low carbon energy generation been considered?</li> </ul>
SOC1: To improve the health of the population and promote a healthy lifestyle.	Population and human health.	Mental health, healthy life styles, wellbeing and reducing health inequalities.	<ul style="list-style-type: none"> <li>Does the allocation/policy/strategic action: <ul style="list-style-type: none"> <li>Affect physical and/or mental health?</li> <li>Affect wellbeing?</li> <li>Promote active lifestyles?</li> <li>Promote active travel?</li> </ul> </li> <li>Does the allocation/policy/strategic action include: <ul style="list-style-type: none"> <li>Publicly accessible open space?</li> <li>Sports facilities?</li> <li>Health infrastructure?</li> </ul> </li> <li>Does the policy enable active use of water space?</li> </ul>
SOC2: To reduce poverty, inequality and social exclusion.	Population and human health. Inclusive communities.	<p>The darker the blue, the more deprived.</p>	<ul style="list-style-type: none"> <li>Does the allocation/policy/strategic action affect any of these domains? <ul style="list-style-type: none"> <li>Income</li> <li>Employment</li> <li>Health and Disability</li> <li>Education, Skills and Training</li> <li>Barriers to Housing and Services</li> <li>Crime</li> <li>Living Environment</li> </ul> </li> <li>Does the allocation/policy/strategic action affect inclusive communities?</li> <li>Does it affect community cohesion?</li> <li>Does it affect quality of life?</li> <li>Does the policy avoid potential for inequality or serve to positively address existing identified inequalities through its implementation?</li> </ul>
SOC3: To improve education and skills including those related to local traditional industries.	Population and human health. Economic Activity.	Children and young people in Norfolk schools achieve less well than in other parts of England. Suffolk is still performing poorly in comparison with national averages and its statistical neighbours. 'Special qualities' of the Broads include cultural heritage, wetland landscape, biodiversity, navigable waterways. National policy supports heritage and cultural skills training and employment in traditional Broads industries.	<ul style="list-style-type: none"> <li>Is the allocation/policy/strategic action for an education/skills establishment?</li> <li>Does the policy/allocation/strategic action enable improved understanding of the special qualities, pressures and management of the Broads to all?</li> <li>Does it relate to Traditional Broads industries?</li> <li>Will it facilitate improved access to vocational training, education and skills for all, including young people?</li> <li>Will it facilitate opportunity for delivery and uptake of traditional skills training which may benefit wider Broads purposes?</li> </ul>
SOC4: To enable suitable stock of housing meeting	Population and human health. Inclusive communities.	The BA will have a housing need figure for the Local Plan to address. With constraints on new development, meeting the residential	<ul style="list-style-type: none"> <li>Does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> <li>Housing?</li> <li>Affordable Housing?</li> </ul> </li> </ul>

SA Objective	SEA General Theme	Reason	Decision making criteria/prompting questions
local needs including affordability.		needs of the local community for affordable housing is a key challenge.	<ul style="list-style-type: none"> <li>○ Gypsy and Traveller accommodation?</li> <li>○ Residential moorings/boats used as residences?</li> </ul>
SOC5: To maximise opportunities for new/additional employment	Economic activity.	Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. Sustainable economic development.	<ul style="list-style-type: none"> <li>● Does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> <li>○ Employment land uses?</li> <li>○ Numbers of jobs?</li> <li>○ Tourism?</li> <li>○ Does it relate to Traditional Broads industries?</li> </ul> </li> </ul>
SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.	Population and human health. Inclusive communities.	 <p>The darker the blue, the more deprived. With a sparse population, it can be difficult to maintain essential rural services such as shops, post offices and public transport.</p>	<ul style="list-style-type: none"> <li>● Is the allocation/policy/strategic action within walking distance (800m) from Key Services?</li> <li>● Is the allocation within a settlement boundary?</li> <li>● Is the allocation/policy/strategic action for a key service?</li> <li>● Will the allocation/policy/strategic action affect public transport, walking and cycling?</li> <li>● Does the policy/allocation/strategic action relate to Local Green Space?</li> <li>● Will routes be functional and accessible for all?</li> <li>● Will routes be safe and attractive public spaces?</li> <li>● Does it consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles?</li> <li>● Will it support the retention of key facilities and services ensuring that local needs are met locally wherever possible or alternative sustainable access is provided?</li> </ul>
SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.	Population and human health. Inclusive communities.	The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.	<ul style="list-style-type: none"> <li>● Does the policy/allocation/strategic action relate to: <ul style="list-style-type: none"> <li>○ Designing out crime?</li> <li>○ Designing in community safety?</li> <li>○ An inclusive environment?</li> <li>○ Robust structure and identity?</li> <li>○ Interaction with other uses positively?</li> <li>○ Avoiding opportunities for conflict?</li> </ul> </li> </ul>
ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.	Economic activity.	Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. Sustainable economic development. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.	<ul style="list-style-type: none"> <li>● Will it provide the spaces and infrastructure to support self-employment opportunities and business start-up?</li> <li>● Will it support existing business viability and local employment growth?</li> <li>● Does it contribute to a thriving rural community?</li> <li>● Does it contribute to a prosperous rural community?</li> </ul>

SA Objective	SEA General Theme	Reason	Decision making criteria/prompting questions
ECO2: To ensure the economy actively contributes to social and environmental well-being.	Economic activity. Population and human health. Inclusive communities	Local plans need to positively and proactively encourage sustainable economic growth.	<ul style="list-style-type: none"> <li>• How does the policy/allocation/strategic action affect 'Social Capital'? <ul style="list-style-type: none"> <li>○ Skills development</li> <li>○ Community cohesion</li> <li>○ Amenity</li> <li>○ Job provision</li> <li>○ Quality of life</li> </ul> </li> <li>• How does it affect 'Low Carbon'? <ul style="list-style-type: none"> <li>○ Innovation</li> <li>○ Resource efficiency</li> </ul> </li> <li>• How does it affect 'Natural Capital'? <ul style="list-style-type: none"> <li>○ Landscape</li> <li>○ Biodiversity</li> </ul> </li> </ul>
ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.	Economic activity. Population and human health. Inclusive communities.	Tourism is important to the Broads economy and promoting the area for enjoyment and recreation is a statutory purpose of the Broads Authority. The Broads is one of the most extensive and varied inland waterway systems in the UK, offering 190km of boating on lock-free tidal navigable rivers, including navigation to the sea. Wetland and coastal habitats and species can be negatively affected by recreational disturbance. Land based tourism is popular (and the Broads Authority would like to encourage more land-based activity) and contributes significantly to the local tourist economy.	<ul style="list-style-type: none"> <li>• Does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> <li>○ Sustainable tourism.</li> <li>○ Responsible tourism.</li> </ul> </li> <li>• Does it: <ul style="list-style-type: none"> <li>○ Promote enjoyment and understanding of the Broads?</li> <li>○ Raise awareness of the Broads as a special destination?</li> <li>○ Drive up the quality of the visitor experience?</li> <li>○ Strengthen tourism performance across the whole Broads area?</li> <li>○ Maintain the Broads' position as a premier inland boating destination in the UK?</li> <li>○ Respect the sensitive environment of the Broads?</li> <li>○ Provide the right conditions for successful tourism businesses?</li> <li>○ Will it maximise benefits and minimise impacts from visitors to communities?</li> </ul> </li> </ul>

## Appendix 6: Compatibility of SA Objectives

	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
ENV1																							
ENV2																							
ENV3																							
ENV4																							
ENV5																							
ENV6																							
ENV7																							
ENV8																							
ENV9																							
ENV10																							
ENV11																							
ENV12																							
SOC1																							
SOC2																							
SOC3																							
SOC4	1	2	3	4	5	6	7	-	8														
SOC5	1	2	3	4	5	6	7	-	8		9												
SOC6																							
SOC7																							
ECO1	1	2	3	4	5	6	7	-	8		9												
ECO2																							
ECO3																							

### Environment

ENV1: To reduce the adverse effects of traffic.

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

ENV3: To protect and enhance biodiversity and geodiversity.

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

ENV5: To adapt to and mitigate against the impacts of climate change.

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

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

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

ENV9: To conserve and where appropriate enhance the cultural heritage and archaeological importance of the area.

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

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

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

### Social

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

SOC2: To reduce poverty, inequality and social exclusion.

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

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

SOC5: To maximise opportunities for new/ additional employment

SOC6: To improve the quality, range and accessibility of community services and facilities.

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

### Economic

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

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

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

1. More housing or employment development in an area is likely to result in more car movements. By locating housing allocations in areas with public transport, services and facilities, or within walking and cycling distance (and having safe, attractive and quality routes) and locating employment near areas of housing the effect of traffic could be reduced.
2. More housing or employment development will result in more use of water and production of waste water. However, the effect of more people in an area on water resource and waste water could be reduced by water efficiency measures.
3. Housing and employment development could be on brownfield land or greenfield land. Both areas have the potential to provide biodiversity benefits. However the effect of development on biodiversity and geodiversity depends on the location, type, scale, characteristics and design of any scheme.
4. Housing and employment development could potentially harm the local distinctiveness. However, there are other SA objectives relating to design and cultural heritage of the area. However the effect of development on local distinctiveness depends on the location, type, scale, characteristics and design of any scheme.
5. Housing and employment development is likely to result in greenhouse gas emission due to the embodied carbon or transport of materials or people for example. However by using local materials (such as on-site minerals), locating development to minimise transport requirements (as well as provide smarter choices) and by considering design, which are all other SA objectives, the conflict could be reduced.
6. According to the NPPF flood risk technical guidance, housing is classed as highly or more vulnerable and the vulnerability of employment depends on the end use. There are tests that need to be undertaken if proposals are contrary to flood risk policy. As such, flood risk will be a constraint to consider for any site allocation.
7. The Broads is likely to not have a housing need. As such, it is unlikely that greenfield land will be allocated for development through the plan. In conjunction with the Minerals and Waste Core Strategies of NCC and SCC, mineral resources will not be sterilised by development. Whilst energy will be used in development, energy efficiency of the resulting development could be addressed through policies or scheme design.
8. Housing and employment development could potentially harm the archaeology or cultural heritage of the area. However, the effect of development on local distinctiveness depends on the location, type, scale, characteristics and design of any scheme.
9. Employment development could potentially affect air quality, noise, vibration and light pollution. However the effect depends on the location, type, scale, characteristics and design of any scheme.

## Appendix 2: Literature Review

**Note:** This literature review was produced for the Local Plan for the Broads. For the purposes of this Sustainability Appraisal process, it will also relate to the Broads Plan review as relevant.

### A2.1 International

[Ramsar Convention on Wetlands of International Importance, Especially Waterfowl Habitat](#) (1971) (amended 1982)

The Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat (also known as the Convention on Wetlands) is an international treaty for the conservation and sustainable use of wetlands. It is named after the city of Ramsar in Iran, where the convention was signed in 1971.

[Kyoto Protocol](#) (1997)

The Kyoto Protocol is an international treaty. It extends the 1992 United Nations Framework Convention on Climate Change that commits state parties to reduce greenhouse gas emissions, based on the scientific consensus that global warming is occurring and that human-made CO<sub>2</sub> emissions are driving it.

[Rio Earth Summit 1992](#)

Through this summit, the United Nations sought to help national governments to rethink economic development and find ways to stop polluting the planet and depleting its natural resources.

[Johannesburg Declaration on Health and Sustainable Development](#) (2002)

The Johannesburg Declaration builds on earlier declarations made at the United Nations Conference on the Human Environment at Stockholm in 1972, and the Earth Summit in Rio de Janeiro in 1992. While committing the nations of the world to sustainable development, it also includes substantial mention of multilateralism as the path forward.

[UN Convention on Human Rights](#)

The Universal Declaration of Human Rights (UDHR) is an international document adopted by the United Nations General Assembly. It enshrines the rights and freedoms of all human beings.

[Paris Agreement](#) (2016)

The Paris Agreement is a legally binding international treaty on climate change. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. To achieve this long-term temperature goal, countries aim to reach global peaking of greenhouse gas emissions as soon as possible to achieve a climate neutral world by mid-century. Climate change will be a key topic running through the entire Local Plan.

### A2.2 European

While the UK has left the EU, there are still some documents of relevance as they have been transposed into UK law. These documents are listed below. Over the period of producing

the Local Plan and the Broads Plan, some of these documents may no longer be relevant. We will ensure the plans meet all necessary requirements as they are produced.

#### [European Climate Change Programme](#)

The European Commission established the European Climate Change Programme (ECCP) in 2000 to help identify the most environmentally and cost-effective policies and measures that can be taken at European level to cut greenhouse gas emissions. Climate change will be a key topic running throughout the Local Plan.

#### [Air Quality Framework Directives](#)

European Union policy on air quality aims to develop and implement appropriate instruments to improve air quality. The main instruments are a series of Directives setting ambient air quality standards to provide protection from excessive pollution concentrations, based on the latest research on the health effects of air pollution. Air quality will be an important consideration when producing the Local Plan.

#### [Directive 2002/49/EC on the Assessment and Management of Environmental Noise](#)

This Directive aims to “define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to the exposure to environmental noise.” Noise will be an important consideration in the Local Plan.

#### [Birds Directive 1979 79/409/EEC](#)

Habitat loss and degradation are the most serious threats to the conservation of wild birds. The Directive therefore places great emphasis on the protection of habitats for endangered and migratory species. It establishes a network of Special Protection Areas (SPAs) including all the most suitable territories for these species. Since 1994, all SPAs are included in the Natura 2000 ecological network, set up under the Habitats Directive 92/43/EEC. Protecting and enhancing wildlife is key to the Local Plan. Impacts will be assessed through the Habitats Regulation Assessments.

#### [Conservation of Natural Habitats and of Wild Flora and Fauna Directive \(92/43/EC\)](#)

The Habitats Directive ensures the conservation of a wide range of rare, threatened or endemic animal and plant species. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right. It forms the cornerstone of Europe's nature conservation policy with the Birds Directive and establishes the EU wide Natura 2000 ecological network of protected areas, safeguarded against potentially damaging developments. Protecting and enhancing wildlife is key to the Local Plan. Impacts will be assessed through the Habitats Regulation Assessments.

#### [Water Framework Directive 2000 2000/60/EC](#)

Citizens, environmental organisations, nature, water-using sectors in the economy all need cleaner rivers and lakes, groundwater and bathing waters. Water protection is therefore one of the priorities of the Commission. European Water Policy should get polluted waters clean again, and ensure clean waters are kept clean. Water will be a key consideration in the Local Plan.

### [European Strategic Environmental Assessment Directive \(2001/42/EC\)](#)

The Protocol on Strategic Environmental Assessment augments the Espoo Convention by ensuring that individual Parties integrate environmental assessment into their plans and programmes at the earliest stages, and thus help in laying down the groundwork for sustainable development. This Directive is met through Sustainability Appraisals.

### [European Renewable Energy Directive \(2018/2001/EU\)](#)

In December 2018, the recast Renewable Energy Directive 2018/2001/EU entered into force, as part of the Clean Energy for all Europeans package, aimed at keeping the EU a global leader in renewables and, more broadly, helping the EU to meet its emissions reduction commitments under the Paris Agreement. There will be a renewable energy section of the Local Plan.

### [Transforming our World: the 2030 Agenda for Sustainable Development \(2015\)](#)

This agenda, including its 17 Sustainable Development Goals (SDGs) and 169 targets, was adopted on 25 September 2015 by Heads of State and Government at a special UN summit. The Agenda is a commitment to eradicate poverty and achieve sustainable development by 2030 world-wide, ensuring that no one is left behind. The adoption of the 2030 Agenda was a landmark achievement, providing for a shared global vision towards sustainable development for all.

## A2.3 National

### [National Planning Policy Framework \(NPPF\) \(2019\)](#)

The NPPF sets out Government planning policy and will influence the Local Plan. At the time of writing, changes to the NPPF were being consulted on. We will ensure the Local Plan for the Broads reflects the most up to date national policy.

### [National Planning Policy Guidance \(NPPG\)](#)

The NPPG sets out guidance to Government planning policy and will influence the Local Plan. From time to time, aspects are updated. We will ensure the Local Plan for the Broads reflects the most up to date national policy.

### [Dark Skies APPG Policy Plan \(2021\)](#)

The All-Party Parliamentary Group has produced policy areas where there could be improvements relating to dark skies. This will be of relevance to the dark sky section of the Local Plan, which will probably be rolled forward.

### [National design code \(consultation version, February 2021\)](#)

The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government's priorities and provides a common overarching framework for design. As the requirements relating to design codes and guidance are finalised, we will ensure we do what is required. That being said, design is already an important consideration in the Local Plan and will continue to feature strongly.



#### [Indices of Multiple Deprivation \(IMD\) \(2019\)](#)

The Indices of Multiple Deprivation are updated every five years or so. There will be a topic paper that shows how the Broads rates against the IMD.

#### [English National Parks and the Broads UK Government Vision and Circular \(2010\)](#)

The purpose of this circular, which applies only in England, is to provide updated policy guidance on the English National Parks and the Broads ('the Parks'). The current Local Plan already meets the requirements of the policy, but will be checked as the new Local Plan is produced.

#### [Planning for the Future, White Paper \(2020\)](#)

This White Paper proposes many changes to the planning system. As such changes come into place, we will ensure the Local Plan reflects them.

#### [Fixing our broken housing market \(2017\)](#)

This housing white paper sets out the Government's plans to reform the housing market and boost the supply of new homes in England. While the scale of growth that takes place in the Broads is quite small, we will ensure that the economic section reflects this strategy as appropriate.

#### [Building our Industrial Strategy \(2017\)](#)

This document identifies 10 pillars we believe are important to drive forward our industrial strategy across the entire economy: science, research and Summary10 Building our Industrial Strategy innovation; skills; infrastructure; business growth and investment; procurement; trade and investment; affordable energy; sectoral policies; driving growth across the whole country; and creating the right institutions to bring together sectors and places. These pillars frame our approach, and across each of them we set out a programme of new policy. While the scale of growth that takes place in the Broads is quite small, we will ensure that the economic section reflects this strategy as appropriate.

#### [National Planning Policy for Waste \(2014\)](#)

This document sets out the government's detailed waste planning policies. It may be more relevant to Minerals and Waste Planning Authorities than to the Broads Authority, but this will be checked when producing the Local Plan. We also work closely with the county councils regarding minerals and waste.

#### [Air quality plan for nitrogen dioxide \(NO2\) in UK \(2017\)](#)

This plan sets out the UK's plan for reducing roadside nitrogen dioxide concentrations. This may be of relevance to the transport and health section of the Local Plan, as well as the Habitats Regulation Assessments.

#### [UK Marine Policy Statement \(2011\)](#)

The Marine Policy Statement is the framework for preparing Marine Plans and taking decisions affecting the marine environment. The East inshore and offshore plans relate to the Statement. The current Local Plan already meets the requirements of the policy, but will be checked as the new Local Plan is produced.

[Planning policy for traveller sites](#) CLG (2012 and 2015)

This Government planning policy for traveller sites should be read in conjunction with the National Planning Policy Framework. The current Local Plan already meets the requirements of the policy, but will be checked as the new Local Plan is produced.

#### **Various consultations on planning reforms**

There could be changes to the planning system over the coming years, and the Local Plan will need to reflect and be in conformity with those changes.

[Landscapes Review: National Parks and AONBs](#) (2019)

The Landscapes Review considers the next steps for National Parks and Areas of Outstanding Natural Beauty (AONBs) in England. Any proposals taken forward by the Government could have implications for the Local Plan.

[Environment Bill](#) (ongoing)

The Environment Bill will make provision: about targets, plans and policies for improving the natural environment; for statements and reports about environmental protection; for the Office for Environmental Protection; about waste and resource efficiency; about air quality; for the recall of products that fail to meet environmental standards; about water; about nature and biodiversity; for conservation covenants; about the regulation of chemicals; and for connected purposes. These aspects could influence the Local Plan.

## **A2.4 East Anglia**

[A47 Business Case](#) (2017)

The Acle Straight passes through the Broads and is part of the A47. We are aware of the desire of some people to dual this part of the A47. The Local Plan already has a policy relating to this, and it is likely that this policy will be rolled forward into the new Local Plan.

[East Anglia Rail Prospectus](#) (2015)

Rail lines and rail stations run throughout the Broads. There is a policy in the Local Plan that relates to rail stations and halts, and this is likely to be rolled forward into the new Local Plan.

[Norfolk and Suffolk Gypsy and Traveller Strategy](#) (2012)

The actual need for Gypsy, Travellers and Travelling Show People was calculated as part of a 'needs assessment', completed jointly with other Local Planning Authorities. This concluded a need of zero in the Broads, but we included a development management policy relating to such sites, which is likely to be rolled forward in the new Local Plan.

[East Inshore and East Offshore Marine Plans / MMO](#) (2014)

These Marine Plans are already reflected in the Local Plan. The MMO is a key stakeholder and will be consulted at various stages of the Local Plan production.

[Anglian Water: Water Resources Management Plan](#) (2019)

Anglian Water supplies water to parts of the Broads and is responsible for waste water for the whole of the Broads Authority Executive Area. Their plans will be of relevance to the Local Plan.

#### [Essex & Suffolk Water WRMP \(2019\)](#)

Essex & Suffolk Water supplies water to parts of the Broads. They also extract water from the Broads. Their plans will be of relevance to the Local Plan.

#### [Shoreline Management Plans](#)

There is a small section of coastline in the Broads executive area. There is a policy that seeks to protect the general openness and low-key development on the coast in the current Local Plan, and this policy stance is likely to be rolled forward in the new Local Plan.

#### [Broadland Catchment Plan \(2018\)](#) and [Anglian River Basin District River Basin Management Plan \(2018\)](#)

What happens upstream of the Broads can have significant impacts on the Broads. These reports will inform the Local Plan, as will the advice of the Broadland Catchment Officer.

#### [Water Resource East Updated Resource Position Statement \(February 2021\)](#)

Water Resources East (WRE) is one of five Regional Planning Groups working under the National Framework for Water Resources to develop a long-term integrated water management plan for Eastern England. WRE's vision is for Eastern England to have sufficient water resources to support a flourishing economy, a thriving environment and the needs of its population, and for the region to be seen as an international exemplar for collaborative integrated water resource management. Water resources will be an important aspect of the Local Plan.

#### [Norfolk and Suffolk Natural Capital Assets Evidence Compendium | Norfolk Biodiversity Information Service \(nbis.org.uk\) \(2020\)](#)

The counties of Norfolk and Suffolk have stewardship of a wealth of natural assets. The purpose of this Evidence Compendium is to present information about these assets and the potential risks to them, to provide an element of the preparatory work that will feed into a Norfolk & Suffolk 25 Year Environment Plan. Where possible, data is provided by county and also for five important natural areas within them: the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and Suffolk Coasts & Heaths AONB, plus The Broads, The Brecks and the Dedham Vale AONB.

## **A2.5 New Anglia LEP**

#### [Local Industrial Strategy \(2020\)](#)

This Local Industrial Strategy is based on strong evidence and sets out the actions local partners are taking and how they are working with government to continue to make this one of the best places in the world to live, work, learn and succeed in business. While the scale of growth that takes place in the Broads is quite small, we will ensure that the economic section of the Local Plan reflects this strategy as appropriate.

#### [Economic Strategy and Investment Plan \(2017\)](#)

The Economic Strategy for Norfolk and Suffolk is a shared endeavour between businesses, education providers, local councils, the voluntary and community sector and is led by New Anglia LEP. It outlines ambitious plans for future growth across Norfolk and Suffolk. While

the scale of growth that takes place in the Broads is quite small, we will ensure that the economic section of the Local Plan reflects this strategy as appropriate.

#### [Covid-19 Economic Recovery Plan](#) (ongoing)

The Norfolk and Suffolk Covid-19 Economic Recovery Restart Plan brings together commitments and actions from local authority, private sector, third sector and education organisations to outline the key activities in place to help our region's economy restart after the COVID-19 pandemic. The Norfolk and Suffolk Visitor Economy Recovery Plan, from New Anglia LEP and Visit East of England, outlines commitments and actions to support our tourism and cultural sectors.

#### [Local Energy East Strategy](#) (2018)

The three LEP areas of Cambridgeshire and Peterborough (formerly Greater Cambridge and Greater Peterborough), Hertfordshire and New Anglia have joined together to create a tri-LEP area project. The project also involves their constituent local authorities, the Distribution Network Operator (DNO), universities, third sector and energy sector businesses. This strategy sets out the collective ambitions to 2030. These are underpinned by a range of activities that the LEE Network and the Greater South East Energy Hub will take forward to ensure that we remain at the forefront of Clean Growth in the UK and grasp the opportunities ahead. This will be relevant to the energy section of the Local Plan.

#### [Rail Prospectus](#) (2015)

There are rail lines and rail stations that run throughout the Broads. There is a policy already in the Local Plan that relates to rail stations and halts and this is likely to be rolled forward into the new Local Plan.

## A2.6 Norfolk

#### [Central Norfolk SHMA](#) (2017)

This SHMA calculated the housing need for the Broads. While it is now a few years old, it still contains relevant information. In the near future we will start work on calculating the housing need for the new Local Plan.

#### [Norfolk Minerals and Waste Core Strategy and Site Allocations documents.](#)

There may be some sites that the new Local Plan allocates near or on sites that have been identified as sources of minerals. Working with the planners at Norfolk County Council, we will seek to safeguard/seek the use of such materials as relevant.

#### [Norfolk Rural Development Strategy](#) (2017)

While a few years old, this strategy is relevant to the Local Plan for the Broads as much of the Broads is rural.

#### [Norfolk's Earth Heritage - valuing our geodiversity](#) (2010)

Geodiversity is addressed through the natural environment policy of the Local Plan, which is likely to be rolled forward to the new Local Plan.

#### **Norfolk Strategic Planning Framework, Version 3 (2021)**

This framework includes agreements that Local Plans need to address as they are produced.

This is also important in addressing the Duty to Cooperate requirements. At the time of writing, the document is in the process of being endorsed by the Norfolk Local Planning Authorities.

#### [Norfolk County Council Environment Policy](#) (2019)

This policy reflects the areas that the Council sees as key to protecting and maintaining the health of Norfolk's distinctive environment and its occupants. The Policy signposts to overarching activity spanning a range of environmental interactions the Council is involved with, including those where it already has its own statutory environmental responsibilities. Generally, the policy aligns with the general aims of the Local Plan.

#### [Norfolk Local Transport Plan](#) (being updated)

This plan sets out the approach to transport over the coming years. As well as liaising with the County Council Highways team, this document will be of relevance to the Local Plan.

#### [Norfolk Strategic Infrastructure Plan](#) (2020)

The Strategic Infrastructure Delivery Plan (SIDP) sets out Norfolk's high-level infrastructure priorities for the next 10 years (see [project map](#)). Some projects are near to the Broads. The Acle Straight passes through the Broads and is part of the A47. We are aware of the desire of some to dual this part of the A47. The current Local Plan already has a policy relating to the dualling and it is likely that this policy will be rolled forward into the new Local Plan.

#### [Norfolk Rail Prospectus](#) (being updated)

There are rail lines and rail stations that run through the Broads. There is a policy already in the Local Plan that relates to rail stations and halts and this is likely to be rolled forward into the new Local Plan.

#### [Wroxham and Hoveton Network Improvement Strategy](#) (2020)

This strategy could influence the Hoveton and Wroxham sections of the Local Plan.

#### [Public Health Strategy](#) (2016) and [Joint Health and Wellbeing Strategy](#) (2018)

These strategies look at health issues across Norfolk and review Public Health priorities and vision for the next four years. The link between health and planning is clear and we will ensure health continues to be addressed in the new Local Plan.

#### [Norfolk Access Improvement Plan](#) (2019)

This looks into land and water-based ways to enjoy the area, with benefits to the economy and health and wellbeing. The Local Plan will look to protect existing routes and safeguard future routes.

#### [Digital Inclusion Strategy](#) (2018)

The strategy's aim is that: "Every Norfolk resident has ability to take full advantage of the opportunities and benefits of accessing online services and harnessing internet technology." Generally, this aim is supported in the current Local Plan and the relevant policies are likely to be rolled forward into the new Local Plan. Care needs to be taken to balance the importance of providing telecommunications and the impact on protected landscapes.

[Local Flood Risk Management Strategy](#) (most recent parts adopted 2020)

Flood risk from all sources of flooding and the impact of climate change are fundamental issues the Local Plan will need to address. The Pitt Review produced 91 recommendations for the Government to act upon. At the heart of these recommendations are: Knowing where and when it will flood, reducing the risk and impact of flooding, better advice and help for people to protect their families and homes, maintaining power and water supplies and protecting essential services, rescuing and caring for people during an emergency, staying healthy and speeding up recovery. To fulfil these recommendations locally, Norfolk County Council as Lead Local Flood Authority is required to develop, maintain, apply and monitor a Local Flood Risk Management strategy.

[Surface Water Management Plans](#)

As Lead Local Flood Authority, Norfolk County Council is responsible for looking at the causes of surface water flooding and its consequences, in order to learn lessons and help predict potential future flooding and minimise its effects. They do this through our Surface Water Management Plans (SWMP) which utilise historical flood records and detailed models of potential future floods. If there are any SWMP for areas which are allocated for development in the Local Plan, we will liaise with the LLFA.

### **Emerging documents**

The Norfolk Green Infrastructure and Recreation Impact Avoidance and Mitigation Strategy and the Norfolk Older Persons Accommodation report were in preparation at the time of preparing this report. Their findings will inform the new Local Plan.

## **A2.7 Suffolk**

[Suffolk Minerals and Waste Local Plan](#) (2020)

There may be some sites that the new Local Plan allocates near or on sites that have been identified as sources of minerals. Working with the planners at Suffolk County Council, we will seek to safeguard/seek the use of such materials as relevant.

[Suffolk Green Access Strategy](#) (2020)

This strategy looks into land and water-based ways to enjoy the area, with benefits to the economy and health and wellbeing. The Local Plan will look to protect existing routes and safeguard future routes.

[Suffolk Transport Plan](#) (2011)

This plan sets out the approach to transport over the coming years. As well as liaising with the County Council Highways team, this document will be of relevance to the Local Plan.

[Suffolk Growth Strategy](#)

This strategy provides the broad framework showing how the county, district and borough councils, working together, intend to do “whatever they can” to enable business to be successful. This will be relevant to the economic section of the Local Plan.

[Suffolk Design](#)

Suffolk Design is an initiative to ensure the quality of new buildings, public spaces and

neighbourhoods throughout the county meets today's needs and tomorrow's challenges. This will be relevant to the design section of the Local Plan.

[Suffolk's Nature Strategy](#) (2015) and [Suffolk Biodiversity Action Plan](#) (2012)

These documents outline priorities and how the landscapes and wildlife in Suffolk contribute to economic growth and health and wellbeing. This will be relevant to the natural environment aspects of the Local Plan.

[Suffolk Flood Risk Management Strategy](#) (2016) and [Preliminary Flood Risk Assessment](#)

Flood risk from all sources of flooding and the impact of climate change are a fundamental issue that the Local Plan will need to address. This is an important tool to help everyone understand and manage flood risk within Suffolk. The strategy summarises the information available on the risk of flooding in Suffolk and way to manage that risk. The strategy document has been published by the Suffolk Flood Risk Management Partnership, which is made up of all the relevant Risk Management Authorities (RMAs) relevant to flood risk in Suffolk. The Preliminary Flood Risk Assessment is an assessment of floods that have taken place in the past, floods that could take place in the future. It considers flooding from surface water runoff, groundwater and ordinary watercourses.

[A policy to address poverty in Suffolk](#) (2015)

The aim of this policy is to ensure that we build on work that is already in place to address poverty, so that it is embedded in the planning and delivery of all services, in particular for our most vulnerable groups.

[Suffolk Local Geodiversity Action Plan](#) (2006)

Geodiversity is addressed through the natural environment policy of the Local Plan, and is likely to be rolled forward to the new Local Plan.

[Health and Wellbeing Strategy](#) (2019)

The link between health and planning is clear, and we will ensure health continues to be addressed in the new Local Plan.

## A2.8 Local

[North Norfolk AONB Management Plan](#) (2014) and [\(more recent version under preparation\)](#)

Part of the AONB is in the Broads and therefore this management plan is an important consideration.

### **Neighbouring Local Planning Authority Local Plans, Core Strategies, Development Management and Site Allocations documents**

More Local Plans will be adopted while the Local Plan for the Broads is being prepared. These documents will not directly be relevant to the Broads, as the Broads Authority is the Local Planning Authority and produces its own documents, but it will be important to understand local policy approaches, particularly for settlements that are partly in the Broads and partly in the neighbouring Local Planning authority's area.

### **Constituent District/Council/Borough economic strategy, environment strategy, housing strategy, business plan**

While the Broads Authority is the Local Planning Authority for the Broads, the Broads sits within six district council and two county council areas that provide services to residents, and the various strategies produced by these councils will therefore be of relevance and could inform the Local Plan for the Broads.

### **District and County Sustainable Community Strategies**

While these strategies are past their published end date, they are still in place as far as we are aware. A note produced to support the 2019 Local Plan will be updated when policies of the new Local Plan are formulated.

### [Solar PV and Building Regulations in Conservation areas](#) – covering Suffolk

This was produced to cover all of Suffolk. As we produce the Local Plan, we will review the potential and need to incorporate this into the Local Plan.

### [Strategic Flood Risk Assessment](#) (2017, 2018 and 2019) and [Broadland Futures Initiative](#) (ongoing)

This sets out detailed flood risk zones. Working with other Local Planning Authorities and the Environment Agency, we will assess the need to review these documents. But flood risk from all sources of flooding and the impact of climate change are a fundamental issue that the Local Plan will need to address. The Broadland Futures Initiative work will be relevant to the Local Plan for the Broads as well.

### [River Wensum Strategy](#)

The River Wensum Strategy's vision is: "To breathe new life into the river by enhancing it for the benefit of all and increasing access to, and greater use of, this important asset. An enhanced river corridor, with its unique natural and historic environment, will once again play an important part in the growth and vitality of the city, strengthening the visitor economy and helping to give the city a competitive advantage in attracting inward investment."

### [Suffolk Coast RAMS strategy](#)

The RAMS project allows for a strategic approach to mitigating the in-combination effects of development on these designated areas and allows mitigation to be delivered across the project area.

## **A2.9 Broads-specific**

### [Broads Plan](#)

The Broads Plan sets out the strategic direction for managing the Broads. It is the key document for the Broads, which other documents need to reflect. The Broads Plan is being reviewed and updated during the production of the Local Plan.

### [Broads Integrated Access Strategy](#) (2019)

This looks into land and water-based ways to enjoy the Broads, with benefits to the economy and health and wellbeing. The Local Plan will look to protect existing routes and



safeguard future routes. The Authority's Waterways and Recreation Officer will advise on relevant aspects of the Local Plan.

#### [Broads Flood Risk SPD](#) (2020)

Flood risk is a key constraint in the Broads. This elaborates on adopted policy. It does provide more detail than might be relevant for a Local Plan, but the potential to incorporate elements of the SPD into the Local Plan will be reviewed. The SPD may need updating over the coming years, certainly when a new Local Plan is adopted.

#### [Landscape Character Assessment](#) (2016) and [Landscape Sensitivity Study](#) (2012)

Impact of development on landscape character is a key consideration for the Local Plan. These documents will be reviewed and may be updated and findings will be reflected in the Local Plan.

#### [Sustainable Tourism in the Broads](#) (2016)

Tourism is an important part of the local economy, and for the wider economy as many businesses, located outside of the Broads, rely on the Broads. The Strategy may be updated during the production of the Local Plan.

#### [Education Strategy](#) (2017-2022)

The Education Strategy provides a framework for environmental education and wider outreach in the Broads, including the [Broads Curriculum](#).

#### [Volunteer Strategy](#) (2017-2022)

The Volunteer Strategy outlines how the Broads Authority uses volunteers to help its work in the Broads, and identifies objectives to develop and refine our volunteer offer.

#### [Broads Climate Change Adaptation Plan](#) (2016) and [Cutting the Broads' Carbon Footprint](#) (ongoing)

The Broads Authority, like many other Authorities, has declared a climate emergency. A lot of work is ongoing on the issue of climate change mitigation and adaptation. Climate change will be a fundamental theme running throughout the Local Plan, and the Authority's Climate Reduction Project Manager will provide advice.

#### [Knackers Wood Water Recycling Centre Joint Position Statement](#) (2017)

Produced in 2017, this Statement will be reviewed and updated. Depending on the current position, development may still be difficult to bring forward in Horning, until the capacity issues at the Water Recycling Centre are addressed.

#### [Mooring Design Guide](#) (2015)

Moorings, including their design and availability, is a key consideration for the Broads. The topics covered in this guide will be important when producing the Local Plan. The need to review and update this guide will be scoped out during the Local Plan production. The potential to incorporate elements of the guide into the Local Plan will also be reviewed.

#### [River bank stabilisation guide](#) (2015)

Most of the Broads is water and so there are many river banks. With natural erosion and the effects of climate change, as well as the need to protect the character of the area, the topics

covered in this guide will be important when producing the Local Plan. The need to review and update this guide will be scoped out during the Local Plan production. The potential to incorporate elements of the guide into the Local Plan will also be reviewed.

#### [Peat Guide](#) (2021)

With part of the Broads being peat soils, with pressures from development and considering the special qualities of peat, peat will be an important consideration in this Local Plan. As this guide is so recent, it could be reviewed later in the production of the Local Plan. The potential to incorporate elements of the guide into the Local Plan will be reviewed.

#### [Biodiversity Enhancements Guide](#) (2016)

Protecting and enhancing biodiversity will be an important theme in the Local Plan. The need to review and update this guide will be scoped out during the Local Plan production. The potential to incorporate elements of the guide into the Local Plan will also be reviewed. It is anticipated that over the coming months/years, the need for biodiversity net gain will be a requirement and that could inform the review of this guide.

#### [Planning for waterside bungalows/chalets](#) (2016)

With so many riverside bungalows and chalets, which are part of the character of the area, and with owners often wishing to undertake work to them, these buildings will be an important consideration when producing the Local Plan. The need to review and update this guide will be scoped out during the Local Plan production. The potential to incorporate elements of the guide into the Local Plan will also be reviewed.

#### [Guide to integrating development into the Broads Landscape](#) (2017)

Protecting and enhancing landscape character will be an important theme in this Local Plan. The need to review and update this guide will be scoped out during the Local Plan production. The potential to incorporate elements of the guide into the Local Plan will also be reviewed.

#### [Annual Monitoring Reports](#) (various years)

The most recent AMRs (2019/20 and 2020/21) will be of particular relevance as they are the first to reflect the 2019 Local Plan for the Broads; for example, where some policies are used more than others or where schemes tend to depart from some policies.

#### [Statement of Community Involvement](#) (2020)

The SCI sets out how we will consult on the Local Plan and other key documents such as the Broads Plan. The SCI may need to be updated, given the Government roadmap out of Covid-19 lockdown and requirements for social distancing.

#### [Broads Biodiversity and Water Strategy](#) and [action plan](#) (2019)

Protecting and enhancing biodiversity will be an important theme in the Local Plan. This strategy may be relevant to the policies of the Local Plan. We will work closely with our ecologists and other environment advisors when producing the Local Plan.

#### [Evidence Base](#) and [Examination Library](#) to support the 2019 Local Plan.

The evidence base produced to support the last Local Plan may still be relevant to this new

Local Plan. It will be reviewed and updated as required, and the examination library will also be reviewed.

#### [Management of the Marshes](#) (2014)

This document is an analysis of the intentions of farmers and landowners in respect of marsh management post ESA and Environmental Stewardship.

### A2.10 Neighbourhood Plans

Numerous Neighbourhood Plans are in production, and details are on the Authority's website at [Neighbourhood planning \(broads-authority.gov.uk\)](http://neighbourhoodplanning.broads-authority.gov.uk). The following Plans have been adopted:

- [Acle](#) (2015)
- [Brundall](#) (2016)
- [Salhouse](#) (2016)
- [Strumpshaw](#) (2014)
- [Wroxham](#) (2019)

The Local Plan will have a site-specific policies section. Neighbourhood Plans will be checked as policies for each area are formulated.

(end of document)

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### Description of the State of the Environment

Note: Some of the data in the following report is based on the 2011 Census. During the production of the Broads Plan and the Local Plan for the Broads (referred to below as the Local Plan) the results of the 2021 Census will be released, and subsequent Sustainability Appraisals (SAs) will include the updated data.

#### 3.1 Biodiversity, Geodiversity, Flora and Fauna

The Broads contains a mosaic of habitats which gives the area a high conservation value and contributes to the distinctiveness of the landscape. The wetlands which characterise the Broads are essentially a freshwater system, becoming more brackish towards the coast. As well as rivers, estuary and broads, there are fens, reedbeds, wet woodlands, coastal dunes and grazing marshes.

The Biodiversity audit headlines are that the Broads is home to around 1,500 species of conservation concern with 66 species relying almost entirely on the Broads for UK survival.

As well as having status equivalent to a national park, the Broads contains many areas with national and international designations for their environmental and wildlife importance, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, Sites of Special Scientific Interest (SSSI), numerous County Wildlife Sites (both within the area and close to or on the border of the Broads), as well as 8 National Nature Reserves and one Local Nature Reserve. Virtually the entire SSSI network is designated as internationally important for nature conservation and has either SPA or SAC status under European legislation. A large number of SPAs are also Ramsar sites. See the Map Bundle (Appendix 3b) for national and local protected sites. Table 1 shows the condition of SSSI in the Broads area. (Source: [Natural England](#), January 2021).

**Table 1**

SSSI condition in Broads (Jan 2021)

SSSI Name	% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining
<a href="#">Alderfen Broad</a>	100.00%	8.65%	91.35%	0.00%	0.00%
<a href="#">Ant Broads and Marshes</a>	92.71%	49.90%	42.81%	0.00%	7.29%
<a href="#">Barnby Broad &amp; Marshes</a>	100.00%	59.93%	40.07%	0.00%	0.00%
<a href="#">Breydon Water</a>	100.00%	100.00%	0.00%	0.00%	0.00%
<a href="#">Broad Fen, Dilham</a>	100.00%	0.00%	100.00%	0.00%	0.00%
<a href="#">Bure Broads and Marshes</a>	89.93%	43.08%	46.85%	10.07%	0.00%
<a href="#">Burgh Common and Muckfleet Marshes</a>	96.57%	27.00%	69.57%	3.43%	0.00%
<a href="#">Croswick Marsh</a>	0.00%	0.00%	0.00%	100.00%	0.00%
<a href="#">Damgate Marshes, Acle</a>	100.00%	74.73%	25.27%	0.00%	0.00%
<a href="#">Decoy Carr, Acle</a>	100.00%	70.21%	29.79%	0.00%	0.00%
<a href="#">East Ruston Common</a>	100.00%	38.11%	61.89%	0.00%	0.00%
<a href="#">Geldeston Meadows</a>	0.00%	0.00%	0.00%	97.18%	2.82%

SSSI Name	% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining
<a href="#">Hall Farm Fen, Hemsby</a>	100.00%	100.00%	0.00%	0.00%	0.00%
<a href="#">Halvergate Marshes</a>	81.77%	72.75%	9.02%	18.23%	0.00%
<a href="#">Hardley Flood</a>	100.00%	100.00%	0.00%	0.00%	0.00%
<a href="#">Leet Hill, Kirby Cane (near to BA boundary)</a>	100.00%	100.00%	0.00%	0.00%	0.00%
<a href="#">Limpenhoe Meadows</a>	100.00%	0.00%	100.00%	0.00%	0.00%
<a href="#">Ludham - Potter Heigham Marshes</a>	100.00%	100.00%	0.00%	0.00%	0.00%
<a href="#">Poplar Farm Meadows, Langley</a>	100.00%	100.00%	0.00%	0.00%	0.00%
<a href="#">Priory Meadows, Hickling</a>	100.00%	29.79%	70.21%	0.00%	0.00%
<a href="#">Sprat's Water and Marshes, Carlton Colville</a>	99.67%	80.48%	19.19%	0.33%	0.00%
<a href="#">Stanley and Alder Carrs, Aldeby</a>	100.00%	0.00%	100.00%	0.00%	0.00%
<a href="#">Trinity Broads</a>	87.46%	45.48%	41.98%	12.54%	0.00%
<a href="#">Upper Thurne Broads and Marshes</a>	80.62%	63.97%	16.65%	4.82%	14.57%
<a href="#">Upton Broad &amp; Marshes</a>	99.28%	7.43%	91.84%	0.72%	0.00%
<a href="#">Winterton-Horsey Dunes</a>	77.80%	67.92%	9.88%	22.20%	0.00%
<a href="#">Yare Broads and Marshes</a>	50.52%	39.22%	11.30%	47.27%	2.20%

Where unfavourable condition exists, it is mostly due to eutrophication, excessive nutrients and water abstraction, agricultural runoff and water pollution from sewage, and industrial and urban discharge.

Peatland is a particularly important feature of the Broads, covering about 27% of the area and the basis of both fen and wet woodland habitats and some drained marshes (or fen meadows) – see the peat in the Broads at section 3.6.1. These are highly valuable for the characteristic and specialised wildlife of the Broads. Altogether, the Broads contains the largest expanse of species-rich fen in lowland Britain as well as the most extensive tract of wet woodland within the region. Grazing marshes are another characteristic habitat of the area. Each of these habitats supports a different wealth of species, and each requires active management to maintain.

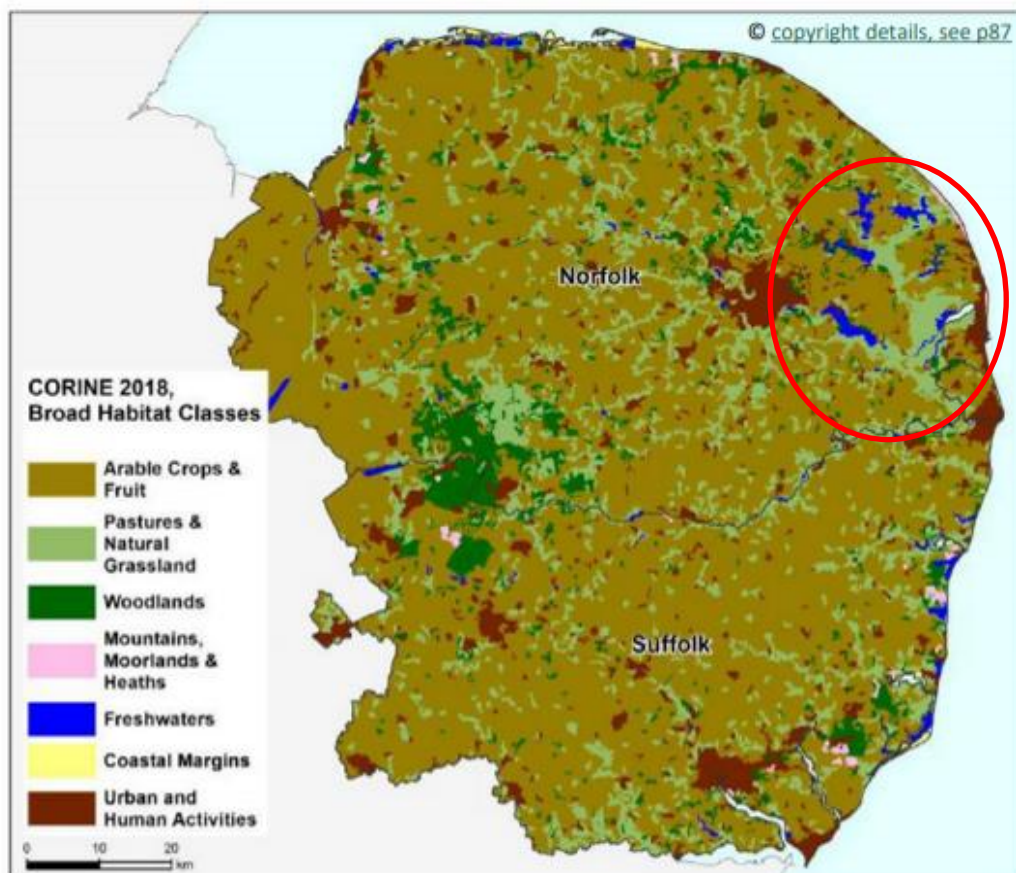
Biodiversity within the Broads is being affected by a number of threats and pressures. These include land-take for development, invasion of non-native species, pollution, habitat fragmentation, disturbance (such as recreation impact), sea level rise and climate change. In particular, the area is threatened by two sets of water resource problems – low river flows and depleted groundwater and the threat of increased salt water incursion and tidal salt water flooding. Water quality is also an issue – the main threat comes from waste water and diffuse pollution, often arising from outside the Broads boundary, for example, from sewage, farm and road run-off. See 3.7.2 for recent water quality mapping.

### 3.2 Habitats

The various broad habitat sites of the Broads, and the wider local area, are shown on the Map 1 and Table 2, taken from [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) (2020). This shows that much of the Broads is pastures and grassland. The Broads area is circled.

## Map 1

### Broads habitats



**Table 2**

### Broads habitats by type (data)

LAND TYPES BY AREA (Ha)	Norfolk	Suffolk	England TOTAL	The Brecks	Broads NP	N&S AONBs TOTAL
Arable crops and Fruit	380,622	280,916	5,759,358	55,206	6,623	45,954
Pastures and Natural Grassland	71,618	41,734	3,967,464	15,077	15,358	14,336
Heaths (Mountains, Moors & Heaths)	1,198	1,732	671,428	407	111	1,935
Woodlands	35,814	20,443	831,116	24,532	2,371	9,481
Freshwaters	7,445	2,677	77,755	240	4,640	2,634
Coastal Margins	3,674	1,587	49,046	0	501	14,460
Urban and Human Activities	37,477	31,020	1,696,614	6,465	547	5,019
Unclassified	164	60	1,679	0	-1	369
<b>TOTAL AREA</b>	<b>538,011</b>	<b>380,169</b>	<b>13,054,460</b>	<b>101,926</b>	<b>30,151</b>	<b>94,187</b>

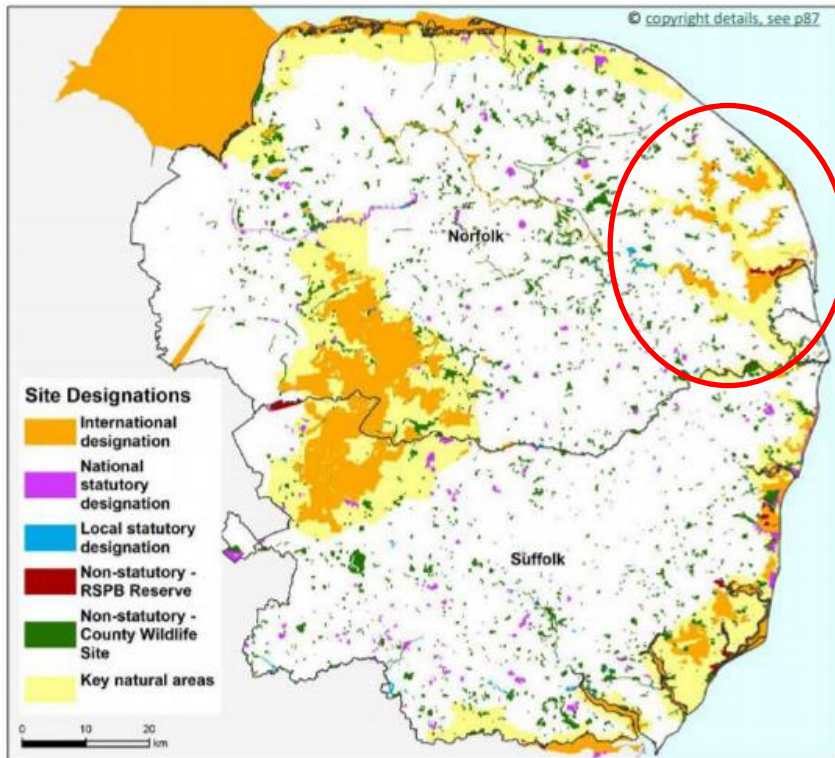
### 3.3 Land under conservation management

Map 2 shows how much of the Broads, and the wider local area, are under conservation management. Map taken from [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) (2020). This shows that a lot of the Broads is under an international designation. The Broads area is circled.



## Map 2

### Broads area under conservation management



### 3.4 Landscape

The Broads is considered to be the UK's premier wetland and is part of a global network of protected landscapes. Its national designation, equivalent to a national park, both reflects its landscape value and provides the highest level of landscape protection under national planning policy. The Broads has a largely undeveloped, yet highly managed, landscape of water, fens, marshes and woodland. The 2.7 km long coastal strip at Winterton is also part of the North Norfolk Coast Area of Outstanding Natural Beauty.

'Landscape' is a term with a variety of meanings. It can include components such as visual amenity, character, integrity and sensory factors, which are harder to identify and quantify than a view, and consequently more sensitive and vulnerable to change. Anecdotal evidence suggests a continuing incremental change to some aspects of the Broads' landscape.

Although the area benefits from protection, there are pressures from development, including large scale housing development planned for the areas outside but close to the Broads, which could adversely affect the landscape of the area.

In the past the area has been threatened by, for instance, the impact of intensive agriculture. To counter this, Halvergate Marshes became the birthplace of agri-environment support, with the Broads Grazing Marsh Scheme which led to the Environmentally Sensitive Area (ESA) scheme – the total area eligible for grant support was 32,400 ha (75% of the wider ESA). ELM scheme is being developed by Defra to provide public benefits, such as sustainable farming, nature recovery and landscape recovery.

Above all, it is the landscape of the Broads that gives rise to the unique character and distinctiveness of the area. One of the main issues for the Broads Plan and the Local Plan, therefore, is the need to protect the landscape character, and to conserve the Broads as a living, working landscape.

### 3.5 Cultural Heritage

The historic landscape reflects patterns of human activity over hundreds of years, and contains distinctive landscape features particular to the area. These include drainage mills, waterside chalets and villages with houses of brick and thatch. This unique environment has a high economic value, attracting business and tourism to the area.

The built and historic environment are important parts of the cultural landscape and reflect the activities of people living and working in the Broads over time for example, there are over 70 surviving drainage mills. Together these contribute significantly to the character and distinctiveness of the Broads.

There is evidence that there has been gradual erosion of the Broads' historical assets, and of the quality and distinctiveness of the built environment. Successive development plans and management plans for the Broads have recognised the need to protect and enhance the historic and cultural landscape of the area, which is as important as its natural assets. Nevertheless, it is essential that these general aims be framed within the context of a changing Broads. It is neither possible nor desirable to protect the area exactly as it is now, but it is feasible to maintain the best elements and enhance those that have been degraded. Enhancement may necessitate a dramatic change in management in certain areas.

See the Baseline Map Bundle (Appendix 3b). These show Conservation Areas, Registered Parks & Gardens, Listed Mills, Scheduled Monuments and Listed Buildings.

#### **Conservation Area Appraisals reviewed**

(Source: Broads Authority Historic Environment Officer)

- 2021 Horning Conservation Area ready to be consulted
- 2021 Belaugh Conservation Area re-appraisal to be consulted upon May-June 2021
- 2021 Halvergate and Tunstall Conservation Area re-appraisal being prepared
- 2020 Ludham Conservation Area adopted
- 2018-2019: Somerton Conservation Area adopted
- 2016-2017: Loddon and Chedgrave Conservation Area re-appraisal adopted, Stalham Staithe Conservation Area re-appraisal adopted
- 2015-2016: Oulton Broad Conservation Area re-appraisal adopted
- 2014-2015: Beccles and Halvergate Marshes Conservation Area re-appraisals were adopted
- 2013- 2014: Langley Abbey re-appraisal adopted

- 2012-2013: Ellingham, Ditchingham Dam and Geldeston Conservation Areas re-appraisals adopted
- 2011-2012: Neatishead and Somerleyton Conservation Areas re-appraisals adopted
- 2010-2011: Belaugh and Wroxham Conservation Areas re-appraisals adopted

### **Number of Listed Buildings at Risk**

(Source: Broads Authority Historic Environment Officer)

- 2020-2021: 18
- 2019- 2020: 18
- 2018 - 2019: 18
- 2017 - 2018: 22
- 2016 - 2017: 26
- 2015 - 2016: 28
- 2014 - 2015: 28
- 2013 - 2014: 29
- 2012 - 2013: 26
- 2011 - 2012: 37
- 2010 - 2011: 49
- 3.6 Geodiversity

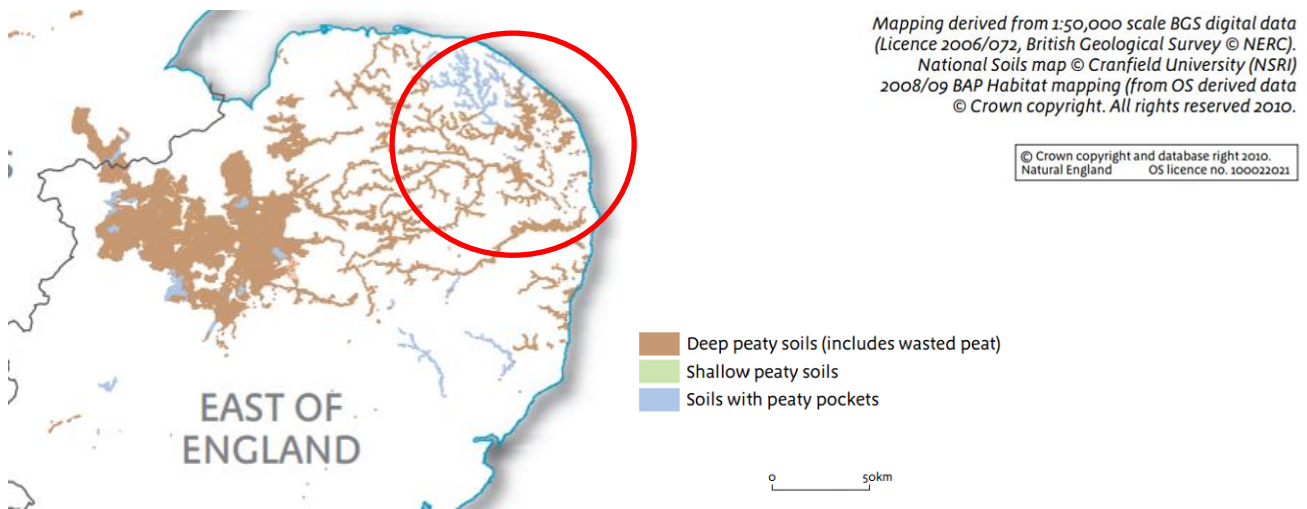
#### **3.6.1 Peat**

England's deep peatlands cover much of our uplands, but also include large lowland areas. Shallower peaty soils fringe the uplands. The Map 3 shows the general areas of peat around the Broads (also see peat map in the bundle). The Broads area is circled.

### Map 3

Areas of peat around the Broads

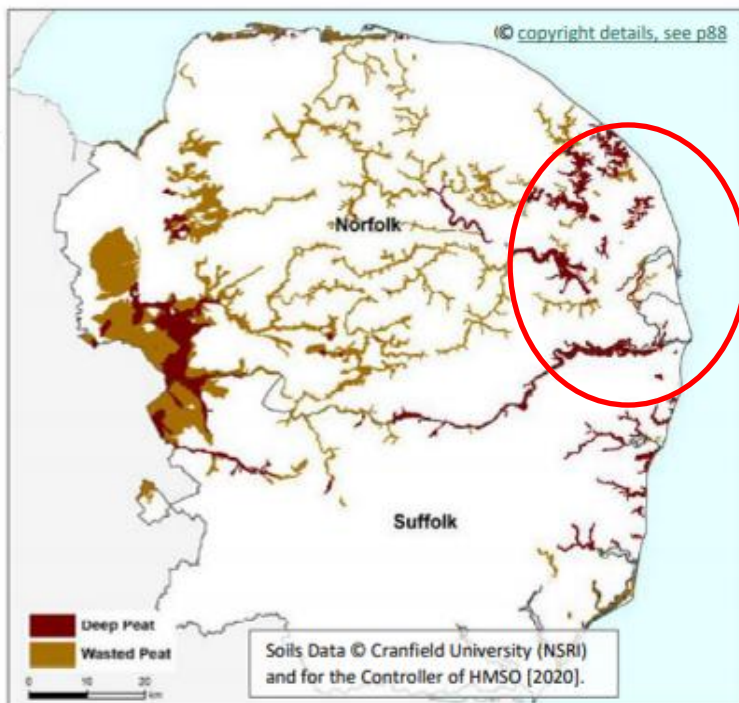
Source: [England's peatlands – carbon storage and greenhouse gases, Natural England \(2010\)](#).



Map 4, taken from [Natural Capital Evidence Compendium for Norfolk and Suffolk \(2020\)](#) shows the location of deep and wasted peat. The Broads area is circled. The maps show that some of the Broads is peat soils.

### Map 4

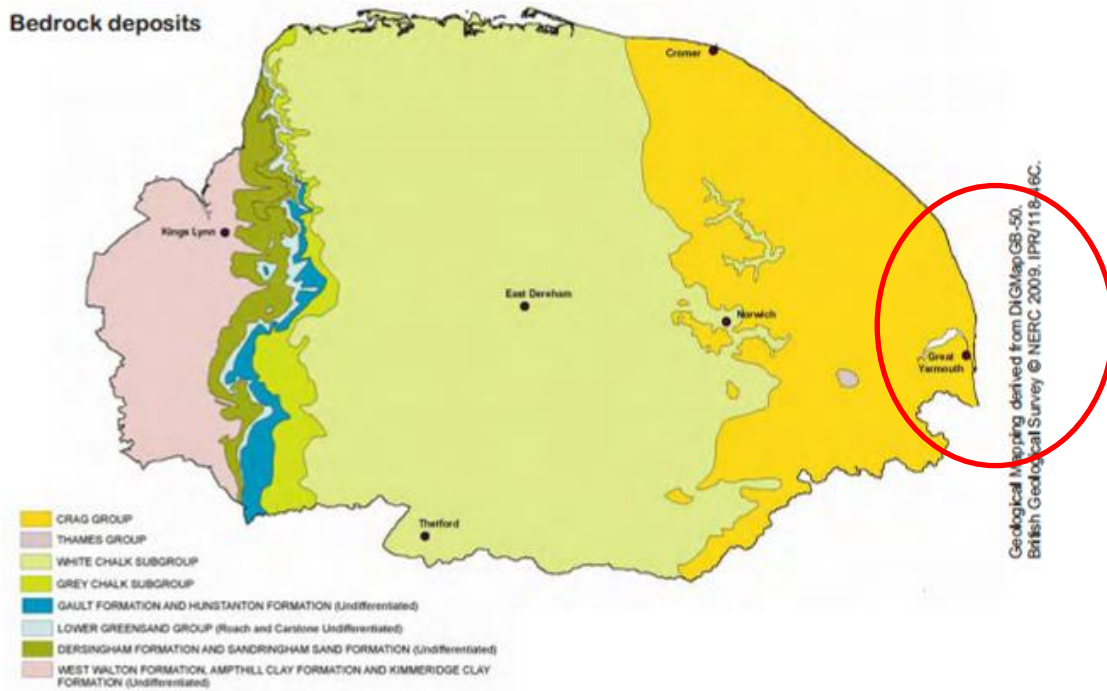
Location of deep and wasted peat



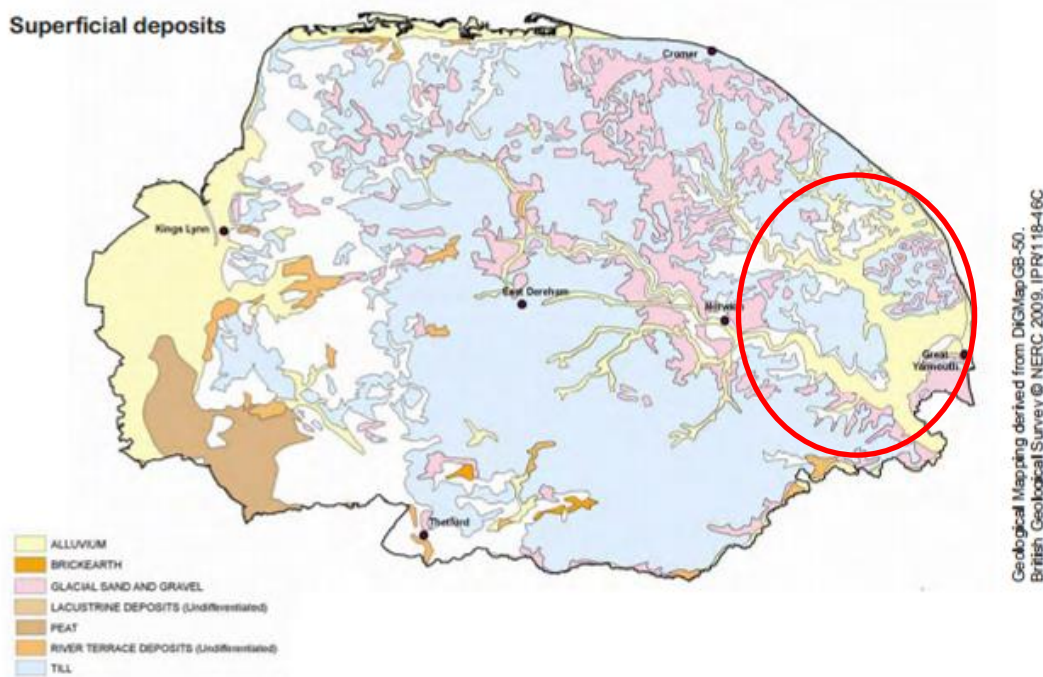
### 3.6.2 Bedrock and Soils

Map 5 show that the Broads lie on Crag Group bedrock and Aluvium soil. Source: [Norfolk's Earth Heritage - valuing our geodiversity \(2010\)](#).

**Map 5**  
Bedrock deposits



**Map 6**  
Bedrock deposits



**3.6.3 Norfolk Geodiversity Audit**

The tables at Appendix 3c shows the results of the Norfolk Geodiversity Audit. Features or merit are detailed, sorted by district/borough/city - also includes sites in East Suffolk.

### 3.6.4 Soils

See the Agricultural Land Class map in the Baseline Map Bundle (Appendix 3b). This shows that the majority of the area is Grade 3.

## 3.7 Water

Water is an essential natural resource, but especially important for the Broads as a sensitive wetland. Before reaching the Broads, its rivers drain large parts of Norfolk and Suffolk, including some of the most built up areas and those planned to receive major growth in housing and other development. The Broads therefore remains vulnerable to impacts of upstream abstraction and pollution. In the East of England there is a deficiency between demand for water and supply, which may affect the Broads the peak tourist season.

### 3.7.1 Water Supply

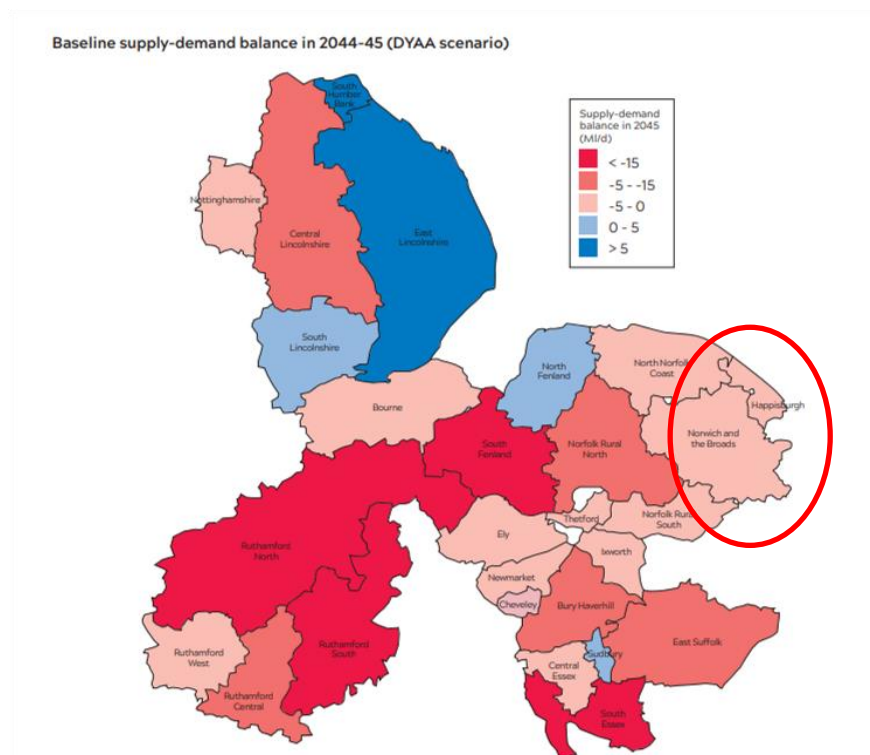
Source: [Anglian Water Resource Management Plan 2019](#).

Map 6 shows that the Norwich and the Broads zone will be in deficit by 2045.

‘Impacts are not distributed evenly; some Water Resource Zones (WRZs) are affected more than others. Central Lincolnshire, Ruthamford North and South, South Fenland, Bury Haverhill, East Suffolk and South Essex are particularly affected. By 2045, only six WRZs remain in surplus: East Lincolnshire, South Lincolnshire, North Fenland, Sudbury, South Humber Bank and Hartlepool’.

### Map 6

Supply demand balance in 2045



Part of the Broads is Essex & Suffolk Water, and they also have a [WRMP](#) – see table 3.

**Table 3**  
Suffolk Northern Central balance of supply

Table 8.4: Suffolk Northern Central balance of supply

Northern Central WRZ	End of AMP6	End of AMP7	End of AMP8	End of AMP9	End of AMP10	End of Planning Horizon	End of 40 Year Planning Horizon
Year	2019/20	2024/25	2029/30	2034/35	2039/40	2044/45	2059/60
Balance of Supply (excluding headroom)	23.93	24.03	23.95	23.62	22.91	22.13	19.97
Balance of Supply (including headroom)	19.16	18.66	18.93	18.93	18.42	17.76	15.99

The balance of supply with target headroom ranges from 19.16 MI/d at the end of AMP6 to 17.76 MI/d at the end of the 25 year planning horizon and 15.99 MI/d at the end of the 40year planning horizon.

Given the supply surplus, no supply or demand schemes will be required.

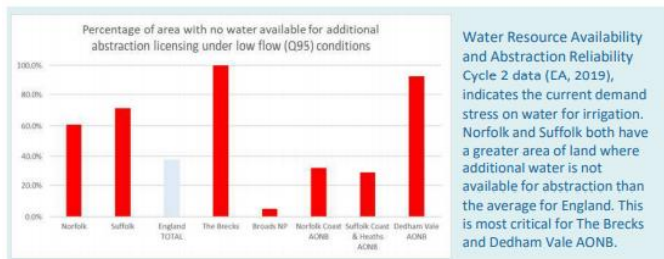
Figure 1 is taken from the [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) (2020).

**Figure 1**

Water related information, including pressures and responses.

Water Resources East (WRE) is the organisation tasked under the National Framework for Water Resources (EA, 2020) with producing an integrated water resource plan for eastern England. The WRE initial position statement (2020) includes an assessment of the current and future supply-demand balance based on water company Water Resource Management Plans, taking into consideration climate change impacts, abstraction reductions in environmentally-sensitive areas, and demand considerations based on forecasted economic growth and development. The maps on the right show the current supply-demand status and projections out to 2040. Across the whole region there is a **net projected deficit of around -200 MI/d by 2050** (WRE, 2020).

**Water Use:** (Baseline 2020/21): "On an average day, in a dry year, the total consumptive demand for water in the WRE region is equivalent to 2,311 million litres (megalitres) per day. Most of this water (85%) is used for public water supply. Most of the rest is used for spray irrigation (8%), power generation (3%) and in the manufacturing, food and drink sectors (2%). (WRE, 2020 p.9)



Water Resource Availability and Abstraction Reliability Cycle 2 data (EA, 2019), indicates the current demand stress on water for irrigation. Norfolk and Suffolk both have a greater area of land where additional water is not available for abstraction than the average for England. This is most critical for The Brecks and Dedham Vale AONB.



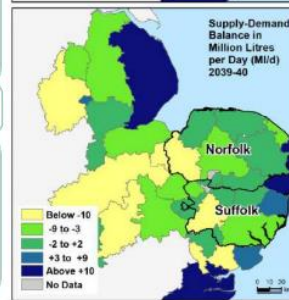
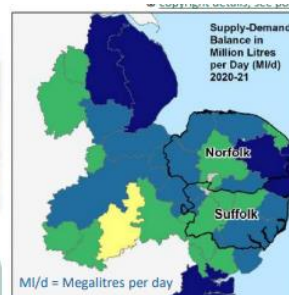
**Pressures**

- Driest region in the UK
- Highest forecast growth outside London
- Internationally important natural habitats
- Leading agricultural producer
- Tension between water needed for the environment, public supply and irrigation
- Little surplus water currently available

**Responses**

- Increase efficiency of all water users
- Promote need for additional water storage within the landscape through opportunities to link water scarcity with flood risk management solutions
- Transfer water from areas of surplus to areas of deficit, increasing connectivity and maximising open water channels
- Explore other technologies, e.g. water transfers, desalination and water re-use.

Source: WRE (2020)



### 3.7.2 Water Quality

Water quality is a key issue for the Broads. Poor water quality had become a serious problem in the Broads in the mid to late 20th century, affecting both biodiversity and recreational enjoyment. Sustained efforts on particular water bodies and on reducing pollution inputs from agricultural and waste water sources have produced major improvements to date, but more remains to be done. Both maintenance of previous gains and further improvements depend on Asset Management Planning schemes, the Review of Abstraction Consents, Catchment Sensitive Farming Projects and control and co-ordination of development over the Broads and beyond. The Norwich Growth Area Water Cycle Study is an important component of the latter.

Water is essential for wetland habitats and species. The Broads are rich in wetland and related habitats including wet woodland, grazing marsh, reedbed, lakes, and fen. Many animal and plant species supported by these are important in national and European terms.

See WFD Ecological Status 2013 map in the map bundle at Appendix 3a. This shows that the majority of the water bodies in the Broads are rated as Moderate, with some as poor and some as bad.

Water management is also important for biodiversity within drained areas. Management of water levels and the poor-quality river water has continued to significantly constrain the environmental potential of the Broads. SSSIs in unfavourable condition in the Broads are mainly due to the impacts of water pollution and water management problems on biodiversity. Some of this will be addressed by Internal drainage board investment and agri-environment schemes.

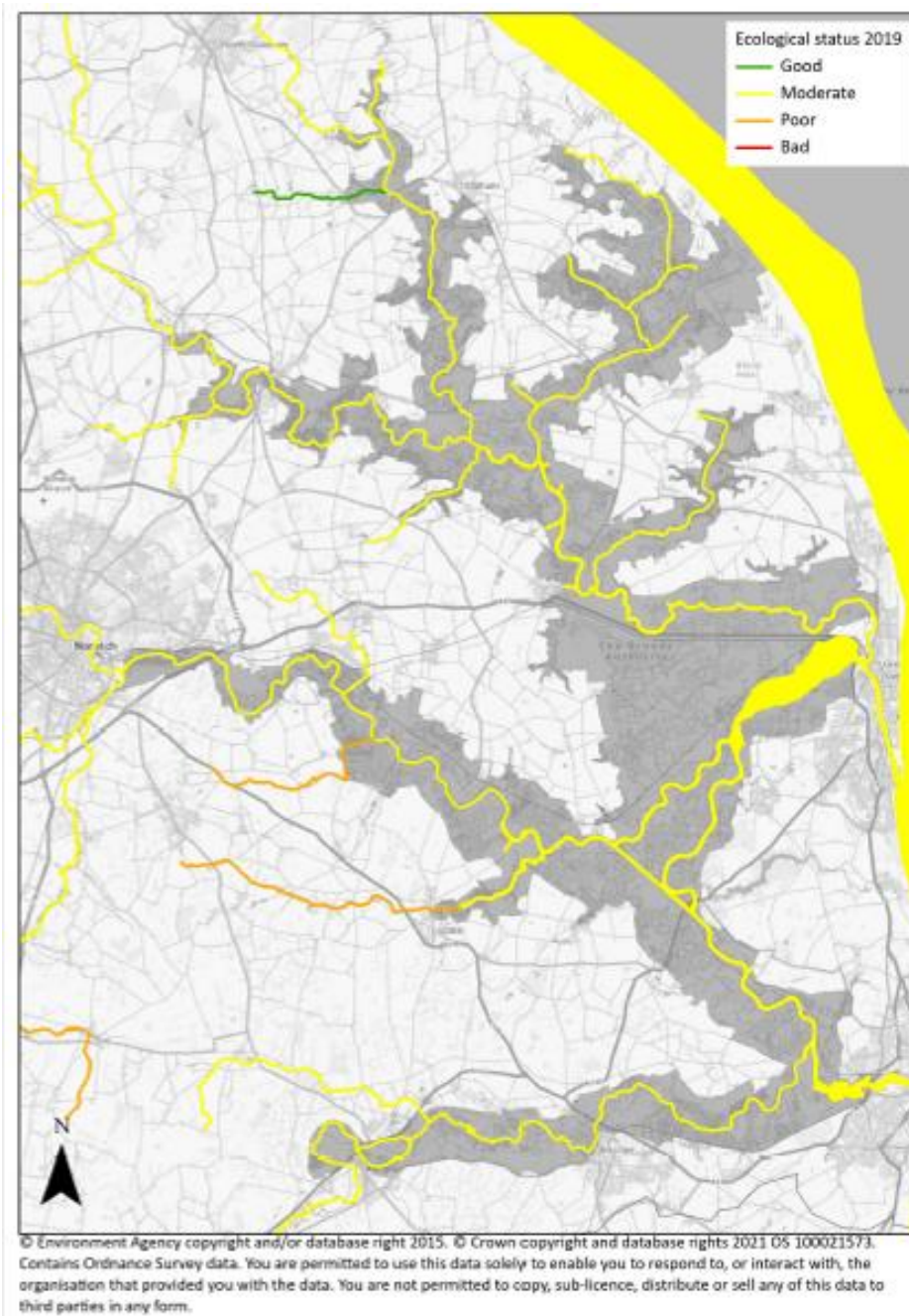
Water quality (particularly phosphate levels) in parts of the Broads has actually improved markedly in recent decades, helped by improvements and new initiatives in sewage treatment, agri-environmental practices. However, the ecology requires lower levels of nutrient input to recover to health and meet the WFD targets. These targets measure 30 different elements with a principle of 'one out, all out' (i.e. the poorest individual result drives the overall classification).

Map 7 shows the ecological status of waterbodies in the Broads (and wider area) in 2019 as moderate.



## Map 7

### Ecological status of waterbodies in the Broads



#### 3.7.3 Drinking Water safeguard Zones Nitrate Vulnerable Zones

A Nitrate Vulnerable Zone (NVZ) is designated where land drains and contributes to the nitrate found in “polluted” waters. Polluted waters include:

Surface or ground waters that contain at least 50mg per litre (mg/l) nitrate

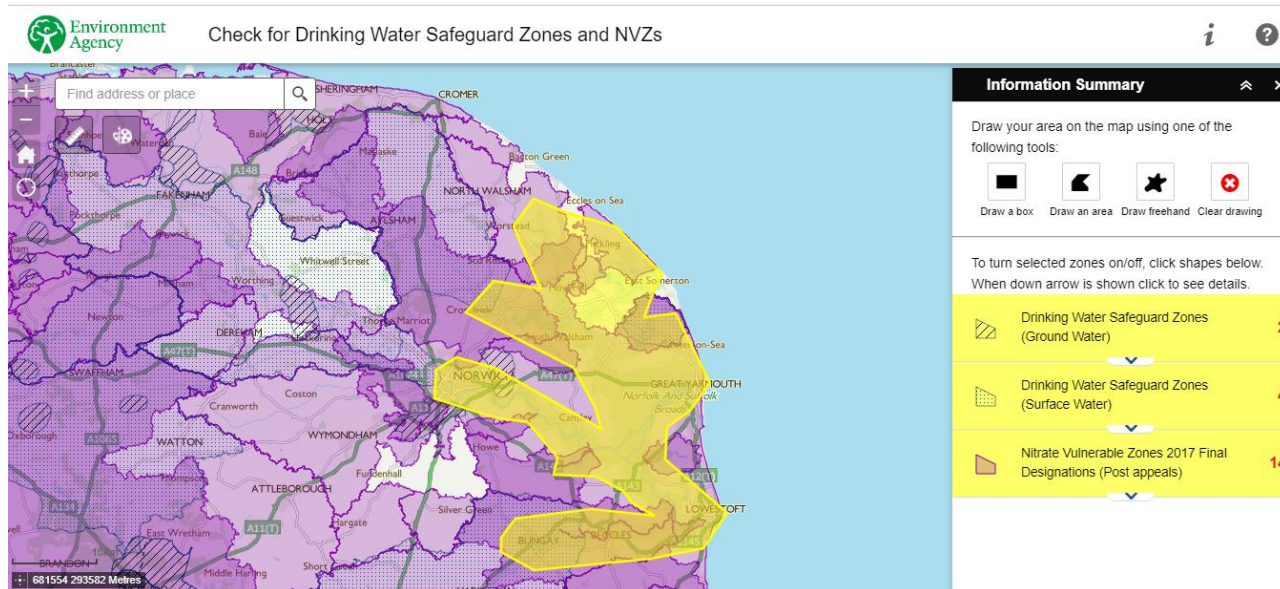
Surface or ground waters that are likely to contain at least 50mg/l nitrate if no action is taken

Waters which are eutrophic, or are likely to become eutrophic if no action is taken

Drinking Water Safeguard Zones are designated areas in which the use of certain substances (including fertilisers, pesticides or other chemicals) must be carefully managed to prevent the pollution of water that is abstracted for use as drinking water.

## Map 8

### Drinking water safeguard zones and nitrate vulnerable zones



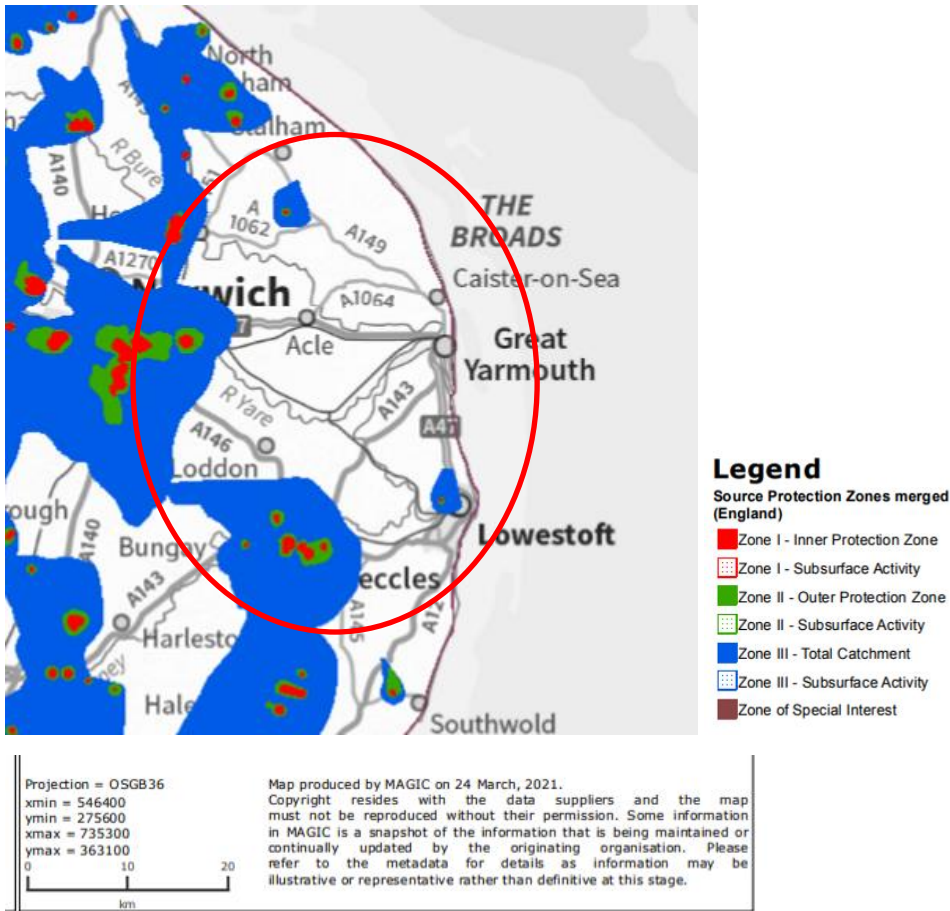
Source: [Check for Drinking Water Safeguard Zones and NVZs \(data.gov.uk\)](https://data.gov.uk)

### 3.7.4 Source Protection Zones

The Environment Agency have defined Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment) and a fourth zone of special interest, which we occasionally apply, to a groundwater. See map 9. Source: [Magic Map Application \(defra.gov.uk\)](https://defra.gov.uk).

## Map 9

### Source protection zones



### 3.8 Climate Change

Climate change and the emissions of greenhouse gases that contribute to climate change are a matter of concern for the Broads Authority, both in terms of mitigation and adaptation to climate change. Our approach is not to assign blame to a particular group, but it is worth noting that two significant direct emitters are the traffic on the A47 and Cantley Sugar Factory.

Figure 2 includes graphs and tables are taken from [Towards a GHG Reduction Strategy for the Broads – Identifying and Prioritising Actions Final Report On Behalf of: The Broads Authority May 2010](#).

Please note that we will soon have an updated footprint for the Broads. We are looking at a consumption based rather than emissions based footprint, so this may look a little different and will be presented in subsequent Sustainability Appraisals.

**Figure 2**

Extracts from the greenhouse gas reduction strategy for the Broads.

Caveats explained, the data suggests emissions at the various levels with the following approximate magnitudes:

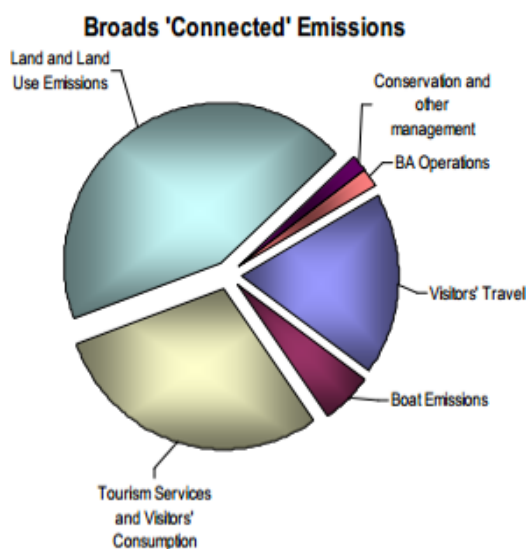
- Broads Authority operations (Level1): **~1,900 tCO<sub>2</sub>e<sup>3</sup>**;
- Activities and operations connected with Broads services (including the above): **~131,000 tCO<sub>2</sub>e**; and
- Other activities in the Executive Area (but not specifically connected with the Broads itself): **~359,000 tCO<sub>2</sub>e**.

In addition to GHG emissions, the carbon stored in soils and vegetation within the Broads Executive Area has also been estimated. This suggests a total carbon store within the Broads Executive Area of the order of **40 million tCO<sub>2</sub>e**.

**Table 1.1: Overview of the likely magnitude and context of GHG emissions and carbon stores (t CO<sub>2</sub>e)**

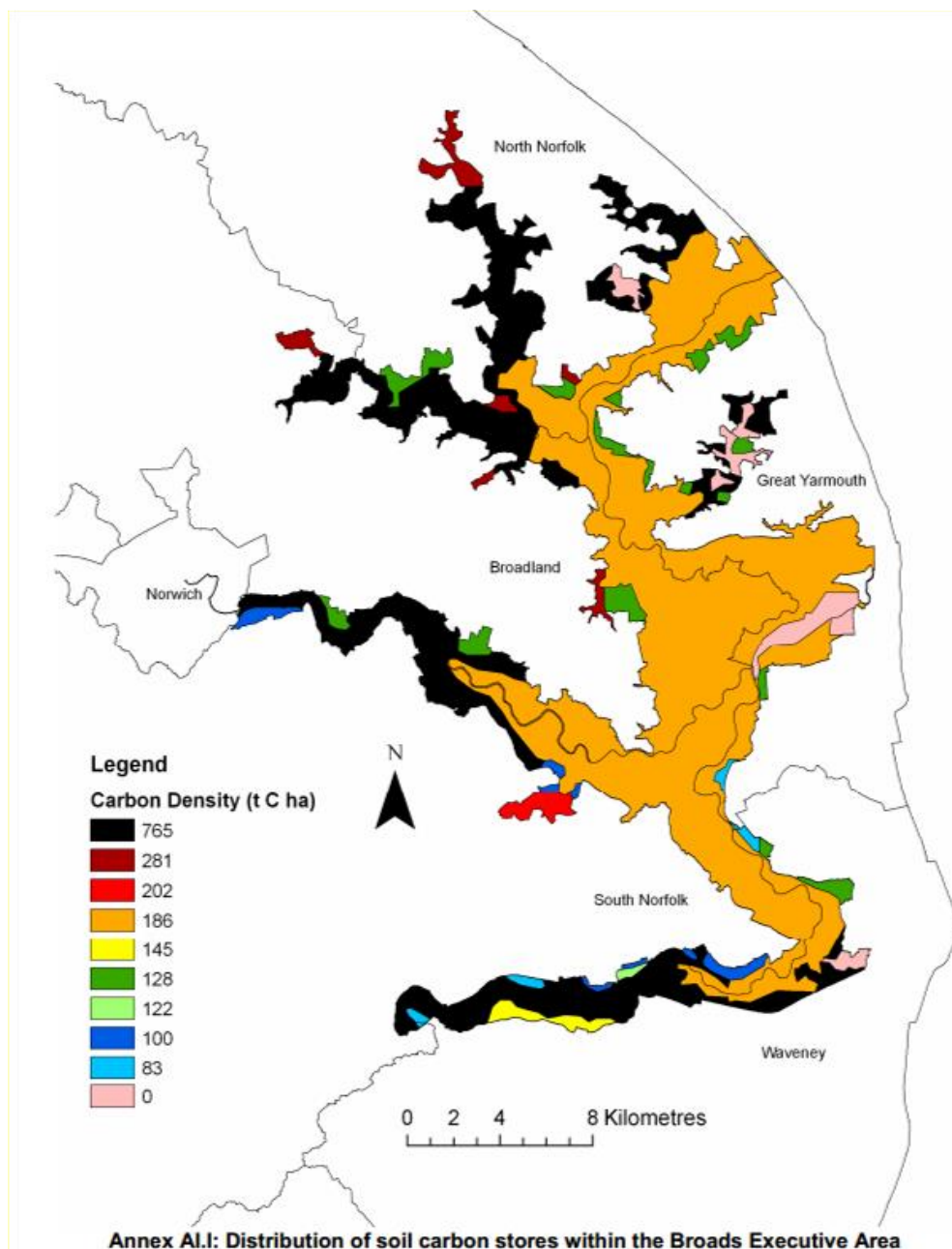
Category	Level 2a: estimated magnitude of GHG emissions 'connected with' the Broads	Level 1: Broads Authority Operations	1,900	131,000
		Other management and organisations	1,900	
Broads Emissions	Level 2a: estimated magnitude of GHG emissions 'connected with' the Broads	Tourism and Recreation	54,000	360,000
		Land and Land Use	73,500	
		Emissions from industry & commerce*	75,000	
		Emissions from domestic sources	55,000	
	Level 2b: estimated magnitude of emissions 'NOT connected with' the Broads	Emissions from transport**	76,000	
		Point source emissions (British Sugar Cantley factory)	154,000	
		Soil	38,800,000	39,900,000
		Vegetation	1,100,000	
Broads Carbon Stores				

<b>BA Operations</b>	BA Operations	1,900
<b>Tourism and Recreation</b>	Visitor's Transport	18,920
	Boat Emissions	5,500
	Services	30,000
<b>Land and Land Use</b>	Land Use Emissions	73,500
	Conservation and other management	1,900
<b>TOTAL</b>		<b>~131,000</b>



## Map 10

### Soil carbon stores in the Broads Authority



### 3.9 Flooding

In the longer term, a critical issue for the Broads is the potential impacts of climate change, particularly the anticipated and possible rises in sea level. These have the potential to affect the character and integrity of the area through breaches of the coast, increase water and soil salinity, and temporary and permanent flooding. More immediate issues include the protection of water resources and water quality. Elevated water levels are already a problem in many of the river valleys. Parts of the Yare Broads and Marshes SSSI, SAC, SPA and Ramsar site are already in an unfavourable condition due to excessive water levels. A report on [the future impacts of climate change](#) on flood risk was published by the Broadland Futures Initiative.

The implementation of the Water Framework Directive will also be important. The Environment Agency produces a number of plans and programmes to address these issues. In particular, the Broadland Rivers Catchment Flood Management Plan (CFMP) and the Broadland Rivers Catchment Abstraction Management Strategy will exert a considerable influence on the Broads Plan and the Local Plan. In overall terms, this catchment-based approach to water management will be critical for the future of the Broads.

As a low-lying wetland area sited almost wholly within the flood plains of the rivers Yare, Bure, Ant, Thurne and Waveney, over 95% of the Broads area is at risk from flooding. The [flood zone maps](#) produced by the 2017 and 2018 SFRA show the extent of flooding in the Broads (these are interactive PDFs, but you will need to save them first before clicking layers on or off).

Flooding can occur as a result of high river flows or, more frequently, high sea levels and the risk of flooding will increase with sea level rise, more intense rainfall and the other changes predicted as a consequence of climate change. The impacts of such flooding are often minor, as buildings and occupiers have adapted to the usually low levels and speeds of flood water in the Broads. History shows, however, that this is not always the case and the effects can occasionally be devastating to communities and to wildlife and biodiversity within the Broads, with the latter being particularly affected by saline intrusion into the freshwater system.

Flood alleviation and management are constant issues for the Broads. Much of the flooding occurs from tidal surges, which damage property and introduce brackish water into fresh water habitats. Flood defences require regular maintenance and will need to be strengthened in areas of special risk. In particular, continued flood management is required to sustain those areas that currently rely on earth embankments for flood defence.

There are c.240km of flood banks protecting approximately 21,300 hectares, almost wholly within the designated Broads area, containing more than 1,700 properties of which more than 1,000 are residential. This network of flood defences was subject to a 20-year programme (Broadland Flood Alleviation Project) of repair and strengthening.

Flood risk to existing property in the Broads area, however, remains significant and widespread. The anticipated future increase in serious flood events as a result of sea level change, climate change, and continuing settlement and erosion of flood defences, adds impetus to the need to take a very cautious approach to developing in the flood plain which makes up most of the Broads area.

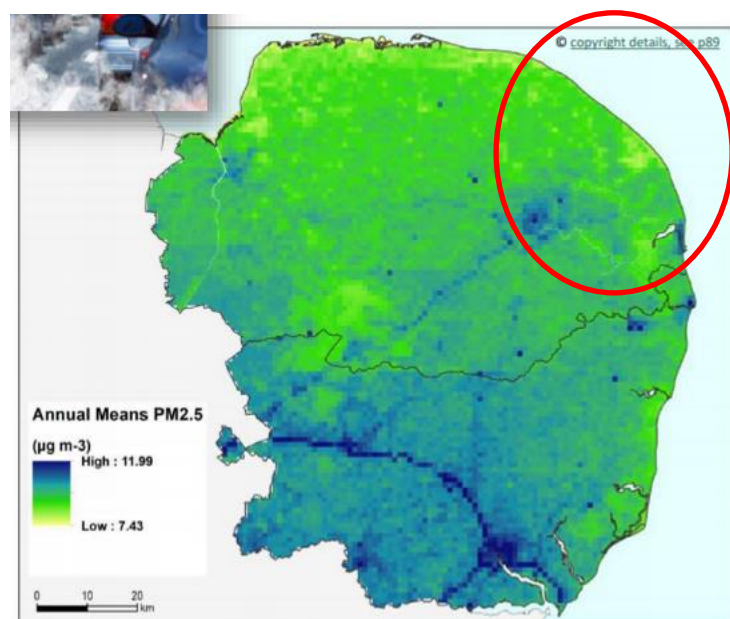
### 3.10 Air

There are no air quality management areas currently declared for breaching Government objective threshold limits for air pollutants in the Broads. However, there are areas, such as just north of the bridge in Hoveton, where congested traffic has adverse air quality impacts.

Map 11 is taken from the [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) (2020). It shows that the annual PM2.5 levels are greater in the urban areas.

## Map 11

### PM2.5 levels



The easy to use [interactive map](#) allows you to explore emissions data from the UK National Atmospheric Emissions Inventory for 2018. The maps have not been copied over to this document.

### 3.11 Material Assets

Notwithstanding the generally rural and undeveloped appearance of most of the Broads area, it does contain a great deal in the way of physical infrastructure, including important sections of the road network (including the A47 Acle Straight and Postwick Bridge); railway lines; waterworks and public water supply reservoir at Trinity Broads; 240km of flood defences; a 200km navigation with around 30 bridges (including many swing or lifting bridges) and many moorings (including around 8741m of visitor mooring spaces provided by the Broads Authority).

### 3.12 Minerals and Waste

The Minerals and Waste designations in the Broads are shown on these maps. We will ensure we consider and include such designations as we produce the Local Plan.

[Nature conservation & heritage assets - North East](#)

[Nature conservation & heritage assets - North West](#)

[Nature conservation & heritage assets - South](#)

### 3.13 Ecosystem Services

The [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) (2020) identifies ten nationally important assets such as soil quality, peat and high productive aquifers. These are shown on map 12.

## Map 12

### National important assets

#### State: Nationally important assets

Norfolk and Suffolk constitute 7% of the land area of England and in 2018, supported 3% of its population. As the maps to the right show, the counties include over 10% of a variety of natural assets and protected areas. These examples span provisioning, regulating and cultural ecosystem services, as well as aspects of biodiversity and terrestrial and marine designations. The land, coast and sea of Norfolk and Suffolk therefore make a substantial contribution to the total stock of England's natural assets.

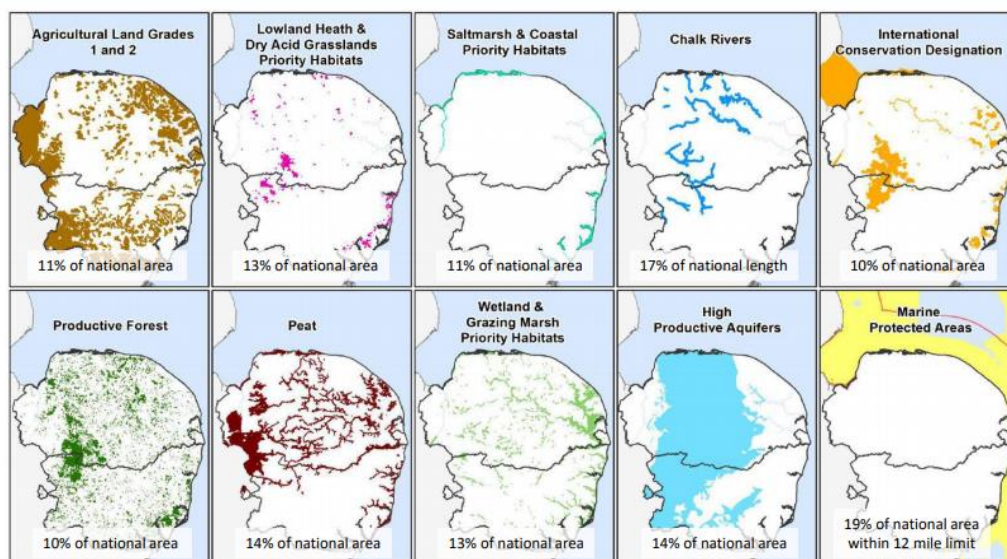


Figure 3, from the Compendium, shows the outcome of comparing the ten nationally important assets, shown above, against the key findings of the risk review.

### Figure 3

#### Risk of nationally important assets

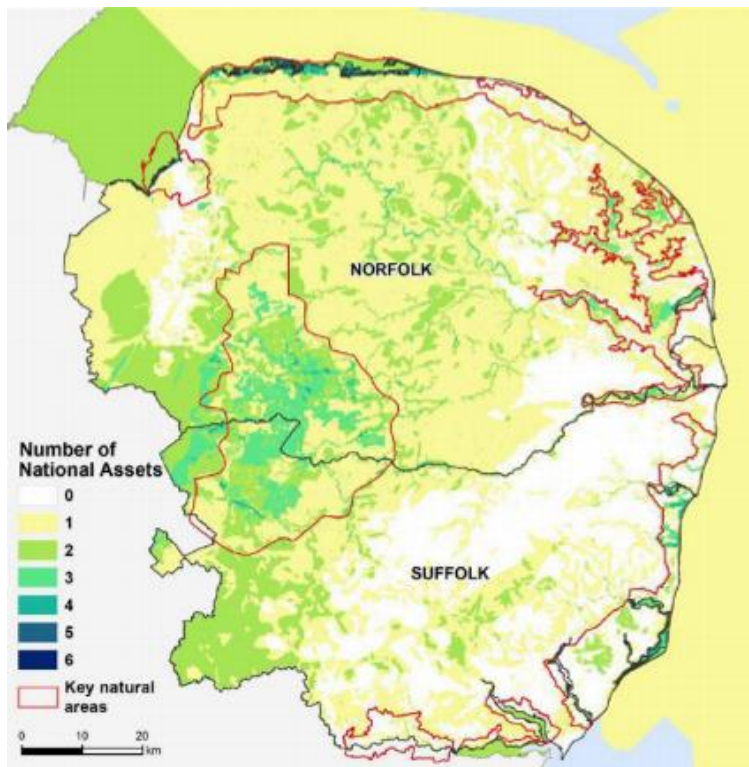
Risk Category	Nationally Important Assets
High	High productive aquifers
	Peat
	Saltmarsh & coastal habitats
	Wetlands & grazing marsh
Medium	Grade 1 & 2 agricultural land
	Productive forest
	Chalk rivers
	Marine Protected Areas
	International conservation designations
Low	Lowland heath & dry acid grasslands

Map 13 overlays the ten important assets and shows that much of the Broads is covered by at least one asset. The Compendium suggests that 'initiatives in areas currently without such assets (the 'white space' on the map) might well improve quality further afield and indeed may be places where the greatest benefits could be achieved from investments in the local environment'.



### Map 13

Overlay of the ten important assets



### 3.14 Recreation and Economy

Figure 4 is from the STEAM Report 2019, shows facts and figures about tourism in the Broads and surrounding area (area of influence).

**Figure 4**  
STEAM Report data from 2019

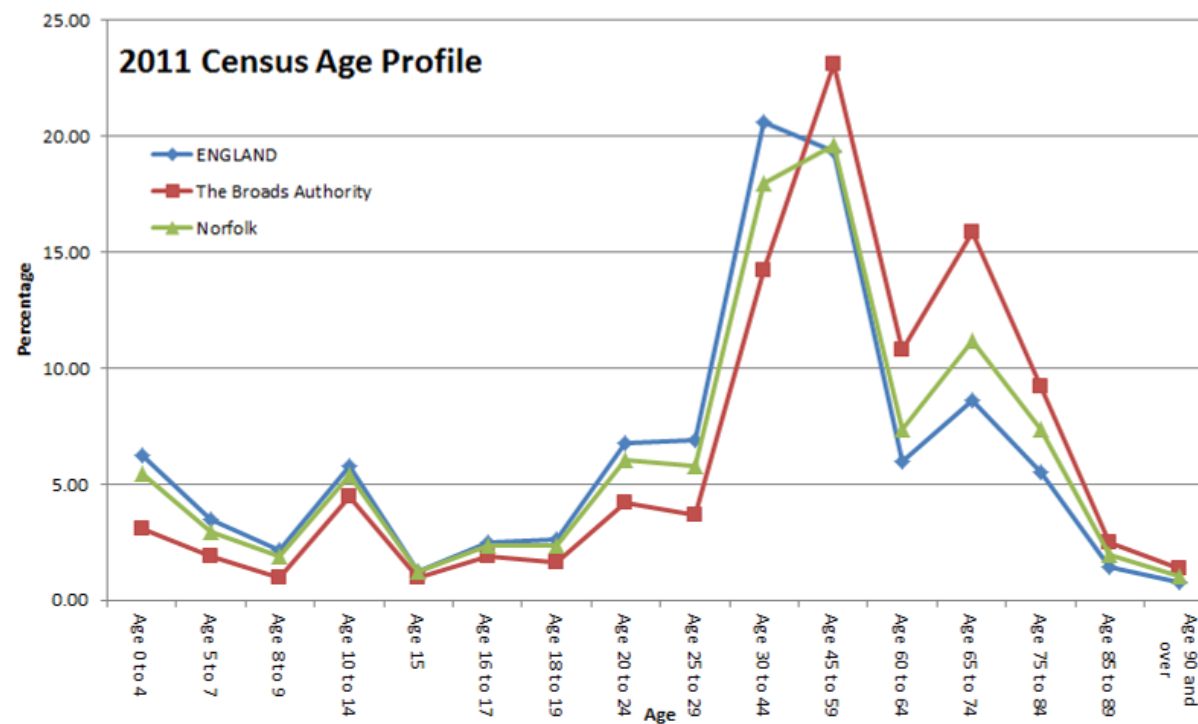


### 3.15 Demographic Profile

According to the 2011 Census, the population of the Broads Executive Area is 6,300 which is 6.7% (400 people) greater than the 2001 Census. With an area of 290 km<sup>2</sup>, the population density is 21.7 per km<sup>2</sup>. The population is markedly elderly, as shown in the Graph 1.

**Graph 1**

Census age profile



**Table 4**

Population comparisons between the 2001 and 2011 Census.

2001 Population	2011 Population	Population change	Population change (%)	Area (km <sup>2</sup> )	2011 Population density (per km <sup>2</sup> )
5,900	6,300	400	6.7	290	21.7

Compared to the other National Parks, the Broads has the second greatest increase in population (South Downs increase was 6.8%). Exmoor had a 5.5% decrease in population.

With regards to the percentage change in size of usual resident population by age between 2001 and 2011, Census 2011 information is shown in the table 5.

**Table 5**

Percentage change in size of usual resident population by age between 2001 and 2011

Age	0 - 14	15 - 29	30 - 44	45 - 59	60 - 74	75 and over
Change	-11.4	6.7	-13.8	-5.0	41.6	23.8

Compared to the other National Parks, the Broads had the greatest increase in change in the age category 75 and over.

The Broads Authority has the least percentage of households with dependent children when compared to the national average, neighbouring districts and other National Parks. Table 6 shows data from the 2011 Census.

**Table 6**

Percentage of households with dependent children

Area	Dependent children in household: All ages %	Dependent children in household: Age 0 to 4 %
The Broads Authority	16.2	5.2
National Park Average	21.7	7.1
Broadland	26.3	9
Great Yarmouth	27.6	10.6
South Norfolk	26.7	10
North Norfolk	20.7	7.4
Waveney	25.3	9.7
Norwich	23.3	11
England	29.1	11.8

Turning to Country of Birth, table 7 sets out the findings of the 2011 Census. The Broads is similar in Country of Birth to the other more rural districts in Norfolk.

**Table 7**

Country of birth (percentages)

Area	England	Northern Ireland	Scotland	Wales	United Kingdom not otherwise specified	Ireland	Other EU	Other countries
The Broads Authority	93.4	0.1	1.2	0.7	0.0	0.3	1.6	2.7
National Park Average	78.3	0.29	1.65	14.78	0.01	0.34	1.73	2.86
Broadland	93.6	0.3	1.3	0.7	0	0.3	1.4	2.5 Bottom of Form
Great Yarmouth	91.3	0.3	1.4	0.5	0	0.4	3.5	2.7 Bottom of Form
South Norfolk	92.9	0.3	1.3	0.7	0	0.3	1.8	2.8 Bottom of Form
North Norfolk	93.6	0.3	1.2	0.8	0	0.3	1.7	2.1 Bottom of Form
Waveney	94	0.2	1.3	0.7	0	0.3	1.5	2 Bottom of Form
Norwich	84.8	0.4	1.3	0.6	0	0.5	4.6	7.8 Bottom of Form
England	83.5	0.4	1.3	1	0	0.7	1.9	9.4 Bottom of Form

### 3.16 Economic Activity

On the subject of Economic Activity, table 8 shows the economically active and inactive according to the 2011 Census.

**Table 8**

Economically active and inactive according to the 2011 Census (percentage)

	Part-time	Full-time	Self-employed	Unemployed	Full-time student
The Broads Authority	13.1	30.9	16.3	3.0	1.7
National Park Average	13.9	30.5	20.1	2.4	1.9
England	13.7	38.6	9.8	4.4	3.4

The Broads area is on a par with other National Parks. Like the National Park average, the Broads has fewer full time but more people self-employed when compared to England's average.

**Table 9**

Economically Inactive and unemployed.

	Economically inactive %					Unemployed %	
	Retired	Student	Looking after home or family	Long-term sick or disabled	Other	Never worked	Long-term
The Broads Authority	24.2	2.6	3.1	3.5	1.5	0.3	1.0
National Park Average	20.3	3.3	3.1	2.8	1.6	0.2	0.9
England	13.7	5.8	4.4	4.0	0.8	0.7	1.7 Bottom of Form

The Broads area has a higher proportion of retirees and a lower proportion of students.

**Table 10**  
Professions

	Managers, directors, senior officials	Professional	Associate professional and technical	Admin and secretarial	Skilled trades	Caring, leisure and other service	Sales and customer service	Process, plant and machine operatives	Elementary
<b>The Broads Authority</b>	18.1	16.4	11.0	10.2	14.4	9.0	5.5	5.9	9.4
<b>National Park Average</b>	15.3	17.4	10.5	8.5	18.9	8.5	5.3	5.1	10.4
<b>England</b>	10.9	17.5	12.8	11.5	11.4	9.3	8.4	7.2	11.1 Bottom of Form

With regards to general occupations of residents in the Broads Area, according to the 2011 Census, the Broads has a high proportion of Managers and a low proportion of Elementary Occupations when compared to both England and other National Parks.

**Table 11**

Detailed occupation data

Area name	A Agriculture, forestry and fishing	B Mining and quarrying	C Manufacturing	D Electricity, gas, steam and air conditioning supply	E Water supply; sewerage, waste management and remediation activities	F Construction	G Wholesale and retail trade; repair of motor vehicles and motor cycles	H Transport and storage	I Accommodation and food service activities	J Information and communication	K Financial and insurance activities	L Real estate activities	M Professional, scientific and technical activities	N Administrative and support service activities	O Public administration and defence; compulsory social security	P Education	Q Human health and social work activities	R, S, T, U Other
The Broads Authority	3.8	0.9	9.7	0.4	0.8	7.8	13.9	3.6	7.2	2.6	3.1	1.6	6.7	5.5	4.9	9.3	12.5	5.8
National Park Average	7.5	0.5	6.9	0.4	0.6	8.1	12.9	3.0	10.7	2.4	1.9	1.6	6.4	4.2	5.1	10.3	11.4	5.9
Broadland	1.4	0.3	8.8	0.5	0.7	9.7	17.6	4.0	4.8	2.6	6.4	1.4	5.2	4.1	5.8	8.9	13.3	4.6
Great Yarmouth	1.1	1.6	9.4	0.6	0.7	8.1	18.0	4.9	9.5	1.2	2.0	0.9	4.8	4.7	4.4	7.7	14.7	5.4
North Norfolk	3.7	0.3	9.3	0.5	0.7	9.1	17.5	3.7	7.9	1.6	2.3	1.4	4.9	4.6	4.2	9.2	13.1	5.8
Norwich	0.3	0.1	6.9	0.2	0.6	6.3	17.2	3.6	7.5	3.4	6.4	1.3	5.9	4.7	4.7	11.5	13.9	5.5
South Norfolk	3.0	0.2	9.3	0.3	0.6	8.8	16.1	3.8	4.3	2.5	5.2	1.6	6.5	3.9	5.4	10.6	13.4	4.5
Waveney	1.6	1.1	11.6	1.1	1.1	9.3	17.4	4.1	7.1	1.4	2.0	1.2	5.1	4.5	4.8	9.0	12.9	4.8

More detailed occupation data from the 2011 census shows the main industry in the Broads wholesale and retail trade.



With regards to out of work benefits claimants<sup>1</sup>, table 12 shows the claimants for February 2021. The trend can be seen on [nomisweb](http://nomisweb) by adding the ward name. Rates are high at the moment, and this is likely to be as a result of COVID19 and the various restrictions.

**Table 12**

Out of work benefits claimants

Ward	Total JSA claimants Feb 2021
33UCGN: Acle	4.5%
33UCGQ: Blofield with South Walsham	3.4%
33UCGR: Brundall	4.1%
33UCGT: Buxton	2.7%
33UCGU: Coltishall	3.8%
33UCHE: Marshes	3.9%
33UCHQ: Thorpe St Andrew South East	4.2%
33UCHR: Wroxham	3.7%
33UDFY: Bradwell North	4.3%
33UDGB: Caister South	6.4%
33UDGE: East Flegg	6.7%
33UDGF: Fleggburgh	4.3%
33UDGL: Ormesby	6.3%
33UDGP: West Flegg	5.1%

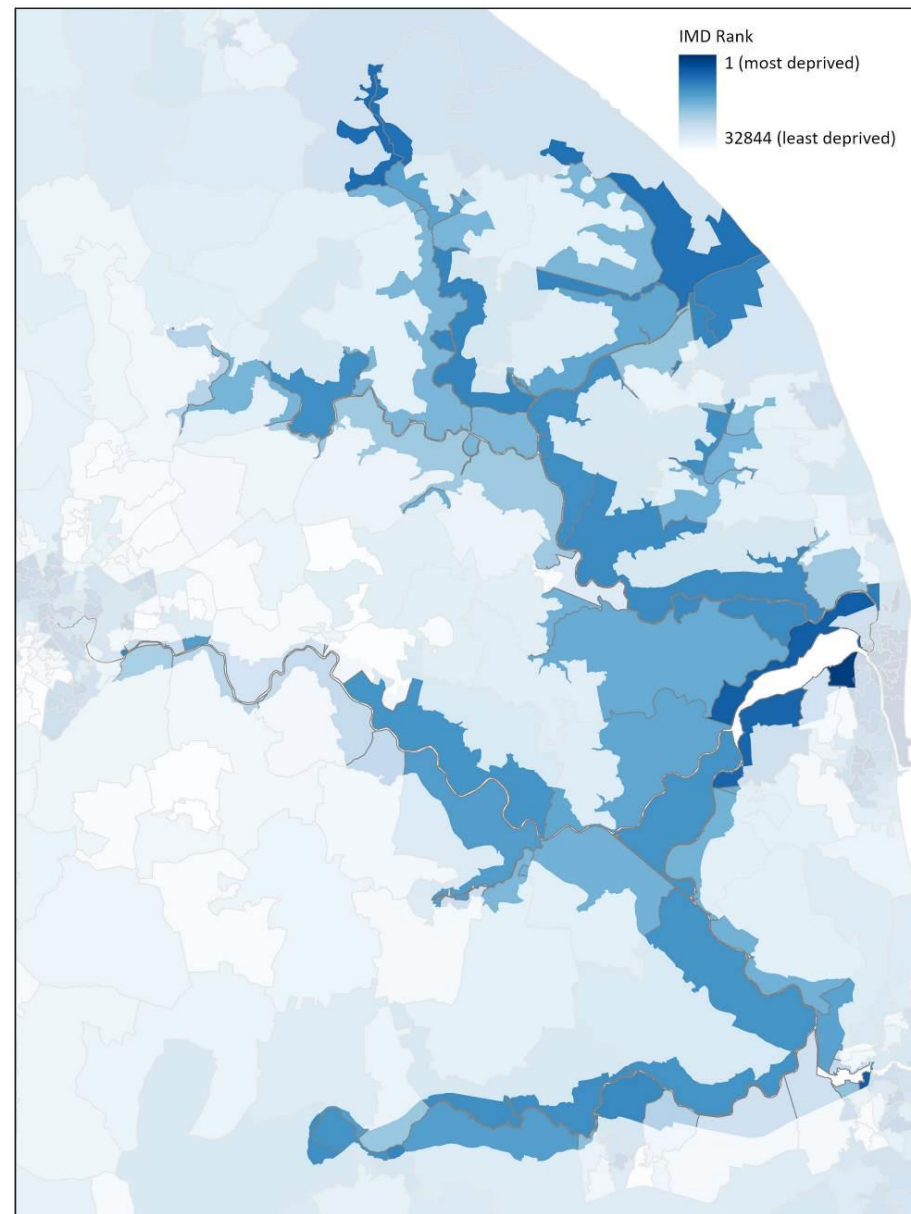
<sup>1</sup> The Claimant Count is the number of people claiming benefit principally for the reason of being unemployed. This is measured by combining the number of people claiming Jobseeker's Allowance (JSA) and National Insurance credits with the number of people receiving Universal Credit principally for the reason of being unemployed. Claimants declare that they are out of work, capable of, available for and actively seeking work during the week in which the claim is made. The measure of the number of people receiving Universal Credit principally for the reason of being unemployed is still being developed by the Department for Work and Pensions. Consequently this component of the total Claimant Count does not yet correctly reflect the target population of unemployed claimants and is subject to revisions. For this reason the Claimant Count is currently designated as Experimental Statistics. The Claimant Count is mostly derived from DWP administrative systems. For various reasons, e.g. a claimant's National Insurance number is not known, a small number of claims have to be dealt with manually. These clerical claims do not have as much detail as the computerised claims and therefore, whilst part of the claimant count by sex table, cannot be included the age breakdown. [www.nomisweb.co.uk](http://www.nomisweb.co.uk)

Ward	Total JSA claimants Feb 2021
33UFGY: Happisburgh	4.9%
33UFHB: Hoveton	5.1%
33UFHM: Scottow	3.1%
33UFHR: Stalham and Sutton	5.6%
33UFHX: Waterside	4.9%
33UFHY: Waxham	4.9%
33UHHA: Chedgrave and Thurton	4.9%
33UHHF: Ditchingham and Broome	2.7%
33UHHG: Earsham	3.3%
33UHHK: Gillingham	4.4%
33UHHQ: Loddon	5.2%
33UHHY: Rockland	3.3%
33UHJC: Stoke Holy Cross	3.1%
33UHJF: Thurlton	4.6%
42UHFY: Beccles North	5.8%
42UHGB: Bungay	5.7%
42UHGD: Carlton Colville	3.7%
42UHGE: Gunton and Corton	4.6%
42UHGK: Lothingland (GYBC)	6.4%
42UHGN: Oulton Broad (Whitton)	5.1%
42UHGT: Wainford	4.2%
42UHGW: Worlingham	3.3%

### 3.17 Deprivation

Indices of Multiple Deprivation are often used to highlight those areas most likely to suffer from social exclusion. Map 14, 15 and 16 reflect the most recent Indices of Multiple Deprivation data (2019) at Lower Super Output Area. The English Indices of Deprivation 2019 provide a relative measure of deprivation at small area level across England. Areas are ranked from least deprived (green) to most deprived (red) on seven different dimensions of deprivation and an overall composite measure of multiple deprivation. There are several data sets, however three are displayed in map format at maps 14, 15, 16.

Index of Multiple Deprivation



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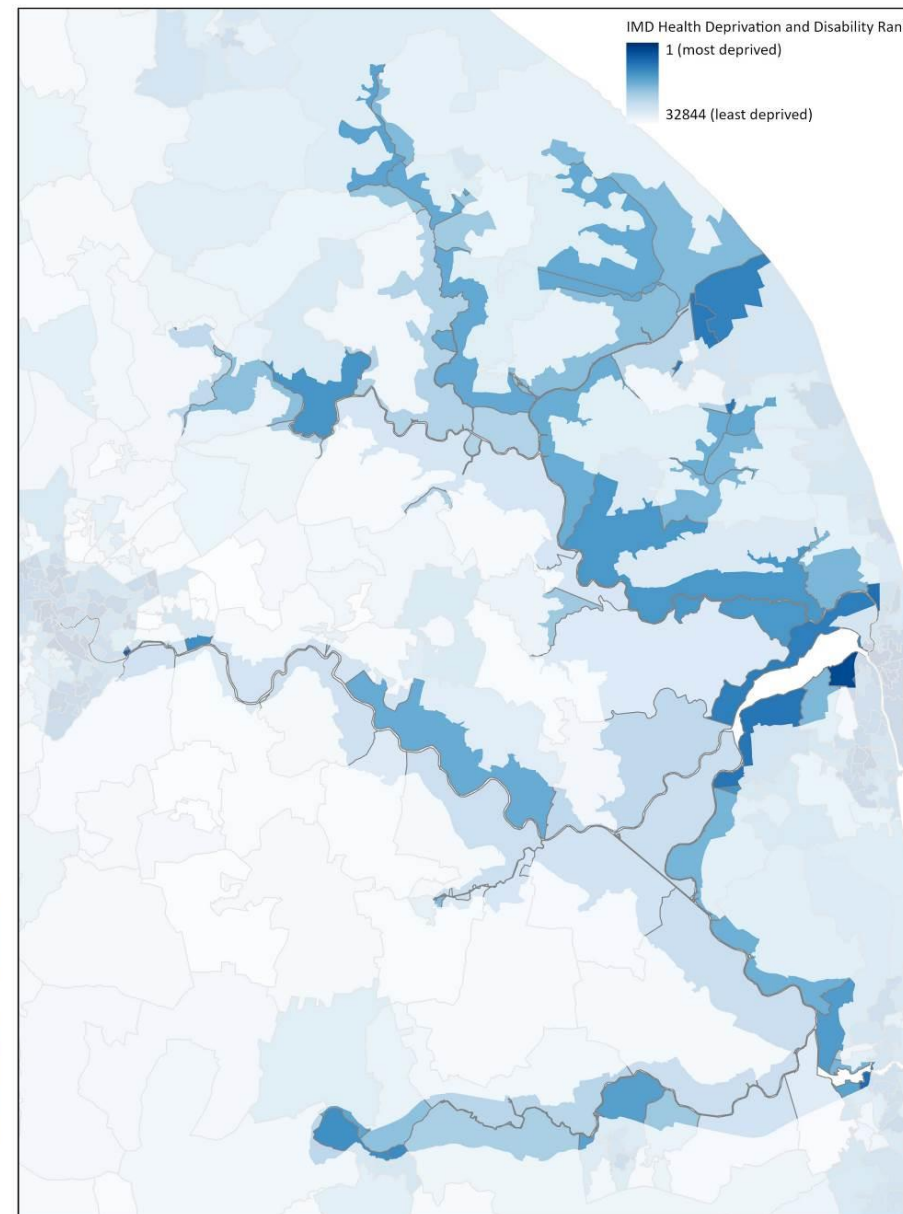
#### Map 14

Index of Multiple Deprivation for the Broads.

The IMD 2010 was constructed by combining the seven transformed domain scores, using the following weights:

- \*Income (22.5%)
- \*Employment (22.5%)
- \*Health and Disability (13.5%)
- \*Education, Skills and Training (13.5%)
- \*Barriers to Housing and Services (9.3%)
- \*Crime (9.3%)
- \*Living Environment (9.3%)

Index of Multiple Deprivation



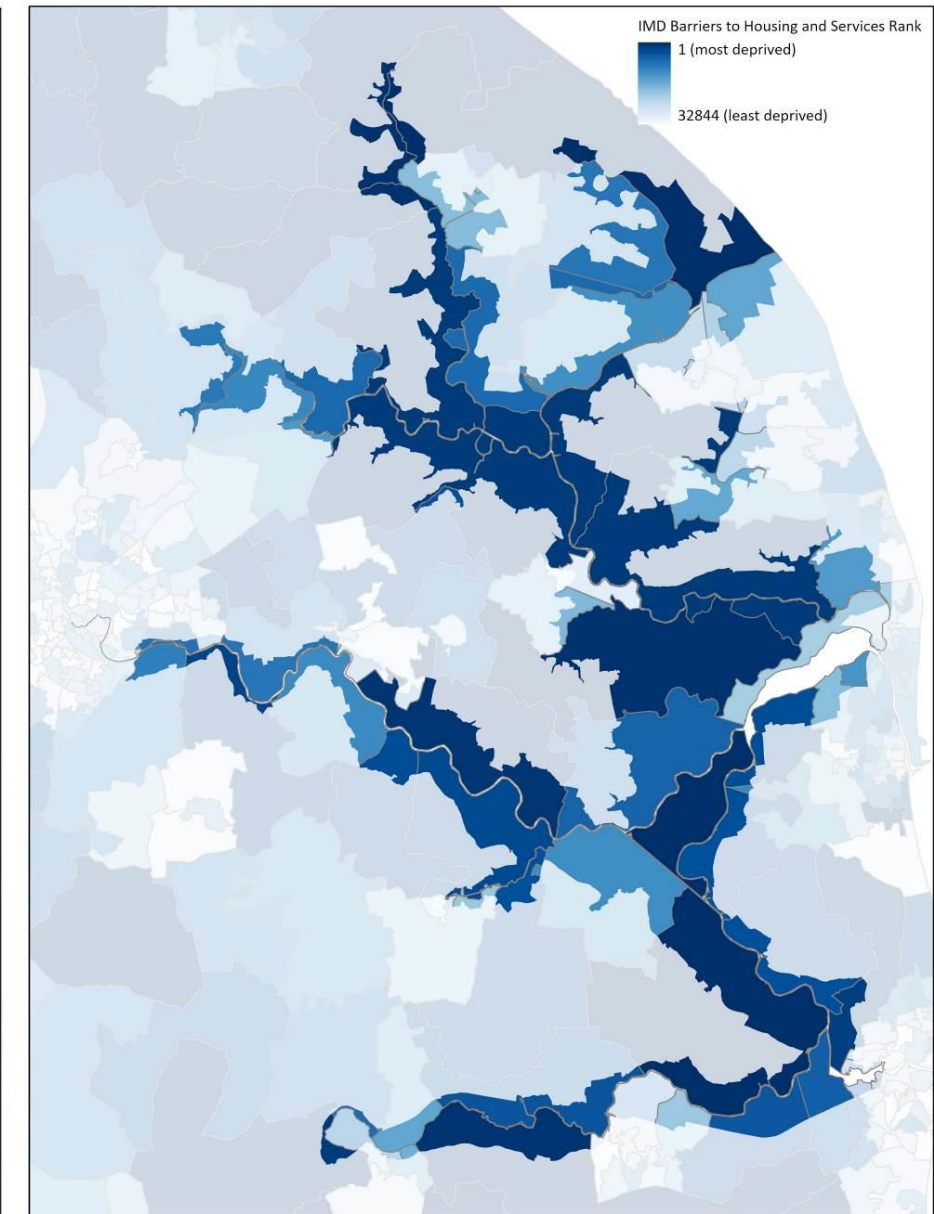
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#### Map 15

Health Deprivation and Disability Rank for the Broads Authority

In the main, the Broads area reflects the rest of the surrounding areas.

Index of Multiple Deprivation



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#### Map 16

Barriers to housing and services for the Broads

Map 16 shows much dark blue, although in Norfolk, the Broads is not alone in having barriers to houses and services. .

## 3.18 Housing

### 3.18.1 Accommodation Type

According to the 2011 Census, the Broads Area has the accommodation types set out in tables 13 and 14.

**Table 13**

Accommodation types

	Whole house or Bungalow						Flat, maisonette or apartment		Caravan or other mobile or temporary structure	
	Detached		Semi-detached		Terraced (inc. end terrace)					
	Number	%	Number	%	Number	%	Number	%	Number	%
The Broads Authority	1,900	53.6	700	19.3	400	11.9	440	12.1	110	3.2
National parks	89,800	44.2	50,430	24.8	39,500	19.4	21,100	10.4	2,420	1.2
England and Wales	5,512,300	22.6	7,506,350	30.7	6,028,300	24.7	5,276,620	21.6	106,010	0.4

A greater number proportion of residents in the Broads live in detached properties than in other National Parks and nationally, with fewest in terraced properties.

**Table 14**

Property ownership

	Owned outright	Owned with a mortgage or loan	Shared ownership (part owned and part rented)	Social rented: Rented from council (Local Authority)	Social rented: Other	Private rented: Private landlord or letting agency	Private rented: Other	Living rent free
The Broads Authority	48.2	23.3	0.4	2.4	3.0	18.0	2.0	2.7
National Park Average	45.9	24.5	0.5	4.0	5.9	13.7	2.4	3.0

While the level of owner occupation is roughly similar to that for the English National Parks average, the level of outright ownership (without a mortgage) in the Broads is significantly higher than each of the comparator averages. The level of private renting in the Broads is higher, and the level of social housing (council and housing association, etc.) significantly lower, than the averages for the English National Parks.

### 3.18.2 Residential Development in the Broads

Housing development in the Broads typically comprises primarily replacement dwellings or conversion to dwellings and small infill development. This applies both to permanent residential properties and holiday accommodation. A small number of new houses are permitted each year. A major constraint on housing development is flood risk and the application of national planning policy in relation to this.

The number of dwellings permitted in the Broads is given below (taken from Broads Authority Annual Monitoring Report):

- 2020/2021 – 7 net new residential dwellings and 0 holiday homes.
- 2019/2020 – 13 net new residential dwellings and 8 holiday dwellings.
- 2018/2019 – 6 net new residential dwellings and 7 holiday dwellings.
- 2017/2018 – 10 net new residential dwellings and 16 holiday dwellings.
- 2016/2017 – 4 net new residential dwellings and 8 holiday dwellings.

Settlements in the Broads are often dominated by the importance of the waterways, with their associated trades and activities. Villages are typically centred around the staithe, with building designs that reflect their special functions, whether connected with riverside trade or management of the land.

Housing costs in the Broads are generally very high, because of the attractiveness of the area. The high cost of housing could impact on the economy of the Broads, as it affects those traditional trades such as agriculture and boat manufacture. Reed and sedge cutters have also indicated the importance of the proximity of living close to the reed and sedge beds. Because of the relative remoteness of parts of the Broads, housing and services in general are in some cases less accessible than elsewhere in the Norfolk and Suffolk counties.

All six Housing Authorities in the Broads area have identified a need for additional local affordable housing, but it will be rarely possible to provide this within the Broads because of the flood risk in most of the area and high land values.

3.18.3 Household Composition

**Table 15**

Household composition

	One person household: Aged 65 and over	One person household: Other	One family only: All aged 65 and over	One family only: Married or same-sex civil partnership couple: No children	One family only: Married or same-sex civil partnership couple: Dependent children	One family only: Married or same-sex civil partnership couple: All children non-dependent	One family only: Cohabiting couple: No children	One family only: Cohabiting couple: Dependent children	One family only: Cohabiting couple: All children non-dependent	One family only: Lone parent: Dependent children	One family only: Lone parent: All children non-dependent	Other household types: With dependent children	Other household types: All full-time students	Other household types: All aged 65 and over	Other household types: Other
National Park Average	15.5	14.6	12.9	18.3	13.3	5.6	4.8	3.1	0.4	3.7	2.7	1.6	0.0	0.5	3.0
The Broads Authority	16.0	16.6	14.3	19.0	9.3	5.3	5.9	3.0	0.6	2.7	2.1	1.3	0.0	0.5	3.4
Broadland	14.1	12.3	12.6	16.8	16.2	6.3	5.5	3.9	0.5	4.9	2.7	1.3	0.0	0.3	2.6
Great Yarmouth	14.8	15.0	10.3	13.4	12.0	5.8	4.9	5.7	0.7	7.7	3.4	2.2	0.0	0.3	3.7
North Norfolk	17.9	13.2	15.2	16.5	11.1	5.0	4.9	3.8	0.5	4.3	2.7	1.4	0.0	0.6	2.8
Norwich	12.7	25.4	6.0	9.7	9.8	3.3	7.7	4.7	0.4	7.3	3.0	1.5	2.4	0.2	5.9
South Norfolk	13.5	12.8	12.5	16.8	16.4	5.7	6.0	4.1	0.5	4.9	2.6	1.3	0.0	0.4	2.5
Waveney	16.3	14.6	12.6	14.4	12.4	5.2	5.0	4.8	0.6	6.2	3.1	1.8	0.0	0.3	2.5

The percentage of one family only with no children in the Broads slightly higher than the National Park Average, but much higher than constituent councils. The percentage of lone parent with dependent children is much lower than constituent councils. Around a hundred residents live in around 10 private residential care homes in the Broads. There are no NHS, local authority, housing association, children's home, or psychiatric communal residential establishments in the Broads.

### 3.19 Access and Transport

#### 3.19.1 Access

The Broads is a living and working environment, and because of its geography there is a high level of inter-dependence with the surrounding areas. Although the population within the area is small, and includes a high proportion of retirees, there are many adjacent villages and communities that are economically dependent on the Broads and are part of its social and cultural network. Conversely, many of those who live within the Broads boundaries rely on facilities and employment in the surrounding villages, towns and city.

Access to facilities and services is critical for the well-being of the local population and the continued enjoyment of the Broads by its many visitors. Improvement and maintenance of safe access for all to facilities, services and recreational facilities have been identified as a key issue.

Access to the Broads is of varied quality, and is difficult, without private transport, to many parts of the area. Due to the geography and network of waterways, much of the Broads area is also relatively difficult to access and the best – and sometimes only – way to reach certain parts of the system is by water. Moreover, links between land and water-based recreational provisions are not as plentiful as they might be. Nevertheless, there are 29km of Bridleways and 291km of footpaths. There are also many community transport schemes based in and around Broads villages. For example, Acle Area Ring and Ride flexi bus serves the villages of Martham, Ormesby, Rollesby, Thurne, Filby, Fleggburgh, Stokesby, Thrigby, Clippesby, Upton, Pilsen Green, South Walsham, Ranworth, Woodbastwick, Salhouse and Wroxham. Another example is Transport Plus which is a unique public transport service provided jointly by Norfolk County Council, East of England Ambulance Service and NHS Norfolk assisting adult members of the public to access essential health, social and wellbeing services. There is also Beccles and Bungay Area Community Transport.

The Broads area is crossed by a number of major transportation links, including the A47 trunk road east of Norwich, the A12 south of Great Yarmouth, and a number of other important roads. Despite this, access to the villages, rivers and Broads is usually off minor roads, as the area is predominantly rural in nature.

#### 3.19.2 Car Ownership

Looking at car ownership figures from the 2011 Census, in the no, 1 and 2 cars or vans categories, the Broads area is similar to other rural districts of Norfolk. The proportion of households with 3 or more cars is greatest in the Broads when compared to the other areas in table 16.

**Table 16**

Car ownership (percentages)

	No cars or vans in household	1 car or van in household	2 cars or vans in household	3 cars or vans in household	4 or more cars or vans in household
The Broads Authority	12.4	40.7	32.3	10.3	4.3
National Park Average	11.9	40.8	33.6	9.6	4.1
Broadland	11.4	44.4	33.5	7.8	2.9
Great Yarmouth	27.2	44.8	21.2	5	1.8
South Norfolk	11.7	42.4	34.3	8.4	3.3
North Norfolk	16.2	46.1	28.1	6.9	2.7
Waveney	21.9	46.4	24.3	5.6	1.9
Norwich	33.4	47.6	15.8	2.5	0.7
England	25.8	42.2	24.7	5.5	1.9

Most visitors to the Broads arrive by private car, causing seasonal congestion during the summer travel period, particularly in and around towns acting as a focus for attractions and which provide easy access to the rivers or Broads. The result is increased pressure on the area in terms of demands for visitor attractions, accommodation, road space and parking. This creates a contradictory impression to visitors who expect the Broads to be tranquil and not an area of dense traffic and congestion.

### 3.19.3 Rail

There are three railway lines that cross the Broads – these serve many of the smaller settlements between Norwich, Great Yarmouth and Lowestoft. The Bittern Line goes north from Norwich via Wroxham, whilst the Wherry Line service runs from Norwich to Great Yarmouth and Lowestoft. Service improvements on the latter resulted in a marked increase in the use of the line. There is also a route from Lowestoft south to Ipswich, with a connection to London Liverpool Street, giving a total journey time of less than three hours.



### 3.19.4 Air

Norwich International Airport is within a few miles of the western edge of the Broads and offers an increasing number of commercial and low-cost flights. However, air traffic from the airport remains relatively low, and the Broads has as yet not suffered the adverse impacts of air traffic on tranquillity and quiet enjoyment that affect several UK national parks. Stansted Airport is well connected to the area by rail and road.

### 3.19.5 Travel to work by Car

According to the 2001 Census, the Broads has a higher level of travel to work by car, and a lower level of travel on foot than the English National Parks', Norfolk county's and England's averages. The level of cycling to work in the Broads is about the national average, but this is around half the Norfolk average though higher than any of the English National Parks. At the time of writing, 2011 Census Travel to Work data was not available.

### 3.19.6 Road Traffic Incidents

Maps 17 and 18 show data relating to road traffic collisions in the Broads Authority Area.

#### Norfolk

Source: Norfolk County Council.

Covering 01/11/2017 to 31/10/2020

Legend:

The icons with the red outlined shapes and "P" are collisions involving pedestrians.

Fatal Collision:  Serious Collision:  Slight Collision:  Numbers inside the shapes are accident references.

**Table 17 and 18**

**Accident severity and casualty severity**

Accident Severity

	2017	2018	2019	2020	Total
Fatal	0	0	0	1	1
Serious	0	10	10	9	29
Slight	5	27	25	23	80
Total	5	37	35	33	110

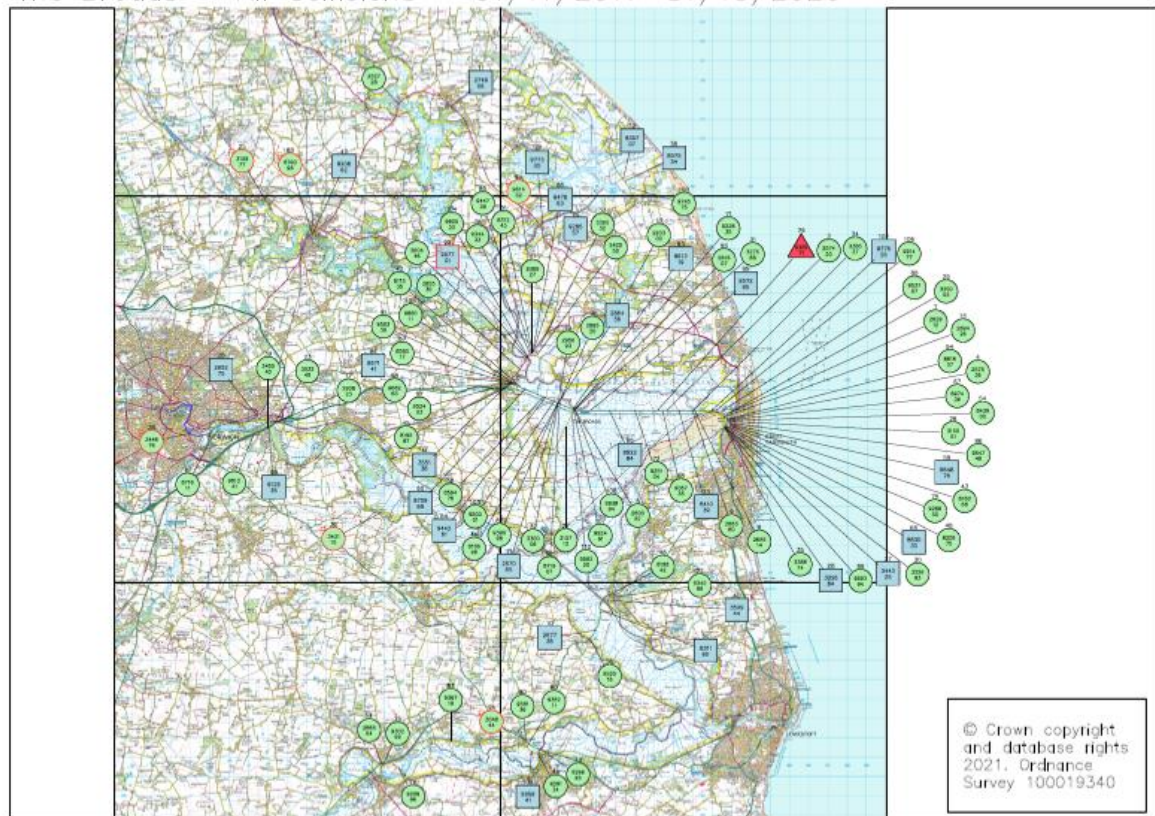
Casualty Severity

	2017	2018	2019	2020	Total
Fatal	0	0	0	2	2
Serious	0	10	11	12	33
Slight	10	62	45	56	173
Total	10	72	56	70	208

**Map 17**

**Traffic incidents in the Norfolk part of the Broads**

The Broads – All Collisions – 01/11/2017–31/10/2020



**Suffolk**

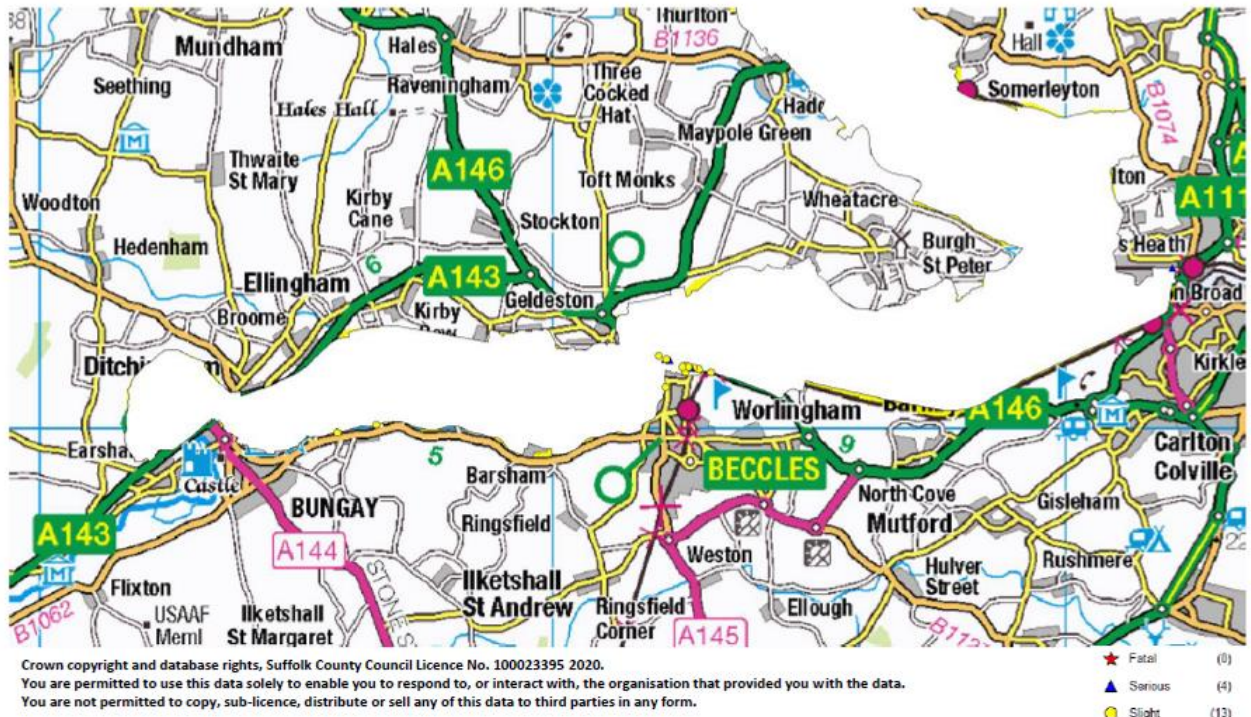
**Map 18**

Traffic incidences in Suffolk part of the Broads Authority

Source: Suffolk County Council.

Covering 01/11/2017 to 31/10/2020

**Road accidents between 1/11/2017 and 31/10/2020**



**3.19.7 Water**

**Table 19**

Public moorings (m) in the Broads. (Source: Broads Authority Asset Management figures).

	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/8	2018/9
Total Length	7778.6m	7824.6m	7847.6m	7814.5	7568.50	7568.50	7760.30	8456.3	8625.8

### 3.19.8 Boat Usage

**Table 20**

Boat usage

Source: Broads Authority Tolls Team.

<b>PRIVATE BOATS</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Motor Cruisers	4,852	4,893	4,945	4,967	5,059	5,091	5,086	5,110	5,079	5,083
Auxiliary Yachts	1,215	1,212	1,188	1,166	1,168	1,152	1,127	1,132	1,093	1,107
Day Launches	562	549	542	521	514	504	495	556	574	558
Outboard Dinghies	1,083	1,112	1,058	1,043	1,062	1,016	962	1,064	1,060	1,058
Workboats	170	175	179	188	180	172	156	158	156	153
Passenger Vessels SPB		<i>Small Passenger Boats (Charitable Trusts &amp; Ferries)</i>						22	21	23
<b>TOTAL MOTOR BOATS:</b>	<b>7,882</b>	<b>7,941</b>	<b>7,912</b>	<b>7,885</b>	<b>7,983</b>	<b>7,935</b>	<b>7,826</b>	<b>8,042</b>	<b>7,983</b>	<b>7,982</b>
Sailing Craft	1,298	1,275	1,262	1,214	1,230	1,191	1,107	1,076	1,081	1,023
Rowing Craft	1,622	1,704	1,701	1,636	1,578	1,532	1,513	1,483	1,513	1,545
Houseboats	26	21	23	33	27	33	45	45	49	52
<b>Total</b>	<b>10,828</b>	<b>10,941</b>	<b>10,898</b>	<b>10,768</b>	<b>10,818</b>	<b>10,691</b>	<b>10,491</b>	<b>10,646</b>	<b>10,626</b>	<b>10,602</b>
<b>HIRE BOATS</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Motor Cruisers	878	904	894	869	842	821	789	802	806	801
Auxiliary Yachts	47	47	46	46	47	43	44	45	46	44
<b>ALL CABIN HIRE BOATS:</b>	<b>925</b>	<b>951</b>	<b>940</b>	<b>915</b>	<b>889</b>	<b>864</b>	<b>833</b>	<b>847</b>	<b>852</b>	<b>845</b>
Day Launches	296	307	294	289	299	290	295	290	301	297
Outboard Dinghies	8	5	4	7	8	10	11	9	9	8
Passenger Vessels MCA	12	11	13	11	10	10	6	6	6	6
Passenger Vessels SPB		<i>Small Passenger Boats (Commercial)</i>						6	7	7
<b>TOTAL MOTOR BOATS:</b>	<b>1,241</b>	<b>1,274</b>	<b>1,251</b>	<b>1,222</b>	<b>1,206</b>	<b>1,174</b>	<b>1,145</b>	<b>1,158</b>	<b>1,175</b>	<b>1,163</b>
Sailing Craft	120	117	110	109	110	108	102	101	95	87
Rowing Craft	170	179	184	188	175	184	192	191	194	193
Houseboats	16	15	16	16	16	16	16	28	26	26
<b>Total</b>	<b>1,547</b>	<b>1,585</b>	<b>1,561</b>	<b>1,535</b>	<b>1,507</b>	<b>1,482</b>	<b>1,455</b>	<b>1,478</b>	<b>1,490</b>	<b>1,469</b>
<b>Grand Total</b>	<b>12,375</b>	<b>12,526</b>	<b>12,459</b>	<b>12,303</b>	<b>12,325</b>	<b>12,173</b>	<b>11,946</b>	<b>12,124</b>	<b>12,116</b>	<b>12,071</b>

The numbers of boats on the Broads has reduced gradually.

### 3.20 Health

**Table 21**

Those who completed the Census were asked to rate their health. Source: 2011 Census.

	<b>Very Good Health</b>	<b>Good Health</b>	<b>Fair Health</b>	<b>Bad Health</b>	<b>Very Bad Health</b>
Broadland	44.3	37	14	3.6	1.1
Great Yarmouth	40.3	36	16.6	5.5	1.6

	Very Good Health	Good Health	Fair Health	Bad Health	Very Bad Health
North Norfolk	38.9	37.8	17.2	4.8	1.4
Norwich	44.9	35.4	14.1	4.4	1.2
South Norfolk	46.4	35.8	13.4	3.5	1
Waveney	41.1	36.3	16.1	5.1	1.5
Broads Authority	39.9	38.1	16.0	4.8	1.3

### 3.21 Crime

Source: Norfolk Policy, March 2021.

- Between 1st January 2018 to 31st December 2020 there has been a total of 247 crimes reported across the Broads in Norfolk and Suffolk.
- The yearly figures have remained relatively constant with a mean average of 82 crimes per year.
- The peak times for crime to be committed is during the summer months. This coincides with the high season on the Broads when the public visit the area for a holiday.
- Theft accounts for 47 of total crime committed in the past 3 years. This includes the theft of various types of property such as boats, outboard engines, navigational equipment and fuel.
- Crime has been reported from locations across the whole of the Broads however there are repeat locations. These include Oulton Broad, Wroxham, Potter Heigham, Trowse, Brundall and Beccles.
- Of the five districts that cover the Broads, East Suffolk has reported the highest number of crimes in the last 3 years (73). This is reflected by the hot spot seen at Oulton Broad.
- In Norfolk, Broadland district has reported the most crime (69).
- In addition to the crimes reported on The Broads, there has been 23 marine crimes along the River Wensum in Norwich City Centre. A third of these are located around the Yacht Station on Riverside Road.

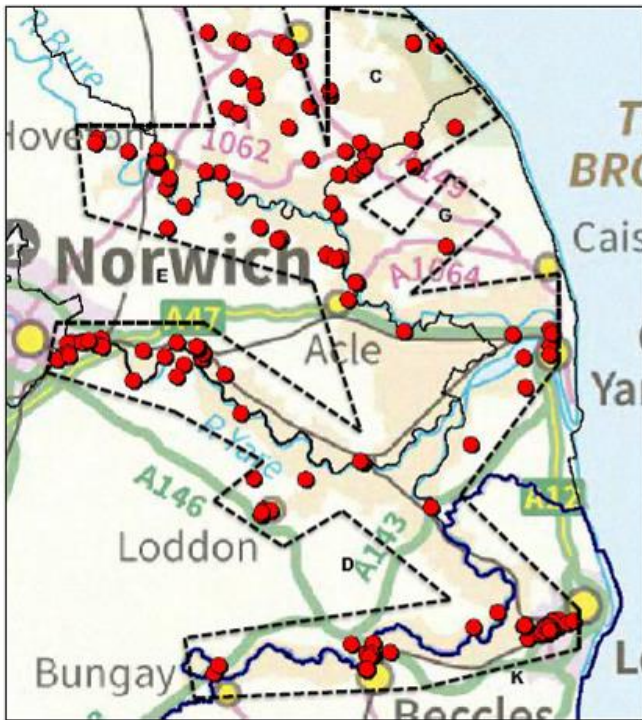
- A quarter of the crime reported in Norwich is theft. The property reported stolen include kayak, boats and canoes.

**Map 19**

Crime on the Broads in Norfolk and Suffolk



Crime on the Broad in Norfolk and Suffolk



Map 1: location of crimes reported in the area of the Broads. The Broads have been outlined using a dashed line.

**KEY**

Crime  
 ● Point

Suffolk/Norfolk boarder  
 [Blue line] Region

District boundary  
 [Black line] Region

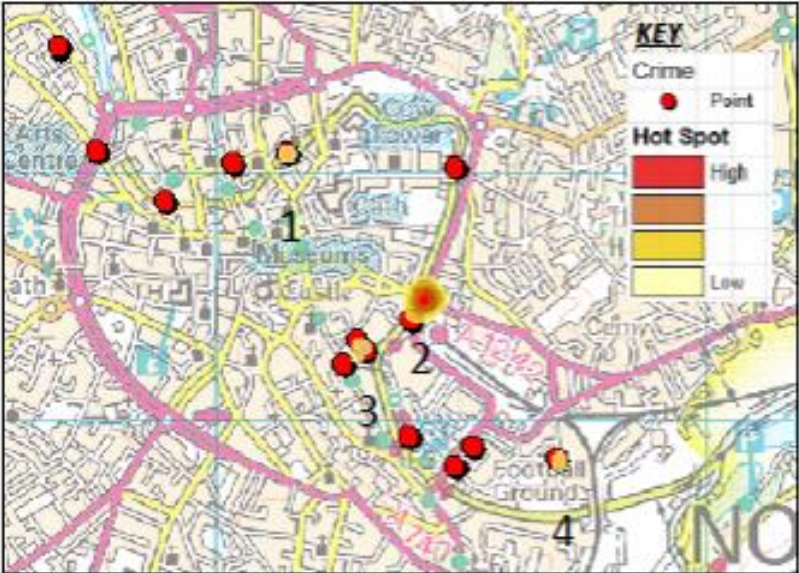
----- Approximate outline of the Broads

**Districts**

- C North Norfolk district
- D South Norfolk district
- E Broadland district
- G Great Yarmouth district
- K East Suffolk district

**Map 20**  
Crime in Norwich

### Crime in Norwich



*Map 3: location of crimes reported on or along the banks of the River Wensum in Norwich only. The hotspots highlight repeat locations.*

### 3.22 Qualifications

**Table 22**

Qualifications. Source: 2011 Census.

Area name	None	Level 1 highest	Level 2 highest	Apprenticeship highest	Level 3 highest	Level 4 highest	Other highest	School children and full-time students age 1`6 to 17	School children and full-time students 18 and over	Full-time students 18 to 74: economically active in employment	Full-time students 18 to 74: economically active unemployed	Full-time students 18 to 74: economically inactive
Broads Authority	23.8	12.3	15.6	5.3	11.1	27.9	4.0	1.8	1.7	0.8	0.1	0.8
National Park Average	19.8	11.8	15.6	3.9	11.2	33.6	4.0	2.4	2.0	0.8	0.1	1.1
Broadland	22.9	14.8	17.5	5.5	12.0	23.2	4.3	2.6	2.1	1.1	0.1	0.8
Great Yarmouth	32.8	15.7	16.1	4.7	10.6	14.2	5.9	2.6	2.5	1.0	0.3	1.2
North Norfolk	27.5	14.1	16.2	4.7	10.5	22.3	4.7	2.2	1.5	0.7	0.1	0.7
Norwich	22.6	12.8	13.8	2.6	15.2	27.7	5.2	1.9	11.6	3.3	1.0	7.3
South Norfolk	22.6	13.6	17.1	4.2	11.5	27.0	4.0	2.7	2.1	1.0	0.1	1.0
Waveney	29.8	14.2	16.2	5.4	11.7	17.9	4.7	2.6	2.1	0.9	0.3	0.9

The Broads has a greater proportion with no qualifications than the National Park Average.



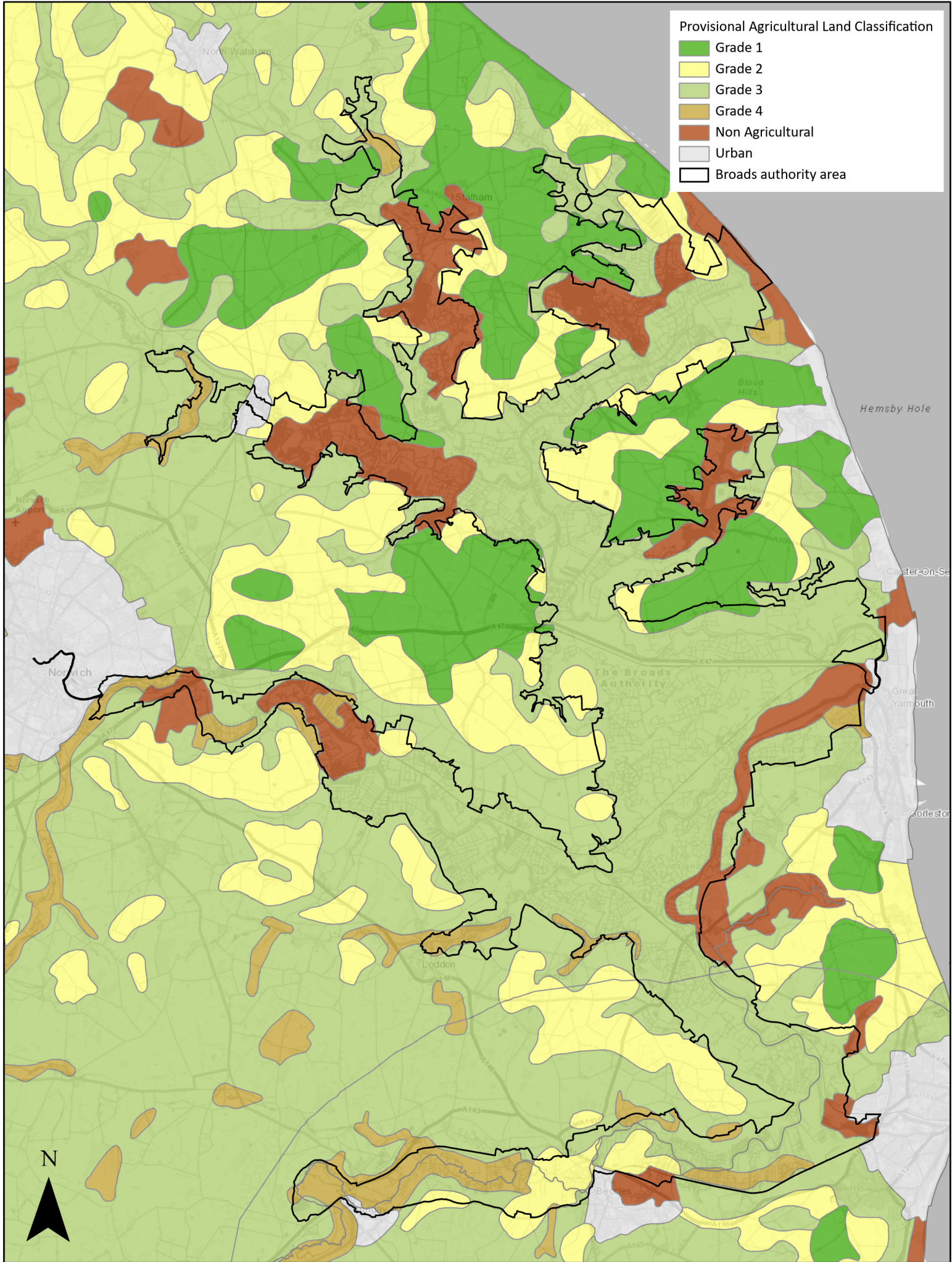
### 3.23 Ethnic Group

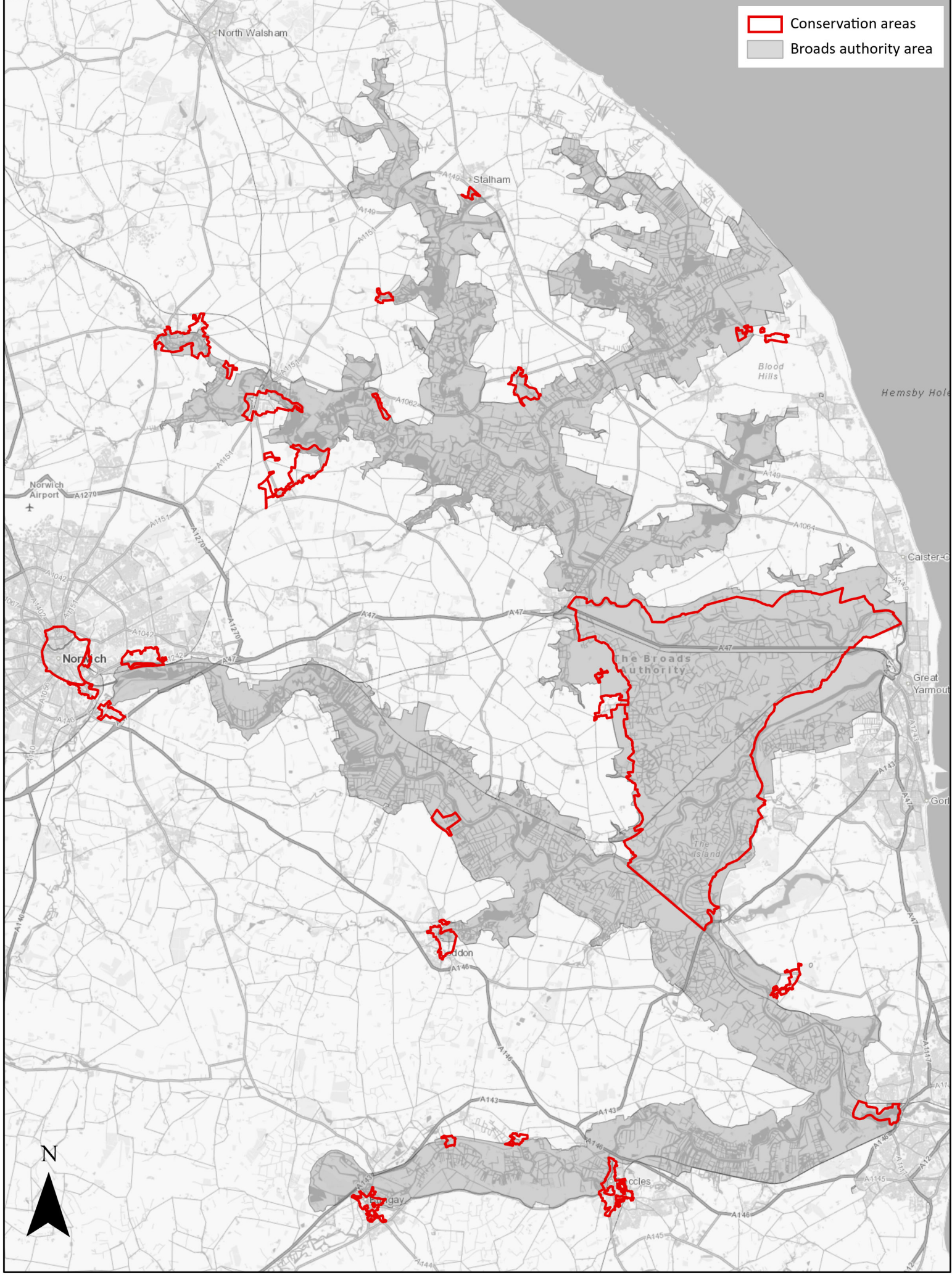
Table 23

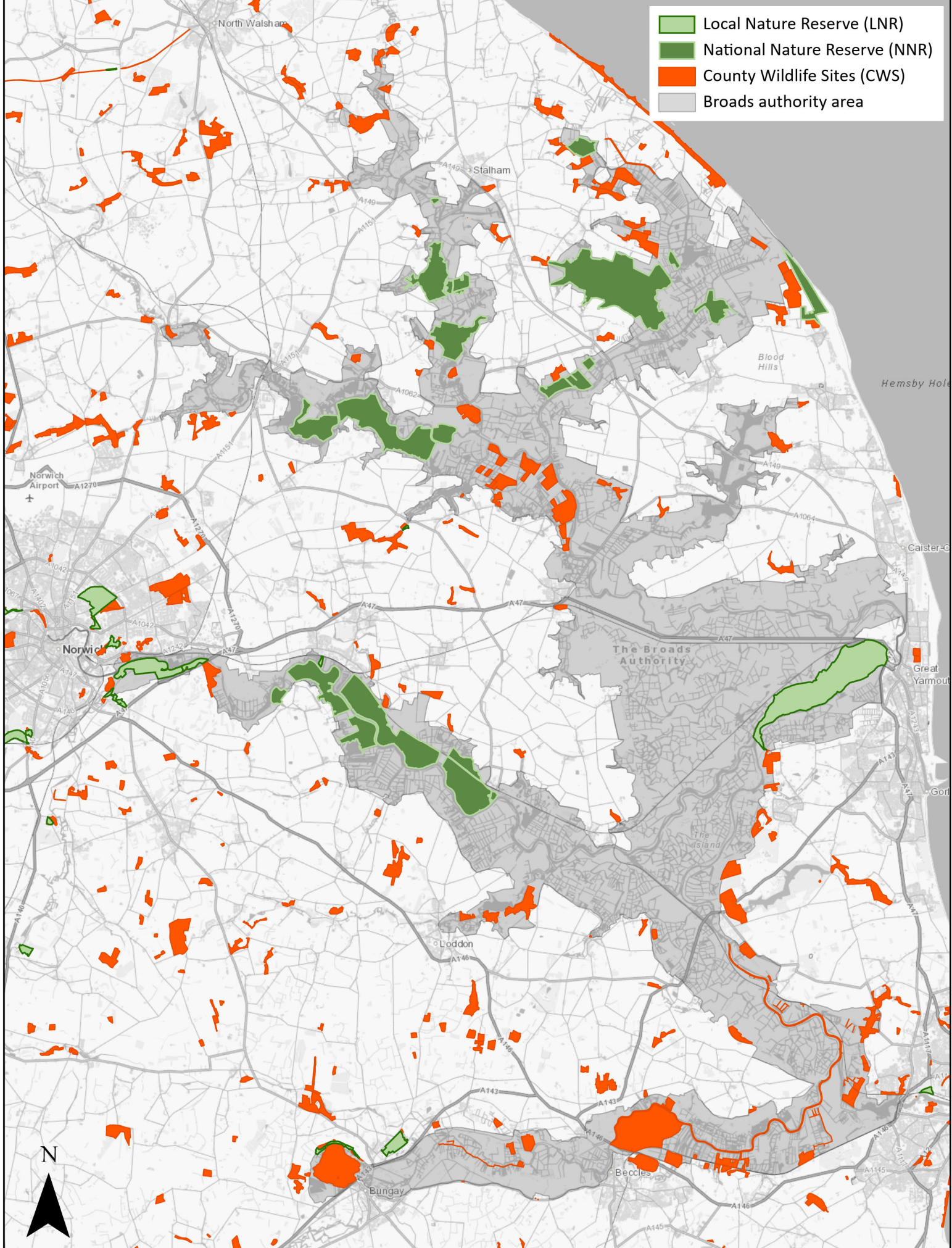
Ethnic Group. Source: 2011 Census.

	<b>White: English/Welsh/Scottish/Northern Irish/British</b>	<b>White: Irish</b>	<b>White: Gypsy or Irish Traveller</b>	<b>White: Other White</b>	<b>Mixed/multiple ethnic group: White and Black Caribbean</b>	<b>Mixed/multiple ethnic group: White and Black African</b>	<b>Mixed/multiple ethnic group: White and Asian</b>	<b>Mixed/multiple ethnic group: Other Mixed</b>	<b>Asian/Asian British: Indian</b>	<b>Asian/Asian British: Pakistani</b>	<b>Asian/Asian British: Bangladeshi</b>	<b>Asian/Asian British: Chinese</b>	<b>Asian/Asian British: Other Asian</b>	<b>Black/African/Caribbean/Black British: African</b>	<b>Black/African/Caribbean/Black British: Caribbean</b>	<b>Black/African/Caribbean/Black British: Other Black</b>	<b>Other ethnic group: Arab</b>	<b>Other ethnic group: Any other ethnic group</b>
The Broads Authority	96.4	0.6	0.0	1.6	0.2	0.1	0.2	0.2	0.1	0.0	0.0	0.0	0.3	0.1	0.1	0.0	0.0	0.0
National Parks Average	95.9	0.4	0.1	1.9	0.2	0.1	0.3	0.2	0.1	0	0	0.2	0.4	0.1	0	0	0	0.1

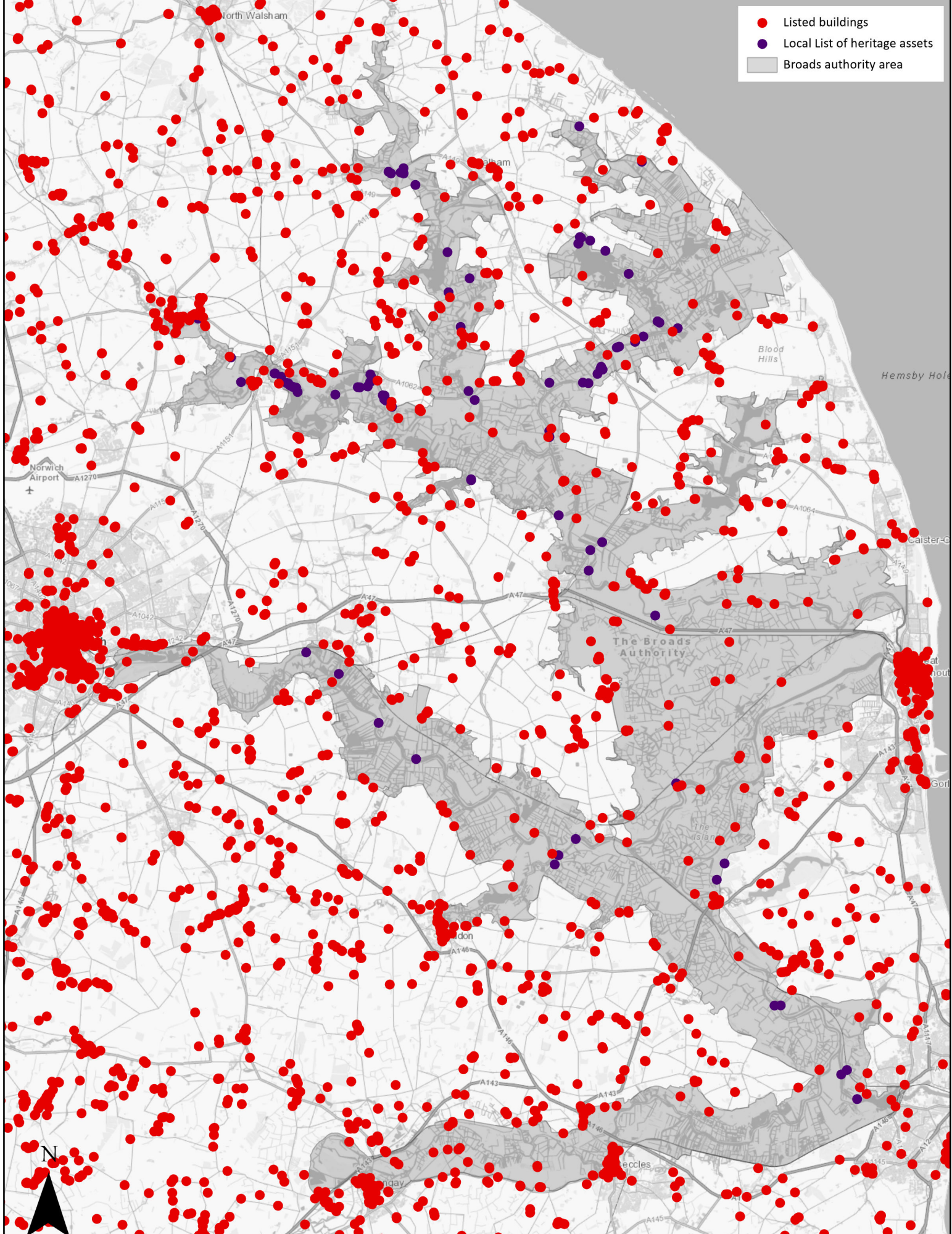
In general, the ethnicity of the community of the Broads is similar to other National Parks.



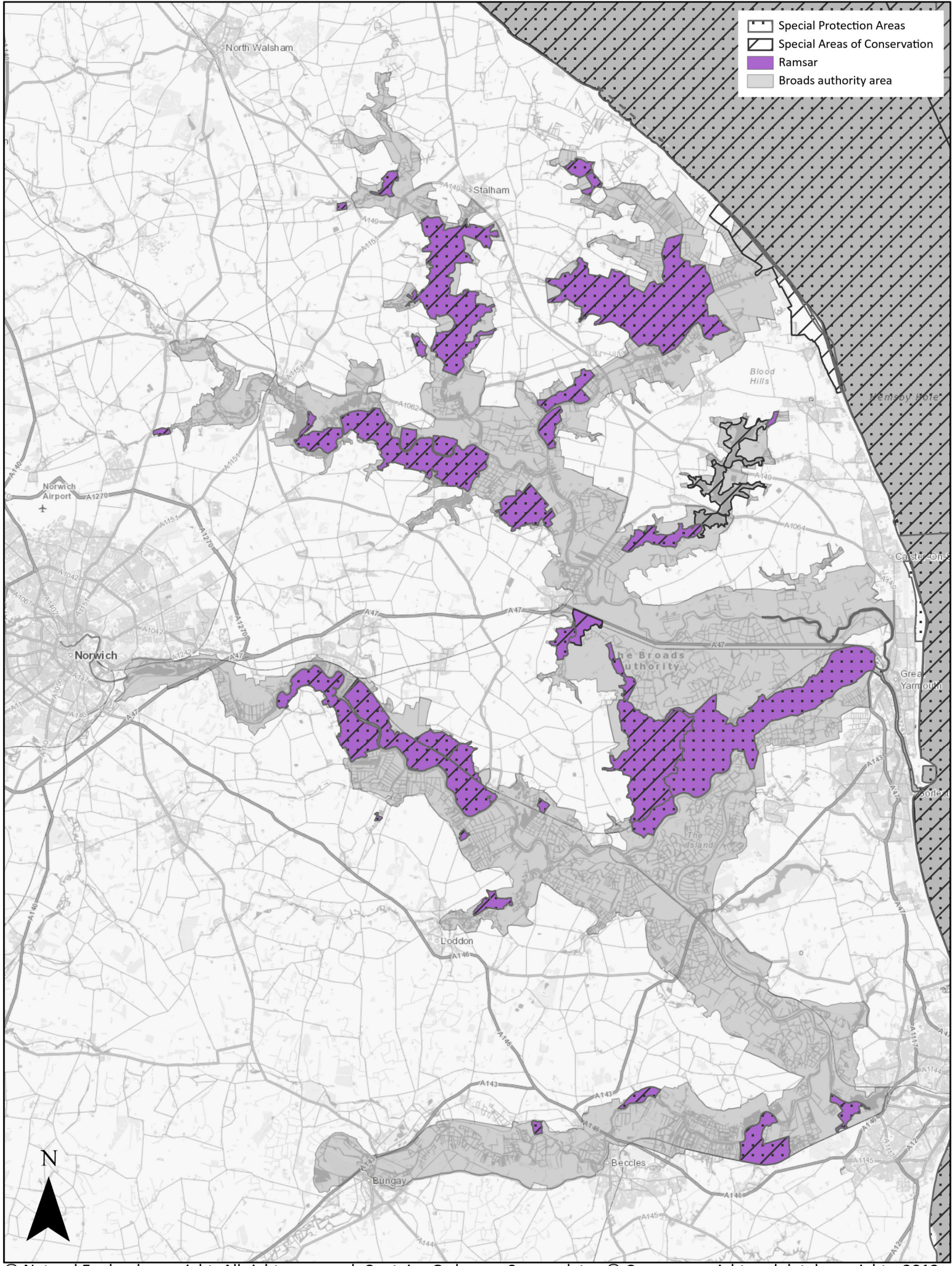








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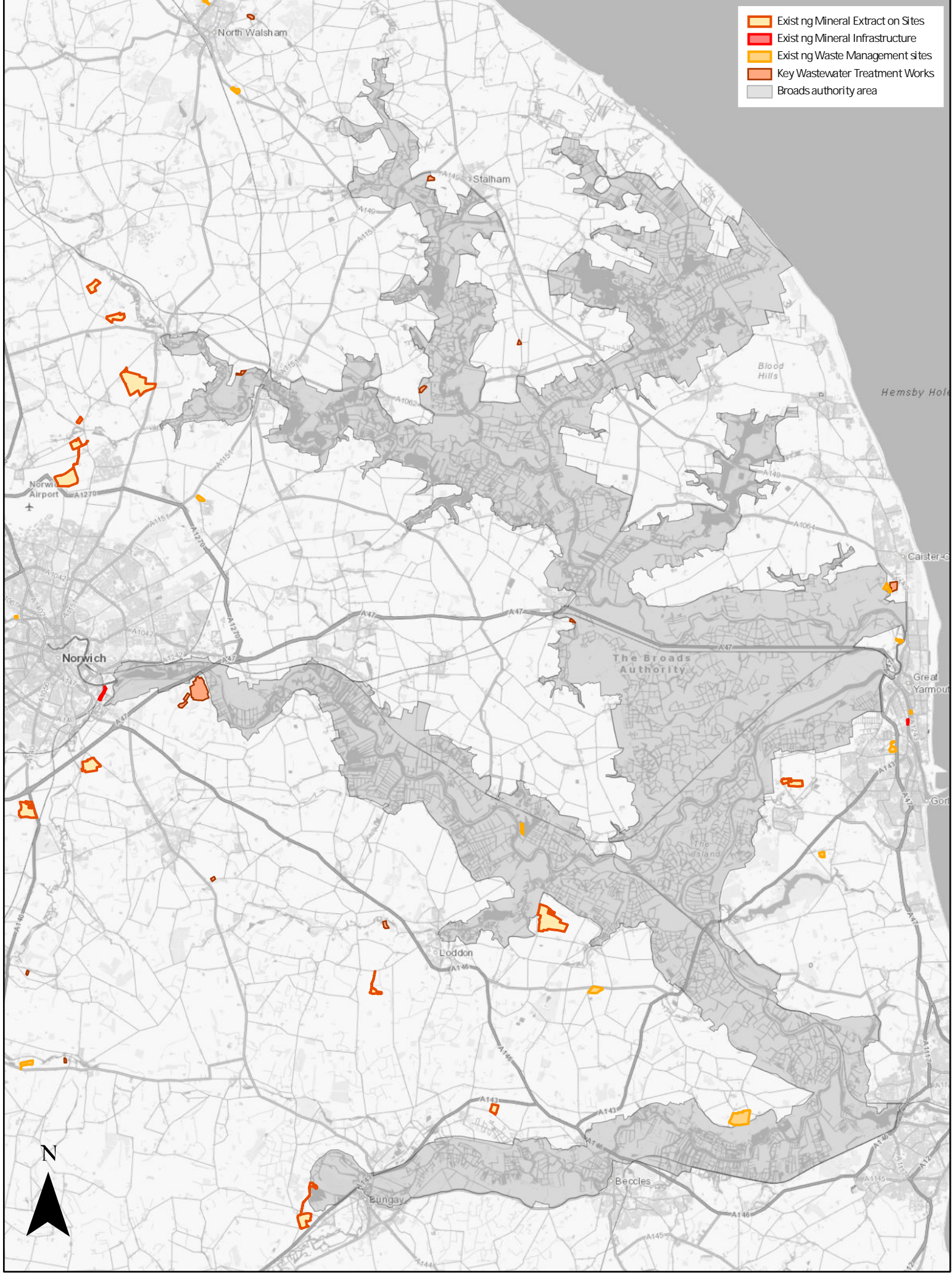


-  Special Protection Areas
-  Special Areas of Conservation
-  Ramsar
-  Broads authority area

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- Existing Mineral Extract on Sites
- Existing Mineral Infrastructure
- Existing Waste Management sites
- Key Wastewater Treatment Works
- Broads authority area



**Broads Authority area sites which are included in the Norfolk Geodiversity Audit**

Sites marked in blue are those close to the BA boundary which have particular geological interest associated with the BA area itself

Information in red indicates site (or part of) is designated as SSSI (bio and/or geo)

	Site no.	Parish	Site name(s)	Grid Reference	Site descrip	Geo-features	HER	Other	CWS	SSSI	Access	Management	Condition notes	Vulnerability	Threats actual	Threats potential
Broadland District	BRL05	Catfield	Ludham Pilot Borehole Site	TG385199	Site of water supply borehole	Borehole site yielding important information about Pliocene and early Pleistocene lithostratigraphy and biostratigraphy.					Private	[Anglia Water]	Site is a commercial waterworks.			
	BRL23	Horstead With Stanninghall	Little Switzerland Chalk Pits	TG277173	former chalk pit complex	Former chalk pit complex developed in slopes of Bure valley until 1877, with access canals for wherry transport. Chalk of Campanian Mucronata Zone (Paramoudra Chalk horizon). Peake & Hancock chalk site #194. Findspot of entire Mastodon skeleton in Crag Basement Bed (Woodward 1881, p57). A picturesque site mentioned and illustrated by Lyell 1838 (fig 237).		Peake site #194			Private	[woodland and meadow]		Low		
	BRL27	Ludham	How Hill & Crome's Farm	TG377199	Trial pits site	Site of three trial pits in early Pleistocene marine sediments of the Wroxham Formation, How Hill Member.					Private					
	BRL31	Postwick	Postwick Grove River Cliff	TG286080	river cliff	Important exposure of Cretaceous Campanian Chalk, being the most easterly, extant, permanent inland exposure in Norfolk. Exposes a richly fossiliferous horizon close to the upper boundary of the Stage. Should be a Candidate SSSI.		BA			[Public]					vegetation overgrowth; slope stabilisation
	BRL32	Strumpshaw	Buckenham Station Pit	TG352058	disused sand pit	Exposure of sands of the Pliocene Norwich Crag overlain by soliflucted sands and till, with windblown sand on top.					Private			Low		landscaping, tree planting
	BRL33	Strumpshaw	The Sandpit, Stumpshaw Fen CGS	TG341065	disused sand pit	Exposure of sands of the Pliocene Norwich Crag or Pleistocene Corton Formation. Link with biodiversity SSSI.		adjacent Mid-Yare NNR		adjacent Yare Broads & Marshes SSSI (bio)	[public]	Fresh exposure maintained for biodiversity interest (sand wasps)		Medium (vegetation and slumping)		cessation of biodiversity management
	BRL36	Thorpe St Andrew	The Dell Pit	TG26150865	disused chalk pit	Former chalk pit active in C18th, linked with historic lime trade on river Yare. Disused by mid C19th.					Public	Site managed as nature area.	No sections visible as site heavily vegetated and sections slumped			
	BRL40	Wroxham	Dobbs Plantation Pit	TG273158 & TG27251586 (site 2) & TG27251588 (site 3)	[disused gravel pit]	Exposure of [late Pliocene] Pre-Pastonian sediments of the Wroxham Formation, Dobbs Member. Site represents appearance of Macoma balthica. An important site for correlation of marine and terrestrial sequences.					Private					
	BRL41	Wroxham	Wroxham Hall Pit	TG 272 160	[disused gravel pit]	Exposure of early Pleistocene marine sediments of the Wroxham Formation ('Bure Valley Beds'), comprising sands, clays and shelly sands over Cretaceous Chalk. Crag mollusca (but not M.balthica) indicate estuarine conditions.					Private					
Great Yarmouth Borough	GTY01	Fleggburgh	Billockby Sand Pit	TG 4295 1350	disused sand pit	Degraded exposure of Pleistocene Happisburgh Formation 'Corton Beds' sands yielding derived Norwich Crag shell fauna (worked on by SV Wood and FW Harmer). Notable for use of soft, fine sand in the casting of metals in the 19th century. Denotified geological SSSI.					Private	Billockby Farms Limited	Overgrown and slumped	Low		
	GTY04	Somerton	Somerton No.1 Borehole Site	TG46072120	Site of research borehole	Deep research borehole site yielding information about 1400m sequence of strata, including Palaeozoic (530m), Mesozoic (763m, of which Chalk Group 433m), Tertiary (51m) and Quaternary (55m, of which Crag 29m).					Private	farmland		zero		
	GTY05	Stokesby With Herringsby	Hillborough Hole Pit	TG444116	disused sand and gravel pit	Exposure of Pleistocene Happisburgh Formation 'Corton Beds, comprising cross-bedded sand and gravel underlying sandy till. Sequence capped by cryoturbated stony coversilt.					Private					
	GTY06	Winterton	Winterton Ness GCR & Winterton-Horsey Dunes SSSI	TG490210 & TG460247 to TG504179	coastal ness and sand-dune complex	Nationally important dune system, including ness feature. Link with biodiversity. GCR SSSI composed of three former SSSIs and Winterton Dunes NNR.		AONB	NNR (Winterton Dunes)	SSSI geo + bio (Winterton-Horsey Dunes)						
North Norfolk District	NNF33	Ludham	Ludham Staithe Lime Kiln	TG38941805	Disused lime kiln	Disused lime kiln at Staithe House, circular form, with pointed entrance, made of flint and brick, with rake holes. Dependent on chalk imported by wherry. NHER 17527	NHER 17527				Private					collapse, landscaping
	NNF45	Sea Palling	Sea Palling Dunes	TG 443264 to TG460247	coastal dune complex	Example of coastal dune complex displaying dune succession and range of depositional and erosional features. Link with biodiversity CWS.		AONB	CWS 1231 Waxham Sands Holiday Park; CWS 1247 Marram Hills		[Public]					
Norwich	NCH02	Norwich	Carrow Works	TG242075	industrial works of Reckitt & Colman	Former exposure of Pleistocene river terrace gravels banked up against Cretaceous Chalk cliff, yielding 5 Palaeolithic hand-axes and other flint artefacts excavated by JE Sainty 1926.					Private		site presumably built over			
	SNF01	Aldeby	Aldeby Quarry	TM 459 928	Former quarry undergoing restoration	Former exposure of Pleistocene glacial and glacio-fluvial outwash sediments of the Lowestoft Formation; former type-site of Aldeby Sand & Gravel Member.					[Private]		Landfilled	Zero		
	SNF02	Aldeby	Boon's Heath Pit	TM470926	Former quarry undergoing restoration	Former exposure of Pleistocene glacial and glacio-fluvial outwash sediments of the Lowestoft Formation					[Private]		Landfilled	Zero		
	SNF03	Aldeby	Atlas Aggregates Pit & Stanley Hills Pit	TM 434931	disused pit, partly backfilled'	Exposure of Pleistocene Anglian glacial or terrace sands and gravels; findspot of Palaeolithic hand-axes.					Private		disused and partly back-filled in 1996			

SNF04	Aldeby	Aldeby Brickyard	TM431930	degraded and vegetated former brick pit	Exposure of Pliocene Norwich Crag sands and clays yielding [Baventian] pollen and rich [Antian] molluscan assemblages.					Private		[sections slumped and vegetated]			
SNF05	Aldeby	Oaklands Pit	TM465927	former quarry used as landfill site						Private					
SNF08	Bramerton	Bramerton Pit GCR & Bramerton Common Pit & Bramerton Pits SSSI	TG295060 & TG299061 & TG297060	Former sand pits	Nationally important exposures of Pliocene Norwich Crag strata, including type site of the Norwich Crag Formation. Particularly important for demonstrating vertebrate faunal succession in this period. GCR SSSI.		BA			Private					
SNF09	Bramerton	Blake's Pit & Bramerton Pits SSSI	TG 2982 0608 & TG 298061	Former sand pit	Nationally important exposures of Pleistocene Norwich Crag Formation, including type site of the Bramertonian Stage. Studies of pollen, foraminifera and mollusca have demonstrated change from temperate (Bramertonian) to cold (Pre-Pastonian) climatic conditions. SSSI geo but not cited in GCR.		BA			Private					
SNF10	Broome and Ditchingham	Broome Heath Pit GCR	TM345913 & TM348915	heathland with former sand and gravel pits	Nationally important exposure of Middle Pleistocene fluvio-glacial sediments of the Broome Terrace in the Waveney valley, resting on Pliocene Norwich Crag. Type-site of the Waveney Valley Formation, Broome Member. GCR SSSI.			CWS 130 Broome Heath		Public					
SNF12	Burgh Castle	Burgh Castle Pit & Welcome Pit	TG481043 & TG482043	partially backfilled though active pit' (1994)	Exposure of Pleistocene glacial till and outwash deposits of the Happisburgh Formation (Corton Sands; Leet Hill Sands & Gravels, Corton Till), underlying Anglian Lowestoft Formation (Lowestoft Till).					Private		Only eastern face of quarry being worked in 1988			
SNF28	Ditchingham & Hedenham	Bath Hills	TM321913	river bluff	Notable incised meander bluff of River Waveney developed around meander core of Outney Common (Suffolk)		BA (part)			Private, with public footpath	woodland		low		landscaping
SNF29	Earsham	[Earsham Quarry]	TM317899	active quarry with landscaped areas	Exposure of Pleistocene river terrace deposits of the 2nd (Broome) terrace of R.Waveney					Private		pits now landscaped and flooded			
SNF31	Earsham	Pheasant Walk Quarry	TM315892	[active gravel quarry]	Pleistocene [late Anglian] glaciofluvial sands and gravels associated with Terrace 3 (Homersfield Terrace).					Private	gravel extraction		High		backfilling
SNF39	Gillingham	[Gillingham Gravel Pit]	TM427932 & TM426929	[former sand pit]	Exposure of Pliocene Crag and Pleistocene glacial sediments.					Private					
SNF40	Haddiscoe	Haddiscoe Old Pit	TM444966 + TM445963	[disused quarry]	Former exposures of Pliocene Norwich Crag Formation and Pleistocene Happisburgh Formation, Corton Beds and Anglian Formation, Haddiscoe Sands and Gravels (glacio-fluvial outwash).					Private					backfilling and landscaping
SNF46	Kirby Bedon	Whitlingham Sewage Works (North)	TG279077	Excavation for sewage works settling tank	Exposure of the Cretaceous Maastrichtian Chalk of the Weybourne Chalk sub-division, B.lanceolata Zone. Exact stratigraphic position needs further research.					Private		Chalk strata presently inaccessible			
SNF47	Kirby Bedon	Whitlingham Sewage Works (South)	TG281073 & TG281070	Rough disturbed ground south of treatment works; site of former gravel pit'	Temporary exposure of Pleistocene terrace gravels of R. Yare, resting on Norwich Crag. Important findspot of Palaeolithic flint artefacts including more than 200 Acheulian hand-axes (some in primary context).					[Private]		site landscaped 1972			extension of sewage works
SNF48	Kirby Cane and Stockton	Leet Hill Pit & Leet Hill Kirby Cane GCR	TM381929 + TM384926	Former sand and gravel pit	Nationally important exposures of Middle Pleistocene deposits associated with proto-thames and Bytham rivers beneath glacial sands and gravels of the Happisburgh Formation, including type-site of the Leet Hill Sand & Gravel Member; also new type-site for Lowestoft Formation, Aldeby Sand & Gravel member (TM384926) as Aldeby sections destroyed. GCR SSSI.					Private					
SNF52	Norton Subcourse	Norton Subcourse Quarry, South-East Pit	TM403992	Active quarry	Exposure of marine Pliocene sands and gravels of the Norwich Crag and Lower Pleistocene sands and gravels of the Wroxham Formation. Overlying fluvial sediments of the Cromer Forest-bed Formation (MIS 17) have yielded important environmental evidence, including vertebrate fossils. Overlying Middle Pleistocene sands and gravels of the Ingham and Lowestoft Formations. A nationally-important site for early Pleistocene stratigraphic and faunal correlations. Site excavated by British Museum/AHOB project 2004.					Private				resumption of mineral extraction	mineral extraction; landscaping
SNF63	Trowse with Newton	Whitlingham Chalk Pit & Crown Point Pit & Colman's Pit	TG2675 0770	disused chalk pit and lime kiln complex	Large former chalk pit with two disused lime kilns. Exposure of the Cretaceous Campanian Chalk of the Paramoudra Chalk sub-division, B.mucronata Zone. Exposes 4m of soft, iron-stained chalk with two bands of flints and in-situ paramoudra. Also exposure of shelly sands of Pliocene Norwich Crag Formation (displaying varve-like sedimentation) and Basement Bed ('Stone Bed') and early Pleistocene Kesgrave Formation. Link with biodiversity in disused lime kiln used as bat roosting site. Site adjacent to former staithe on R.Yare. [Denotified SSSI]. NB Coronation Belt Pit also called Crown Point Pit (TG253073)		BA		[denotified SSSI]	[Public]		site described as 'badly overgrown' in 1960. Much tree growth on slopes. But exposure visible on east side of pit near entrance.			
SNF64	Trowse with Newton	[Crown Point Pit] or [Coronation Belt Pit]	TG253073	former pit close to dry ski slope	[Exposure of Cretaceous Upper Chalk as erratic raft displaying glacially-tectonised fold structures]		BA		[denotified SSSI]	[Public]					
SNF65	[Trowse with Newton]	Lafarge Grading Plant Site	TG256076	Section on site of mineral grading plant	Exposure of terrace gravels of the R.Yare [and glacially tectonised chalk raft].		BA			[Private]					

Waveney District	1	Barsham	Barsham Marshes	TM396908	grazing marshes	Valley peats of the Breydon Formation containing archaeological remains of triple post alignment of oak stakes beside palaeochannel of R Waveney of late Iron Age date, with palaeo-environmental evidence; channel became infilled by C11th.				Private	grazing meadows		Medium		drainage and wastage of peat
	1	Beccles	Beccles Marshes	TM430920	grazing marshes	Waveney floodplain including 'gravel island' remnants of Late Devensian Terrace 1, containing Holocene Breydon Formation peat and alluvium containing palaeo-environmental and archaeological archives. Iron Age alignment of posts and a trackway under investigation (2007) by Birmingham University under the direction of Andy Howard.		BA		Waveney 8 (Beccles Marshes0	[private]		High	Drainage. "The landscape of the marshes has changed considerably over the last twenty years. Many of the grazing marshes have been converted to arable fields and a large number of dykes have been infilled." - CWS citation	
	No number	Bungay	Outney Common	TM325095		[Small exposure of Pleistocene glacial sand and gravel of the 2nd (Broome) terrace of R.Waveney]. Link with biodiversity CWS.		BA		Waveney 16 (Outney Common)	private		Low		
	No number	Somerleyton	Somerleyton Brickworks	TM 4795 9667	disused brickpit	Poor exposure of 6.5m of pebbly sand of the Pleistocene Kesgrave Formation underlying 6m of Happisburgh Formation, Corton Till Member (aka 'North Sea Drift') overlain by Lowestoft Formation, Lowestoft Till. Brickworks operative from c.1815 to 1939.					[private]				

# Broads Authority

23 July 2021

Agenda item number 15

## Residential Moorings Guide for adoption

Report by Planning Policy Officer

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### Summary

The Residential Moorings Guide is designed to help implement the policies of the adopted Local Plan for the Broads relating to residential moorings. It is designed for decision makers as well as applicants and site owners, with information which is considered to be useful to help make schemes as successful as possible. The first draft guide was subject to public consultation in early 2020, with an amended guide subject to a second round of consultation between September and November 2020.

### Recommendation

To adopt the amended Residential Moorings Guide.

---

## 1. Introduction

- 1.1. The Residential Moorings Guide is designed to help implement the policies of the adopted Local Plan for the Broads relating to residential moorings. It is designed for decision makers as well as applicants and site owners, with information which is considered to be useful to help make schemes as successful as possible.
- 1.2. The first draft guide was subject to public consultation in early 2020, with an amended guide subject to a second round of consultation between September and November 2020.
- 1.3. The Guide was considered by Planning Committee in February 2021 and endorsed for adoption (see para 3.3). Since that time, in liaison with the Environment Agency, there is a proposed change to one paragraph (highlighted in yellow at Appendix 3). This is a technical change, but nevertheless it seemed prudent to take the Guide back to Planning Committee for any comment (see section 3.3) and subsequent endorsement. Planning Committee resolved to endorse the amended Residential Moorings Guide to the Broads Authority for adoption at their meeting on 21 May 2021.

## 2. Consultation responses

- 2.1. The responses received on the first version of the draft Guide are at Appendix 1, and some of the comments resulted in changes to the Guide. The Guide was then consulted

on for a second time and the responses received are at Appendix 2. Again, some of the comments resulted in amendments to the Guide.

### 3. Consultation with internal committees/groups

- 3.1. A report on the draft Guide was taken to the Navigation Committee in January 2021, and no comments were made on the document. Similar information was sent to members of the Boat Safety Management Group in December 2020, and no comments were received.
- 3.2. At its meeting on 5 February, the Planning Committee considered all the comments received and resolved to endorse the Guide and recommend it for adoption. Members noted that the guide was welcomed, but suggested that in future the Authority should look at going further in relation to houseboats, as they can be well designed (like the Netherlands or in Seattle) and respond to a need, and that there may be some suitable areas in the Broads for houseboats. These comments are noted and, as we review the Local Plan for the Broads, the issue of houseboats/floating buildings/can float buildings could be an area we look into.
- 3.3. At the Planning Committee in May, there was further discussion about the amendment to the Guide, following further comments from the Environment Agency (EA) highlighted in yellow in the Guide for adoption. The following summary is taken directly from the minutes of the meeting.
  - a) In response to a member query on whether the proposed change by the EA meant that permanent residential houseboats would not be permitted, the Planning Policy Officer (PPO) confirmed that was correct but emphasised this did not include residential moorings.
  - b) Another member subsequently asked if houseboats could only be used for occasional use and whether this included as tourist accommodation. The PPO drew members' attention to the EA's classification of a body of water as Flood Zone 3b and therefore permanent residential accommodation would be incompatible. Tourist accommodation was also classed as more vulnerable and therefore also incompatible with Flood Zone 3b and should not be permitted. The PPO emphasised that this did not affect residential moorings. However, this did not prevent applications being submitted for houseboats if the applicant disagreed with the assessment, but they would need to be assessed against the guidance and national policy.
  - c) One Member asked if there was a role for the Broads Authority in liaising with the Government about such uses being classed as Water Compatible. The PPO said that this could be investigated through the work on the emerging Local Plan.
  - d) In response to a question, the PPO confirmed that this new guide would only relate to new planning applications only, and not existing properties. In

addition, she emphasised that it was a guide and not a policy document. Any application would be assessed against the flood risk tables set out in National policy/guidance.

- e) A member commented that as this was a change to the existing pattern of use, all Authority members needed to be clear on what defined a houseboat and the PPO agreed to include this in the report for consideration by the Authority in July.

3.5 In response to point (e), houseboats are considered to include boats that are not capable of their own propulsion as well as sheds or caravans on rafts/pontoons. Other than flood risk, another issue relating to houseboats is the impact on character. The Local Plan says that houseboats will be considered on a case by case basis. Residential moorings are for boats that are self-propelled, and there are policies in the Local Plan in general support of these moorings, indeed, some sites are allocated for such uses.

## 4. Final version for adoption

4.1. The proposed amendments to the final Residential Moorings Guide for adoption are shown at Appendix 3. Additions are shown as blue underline, and removals as red strikethrough. It should be noted that the marked changes are as a result of the second consultation; changes made as a result of the first consultation have been 'accepted' and are not marked.

4.2. The Residential Moorings Guide is recommended for adoption.

Author: Natalie Beal

Date of report: 28 June 2021

Appendix 1 – Responses to first consultation

Appendix 2 – Responses to second consultation

Appendix 3 – Final Draft Residential Moorings Guide – for adoption with changes marked

## Appendix 1 - Draft Residential Moorings Guide - responses to first consultation

Ref	Name	Organisation	Comment	BA response	Amendments
#1	Trevor Warren	-	In the Draft, there are references to preserving/enhancing the local area amenity and character; e.g., lines 312 - 314 in Appendix A. I wonder if noise and light pollution have been sufficiently stressed. Section 6, line 127, refers to noise from generators; there are plenty of other source such as boat maintenance and normal social life. Similarly,	Comment noted. The Local Plan for the Broads has a policy on amenity which would be used to determine applications, but agree that there needs to be better mention of other sources of noise.	This could cover aspects such as generators, when engines will run and generally any noise that could be considered a nuisance <a href="#">such as boat maintenance and generally socialising at unsociable hours.</a>
#2	Trevor Warren	-	Section 9.1, line 178, mentions light pollution from generators. More significant might be general safety lighting required in a quayside setting. Both these conditions are made more conspicuous in a peaceful broads location.	Comment noted. The Local Plan for the Broads has a policy on dark skies which would be used to determine applications, but agree that there needs to be better mention of light pollution.	<a href="#">9.1.8 Light pollution</a> <a href="#">Schemes for residential mooring may include lighting. But sites for residential moorings may be on the fringe of settlements, where there is a transition from urban to rural and so the impact of lighting may be significant. The Authority also seeks dark waterways to protect the wildlife in the area. The need for such lighting needs to be justified in line with Local Plan for the Broads policy DM22. If lighting is justified and agreed, then the design needs to ensure no impact on the dark skies of the Broads. The Authority plans to produce light pollution guidance, but in the meantime, the policy requirements of the Local Plan will guide how applications are determined and assessed.</a> <a href="#">Q: How does your scheme address light pollution? How does your scheme maintain dark skies?</a>
#3	Alistair Lipp	-	I am actually not in favour of residential moorings, but considering it is in the plan to have 63, then the proposals suggested seem to be a reasonable way of creating quality moorings.	Response noted.	No change to document.
#4	B J Du Brow	-	In these constrained times we are unable to give any useful comments.	Response noted.	No change to document.
#5	Jeremy Burton	Bungay Town Council	I confirm that the members of Bungay Town Council Planning, Environment and Highways Committee have considered these Documents and have no additional comments to make.	Response noted.	No change to document.
#6	Shamsul Hoque	Highways England	No comment	Response noted.	No change to document.
#7	Penny Turner	Norfolk Police	My main concern for residential moorings is potential vulnerability of uninvited access: (The lack, or reduction in perimeter security of a residence (mooring) due to nature of the site (i.e. open access of quay side) may make it vulnerable to 'attack' from would be offenders).	See following comments.	See following comments.
#8	Penny Turner	Norfolk Police	The location of residential moorings next to defined a defined development boundary for support of key services, together with the potential lack of 'usual' residential perimeter boundaries may open up access opportunities for uninvited visitors – being able to move along the same access routes as genuine users. Therefore it is essential to acknowledge what can be done to prevent would-be offenders entering residential boats. Proposed solutions would be individual to a site and its layout, but I recommend if possible that boatyards/Marinas control access to these moorings via a lockable gate (with resident access only) to the particular quay/boardwalk involved; and that individual boat owners also be aware of further protection/security products designed for boats to increase 'home' security. That this information be linked to 'Helpful links/advice (Section 11).	Comment noted. Security should be considered on a site by site basis. Sites in the Broads tend to be relatively small and many of them are adjacent to other facilities so there tends to be a high level of surveillance. We don't consider that there is a need for the guide to promote this level of security, but we will make reference to security.	New sub section in section 9: <a href="#">You should ensure you consider security at your site. This may already adequately be in place.</a>
#9	Penny Turner	Norfolk Police	Also, the proposed walking route of 800m/10 mins (usable all year round) should were possible be straight and a width of 3m wide, with vegetation maintained to prevent fear of crime (removal of potential hiding places), and to consider lighting if appropriate.	Agreed. Text to be added.	Add this text to the end of section 4: <a href="#">Norfolk Police recommend that the route to the site should, where possible, be straight and have a width of 3m wide, with vegetation maintained to prevent fear of crime (removal of potential hiding places), and to consider lighting if appropriate (taking into account the dark skies policy of the Local Plan and the location of residential moorings).</a>
#10	Penny Turner	Norfolk Police	I support management of sites with rules/terms of conditions, this together with the potential presence of staff would increase guardianship/ownership of area.	Support noted.	No change to document.
#11	Penny Turner	Norfolk Police	Again I support the proposal to provide parking and storage facilities to prevent moorings becoming cluttered.	Support noted.	No change to document.
#12	Penny Turner	Norfolk Police	I recommend that parking spaces be marked to help with correct usage (assists with rule setting) – consider collapsible bollards/chain & lock , and where possible have some capability of surveillance over the area.	Agreed. Text to be added.	Add to 9.5: <a href="#">Norfolk Police recommend that parking spaces be marked to help with correct usage (assists with rule setting) – consider collapsible bollards/chain &amp; lock , and where possible have some capability of surveillance over the area.</a>

#13	Penny Turner	Norfolk Police	With regards external storage facilities, I recommend they are of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender).	Agreed. Text to be added.	Add to 9.7: <a href="#">Norfolk Police recommend that storage is of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender).</a>
#14	Penny Turner	Norfolk Police	Post-boxes – there is an increasing rise in crime associated with post delivery so post boxes should be of robust construction with max aperture size of 260mmx40mm and have anti-fishing properties (the examples pictured look good, Secured by Design recommends letter boxes certificated to TS 009).	Agreed. Text to be added.	Will add this wording to section 9.8 in relation to extra facilities: <a href="#">There is an increasing rise in crime associated with post delivery so post boxes should be of robust construction with max aperture size of 260mmx40mm and have anti-fishing properties (Secured by Design recommends letter boxes certificated to TS 009).</a>
#15	Penny Turner	Norfolk Police	As mentioned above, I would like links to boat security to be included, but would wish to consult with my police colleagues on BroadBeat as to which should be included. (1st Principles boat security; BoatShield and Aweigh).  LINK FOR BOATSHIELD (& Outboard Engine Cover) This weblink from Norfolk & Suffolk Police offers advice on boat safety and security, also information about the Boatshield Scheme. <a href="https://www.norfolk.police.uk/advice/roads-and-vehicles/boats">https://www.norfolk.police.uk/advice/roads-and-vehicles/boats</a>  AWEIGH App Thousands of people enjoy the Broads throughout the year and the AWEIGH app has been designed to help those on and around the waterways. <a href="https://apps.apple.com/app/aweigh">apps.apple.com&gt;app&gt;aweigh</a> <a href="https://play.google.com/store/apps/details?id=com.aweigh">play.google.com&gt;store&gt;apps&gt;details?id=com.aweigh</a>  BOAT SECURITY ADVICE - NORFOLK & SUFFOLK POLICE Norfolk & Suffolk Police advice on water safety and boat security: <a href="https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf">https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf</a>	Agreed. Text to be added.	Add these links to guide.
#16	David Broad	-	Section 3. – I think that continuing to make a distinction between boats suitable for residential moorings and houseboats might become somewhat artificial and unnecessary with the passage of time. (a bit like mobile homes and caravans where the former have residual wheels and tow bar stored underneath but are still classed the same for The Caravan Act/ planning purposes). The BA hung on to this motor and moving thing when the working party initially considered the issue, but I would suggest it is now unnecessary and that it is the matters of controlling the use and appearance which is common and important to both.	We consider houseboats to be floating caravans or floating sheds on a pontoon and these will be dealt with on a case by case basis. We do not promote or expect these at residential moorings around the Broads. This is set out in the Local Plan.	No change to document.
#17	David Broad	-	Item 7 – Register – It might be helpful and save unnecessary administration and enforcement if the policy stating that guests staying less than, say, 30days, were exempt	It does not seem onerous to write down the details of the person visiting or staying in a register.	No change to document.
#18	David Broad	-	Item 9.3 Pump Out and Sewerage – It could be inviting non-compliance by allowing holding tanks and pump-outs as an alternative to mains drainage. History and experience shows that valves are often used for illegal discharge. There could be a strong planning policy preference for the latter and the register extended for logging genuine pump out occurrences.	Noted. Whilst areas of residential moorings may provide toilets and shower blocks, the boats themselves are probably going to have toilets on them. It is not clear how we can stop that from happening through planning. Because they will have toilets on them, the sewerage and foul water need to go somewhere and that is what we are referring to - the provision on site of somewhere to dispose of foul water. We do have policies that promote the connection to the public sewer network as the preference, as set out in that policy, that the facilities provided for pump out to be connected to the public sewer network. If this is not possible, then we set out a hierarchy for disposal methods and seek thorough justification for the method used. If Mr Broad is suggesting that there should be some kind of mechanism that attaches to the on-board toilets and the like and connects to the public sewer network, then that would be something for the management to address as they plan the scheme. We could add some text to raise the issue of valves and illegal discharge and cross refer to the policy that seeks connection to the public network.	Add this to section 9.3: Toilets on boats may require pumping out or somewhere to empty cassettes. Your marina or boatyard may have a system or process to deal with this already. <a href="#">We would assess this part of the application against policy DM2 and as set out in that policy, attachment to the public sewer network is the preferred approach. When considering how to address foul water, you will need to consider the potential for boats to release foul water directly to the waterbody. The Environment Agency also highlight that there is a byelaw that is relevant to the disposal of sewage from boats within the Broads which makes it illegal for boats to discharge their sewage straight to the rivers.</a>
#19	David Broad	-	Notwithstanding the above, you are to be congratulated in producing such a comprehensive and thoughtful draft policy and I look forward to hearing of its progress.	Support noted.	No change to document.



#20	Judith Davidson	Norwich City Council	I just have one comment / suggested change to make in relation to lines 81-84 of the document: • I would suggest deleting the words “ in theory” from this sentence, and adding to the end “and is consistent with the policies of the River Wensum Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners).”	Agreed. Text to be added.	• ‘...or is in Norwich City Council’s Administrative Area’ Norwich City Council requested this addition as there are no mooring basins, marinas or boatyards in Norwich; this change now, <del>in theory</del> , allows for residential moorings in the City <a href="#">(subject to the normal planning application process)</a> and is consistent with the <a href="#">policies of the River Wensum Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners).</a>
#21	Liam Robson	Environment Agency	We agree that all residential boats must be capable of navigation and so function as a boat, in order for residential moorings to be classed as ‘water compatible’ development. If the boat is non-navigable, such as a houseboat, then they would be classed as ‘more vulnerable’ residential development, and therefore Table 3 of the NPPF PPG would class them as inappropriate to be located in boatyards or mooring basins, as these areas are usually classed as Flood Zone 3b Functional Floodplain. It may be beneficial to include this reason within the explanation as to why the boats on the residential moorings need to be navigable.	Agreed. Text to be added.	Section 3. Add this as last paragraph: <a href="#">The Environment Agency agree that all residential boats must be capable of navigation and so function as a boat, in order for residential moorings to be classed as ‘water compatible’ development. If the boat is non-navigable, such as a houseboat, the Environment Agency state that they would be classed as ‘more vulnerable’ residential development, and therefore Table 3 of the NPPF PPG would class them as inappropriate to be located in boatyards or mooring basins, as these areas are usually classed as Flood Zone 3b Functional Floodplain. The Environment Agency state that they would object in principle to any houseboats as they would be an inappropriate ‘more vulnerable’ development in Flood Zone 3b Functional Floodplain. So houseboats are unlikely to be permitted, unless their proposed location is somehow not classed as Functional Floodplain, which would require the marina or mooring basin to not be at risk of flooding in a 5% (1 in 20) annual probability flood event.</a>
#22	Liam Robson	Environment Agency	Also, the last sentence of Section 3 states that ‘Houseboats are considered to be structures without means of independent propulsion and will be dealt with on a case by case basis due to their potential impact on character of the area’. We would object in principle to any houseboats as they would be an inappropriate ‘more vulnerable’ development in Flood Zone 3b Functional Floodplain, so it may be beneficial to make it clear that houseboats are unlikely to be permitted, unless their proposed location is somehow not classed as Functional Floodplain, which would require the marina or mooring basin to not be at risk of flooding in a 5% (1 in 20) annual probability flood event.	Response noted. That wording is from the Local Plan. But we will add it to the guide.	
#23	Liam Robson	Environment Agency	We support the need for a Flood Risk Assessment (FRA) and Flood Response Plan with all applications for residential moorings. If the FRA and Flood Response Plan proposes refuge within the boat in times of flood then the boat will need to be capable of rising up above the extreme 0.1% (1 in 1000) climate change flood level. The FRA will need to detail what the required height of rise will be and demonstrate that the boat’s mooring can enable it to rise that high without posing a hazard to the occupants of the boat.	Agreed. Text to be added.	Add to section 5: <a href="#">If the FRA and Flood Response Plan proposes refuge within the boat in times of flood then the Environment Agency states that the boat will need to be capable of rising up above the extreme 0.1% (1 in 1000) climate change flood level. The FRA will need to detail what the required height of rise will be and demonstrate that the boat’s mooring can enable it to rise that high without posing a hazard to the occupants of the boat. If the FRA and Flood Response Plan does not propose refuge, but instead proposes evacuation in advance of a flood, then the FRA and response plan will need to show how the occupants will be able to receive advanced warnings and where they will be able to evacuate to in time. The Environment Agency go on to say there is always a residual risk of warnings not being received, so the FRA will need to address this risk. The ability to take refuge within the boat, as described above, is a valuable fall-back measure and, if possible, the mooring should be designed to provide this refuge as a precaution, even if the preferred option is evacuation in advance of flooding.</a>
#24	Liam Robson	Environment Agency	If the FRA and Flood Response Plan does not propose refuge, but instead proposes evacuation in advance of a flood, then the FRA and response plan will need to show how the occupants will be able to receive advanced warnings and where they will be able to evacuate to in time. There is always a residual risk of warnings not being received, so the FRA will need to address this risk. The ability to take refuge within the boat, as described above, is a valuable fall-back measure and, if possible, the mooring should be designed to provide this refuge as a precaution, even if the preferred option is evacuation in advance of flooding.	Agreed. Text to be added.	
#25	Liam Robson	Environment Agency	The LPA and their Emergency Planners will need to ensure that they are satisfied with the proposed residential moorings and the proposed measures to ensure the safety of the future occupants should a flood occur.	Noted. The Broads Authority does not have Emergency Planners in house. It is not clear how the District Emergency Planners are able to assist the Broads Authority. This issue is something that is being looked into currently.	No change to document.
#26	Liam Robson	Environment Agency	Line 131 refers to waste management. We would highlight that there is a byelaw that is relevant to the disposal of sewage from boats within the Norfolk and Suffolk Broads which makes it illegal for boats to discharge their sewage straight to the rivers.	Response noted. Text to be added.	See comment #18
#27	Liam Robson	Environment Agency	It may be beneficial to include the need for Flood Response signs in this section, so that everyone is aware of the flood risk and the actions to take.	Noted. The Flood Risk SPD has recently been updated and applicants would be directed to the FRP guidance in that.	No change to document.
#28	Liam Robson	Environment Agency	9.2 Water The management plans should include details of early consultation with the relevant water company to ensure there is sufficient capacity in their network to supply moorings in that specific location. The abstraction of 20 cubic metres or more a day from either surface or groundwater source would require an abstraction licence. If the chosen site for the additional moorings already holds an abstraction licence, there would need to be consideration of the impacts from additional update as a result of the new moorings.	Agreed. Text to be added.	Add this to 9.2: <a href="#">The Environment Agency are keen to emphasise that applications should include details of early consultation with the relevant water company to ensure there is sufficient capacity in their network to supply moorings in that specific location. The abstraction of 20 cubic metres or more a day from either surface or groundwater source would require an abstraction licence. If the chosen site for the additional moorings already holds an abstraction licence, there would need to be consideration of the impacts from additional update as a result of the new moorings.</a>
#29	Liam Robson	Environment Agency	9.3 Sewage This section should be strengthened by stating that ‘toilets on board will require pumping out’ and if possible it would be beneficial to add – ‘to either an appropriate package treatment plant, a containment tank emptied by registered waste carrier or to main sewer’.	Agreed. Text to be added.	See comment #18

#30	Liam Robson	Environment Agency	<p>Informative – Environmental Permit for Flood Risk Activities</p> <p>An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a>. Anyone carrying out these activities without a permit where one is required, is breaking the law.</p>	Agreed. Text to be added.	<p>Add this to the end of section 9: <a href="#">Informative – Environmental Permit for Flood Risk Activities</a></p> <p><a href="#">An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a>. Anyone carrying out these activities without a permit where one is required, is breaking the law.</a></p>
#31	Kate Wood	Pegasus Group on behalf of Crown Point Estate	We welcome the Guide’s intention to provide guidance that builds on already-adopted policy DM37 – New Residential Moorings. We note that this policy is extremely comprehensive in setting out requirements for location and facilities.	Noted.	No change to document.
#32	Kate Wood	Pegasus Group on behalf of Crown Point Estate	The proposed Residential Moorings Guide adds little to the policy, but provides a helpful checklist which would be a useful basis for the planning officer’s consideration of the individual elements requiring consideration.	We would suggest it adds to the policy and elaborates on many parts of the policy as well as many other aspects of a successful residential mooring scheme. But yes, it is also a useful basis as stated.	No change to document.
#33	Kate Wood	Pegasus Group on behalf of Crown Point Estate	We would like to see additional text in relation to management accommodation and the Council’s commitment to engagement with the applicant, particularly at pre-application stage.	We offer a free pre-application advice service. The very nature of our role as a Local Planning Authority means we engage with applicants. Regarding management accommodation, DM38 covers that and refers to residential moorings. DM37 and this guide would then be used.	No change to document.
#34	Kate Wood	Pegasus Group on behalf of Crown Point Estate	Policy DM37 is a relatively self-contained policy. However, there may be circumstances, particularly with larger mooring developments, where the applicant considers that residential management accommodation would be necessary to ensure the moorings are well-managed, maintained and monitored. Such accommodation could, for example, be part of a larger building accommodating post boxes, storage lockers and other facilities.	Noted. If a scheme requires this, then DM38 would be used as would all other relevant policies of the Local Plan and all relevant SPDs and Guides. One point to note however the storage building might be in a high risk flood zone, so accommodation might not necessarily be appropriate there.	No change to document.
#35	Kate Wood	Pegasus Group on behalf of Crown Point Estate	There is no mention in the Guide of the Authority’s pre-application service. We consider this should be included as an option for potential applicants to be aware of. With that option, we request that the Authority includes a commitment to provide advice in a timely manner and stand by its advice unless there have been significant material changes in policy circumstances since the advice was issued. This will enable applicants to have faith in the pre-application system. As you know, pre-application advice, especially when provided in an iterative way, ensures that a proposal can be refined to be the best scheme possible. This ultimately results in greater buy-in from consultees such as Parish Councils and neighbours, a greater likelihood of an efficient and successful application process, and improved development quality when implemented.	Noted. Any advice given on a proposal is as presented and its conformity with current policies. It will remain relevant unless the policy or other material considerations or the details of the application itself change. Pre-application advice is an officer level opinion and given without prejudice.	No change to document.
#36	James Knight	Individual	Although the Guide is presented as a planning document for adoption, the majority of its content falls into the category of helpful guidance for operators hoping to provide residential moorings, and is not directly related to planning.	Noted.	No change to document.
#37	James Knight	Individual	<p>There is an over-riding tendency, both in the policy and in the Guide, to treat residential moorings as materially different to ordinary leisure moorings. In fact, the use of the land is identical - mooring a boat – and the risks are broadly the same, since people live &amp; sleep aboard for many weeks at a time, regardless of whether the boat is their primary residence. The differences from a planning perspective are:</p> <p>a) the fact that the vessel is used as a primary, rather than temporary, residence – which could result in increased demand on local services;</p> <p>b) the fact that residential paraphernalia can accumulate around the moorings, potentially changing the character of the surroundings</p>	The policy treats them as different because the uses are different.	No change to document.
#38	James Knight	Individual	Whilst pleased to have the opportunity of providing input, this Guide ought more properly to be a living document which evolves over time to provide guidance to marina operators – not just as part of the planning process but for promoting ideas and best practice to all operators.	Noted. It will be used for both purposes. We will review guides over time, update and amend and re-consult as required.	No change to document.
#39	James Knight	Individual	The formal consultation process is really designed for strategic planning documents which are adopted for more than a few years, rather than for detailed guidance which, necessarily, should change over time.	The Broads Authority has undertaken consultation on many other guides that are used in planning and intends to produce more guides in future and intends to consult on them as well. We will review guides over time, update and amend and re-consult as required. The purpose of consultation is two fold. Firstly, people may have some really useful comments or observations that will improve the guide or correct it. Secondly, adoption reflects the fact that it has been through this process.	No change to document.
#40	James Knight	Individual	The relevant strategic planning policies for residential moorings are set out in policy DM37. By contrast, this Guide is largely concerned with providing opinions and guidance about current practices and has very little to do with planning.	The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful.	No change to document.

#41	James Knight	Individual	Planning relates to the use and development of land (which includes the land beneath water such as rivers, moorings and basins). The specific characteristics of vessels moored over land will generally fall outside the ambit of planning.	Noted.	No change to document.
#42	James Knight	Individual	Whilst accepting that the definition is set out in the adopted policy, there are still significant grey areas surrounding the meaning of "main residence". For example: a) Does "main residence" really mean "main UK residence"? If a person lives abroad for 6 months and on their boat on the Broads for 6 months, is this a residential mooring? b) If a person stays on their boat during the summer and in a (UK) house during the winter, where is their main residence?	Noted. This is assessed on a case by case basis.	No change to document.
#43	James Knight	Individual	Since it is the boat itself which is "residential" and not the mooring, and the policy wording ties the mooring to a specific singular vessel, the policy could easily be circumvented by moving boats from one mooring to another every 28 days.	The policy is related to the use of the land.	No change to document.
#44	James Knight	Individual	A more sensible and enforceable future policy might instead want to consider limiting the overall number of moorings which could be used for residential purposes within a given marina or location, rather than trying to define individual moorings as residential - which is essentially impossible.	Noted. There are a number of possible approaches. These can be discussed through the determination process.	See #85.
#45	James Knight	Individual	In reviewing the policy direction, officers ought to consider what it is that they are trying to achieve by drawing distinctions between different types of mooring and by treating residential moorings as some kind of special case.	We will note this as and when the policy/Local Plan is reviewed and seek views during any consultation.	No change to document.
#46	James Knight	Individual	Acceptable location for residential moorings 4.1. This section is simply a summary of the adopted policy and is therefore not open for consultation.	Noted.	No change to document.
#47	James Knight	Individual	The Guide requires mooring operators to detail the technique/method of mooring vessels in the FRA.  It is an established fact of maritime law – and the Broads Authority's own navigation byelaws – that responsibility for the safe mooring of a vessel lies at all times with the master of a vessel. Broads Authority byelaw 58(1) (moored vessels to be properly secured) refers. Any planning condition which required the landowner to be responsible for the safe mooring of a navigable vessel would fail the NPPF para 55 tests because it would: a) not be relevant to planning; b) attempt to duplicate non-planning controls (the Navigation Byelaws); c) be unreasonable as the landowner could not be expected to exercise the necessary degree of monitoring or control over the master of a vessel; d) be unenforceable by virtue of the above.  It would be perfectly reasonable to ask mooring operators to provide guidance on safe mooring techniques to their customers, but there can be no transfer of responsibility.	The flood risk assessment and flood response plan will more than likely be required early on in the process so they can be used to determine the application. The Local Plan says that the FRA should show how the vessel will be moored so it does not cause issues at times of flooding. The Guide and Local Plan do not require a condition for a site manager to take over the mooring of a vessel; simply to show/discuss/state how, vessels will be checked to ensure the way they are moored will not impact on the vessel and its contents or other boats etc. nearby. It may be that the responsibility of mooring lies with the master, but if a manager of a site sees something that could need improving in terms of mooring a vessel, especially when a flood event is likely/is happening, it seems reasonable that they may discuss this with the master perhaps. The Manager has responsibility for the site and a poorly moored vessel may impact others on the site. It might be, for example, that the applicant simply says that from time to time, and even more so when flooding could ensue, they will check how vessels are moored.	No change to document.
#48	James Knight	Individual	The Climate Change Checklist link on the Guide is broken, and the document does not appear to exist on the Broads Authority website. There is a climate change checklist within Local Plan policy DM9, which I take to be the relevant list. Whilst this is a very useful checklist for new land-based developments, it is hard to see how very much of it could be applied to residential moorings in any practical way – or indeed to moorings more generally.	Will check the link and amend. The Checklist is here: <a href="https://www.broads-authority.gov.uk/_data/assets/word_doc/0009/1603656/Climate20change20checklist20template.docx">https://www.broads-authority.gov.uk/_data/assets/word_doc/0009/1603656/Climate20change20checklist20template.docx</a> and in the Local Plan. It is for the applicant to determine what aspects of the checklist are relevant and could be addressed in their scheme. If they think part is not relevant or does not apply, they have the option of ticking 'nil'.	Check link.
#49	James Knight	Individual	Clearly the existence of a management plan is of benefit to mooring operators, as well as to their residents and other berth holders.	Noted.	No change to document.
#50	James Knight	Individual	What is less clear is why the content of such a management plan could or should be within the ambit of planning. Planning authorities cannot prescribe the way in which businesses or moorings are managed. Management plans are operational documents, written to ensure that a business is run safely, efficiently, profitably and lawfully (including compliance with planning conditions).	The requirement for a Management Plan is in the adopted policy and this guide expands on what a Management Plan could address.	No change to document.

#51	James Knight	Individual	Planning conditions need to relate to planning and pass the NPPF para 55 tests. Amongst other things, they need to be specific, enforceable and not covered by other regulatory regimes. They should only be applied where they are necessary to make an unacceptable development acceptable. They can't simply be "nice to have".	Noted.	No change to document.
#52	James Knight	Individual	Boat safety certificates & insurance are matters for individual boat owners and are covered by the Broads Authority's own boat registration regulations. They cannot be turned into planning conditions imposed upon the mooring operator.	Noted. This is not the intention of the guide.	No change to document.
#53	James Knight	Individual	Similarly, noise pollution is covered by navigation byelaws as well as by district councils who are responsible for environmental protection - including waste management.	Noted. It is also addressed in the Local Plan as part of the Amenity policy, DM21.	No change to document.
#54	James Knight	Individual	Therefore, although the list is useful to an operator in terms of "things to consider", it would be inappropriate for any planning condition to require the existence of a management plan which featured such a list.	Noted and this will be considered on a case by case basis.	No change to document.
#55	James Knight	Individual	7.1. Where a planning condition restricts the number of residential moorings, it will be necessary to keep a register to ensure compliance with that planning condition. 7.2. The nature of the information made available for inspection to the LPA will need to be carefully considered to ensure compliance with GDPR and other privacy laws. It is important for the Broads Authority to consider what information it could require the operator to provide, and the reasons for requiring it.	Noted. The Authority is mindful of the requirements of other legislation.	No change to document.
#56	James Knight	Individual	Council Tax 8.1. This isn't a planning matter and there is no proposal upon which to consult, but it is useful information to provide in a guide.	Noted.	No change to document.
#57	James Knight	Individual	Facilities 9.1. This is all useful guidance and it is helpful to know how other marinas outside the Broads operate and provide facilities. 9.2. It might also be useful to provide details of relevant arrangements at marinas within the Broads, which offer residential moorings.	Noted. This information will be available on the operator's websites.	No change to document.
#58	James Knight	Individual	The questions within this section are posed as consultation queries but are really matters for individual planning applicants to consider. I cannot see how answers to these questions, provided as part of this consultation exercise, could inform the final version of a planning guidance document.	These questions are prompts for the applicant to answer as set out in Appendix D. They will remain as part of the final document. They are not consultation questions.	No change to document.
#59	James Knight	Individual	This Guide should not be considered as a planning document requiring adoption, but rather something to be continuously updated, intended to provide helpful guidance to new and existing residential mooring operators.	The purpose of this guide, like the other adopted guides, is to provide advice and information. It will be updated as required.	No change to document.
#60	James Knight	Individual	Planning (and other) documents from the LPA should not seek to prescribe the operational practices of businesses unless they directly relate to planning and are necessary in planning terms.	Noted.	No change to document.
#61	James Knight	Individual	Planning conditions must be limited to matters which are within the lawful control of the marina operator. They should never require the operator to be responsible for the conduct or actions of boat owners or others. Planning conditions which impose requirements on the operator relating to noise, boat safety, insurance, payment of tolls or mooring techniques would all probably be unlawful.	Noted.	No change to document.
#62	James Knight	Individual	Clarity is required on the nature of personal information which the operator can reasonably be asked to provide relating to individual berth holders.	Noted.	See #96, 97, 98 and 99.
#63	James Knight	Individual	The Guide as it stands is a hybrid document containing a mixture of planning policy, guidance, links, and questions aimed at specific applicants. It isn't capable of being "adopted" in the formal sense.	The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful. By undertaking consultation, we get wider views which will strengthen the document. Adoption reflects the fact that it has been through this process.	No change to document.
#64	James Knight	Individual	The majority of the guidance (as distinct from the policy) is applicable to all moorings (not just residential ones), and the document ought to be re-imagined as a means of providing evolving guidance and best practice for marina operators - rather than seeking to prescribe operational procedures under the guise of planning conditions.	Noted. The suggestion about the potential wider role of the document is noted. But at this point, it is intended to focus primarily on residential moorings.	No change to document.

#65	James Knight	Individual	I am a Fellow of the Royal Institution of Chartered Surveyors and I have lived and worked around the Broads for all of my life. In addition to enjoying recreational boating activities, I have worked in a professional capacity advising on planning matters. During the past 17 years, I have been a Director of three successful Broads tourism businesses, each employing over 60 people, and have engaged with the planning system as an applicant on numerous occasions. One of these businesses includes a marina which operates 10 residential moorings on the southern Broads. I am a former member of the RICS Governing Council, a South Norfolk District Councillor, and an appointed member of the Broads Authority and its Planning Committee. My response to this consultation is in my capacity as a private individual, property developer and company director. I am not responding in my capacity as a member of the Broads Authority or its Planning Committee.	Noted	No change to document.
#66	Hayley Goldson	Chedgrave Parish Clerk	The content of Marketing and Viability Supplementary Planning Document (SPD) and Residential Moorings Guide was considered by Chedgrave Parish Council on 7th May 2020. I can advise that councillors support the document as long as the guidelines described in the document are adhered to (particularly in relation to residential moorings).	Support noted.	No change to document.
#67	William Hollocks	Loddon Marina	Can you please give me some background on why these are being proposed as you have just produced an excellent document on the Broads Plan that went through an extensive review by every party and then the Inspector for the Secretary of State and then approved at the highest level of government.	Guides and SPDs provide more detail on certain policies in Local Plans. For example, the moorings and riverbank stabilisation guide that we adopted a few years back and the Flood Risk SPD we soon adopted all provide much more detail than would be appropriate in a Local Plan. Policies in the Local Plan provide the hooks for the guides and SPDs. SPDs and Guides help with the implementation of policies. A Local Planning Authority does not need to produce them, but can do.	No change to document.
#68	William Hollocks	Loddon Marina	With regards the residential moorings there is every kind of boat currently on the Broads many used as residential and the BA already has bye law on this so why are the Planning Department trying to be a dictator on a matter which is under another departments jurisdiction (Lucy). The criteria for our residential moorings is well covered in policy LOD1. Does this mean that every boat that does meet this policy will be excluded from the Broads.	The policies relate to the use of the land, not the use of the boat. The Guide elaborates on already adopted policy (the Local Plan for the Broads was adopted in May 2019).	No change to document.
#69	William Hollocks	Loddon Marina	Can you please confirm that any policy you end up will be approved by the Secretary of State through his Inspector as an approved amendment to your Broads Plan. Without this as far as I can see it will be another attempt by the Planning Dictatorship to control the further deterioration of the business's on the Broads and will not be worth the paper it is written on..	These are not policies. These documents help to implement policies. Guides are not prescribed by regulations, but SPDs are. SPDs have a set procedure (see the regulations: <a href="http://www.legislation.gov.uk/uk/si/2012/767/part/5/made">http://www.legislation.gov.uk/uk/si/2012/767/part/5/made</a> ) and the Planning Inspector is not part of the process.	No change to document.
#70	William Hollocks	Loddon Marina	By copy of this e-mail to DR Packman, Lucy as the responsible manager for navigation and bye laws on boats and Marie as the boss of the out of control Planning Department I am asking to put a stop to these amendments as it is a complete waste of money and has no justification to be in the public interest.	Noted	No change to document.
#71	William Hollocks	Loddon Marina	I am more than happy to start a campaign of getting support not for comments to the policies but to get them stopped. We are happy to lobby every Parish Council, BA members, Councils, MP's etc. I have also copied Mr Tarry as he is working with various parties to contribute to the consultation process.	Noted. But guides and SDPs are not policies. They help with the implementation of adopted policies	No change to document.
#72	Thomas Foreman	Thorpe St Andrew Town Council	The Committee welcomed the consultation by the Broads Authority on its Residential Moorings Guide and felt it was a very well-considered document.	Support noted.	No change to document.
#73	Thomas Foreman	Thorpe St Andrew Town Council	The Committee noted the important difference between houseboats and residential moorings, however, it was queried how the policy would apply to mixed sites with both houseboats and residential mooring.	The Local Plan at page 118, second para says that we expect schemes for residential moorings to be occupied by vessels regarded as boats and that houseboats will be dealt with on a case by case basis. That would be the same for mixed schemes, if any were to come forward as a planning application.	No change to document but see rows #21 and 22.
#74	Thomas Foreman	Thorpe St Andrew Town Council	The Committee felt that the management plan was a positive step, particularly with site rules explaining who is resident and how waste will be managed. As part of this section, it was felt the need for an Emergency Evacuation Plan should be included. If safe access for emergency service vehicles is important, it is also important to consider how people might evacuate prior to (or when) the emergency services arrive.	Noted. Access by emergency services would be considered as part of determining the application as per criterion g of DM37.	No change to document.
#75	Alan Wildman	Residential Boat Owners' Association	RBOA is keen to work with the Broads Authority with a view to demonstrating how, with good management controls at site level, residential boaters are of considerable benefit to moorings operators, other berth holders, local communities and the Norfolk Broads as a whole. It is to be hoped that if demand for residential moorings exceeds the 63 already identified, then BA might consider increasing the figure in order to meet that demand.	If applications come forward, they will be determined against the policies of the local plan. The number of 63 is not a maximum and we would not deny applications because we have permitted 63 residential moorings.	No change to document.

#76	Alan Wildman	Residential Boat Owners' Association	Quite apart from the legal requirement and the many general benefits of having water based residents, to Navigation Authorities and to moorings providers, responsible residential boaters are particularly known to provide: <ul style="list-style-type: none"> <li>• Added security: Not just in terms of property - land dwellers, walkers, boaters and other waterway users often confirm that they feel safer knowing there are people living on the water, close by.</li> <li>• Local knowledge: Visitors to areas where there are live-aboards frequently interact and benefit from the available local knowledge, usually freely given, to enhance the visitors' enjoyment of the region.</li> <li>• Safety: Where there are residential craft moored, by nature usually occupied by necessarily safety aware individuals, others who might get into trouble near, in or on the water have potential assistance immediately at hand.</li> </ul>	Noted.	No change to document.
#77	Alan Wildman	Residential Boat Owners' Association	We welcome the distinction between houseboats and other residential craft and would suggest a good, clear description be used to clarify what constitutes those other residential craft. RBOA suggests - traditional in that they would be identified as boats by "the man on the Clapham Omnibus".	The Local Plan described what is expected at these moorings in the supporting text of DM37. Any changes to that wording would need to be as part of the Local Plan review.	No change to document.
#78	Alan Wildman	Residential Boat Owners' Association	It is hoped that planning restrictions on houseboats might be negotiable with the applicants, rather than overly dictatorial, something that could be made clear in The Guide.	The Local Plan is clear that houseboats will be judged on a case by case basis.	No change to document. Also see comments #21 and 22.
#79	Alan Wildman	Residential Boat Owners' Association	Some marinas and boatyards already have on-line moorings. To locate a small number of residential slots in amongst those already existing moorings would impede neither navigation nor access to facilities. Perhaps this could be made clearer in The Guide.	Planning applications will be determined against relevant policies in the Local Plan. Policy SP13 will be relevant and impact on navigation is included on DM37 at criterion d. Again, the policy DM37 sets out where residential moorings will be acceptable and other than in Norwich, that is in marinas or boatyards rather than on line. if the RBOA wish for that to be changed, it is something to discuss as part of the review of the Local Plan.	No change to document.
#80	Alan Wildman	Residential Boat Owners' Association	Some residential boaters have little need for nearby access to most "key" services; for instance, BA acknowledges that many residential boaters are single, perhaps slightly older (without children on board) and/or even fully retired. It is hoped that BA will look favourably on applications for residential berths in areas that are a little remote from such services and could state that fact in The Guide.	The Local Plan for the Broads was adopted in 2019. The policy sets out the requirements for the location of residential moorings and this guide cannot change policy. DM37 is clear about where residential moorings will be deemed acceptable. Indeed, access to services was a key consideration when assessing the allocations in the Local Plan for residential moorings.	No change to document.
#81	Alan Wildman	Residential Boat Owners' Association	Flood Risk and Climate Change BA comments in The Guide are clear.	Noted	No change to document.
#82	Alan Wildman	Residential Boat Owners' Association	RBOA will readily offer advice to operators who may need assistance with creating Management Plans covering "responsible" residential boating. RBOA acknowledges BA's reference to our Association and/or our website and would like to see that reference strengthened within The Guide. RBOA anticipates no commercial benefit from providing such advice.  Follow up: As regards what you might further comment on RBOA, perhaps just a mention that we do liaise with most major Navigation Authorities would suffice - if you agree and feel it appropriate, then all well and good	Agreed, will add the extra wording to the RBOA paragraph.	The Residential Boat Owners' Associations (RBOA). Their website says: 'Established in 1963 the Residential Boat Owners' Association is the only national organisation which exclusively represents and promotes the interests of people living on boats in the British Isles. We represent all those who have chosen to make a boat their home'. <a href="https://www.rboa.org.uk/">The RBOA ensure they liaise with Navigation Authorities like the Broads Authority. https://www.rboa.org.uk/</a>
#83	Alan Wildman	Residential Boat Owners' Association	RBOA acknowledges that clear, strong and fair site management is the key to acceptable live-aboard craft. Good management will encourage responsible site maintenance and preservation of natural habitat and biodiversity. Reference in The Guide to LILO (Low Impact Living Aboard) might be advisable – RBOA can provide guidance in this respect if required.  Follow up: For us, the points we would like to get across are that we (RBOA) are keen to lead operators and customers in the direction of Low Impact Life On Board and, through RBOA, there is a wealth of advice in that respect. Many will hopefully recognise the anachronism (LILO) and seek us out for such free advice.	Agree. Will add reference to LILO.	<a href="#">9.12 Low Impact Life on Board</a> <a href="#">In response to the consultation on this guide, the RBOA were keen to emphasise Low Impact Life On Board and, through RBOA, there is a wealth of advice in that respect. Low impact life on board is an expression from UK waterways boaters who care about the environment.</a>
#84	Alan Wildman	Residential Boat Owners' Association	RBOA believes that boats used as primary residences should not stand out from leisure craft moored in the same vicinities. We would support BA in taking a similar stance and including such advice in The Guide.	The policy and guide seek to influence and guide the moorings and use of land rather than what boats look like. It seems that is will be down to the owner of the boat and management of the moorings.	No change to document.

#85	Alan Wildman	Residential Boat Owners' Association	RBOA believes that moorings operators should have absolute (but reasonable) control of boat placements within their operational sites and would like to see this mentioned in The Guide.	Agreed. Will add text.	Amend section 4 so there are two sub sections - one for geographical location and another for location of residential moorings within a site. Under location of residential moorings within a site add: ' <a href="#">An applicant may want certain specific moorings to be permitted for residential moorings or may want an area to be permitted with a maximum number of residential moorings within that area, to reflect the operations of the marina or boatyard or site. This will need to be discussed and agreed with the Local Planning Authority. It will then be for the operator of the site to control which moorings are used for residential moorings in line with the permission granted. This would then be logged in the register and the approach may be explained in the management plan</a> '.
#86	Alan Wildman	Residential Boat Owners' Association	It is reasonable to expect that any proposed inspection of moorings operators' records should only be requested with a good reason so to do. Such request should be negotiable with the operator, which fact should be made clear in The Guide.	Noted. See #96, 97, 98 and 99.	See #96, 97, 98 and 99.
#87	Alan Wildman	Residential Boat Owners' Association	RBOA has extensive experience of Council Tax issues; again RBOA would be happy for The Guide to refer to our Association and/or our website for advice.	Agreed. Will add text.	At section 8 add: ' <a href="#">and the RBOA also have information on Council Tax: https://www.rboa.org.uk/q-a/</a> '
#88	Alan Wildman	Residential Boat Owners' Association	Some facilities which may not be available "on site" but are available just a short cruise away from base are perfectly acceptable to many live-aboards. This is often the case on other waterways. RBOA suggests that point be clearly made within The Guide. We believe it reasonable to acknowledge that many live-aboard requirements, such as laundry, clothes drying, storage, etc. are often fully catered for within the confines of the craft (boat) itself. Moorings operators might be advised, via The Guide, that such a requirement could be part of their own Management Plan.	The guide is clear in that it says the section relating to facilities are things that an operator may wish to make available. It gives examples and case studies. The elements of this section tend to relate to policy criteria and so the application will need to show how they are addressed. It is up to the operator to consider how the needs of those living on their boats will be catered for.	No change to document.
#89	Alan Wildman	Residential Boat Owners' Association	Key Messages A good summary.	Noted	No change to document.
#90	Alan Wildman	Residential Boat Owners' Association	Helpful links and where to go to get advice RBOA would encourage emphasis on the fact that we are a wholly volunteer group unlike other (commercial) organisations – our focus is not on RBOA revenue generation, but is solely on achieving our aims, as declared at the head of this response paper – RBOA is dedicated solely to the protection, promotion, universal acceptance and continued development of "responsible" residential boating (living-aboard).	Noted. Consider the reference to the various organisations adequately addressed in the Guide.	No change to document.
#91	Jason Beck	East Suffolk Council	East Suffolk Council, Planning Policy Department has no comments to make on this document.	Noted	No change to document.
#92	Emily Curtis	Loddon Parish Council	Councillors welcomed a management plan for the sites with residential moorings. LPC believes that a management plan would ensure the site was is well managed and will help protect land and boat residents from anti-social behaviour.	Support noted.	No change to document.
#93	Emily Curtis	Loddon Parish Council	Councillors welcomed that consideration is being given to climate change, and agreed that it is important to consider the necessity for a site to have adequate provision for waste, sewage disposal and the prevention of pollution. How will these considerations be monitored?	The ability to meet these requirements will be part of the assessment and form part of planning conditions which are routinely monitored.	No change to document.
#94	Emily Curtis	Loddon Parish Council	Councillors consider it is important that a safety plan for flooding is taken into consideration for the safety of the residents on the boat.	Support noted.	No change to document.
#95	Emily Curtis	Loddon Parish Council	Councillors welcomed the policy regarding the necessity for facilities and services available for residential moorings, it is important for people living on land or water to have access to adequate services and facilities.	Support noted.	No change to document.
#96	Emily Curtis	Loddon Parish Council	Councillors raised concerns over the necessity of a register and have asked why it is necessary for this information to be held by the site owner?	The site owner will log who is on what mooring and whether they are residential moorings or other types of moorings they offer, just like any business would keep records. The Broads Authority would request to see this register from time to time to ensure that only the permitted number of boats are being lived on. It would be for the operator to ensure they kept their register in line with GDPR requirements. This approach is similar to the requirement that holiday accommodation operators have - to keep a log of those who stay, including the time period for periodic inspection by the Broads Authority, again to ensure the accommodation is being used as permitted.	Add some further explanatory text to this section: 7. Register A register of those boats being lived on will be required. The register of who lives on which boat will be maintained at all times and is made available for inspections <a href="#">by the Broads Authority as part of monitoring of conditions set on any permission. The reason for keeping this register is to ensure that only the permitted number of boats are being lived on.</a>
#97	Emily Curtis	Loddon Parish Council	What purpose does holding this register have for site owners?		
#98	Emily Curtis	Loddon Parish Council	Is this retention of register data inline with GDPR and should this information be held securely, and for what length of time the data be stored.		
#99	Emily Curtis	Loddon Parish Council	Why do the Broads Authority need to inspect this register?		
#100	Emily Curtis	Loddon Parish Council	We would note that management of any antisocial behaviour by occupants of residential boats is dependent on the quality of designated site manager and what further control measures could be put in place to help the site manager deal with anti-social behaviour?	Operators will no doubt use a contract that sets out the requirements of staying on a boat at their site, including why and how such contract could be terminated. Perhaps anti-social behaviour may be such a reason for termination of a contract. Also such behaviour can be reported to the police or Council just the same as one would if there was anti-social behaviour from those living in a house on land.	No change to document.

#101	Emily Curtis	Loddon Parish Council	Will the Broads Authority have the power to withdraw a site owners licence to accommodate residential boats in the event of recurrent anti social behaviour?	Planning permission, once granted, cannot be revoked like a licence might be. Anti-social behaviour by those living on their boats will be down to the management of the site. Anti-social behaviour will be dealt with in the same way it will be dealt with in any other sort of housing.	No changes to document.
#102	Rachel Card	NSBA	The Norfolk and Suffolk Boating Association (NSBA) thanks the Broads Authority for the opportunity to participate in consultation on the above planning policy guide. The NSBA has no comment to make with regard to the advice and policies in this document.	Noted.	No change to document.
#103	Paul Harris	SNDC and BDC	I note that the document is referred to as a Guide, and whilst it is expressly 'designed to help implement the policies of the Local Plan' and seeks to elaborate on the adopted Broads Local Plan Policy DM37 - New Residential Moorings, it does not appear that you intend to adopt the Guide as a Supplement Planning Document, with the status which that confers.	Correct. We have a few other guides as well: <a href="https://www.broads-authority.gov.uk/planning/planning-permission/design-guides">https://www.broads-authority.gov.uk/planning/planning-permission/design-guides</a>	No change to document.
#104	Paul Harris	SNDC and BDC	Overall the Guide contains a range of useful information; however, at various points throughout the document, it is not entirely clear what issues the Broads Authority consider to be material to determining planning applications, and what is useful background information. The document could give the impression that a significant amount of information will be required to support a planning application, where this may not actually be the case.	The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful.	No change to document.
#105	Paul Harris	SNDC and BDC	<b>Section 5 – Flood risk and Climate Change</b> The aims of this section, to ensure that safety considerations are assessed as part of any Flood Risk Assessment and Flood Response Plan, are supported. The Guide relates this section to Local Plan Policies DM5 and DM37, but it is not clear how much of the suggested information would actually be required to support a planning application; if this information is being required for planning purposes, consideration needs to be given as to (a) how requirements will be monitored, (b) whether they are enforceable under planning legislation and (c) whether they might already be covered by other legislation.	This section generally copies over text from the Local Plan. However amendments following this consultation, as detailed at #23 and #24 provide greater detail. Also see response to #47.	See #23, 24 and 47.
#106	Paul Harris	SNDC and BDC	<b>Section 6 – Management Plan</b> Whilst it could be useful to condition a management plan as part of any planning permission, the list of issues covered would appear to extend beyond those related to the planning aspects of development; for example, conditioning a management plan that incorporates the 'site rules' or 'terms and conditions' could be requiring information that is largely concerned with non-planning issues. In addition, a number of the issues the Guide suggests the management plan could cover would appear to be seeking/requiring a level of detail that would not be required for a more regular residential development, even where that development has shared/communal/public space – the Guide does not make it clear why this level is required, and how it might be used to enforce a planning condition.	The points made are noted. And it is accepted that there is a level of detail set out in the guide, and required to help assess a planning application and this level of details goes beyond that which would be requested for a land based dwelling. However, as a unit of accommodation, residential moorings are different. Facilities required aren't routinely provided on sites which may be used for residential moorings (e.g. waste, pollution prevention, electricity) so we need to see how they will be provide. And there is a level of risk for example from drowning which is not usually present with bricks and mortar accommodation. The purpose of the guide is to prompt people to think about these things.	No change to document.
#107	Paul Harris	SNDC and BDC	<b>Section 7 – Register</b> Again the Guide does not make it clear why a register of who lives on each boat is required for residential moorings (as opposed to a register of the moorings themselves), this would only seem relevant if the Broads Authority was applying specific occupancy conditions to a site; however, this is not clear from the Guide.	Noted. See #96, 97, 98 and 99.	See #96, 97, 98 and 99.
#108	Paul Harris	SNDC and BDC	<b>Section 8 – Council Tax</b> It is useful to highlight need to speak with relevant Local Authorities regarding Council Tax, although it may be worth highlighting that this does not affect the planning decision on a particular site.	This section gives information and provides links to find out more as well as advising operators to contact the relevant district. There is nothing in the text to say that we require the applicant to do something.	No change to document.
#109	Paul Harris	SNDC and BDC	<b>Section 9 – Facilities</b> This sets out a useful checklist for site providers. Again, what is not entirely clear is which of these issues could be material to any decision on a planning application e.g. car parking, or amenity space provision and which provides useful sources of background information e.g. methods of potable water supply.	Section 9.1 to 9.8 relate to topics quoted in the policy. The section is also quite clear in that it uses some examples from elsewhere, but to discuss the approach favoured by the operator with the Broads Authority. 9.9 refers to other facilities/extras to consider.	No change to document.



#110	Paul Harris	SNDC and BDC	In conclusion, the document contains a lot of useful information for the providers of residential moorings. By linking the document closely to adopted Local Plan Policy DM37, it gives the impression that the Guide is setting out the information that will be required to determine planning applications under that policy; however, in some instances this appears not to be the case. As such, it would be useful if the document were more clearly structured to emphasise that information which might be used to determine a planning application, and that information which is a useful resource to site providers about good practice and achieving the best quality of provision.	This is a summary comment and the issues raised have been addressed in previous comments.	See previous comments.
#111	Paul Fletcher	Beccles Parish Council	I realise that I have missed the deadline for responses on the above document, ( Neighbourhood Plan and Beccles Society have taken up too much of my time). Nevertheless, I thought that you might like to know that we felt that it was a very comprehensive all encompassing document and we had no adverse comments to make.	Support noted.	No change to document.

## Appendix 2 - Revised draft Residential Moorings Guide - responses to second consultation

Ref	Name	Organisation	Comment	BA response	Amendments
#1	Philip Linnell	Individual	I thought the Guide very conclusive and well written. There are a few additional considerations that have come to light due to our situation:	Noted. General support welcomed.	No change to Guide.
#2	Philip Linnell	Individual	1. Insurance – I have seen more sunken residential boats than non-residential. I would suggest that the proposed boats register also contains insurance details, and this is also managed by the moorings manager. The Guide does refer to a specific policy for residential boats, you may want to consider specifying what specific events the insurance must cover.	The Guide does refer to insurance - at section 6 i and section 11. During the previous consultation, a respondent stated that reference to insurance should be removed, as it is not a planning issue. So to have the reference we do strikes a balance between that respondent's view and Mr Linnell's.	No change to Guide.
#3	Philip Linnell	Individual	2. Waste – the Guide is conclusive, however in the HOR6 site there would be no direct link to the mains waste service. The immediate neighbour is connected via a pump which he maintains himself. Your guide does not quite cover the scenario of the maintenance of a pumped waste collection facility.	Noted. All planning applications are assessed against all relevant policies of the Local Plan. In the Local Plan, the issue of foul water is addressed at policy DM2 (referenced in the Guide at line 249). We also have a joint position statement with the Environment Agency, Anglian Water and North Norfolk District Council that essentially prevents any development that results in more foul water to the Water Recycling Centre near Horning (Knackers Wood), until such time as the capacity of the Centre has improved. That is why HOR6 is scheduled for after 2024 after which is hoped the capacity issues will have been addressed.	No change to Guide.
#4	Philip Linnell	Individual	3. Fire Access – there needs to be an area large enough for a fire engine to turn around. I am not sure of when this stipulation is required, however there needs to be reference to fire access. I have seen a boat burn and it is pretty frightening.	Noted. The Local Plan adopted policy on residential moorings refers to emergency vehicle access at criterion g. As background, when this policy was being examined by the Planning Inspector, in response to comment by Thorpe St Andrew Town Council, who called for more text in this regard, the Inspector concluded the wording was adequate. When we review the Local Plan, we will look into if this wording can be improved. Turning to the guide, at line 310, there is reference to fire evacuation.	No change to Guide.
#5	Philip Linnell	Individual	4. Flooding – how far should the mooring be from the nearest dry land in the event of flooding? Is it easily reachable?	Noted. The actual residential moorings policy has a section in the supporting text relating to flood risk which sets out the various requirements. One of the issues that any application needs to address is the need for a flood response plan. There is information in the Guide about the issue of refuges. Also, any application would need to address the requirements of the recently adopted Flood Risk Supplementary Planning Document. We therefore consider the issue of flood risk adequately covered in the planning policy documents.	No change to Guide.
#6	Philip Linnell	Individual	5. Road access – although not really a planning issue, the land owner should ensure that there is sufficient right of way provision for this change of use.	Residential Moorings are the same as any other development in that we would expect the site plan to show that there is access to the public highway.	No change to Guide.
#7	Philip Linnell	Individual	6. Sound Nuisance – the Guide covers the boat owners creating noise, but not them suffering from noise already coming from the surrounding area. For example Horning Sailing Club start sailing early on Sundays all year around, have noisy children's sessions, fire guns and hold late night parties, with their only access bridge very near to the proposed moorings. A check for noise and other existing disturbances (like busy roads) should be part of the suitability check.	Noted. As part of assessing any planning application, we consider the issue of Amenity. See policy DM21. So existing land uses will be considered in that assessment. I do note however that the proposed site for residential moorings at Horning is a similar distance from the sailing club as the dwellings like Heronshaw and Romany. Finally, the guide refers to amenity at lines 178, 509.	No change to Guide.
#8	Sarah Luff	LLFA, Norfolk County Council	In section 3 of the report, there is a discussion on the Environment Agency's consideration of the flood risk vulnerability classes for houseboats and boats. Please can you clarify whether this perspective is a national or local perspective? In addition, please can you confirm what the supporting documentation is?	We asked the EA for their thoughts. They responded saying 'Planning law about residential moorings (including vulnerability classification) for boats is complex. Marinas are classified in the PPG as 'water compatible', but there is less certainty over moorings outside marinas. Generally it is considered that residential boats that are navigable are water compatible, however it is up to the LPA to make the final decision. The consideration of non-navigable houseboats as more vulnerable was a local opinion based on our understanding of the NPPF and PPG. It is the responsibility of the Broads Authority to determine the vulnerability classification of non-navigable houseboats. However it is acknowledged by internal EA guidance that purpose-built floating structures that cannot be used for navigation (e.g. floating mobile homes or chalets) are often attached to pontoons and therefore more susceptible to being damaged and swept away in a flood. This places their occupants and others at greater risk. If houseboats are to be sited in Flood Zone 3b then they would be considered an inappropriate development type unless they are classed as either water compatible or essential infrastructure. The only type of residential development that is classed as water compatible in the PPG is 'ancillary accommodation for staff involved in water compatible land uses that are compatible with Flood Zone 3B'. So the LPA should take this into account when making their decisions on vulnerability'.	No change to Guide.

#9	Sarah Luff	LLFA, Norfolk County Council	<p>In section 5 of the report, the documentation introduces the need for a Flood Risk Assessment and a Flood Response Plan. However, there is no mention in this section of the supporting guidance on the preparation of these documents. Please ensure the inclusion of links to:</p> <ul style="list-style-type: none"> <li>• The Environment Agency guidance on the preparation of a Flood Risk Assessment - <a href="https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications">https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications</a> and <a href="https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3">https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3</a></li> <li>• The Environment Agency's guidance on climate change for flood risk assessments - <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a></li> <li>• The LLFA's Developer Guidance - <a href="https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers">https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers</a></li> <li>• The latest ADEPT guidance on emergency flood plans for new development - <a href="https://www.adeptnet.org.uk/system/files/documents/ADEPT%20%26%20EA%20Flood%20risk%20emergency%20plans%20for%20new%20development%20September%202019.pdf">https://www.adeptnet.org.uk/system/files/documents/ADEPT%20%26%20EA%20Flood%20risk%20emergency%20plans%20for%20new%20development%20September%202019.pdf</a></li> </ul> <p>These links will need to be referenced in other sections throughout the report to ensure the reader or developer has every opportunity to understand the requirements.</p>	Noted. We have a recently adopted Flood Risk SPD that includes a template and guidance on producing a flood response plan.	No change to Guide.
#10	Sarah Luff	LLFA, Norfolk County Council	<p>It should be noted that the ADEPT guidance on emergency flood plans for new developments states that "the LPA will have to form an overall view of its adequacy and be satisfied it can be safely and reasonably achieved before determining the planning application. It is not appropriate to defer consideration of emergency planning matters using pre-commencement planning conditions."</p> <p>In addition, the ADEPT guidance is clear that while the local authority emergency planners are not statutory consultees and have no explicit statutory requirement to approve or deliver Emergency Plans, the Planning Practice Guidance is clear that they should be consulted by the LPA to advise on proposals that have emergency planning implications for flood risk.</p>	Noted. We do not have Emergency Planners and at the moment we are discussing how our district Emergency Planners can be involved in our applications that have a flood response plan. Adept guidance is referred to in our SPD.	No change to Guide.
#11	Sarah Luff	LLFA, Norfolk County Council	<p>Further to this matter, does the Broads Authority have a map of where all the residential moorings are located and whether both a flood response plan and a management plan have been provided for the residential moorings? How will the Broads Authority ensure that these plans remain current?</p>	At the moment, only one scheme is in operation - at Waveney River Centre in South Norfolk. Permitted on appeal, before the policy of residential moorings was adopted. A condition on that permission was the production of a flood response plan. This was completed in 2018. Another scheme has been permitted - at Marina Quays in Great Yarmouth. The flood response plan formed part of the flood risk assessment and the scheme was approved. Regarding reviewing the flood response plan, this is mentioned in the guidance in the recently adopted Flood Risk SPD.	No change to Guide.
#12	Sarah Luff	LLFA, Norfolk County Council	<p>In section 5, line 143 to line 155, it is indicated that the Environment Agency have stated particular requirements of the FRA and mooring requirements during a time of flood. However, there is no reference as to where these stated Environment Agency requirements/guidance is derived from. Please can you include a reference in the revised version of the guide?</p>	<p>We asked the EA for their thoughts. They responded saying 'In terms of the Flood Risk Assessment requirements, the FRA should include information on;</p> <ul style="list-style-type: none"> <li>• The nature of the flooding in the proposed location and the impact it could have on the development and its users</li> <li>• What needs to be done to ensure it is safe in the event of flooding in the proposed location in the context of its users</li> <li>• What needs to be done to ensure the floating structure will be adequately secured in the event of a flood in the proposed location, considering the risk if the proposed development becomes mobile in the event of a flood (for example, if downstream of the location there are bridges, if the structure became mobile it could cause a blockage and increase flood risk elsewhere)</li> </ul> <p>It is a key policy of the NPPF that occupants should be safe in a flood, and that an extreme (0.1%) flood can be managed through evacuation in advance of a flood. Paragraph 40 of the NPPF PPG states 'To demonstrate to the satisfaction of the local planning authority that the development will be safe for its lifetime taking account of the vulnerability of its users, a site-specific flood risk assessment may need to show that appropriate evacuation and flood response procedures are in place to manage the residual risk associated with an extreme flood event'. It also states that 'Proposals that are likely to increase the number of people living or working in areas of flood risk require particularly careful consideration, as they could increase the scale of any evacuation required. To mitigate this impact it is especially important to look at ways in which the development could help to reduce the overall consequences of flooding in the locality, either through its design (recognising that some forms of development may be more resistant or resilient to floods than others) or through off-site works that benefit the area more generally.</p>	Following discussions with the EA, no changes required to the Guide.

				<p>Consequently we consider that it is preferable if the occupants can be safe within the development in the event of an extreme flood, to reduce the consequences of flooding in the locality and the reliance on prior evacuation. Therefore we prefer new more vulnerable development, such as dwellings, to have a refuge as a fall back measure should flood warnings not be received in time for evacuation, although we do advise that it is the LPA and Emergency Planner's role to ensure safety of occupants in absence of safe access and/or refuge and to determine whether the proposed Flood Response Plan can manage the safety of the occupants. Therefore we consider that similar requirements apply here as there will be people living on the residential boats. It is preferable for the residential boat to be able to rise high enough to provide refuge in the extreme event, should flood warnings not be received in time, to provide a fall back safety measure. If this refuge was not provided, then it would be up to the LPA and Emergency Planner to determine whether the development would be safe without a higher refuge.</p> <p>Also paragraph 060 if the NPPF PPG states that 'The first preference should be to avoid flood risk. Where it is not possible, a building and its surrounds (at site level) may be constructed to avoid it being flooded (e.g. by raising it above the design flood level).' While a residential boat might not be a building we consider that the same principles apply so the boat should be able to raise up so that it is not at risk of flooding from a design (and ideally extreme) flood'.</p>	
#13	Sarah Luff	LLFA, Norfolk County Council	In addition, the outcomes of the FRA need to be included in all aspects of the application from facilities location to flood resilient and resistant design.	Noted. The Flood Risk SPD, recently adopted, will be of relevance.	No change to Guide.
#14	Sarah Luff	LLFA, Norfolk County Council	Furthermore, in this section the notation of the flood events could be clearer. Please review and update how these are noted. For example, currently the text states "0.1% (1 in 1000) climate change flood level" which would be better written as "0.1% AEP (1 in 1,000 year) plus climate change", where AEP stands for Annual Exceedance Probability.	We asked the EA for their thoughts. They responded saying 'We agree that 0.1% AEP (1 in 1,000 year) plus climate change would be a better wording, and apologise that AEP or annual exceedance probability was missed out from our previous comments'.	Amend the wording to reflect the comment.
#15	Sarah Luff	LLFA, Norfolk County Council	Currently, the guide presents climate change as an isolated issue from flood risk and the proposed development management. Fundamentally climate change adaption and allowances should be integrated within all aspects of designs and developments for use in the future. The application of climate change allowance within flood risk assessment and design is compulsory to represent the future scenario. Therefore, please can the climate change check list be integrated within all aspects of the design and management requirements for residential moorings? For reference, this approach is in line with the developments on land within the county.	The climate change checklist is from the Local Plan which was adopted in May 2019. Other policies in the Local Plan will apply to schemes as well as the Flood Risk SPD. Both the Local Plan and SPD refer to a climate smart approach to development. The SPD also refers to the allowances.	No change to Guide.
#16	Sarah Luff	LLFA, Norfolk County Council	<p>Within both section 6 and 9, there is initial guidance regarding the requirement for storing waste, however there is no guidance on the consideration to pollution and water quality management in flood risk areas should be given during periods of high flows. Please can further information on this matter be included on the guidance?</p> <p>Follow up: We agree that the matter of the consideration to pollution and water quality management in flood risk areas should be given during periods of high flows is not just relevant to residential moorings. We would suggest that if you have guidance that applies to all sites that you cross reference to the relevant guidance within this (and others) guide as appropriate. Regarding noise, it is more a point of raising inconsistency within the guidance document. If it is raised as a specific concern associated with residential moorings, then it is appropriate to provide guidance even if it is only a cross reference to other guidance.</p>	Make change	Make change to section 6 and 9 to refer to location of waste storage near to water.
#17	Sarah Luff	LLFA, Norfolk County Council	The information in section 6 and 9 appears to be interlinked with section 9 looking at the policy and section 6 looking at the management plan. The section stating the policy would normally be presented first in a guidance document, then naturally lead to the section with the management measures relating to the policy. We would suggest that section 9 should come before section 6 or even for the two sections to be combined.	We are content with the order of the document.	No change to Guide.
#18	Sarah Luff	LLFA, Norfolk County Council	In section 9, the policy extract that is provided does not cross reference either internally or externally to the document. Please can this be addressed.	We will remove policy. It was useful for when consulting on the Guide, but reference to the policy in the final document is considered adequate.	Remove policy from guide and cross refer to Local Plan.

#19	Sarah Luff	LLFA, Norfolk County Council	The guidance document notes the importance of being able to provide a power supply to reduce pollution and noise issues, yet no mention of renewable energy facilities is made or encouraged within the guide. Please can further information and suitable cross referencing to other policy documents be made within the guide?	We do not have a policy relating to renewable energy for residential moorings. We do have a general renewable energy and energy efficiency policy in our recently adopted Local Plan (section 16 of the Local Plan). We could add reference when we refer to low impact living.	Add reference to renewable energy and our local plan policy: <a href="#">9.3.4 Renewable/low carbon energy</a> <a href="#">An operator may wish to consider renewable/low carbon energy.</a> <a href="#">The Local Plan for the Broads has policies relating to this: see page 64 of the Local Plan for the Broads.</a>
#20	Sarah Luff	LLFA, Norfolk County Council	With regard to the water supplies and the discussion on the Environment Agency's regulation of abstractions, the inclusion of a link to the Environment Agency's abstraction guidance would be useful to the readers.	Asked the EA for their guidance. They said they are not aware of a particular guide itself but that we could include guidance within the supporting text for applying for a licence here <a href="https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence">https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence</a> or managing a licence here <a href="https://www.gov.uk/guidance/manage-your-water-abstraction-or-impoundment-licences-online">https://www.gov.uk/guidance/manage-your-water-abstraction-or-impoundment-licences-online</a>	Add links to text at 9.1.2
#21	Sarah Luff	LLFA, Norfolk County Council	The sewerage provision is a requirement at the proposed residential moorings. As these provisions are likely to be located in an area at flood risk, further guidance and appropriate cross references should be included with in this guidance to consider operation and pollution prevention during high flow conditions and flood events.  Follow up: We agree that the matter of the consideration to pollution and water quality management in flood risk areas should be given during periods of high flows is not just relevant to residential moorings. We would suggest that if you have guidance that applies to all sites that you cross reference to the relevant guidance within this (and others) guide as appropriate. Regarding noise, it is more a point of raising inconsistency within the guidance document. If it is raised as a specific concern associated with residential moorings, then it is appropriate to provide guidance even if it is only a cross reference to other guidance.	Asked the EA for their guidance. They said that 'in terms of covering flood risk off you could highlight that a Flood Risk Assessment may be required for these facilities. A permit will also be required for any development within 8m of the main river. You could reference that the sewerage provision for the residential moorings must have adequate pollution prevention measures in place at all times (and that would also cover any flood events)'.	Add text about flood risk assessments to section 5. Text about 8m is already in guide, so not change. Add text to 9.1.3 in relation to pollution prevention.
#22	Sarah Luff	LLFA, Norfolk County Council	Within the guidance document, there was an initial mention of noise within the guidance as a consideration, however, no further guidance was then provided on how to manage and address the issue. Please can further information and suitable cross referencing to other policy documents be made.	Whilst noise is a consideration, marinas and boatyards are areas where work is taken place, so those living on boats in those areas should expect a certain level of noise. We already refer to the amenity policy so noise pollution is a consideration. We would expect the terms and conditions the are signed up to by someone living on a boat at a marina or boatyard to have a clause relating to noise.	No change to Guide.
#23	Sarah Luff	LLFA, Norfolk County Council	The guidance indicates the provision of amenity space and landscaping is necessary, although it should be noted that any development of facilities should not reduce the flood storage capacity of the floodplain or impede flood flow routes. Further information regarding flood storage compensation and assessment is available in the LLFA's developer guidance.	Noted and agreed. Will amend text.	9.1.6 Amenity space and landscaping The Amenity policy of the Local Plan (DM21) requires schemes to provide a 'satisfactory and usable external amenity space to residential properties in keeping with the character of the surrounding development'. It may also be appropriate to provide landscape enhancements of the land associated with the Residential Mooring to improve the amenity of the area in connection with the development. <a href="#">Please note that development of facilities should not reduce the flood storage capacity of the floodplain or impede flood flow routes</a>
#24	Sarah Luff	LLFA, Norfolk County Council	In addition, there may be the need for ordinary watercourse consenting depending on the status of the watercourses involved. Further information is available online at <a href="https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management">https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management</a> . The LLFA observes that information is provided on the Environment Agency's environmental permitting for flood risk activities however, no information is presented regarding the need for consenting on ordinary watercourses. Please could the guide include suitable mention and reference on these matters?	Noted and agreed. Will amend text.	9.3.1 Informative – <a href="#">Permits Environmental Permit for Flood Risk Activities</a> An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a> . Anyone carrying out these activities without a permit where one is required, is breaking the law.  <a href="#">Section 23 of The Land Drainage Act 1991 requires applicants who wish to affect the flow of an ordinary watercourse, for instance to culvert, dam, weir or install a headwall into a watercourse, to obtain consent from the drainage board concerned.</a>

#25	Sarah Luff	LLFA, Norfolk County Council	Where new facilities are to be built, there is the potential to increase the area of impermeable surfaces. The LLFA will expect the use of sustainable drainage systems to be included in the proposals to prevent an increase in surface water runoff rate and volume. Further information is available in the LLFA's developer guidance online at <a href="https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management">https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management</a>	Noted and agreed. Other policies of the Local Plan will be used when assessing schemes. Policy DM6: Surface water run-off requires all development proposals will need to incorporate measures to attenuate surface water run-off in a manner appropriate to the Broads. Add reference to surface water in section 5.	At the start of section 9, add: <a href="#">The Local Plan also requires all development to consider and address surface water run off and this may be relevant to your scheme, especially if you plan to provide surfacing that may be impermeable.</a>
#26	Sarah Luff	LLFA, Norfolk County Council	Facilities, such as storage lockers, are presented as possible solutions. Further guidance regarding the design of facilities is required to ensure that proposed structures are designed in a flood resilient or resistant manner. Furthermore, these features should be appropriately secured to prevent excessive movement that could cause blockages downstream should they become mobile.	Noted. We will make that point in the text.	9.1.7 Storage Scheme promoters/operators are required to address storage of residential paraphernalia. Unless a system for storing kit and possessions is put in place, the residential moorings could become cluttered with residential paraphernalia which will alter the character of the area. Norfolk Police recommend storage is of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender). <a href="#">It is also important that lockers are flood resilient and resistant to ensure that, at times of flood, they are not mobile and do not cause blockages in waterbodies.</a>
#27	Sarah Luff	LLFA, Norfolk County Council	In section 9.3, there is mention of low impact boating, although no further information or guidance is provided. This is a missed opportunity to contribute towards net zero to require and direct developers and boaters towards low carbon or sustainable solutions, such as renewable energy supplies (windmills are intrinsic and historical features of this landscape), sustainable drainage and compensating flood storage areas where landward development would reduce it. Please include further information of how developers and residents can contribute to improving the suitability of their community.	Having consulted the RBOA, there is no guidance per se, it is about living on a boat in a low impact sort of way. It refers to how the person lives on the boat. That being said, we will improved reference to renewable energy as per row number 19 above.	No change to Guide.
#28	Sarah Luff	LLFA, Norfolk County Council	In relation to document structure and presentation there are a number of potential improvements that could be made. The questions and case studies are useful although the way they are structured within the report and their headings is confusing. Please can this be reconsidered and addressed?  Follow up: As previously stated, the questions and case studies provide useful information. However, the as you have eluded the current document structure lacks flow and the location of these sections is means the information could be missed. The question and case study information is intertwined in an unclear way and our suggestion would be to have better separation between the guidance and the case studies. Perhaps there would be merit in having a case studies in boxes.  Further maybe the sub-section title should not be posed as a question to give you more scope to discuss matters of concern within the section.  In addition, you may want to review your document from an accessibility perspective too.	Noted, but we are content with the structure.	No change to Guide.
#29	Sarah Luff	LLFA, Norfolk County Council	The key messages section could be moved to the front of the document and used as a basis to prepare an executive summary.	Key messages - could be at the start of the document, but also acts as a conclusion. Do not intend to have an executive summary as the document is only around 20 pages long.	Move key messages to the start of the document.
#30	Sarah Luff	LLFA, Norfolk County Council	While the links section could be reduced so that all background information could be provided in an appendix and links to national and local policies should be woven into the document.	Regarding links and extra information - noted, but we are content with where it is.	No change to Guide.
#31	Sarah Luff	LLFA, Norfolk County Council	We would suggest that the text in lines 363 to 367 should be reconsidered. At present, it lacks strength. For example, the sentence on line 366 and 367 could be improved by being re-written as "We encourage you to contact the Broads Authority to discuss your application prior to submission."	We consider the text robust and clear.	No change to Guide.
#32	Sarah Luff	LLFA, Norfolk County Council	Regarding the current appendices, some of these could be removed or reduced. For example, Appendix A could be presented as a link within the policy section as only one internal cross referencing to Appendix A has been made in the introduction, therefore it has no function in actively supporting the report. Appendix B is generic information that could be hosted outside of the report and referred to. While Appendix C and D could remain either as appendices (although better internal cross referencing would be needed) or alternatively the checklists could be included within the document text.	Appendix A - will consider removing this as yes, could just cross refer to the Local Plan. Appendix B is something we put in all our consultation documents. It will not be in place in the final version. Appendix C and D - it is appropriate to have these at appendices and it follows the other guides that we have in place.	Remove policy from guide and cross refer to Local Plan. Remove appendix B.

#33	Mark Norman	Highways England	The proposals are unlikely to affect the Strategic Road Network in any way and therefore, we have no comments to make on the proposed guidance.	Noted.	No change to guide.
#34	Liam Robson	Environment Agency	Treatment Hierarchy: We see that in response to our comments about sewerage management, there is now additional text added to explain the treatment hierarchy with a presumption to mains sewer network where possible. There is also text added stating that it is illegal to discharge sewage from boats direct into the river. Thank you for amending this. The new text added covers the points we previously raised, and we have no other water quality concerns	Support noted.	No change to Guide.
#35	Liam Robson	Environment Agency	Flood Risk: We are satisfied with the changes you have made to the original comments we raised in relation to flood risk. We have however added some comments to you in response to the LLFA as you requested as well as those requested for tourism houseboats. Overall, we are satisfied with the changes made to the draft document although you might want to change some of the wording once you have reviewed our response to the LLFA below. As always, please do get in touch should you have any questions.	Noted. See row 14.	No change to Guide.
#36	Paul Harris	South Norfolk DC	Thank you for consulting South Norfolk Council and considering our previous representations on this document. The Council remain of the opinion that the document could still benefit from more clearly emphasising the information that which would be used to determine a planning application, and that which is a useful resource to site promoters about good practice and achieving best quality outcomes. However, we recognise that you have previously considered our representation in this regard and the Council does not wish to add further comments at this point.	Noted.	No change to Guide.
#37	Paul Harris	South Norfolk DC	We note that the guide refers to the requirement for new residential moorings to be within 800m or 10 minutes' walk of at least three key services. We recognise that these distances are specified within the adopted policy but are concerned that these distances may be overly restrictive in a Broads landscape with its inherent physical and natural constraints.	The reference to walking distance from the key services was required by the Inspector to enable more areas to meet the locational criteria. As you rightly point out, that wording is in adopted policy and we cannot change policy through this guide. As and when we review the policy, discussions can be had about the locational criteria.	No change to Guide.
#38	Paul Harris	South Norfolk DC	The Council supports references to ensuring that adequate waste disposal facilities are provided.	Support noted.	No change to Guide.
#39	Paul Harris	Broadland DC	Thank you for consulting Broadland District Council and considering our previous representations on this document. The Council remain of the opinion that the document could still benefit from more clearly emphasising the information that which would be used to determine a planning application, and that which is a useful resource to site promoters about good practice and achieving best quality outcomes. However, we recognise that you have previously considered our representation in this regard and the Council does not wish to add further comments at this point.	Noted.	No change to Guide.
#40	Georgia Teague	Suffolk CC	At Section 5 text in the box under a), reference is made to vessel moorings being too tight or loose and consequences. It would be useful to add that vessels that come adrift from their moorings, either in flood conditions or in normal situations could give rise to an increase in flood risk if they drift and block or create a water flow restriction of a waterway on the Broads.	Noted. We could add this to the Guide as another reason for ensuring the boat is moored well.	Add reference to the potential for a boat to block water flow at times of flood: <a href="#">Regarding a) above, please note that vessels that come adrift from their moorings, either in flood conditions or in normal situations, could give rise to an increase in flood risk if they drift and block or create a water flow restriction of a waterway on the Broads.</a>
#41	Georgia Teague	Suffolk CC	The residential moorings guide mentions that such moorings should avoid impacts on the local landscape character; it also requests storage facilities for residential paraphernalia, to maintain the local character and amenity value. It does not go into any detail.	The approach to storage facilities will be a local site-specific approach, proposed by the operator. We include an image to show how this has been done elsewhere. As for the detail of amenity and landscape, the other policies of the Local Plan will be of relevance.	No change to Guide.
#42	Georgia Teague	Suffolk CC	It is suggested that this document could include further detail as to how landscape will be protected, in order to retain local character.	All relevant policies of the Local Plan will be considered in determining residential moorings schemes, including the landscape section of the Local Plan.	No change to Guide.
#43	Georgia Teague	Suffolk CC	SCC would also like to raise the issue of would landscape be covered by other, standard, policies?	All relevant policies of the Local Plan will be considered in determining residential moorings schemes, including the landscape section of the Local Plan.	No change to Guide.
#44	Georgia Teague	Suffolk CC	As stated in the documents, any new parking provision should follow the local authorities parking guidance. For Suffolk there is no specific mention of mooring, but as they are so few it is not likely that SCC would change the current guidance. It is suggested that this could be covered by making contact with the DM team.	It is noted that there are no parking standards for moorings. Suffolk, as Highways Authority, will be consulted on schemes for residential moorings, in the usual way.	No change to Guide.
#45	Georgia Teague	Suffolk CC	SCC would also note that any new access to the public highway may need planning permission from the Local Planning Authority, and that no work can be done within the public highway and that includes verges and public rights of way without the permission of the highway authority.	Noted. All relevant policies in the Local Plan will be considered and our transport related policy will be of relevance. Suffolk, as Highways Authority, will also be consulted on schemes for residential moorings, in the usual way.	No change to Guide.
#46	Jessica Nobbs	Water Management Alliance	No comment	Noted.	No change to Guide.
#47	Rachel Bowden	Natural England	Natural England has no comments to make regarding the consultation on these guides.	Noted.	No change to Guide.

#48	Rachel Bowden	Natural England	<p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p> <p>Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.</p> <p>The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <a href="https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice">https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice</a></p>	Generic advice noted.	No change to Guide.
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# Residential Moorings Guide

Adopted xxxx

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# 1. Introduction

In the current Local Plan for the Broads, the Authority is required to identify a need of 63 residential moorings<sup>1</sup> and subsequently allocate sites for residential moorings to count towards that need. The Local Plan also contains a detailed policy that all proposals for residential moorings are required to address (Policy DM37 – see [page 115 of the Local Plan](#)).

This guide is designed to help implement the policies of the Local Plan relating to residential moorings. It is designed for decision makers as well as applicants and site owners. It contains useful information to help make schemes for residential moorings as successful as possible.

The key messages of this Guide are:

- a) You need to consider flood risk through a flood risk assessment and flood response plan.
- b) You need to consider the impacts of Climate Change.
- c) A management plan is required that details how you will manage the residential moorings. A template is included at [Appendix A](#).
- d) You need to keep a register of those who are living on the residential moorings.
- e) You should contact your District Council to confirm the approach to Council Tax.
- f) You need to provide adequate facilities for those living at the residential moorings. You may already have many of these in place<sup>2</sup>.
- ~~g) There are many permitted residential moorings around the country who have systems in place. They may not necessarily be relevant to the Broads or may not be relevant to your site or may not be how you want to run your site. But they give you an idea of how to do things. We strongly suggest you contact us to talk through your proposed approach in advance of putting it in place.~~
- h) A template to address many of the requirements in the policy and guide is included at [Appendix B](#).

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<sup>1</sup> [Norfolk Caravans and Houseboats Accommodation Needs Assessment \(ANA\) including for Gypsies, Travellers and Travelling Show people](#)

<sup>2</sup> [There are many permitted residential moorings around the country who have systems in place. They may not necessarily be relevant to the Broads or may not be relevant to your site or may not be how you want to run your site. But they give you an idea of how to do things. We strongly suggest you contact us to talk through your proposed approach in advance of putting it in place.](#)

## 2. Consultation

~~This version is an amended draft version out for its second consultation. Please tell us your thoughts and suggest any changes you think would make the Guide better and set out your reasons.~~

~~During the first consultation, movement and access to public venues was restricted due to COVID19. We extended the consultation period twice and it ran for many more weeks than originally intended. We also offered the opportunity to request a hard copy of the document. Despite that, we do not think the consultation was adequate so we are consulting a second time.~~

~~This consultation document and consultation process have been developed to adhere to the Broads Authority's Statement of Community Involvement<sup>3</sup>. We have updated our Statement of Community Involvement. The main changes to how we intend to consult on this document are as follows:~~

- ~~• If you wish to discuss the document, you can still call on 01603 610734 and ask to speak to Natalie Beal. You can also contact Natalie Beal to request a video conference appointment to talk about the document.~~
- ~~• No hard copies will be in libraries.~~
- ~~• No hard copies will be in Yare House<sup>4</sup>.~~
- ~~• If you wish to have a hard copy, we can send this to you. This will initially be for free, but if we get many requests, we may have to consider charging for postage and printing. Please contact the number above to ask to speak to Natalie Beal to request a hard copy.~~

~~The second consultation on this document is for 8 weeks from 25 September to 20 November 2020. We will then read each of the comments received and respond. We may make changes if we agree with you. If we do not make changes we will set out why. The final Guide will be adopted at a future meeting of the Broads Authority. Please email us your comments: [planningpolicy@broads-authority.gov.uk](mailto:planningpolicy@broads-authority.gov.uk).~~

~~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),~~

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<sup>3</sup> Current Statement of Community Involvement is here [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0024/209337/Final\\_adopted\\_SCI\\_formatted\\_July\\_2020.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0024/209337/Final_adopted_SCI_formatted_July_2020.pdf)

<sup>4</sup> Whilst this Guide is not a local plan or SPD, we still consult in the same way as we would those documents. The Government recently amended regulations saying that until 31 December 2021, Local Planning Authorities do not need to make hard copies of planning documents available in head offices or other venues.

~~and the Environmental Information Regulations 2004). Please see [Appendix B](#) for the Privacy Notice. We will make your name and organisation public alongside your comment.~~

~~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](mailto:planningpolicy@broads-authority.gov.uk).~~

The Residential Moorings Guide was consulted on twice during the course of 2020. The first consultation ran from 12 March to 24 April 2020. The second consultation ran from 25 September to 20 November 2020. The comments that were received, the Broads Authority's response to the comments and the amendments which comments may have resulted in, can be found here: [xxxxxx <for the purposes of Planning Committee and Broads Authority, the comments are at the appendices to the report>](#)

### 3. Residential Moorings - definitions

The supporting text of policy DM37 defines a residential mooring as 'a mooring where someone lives aboard a vessel (capable of navigation), where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base'.

It goes on to say that 'for the purposes of this policy, it should be noted that there is an expectation that the moorings will be occupied by a vessel of standard construction and appearance and which is conventionally understood to be a boat. For the avoidance of doubt, the policy does not apply to houseboats.

Houseboats are considered to be structures without means of independent propulsion and will be dealt with on a case by case basis due to their potential impact on character of the area'. Of relevance to schemes for houseboats, the Environment Agency have clarified that a body of water is classed as flood zone 3b. Following the NPPG flood risk tables through<sup>5</sup>:

- If used for permanent residential, they would be classed as highly vulnerable (as they are similar to the category of caravans, mobile homes and park homes intended for permanent residential use). Highly vulnerable development is not compatible with flood zone 3b and should not be permitted.
- If used for tourist accommodation, they would be classed as more vulnerable (as they are similar to this category: sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan). More vulnerable development is not compatible with flood zone 3b and should not be permitted.

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<sup>5</sup> Table 2 is Flood risk vulnerability classification: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](#) and Table 3 is Flood risk vulnerability and flood zone 'compatibility': [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](#)

~~The Environment Agency agree that all residential boats must be capable of navigation and so function as a boat, in order for residential moorings to be classed as 'water compatible' development. In response to the first consultation on this document, the Environment Agency went on to say that if the boat is non-navigable, such as a houseboat, the Environment Agency state that they would be classed as 'more vulnerable' residential development, and therefore Table 3 of the NPPF PPG would class them as inappropriate to be located in boatyards or mooring basins, as these areas are usually classed as Flood Zone 3b Functional Floodplain. The Environment Agency state that they would object in principle to any houseboats as they would be an inappropriate 'more vulnerable' development in Flood Zone 3b Functional Floodplain. So houseboats are unlikely to be permitted, unless their proposed location is somehow not classed as Functional Floodplain, which would require the marina or mooring basin to not be at risk of flooding in a 5% (1 in 20) annual probability flood event.~~

## 4. Acceptable location for residential moorings

### 4.1 Where Residential Moorings could be permitted.

Policy DM37 sets out where residential moorings may be acceptable (criterion a) and would apply to applications for schemes in areas not allocated in the Local Plan. This section breaks that down and provides some more information.

i) 'Is in a mooring basin, marina or boatyard...'

The reason for this requirement is to remove any potential impact on navigation because of residential moorings as well as ensure access to boating facilities such as pump outs and maintenance.

ii) '...that is within or adjacent to a defined development boundary...'

The development boundary could be one of the four in the Local Plan for the Broads<sup>6</sup> or could be set out in the adopted Local Plan of one of our 5 district councils (see below for Norwich City). Development boundaries are areas within which housing (and in this case, residential moorings) are generally supported in principle (but subject to other policies in the Local Plan) because they have good access to key services and are well related to the existing built up area of a settlement.

iii) '...or 800m/10 minutes walking distance to three or more key services...'

Key services are set out in the supporting text for the policy and copied below. They reflect the Housing and Economic Land Availability Assessment methodology:

- A primary school
- A secondary school

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<sup>6</sup> These are in Wroxham/Hoveton, Thorpe St Andrew, Oulton Broad and Horning. See policy DM35 of the Local Plan and see the maps here: [DMS35: Residential development within defined development boundaries Maps](#)

- A local healthcare service (doctors' surgery)
- Retail and service provision for day to day needs (district/local shopping centre, village shop)
- Local employment opportunities which are defined as follows, which reflect areas with potentially a number of and variety of job opportunities:
  - Existing employment areas allocated/identified in our districts' Local Plans; or
  - City, Town or District Centre as identified in the Local Plan for the Broads or our District's Local Plan. We note that this means such centres count towards two of the three key services test; or
  - These sites that are allocated in the Local Plan for the Broads: BRU2, BRU4, CAN1, HOR6, POT1, STA1, TSA3.
- A peak-time public transport service to and from a higher order settlement (peak time for the purposes of this criterion will be 7-9am and 4-6pm)

Applications will need to submit supporting information about the location of these key services.

- ‘...and the walking route is able to be used and likely to be used safely, all year round...’  
 The walking route that is 800m or 10 minutes' walk to the key services needs to be available and attractive for use all year round. In practice this will more likely mean surfaced footways rather than rural public rights of ways. This will be judged on a case by case basis in liaison with the Highways Authority. Norfolk Police recommend that the route to the site should, where possible, be straight and have a width of 3m wide, with vegetation maintained to prevent fear of crime (removal of potential hiding places), and to consider lighting if appropriate (taking into account the dark skies policy of the Local Plan and the location of residential moorings). Applications will need to submit supporting information about the quality and experience of the routes used to travel between residential mooring and services.
- ‘...or is in Norwich City Council's Administrative Area’  
 Norwich City Council requested this addition as there are no mooring basins, marinas or boatyards in Norwich; this change now allows for residential moorings in the City (subject to the normal planning application process) and is consistent with the policies of the River Wensum Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners).

It is important to note that applications in Norwich will need to be determined by Norwich City Council and the Broads Authority. Norwich City Council are the Local Planning Authority

for the land. The Broads Authority is the Local Planning Authority for the river. Policies of both adopted Local Plans will be relevant to schemes in Norwich.

#### 4.2 Location of residential moorings within a site/marina/boatyard/basin.

An applicant may want certain specific moorings to be permitted for residential moorings or may want an area to be permitted with a maximum number of residential moorings within that area, to reflect the operations of the marina or boatyard or site. This will need to be discussed and agreed with the Local Planning Authority. It will be for the operator of the site to control which moorings are used for residential moorings in line with the permission granted. The operator will need to produce a management plan (see section 6), and will also need to record the details of the residential moorings in a register (see section 7).

### 5. Flood Risk and climate change

The Authority will require site specific flood risk assessments including a flood response plan<sup>7</sup>. See policy DM5 of the Local Plan for the Broads as well as the Flood Risk SPD<sup>8</sup>.

Whilst the Authority appreciates that at times of flood the boat which is lived in will be already on water and is able to float, the issue is more to do with the risk arising because of flooding in this instance. The supporting text of DM37 identifies some issues that need to be addressed [through a site-specific flood risk assessment that will be required for residential moorings.](#)

- a) The technique/method of mooring the vessel. The Flood Risk Assessment (FRA) should show how the boat will be moored to prevent it being too tight or too loose. If the vessel is moored too tightly it could list, and by being too loose it could float onto the landside of the quay heading or be cast adrift at times of flooding. Both scenarios have safety concerns for occupiers, possessions and other objects or vessels that could be hit by a loose boat, and should be addressed within the FRA.
- b) A Flood Response Plan needs to be produced. While it is acknowledged that residential boats will float, the access to the boat could be disrupted at times of flood, causing the occupier to be stranded on board the boat. The Flood Response Plan needs to advise what the occupier should do at times of flood to ensure their safety - whether they should evacuate the boat in advance of flooding or take refuge in the boat and therefore have supplies to help them sit out the flood.
- c) Finally, the FRA should include consideration of how the boat moored at the residential mooring will be monitored at times of flood to make sure it does not cause

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<sup>7</sup> A guide/template can be found here: [https://www.broads-authority.gov.uk/data/assets/word\\_doc/0032/298850/Appendix-D-Flood-Response-Plan-Guidance.docx](https://www.broads-authority.gov.uk/data/assets/word_doc/0032/298850/Appendix-D-Flood-Response-Plan-Guidance.docx)

<sup>8</sup> See guidance for best practice Broads Flood Risk Supplementary Planning Document: [https://www.broads-authority.gov.uk/data/assets/pdf\\_file/0019/236404/Broads-Flood-Risk-SPD-2020.pdf](https://www.broads-authority.gov.uk/data/assets/pdf_file/0019/236404/Broads-Flood-Risk-SPD-2020.pdf)



damage to other vessels, and to prevent damage to the belongings on board and the boat itself.

Regarding a) above, please note that vessels that come adrift from their moorings, either in flood conditions or in normal situations, could give rise to an increase in flood risk if they drift and block or create a water flow restriction of a waterway on the Broads.

If the FRA and Flood Response Plan proposes refuge within the boat in times of flood then the Environment Agency states that the boat will need to be capable of rising up above the extreme 0.1% (1 in 1000 year) plus climate change flood level. The FRA will need to detail what the required height of rise will be and demonstrate that the boat's mooring can enable it to rise that high without posing a hazard to the occupants of the boat. If the FRA and Flood Response Plan does not propose refuge, but instead proposes evacuation in advance of a flood, then the FRA and response plan will need to show how the occupants will be able to receive advanced warnings and where they will be able to evacuate to in time. The Environment Agency go on to say there is always a residual risk of warnings not being received, so the FRA will need to address this risk. The ability to take refuge within the boat, as described above, is a valuable fall-back measure and, if possible, the mooring should be designed to provide this refuge as a precaution, even if the preferred option is evacuation in advance of flooding.

Turning to climate change, you will be required to fill out a climate change checklist<sup>9</sup>. This identifies various effects that could arise in a changing climate. Flood risk may be one of them, but there are others. Filling out the checklist may help you consider how you run and develop your site in a changing climate. For example, how will you address risks associated with a changing climate? How will you manage high winds as a result of storms for example?

## 6. Management plan

You will be required to produce a plan that sets out how the residential moorings will be managed.

The management plan will help ensure the site as a whole is appropriately managed. The management plan will be a condition on the permission given to an application for residential moorings. A breach of this management plan would then be a breach of condition and could be enforced.

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<sup>9</sup> Climate Change checklist: [https://www.broads-authority.gov.uk/data/assets/word\\_doc/0033/259917/Climate20change20checklist20template.docx](https://www.broads-authority.gov.uk/data/assets/word_doc/0033/259917/Climate20change20checklist20template.docx)

It is expected that a Management Plan will cover the following. This list is not exhaustive and there may be other aspects that need to be covered. You may already address these issues in some way on your site.

- a) Site rules and/or terms and conditions.
- b) Noise – expectations relating to noise. This could cover aspects such as generators, when engines will run and generally any noise that could be considered a nuisance such as boat maintenance and generally socialising at unsociable hours. Please note that there is a bye-law that could be of relevance: Byelaw is 85 'Noise Nuisance' of Broads Authority Navigation Byelaws 1995. Local Council guidance on noise would also be relevant and so too will the amenity policy of the Local Plan for the Broads ~~will be of relevance.~~
- c) Waste management – sewerage and rubbish and recycling. Methods for storage and removal need to be clearly identified with particular consideration given to location of storage and proximity to water and the effect of high-water flows.
- d) Management of increased vehicular movements.
- e) Storage provision for residential boaters – bicycles and residential paraphernalia. Details of any storage provision needs to be included. Need to consider the impact on the character of the area.
- f) Details of water safety provisions ~~—see policy in Local Plan and any related guidance produced.~~
- g) Contact details of who to contact if the management requirements of the site are not adhered to.
- h) Detail how the mooring will be managed. For example, who will be the point of contact and will they be on site 24/7 or 9-5 weekdays for example.
- i) State requirements on how vessels will meet the requirements of the bye-laws and legislation for example the need for boat safety certificates and appropriate insurance.

## 7. Register

A register of those boats being lived on will be required. The register of who lives on which boat will be maintained at all times and needs to be made available for inspections by the Broads Authority as part of monitoring of conditions set on any permission. The reason for keeping this register is to ensure that only the permitted number of boats are being lived on.

## 8. Council Tax

The Broads Authority is the Local Planning Authority and does not collect Council Tax.

Residential moorings may be liable for Council Tax. The British Waterways Marinas Ltd (BWML) has produced this information on residential moorings and Council Tax:

<https://bwml.co.uk/council-tax-for-residential-moorings/> and the Residential Boat Owners Association (RBOA) also have information on Council Tax: <https://www.rboa.org.uk/q-a/>.

**You should contact your District Council to confirm the approach to Council Tax.**

## 9. Facilities, services and other considerations

The policy, DM37, refers to the provision of facilities. This section provides some further information about the facilities and services set out in DM37 and other relevant policies of the Local Plan and how you may wish to make them available at residential moorings.

Policy DM37 says:

- b) Provides an adequate and appropriate range of ancillary facilities on site to meet the needs of the occupier of the residential moorings (for example potable water, wastewater pump out (see j below), and electricity) or provides adequate access to these ancillary facilities in the vicinity of the residential mooring;
- g) Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians;
- i) Makes adequate provision for waste, sewage disposal and the prevention of pollution; and
- j) Provides for the installation of pump out facilities (where on mains sewer) unless there are adequate facilities in the vicinity.

Proposals need to set out how provisions will be made for facilities associated with residential uses (such as rubbish, amenity space, external storage and clothes drying for example).

[The Local Plan also requires all development to consider and address surface water run off and this may be relevant to your scheme, especially if you plan to provide surfacing that may be impermeable.](#)

### 9.1 Potential ways to address policy DM37 requirements for facilities and services

**Please note that the following are examples from elsewhere in England to give you an idea of how these issues are addressed. The approach of others who provide and manage residential moorings may not necessarily be suitable to the Broads or may not be suitable to your site or may not be how you want to run your site. We strongly suggest you contact us to talk through your proposed approach in advance of putting it in place.**

**We also need this kind of information shows on plans with details included in planning applications to help us to assess the application. There is a checklist at [Appendix B](#) that applicants can work through to address the topics raised in this section.**

#### 9.1.1 Electricity

By providing electricity, there will be no need for boat engines or generators to be run (which have associated noise and fumes). Some electric units come with lights on the top which can cause light pollution so providing these at sites in more rural areas or on edge of settlements will need careful consideration.

**Q: How will you provide the residential moorings with electricity?**

**Q: How will the electricity unit impact on/add to light pollution?**



**Electricity meter cards dispenser and electricity (and water) unit at Cowroast Marina.**

### 9.1.2 Water

The Environment Agency are keen to emphasise that applications should include details of early consultation with the relevant water company to ensure there is sufficient capacity in their network to supply water to moorings in that specific location. The abstraction of 20 cubic metres or more a day from either surface or groundwater source would require an abstraction licence from the Environment Agency. If the chosen site for the additional moorings already holds an abstraction licence, there would need to be consideration of the impacts from additional needs as a result of the new moorings. [Details on applying for a licence here https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence](https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence) or [managing a licence here https://www.gov.uk/guidance/manage-your-water-abstraction-or-impoundment-licences-online.](https://www.gov.uk/guidance/manage-your-water-abstraction-or-impoundment-licences-online)

**Q: How will you provide the residential moorings with potable water?**

### Case Study – Cowroast Marina

Residential moorings are provided with one water tap per two boats. They use trace heating on water taps to prevent freezing in winter.

#### 9.1.3 Sewerage

Toilets on boats may require pumping out or somewhere to empty cassettes. Your marina or boatyard may have a system or process to deal with this already. We would assess this part of the application against policy DM2 and as set out in that policy and connection to the public sewer network is the preferred approach. [The Environment Agency emphasise the need for adequate pollution prevention measures in place at all times.](#) When considering how to address foul water, you will need to consider the potential for boats to release foul water directly to the waterbody. The Environment Agency also highlight that there is a byelaw that is relevant to the disposal of sewage from boats within the Broads which makes it illegal for boats to discharge their sewage straight to the rivers (Water Resources Act 1963, Rivers (Prevention of Pollution) Acts, 1951-1961, BYELAWS Regulating the use of boats fitted with sanitary appliances).

**Q: How will you deal with sewerage arising from the boats on residential moorings?**

### Case Study – BWML moorings

BWML sites tend to include one pump out per month in their residential mooring contract.

#### 9.1.4 Rubbish collection

You will need to address how waste arising from those living on the boats is dealt with, [with particular consideration given to location of storage and proximity to water and the effect of high-water flows.](#) Your marina or boatyard may have a system or process to deal with rubbish already. We recommend that you contact your District/Borough/City Council to discuss waste management.

**Q: How will you deal with rubbish (including recyclable materials) arising from the boats on residential moorings? [Where will you locate the store so it is not affected by high flows?](#)**

#### 9.1.5 Cycle and Car parking

You need to ensure ample car and cycle parking for those who are using residential moorings. Again, you may have car parking or cycle parking on site already. We defer to the parking standards of the relevant district. The standards at the time of adoption of the Local Plan (May 2019) are at Appendix J, page 239, of the Local Plan for the Broads. Norfolk Police recommend that parking spaces be marked to help with correct usage (assists with rule setting) and suggest that you consider collapsible bollards/chain and lock, and where possible have some capability of surveillance over the area.

**Q: How will you address car and cycle parking for those who are using residential moorings?**

9.1.6 Amenity space and landscaping

The Amenity policy of the Local Plan (DM21) requires schemes to provide a ‘satisfactory and usable external amenity space to residential properties in keeping with the character of the surrounding development’. It may also be appropriate to provide landscape enhancements of the land associated with the Residential Mooring to improve the amenity of the area in connection with the development. Please note that development of facilities should not reduce the flood storage capacity of the floodplain or impede flood flow routes.

**Q. How will you address amenity space and landscaping?**

9.1.7 Storage

Scheme promoters/operators are required to address storage of residential paraphernalia. Unless a system for storing kit and possessions is put in place, the residential moorings could become cluttered with residential paraphernalia which will alter the character of the area. Norfolk Police recommend storage is of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender). It is also important that lockers are flood resilient and resistant to ensure that, at times of flood, they are not mobile and do not cause blockages in waterbodies.

**Q: How will you provide storage for those who are using residential moorings?**



**Storage lockers at Priory Marina**

9.1.8 Light pollution

Schemes for residential mooring may include lighting. But sites for residential moorings may be on the fringe of settlements, where there is a transition from urban to rural and so the impact of lighting may be significant. The Authority also seeks dark waterways to protect the wildlife in the area. The need for such lighting needs to be justified in line with Local Plan for the Broads policy DM22. If lighting is justified and agreed, then the design needs to ensure no impact on the dark skies of the Broads. The Authority plans to produce

light pollution guidance, but in the meantime, the policy requirements of the Local Plan will guide how applications are determined and assessed.

**Q: How does your scheme address light pollution? How does your scheme maintain dark skies?**

## 9.2 Other facilities/extras

Depending on your specific circumstances, you may wish to provide other facilities for those who are living on the residential moorings at your site. This may depend on the location of your site as well as what buildings you already have on site. Examples include drying of clothes, post boxes and communal facilities. You will need to consider the impact on the character of the area. You may wish to ensure you have a fire or emergency evacuation procedure too.

### Case Study - Cowroast Marina

There is a communal lounge with kitchenette. The lounge tends to be used once a month for functions.

### Case Study – Priory Marina

Facilities on site for those living on boats include toilets, showers, library, post boxes (reception collects the parcels), large storage boxes, launderette, parking, cycle parking, electricity and water.

Part of contract includes 6 weeks out of water on hard standing for anti-fouling. The marina organises a crane company to come and remove boats and put them back in. The marina coordinate crane and dates – probably five boats at a time. Boats are lived on outside of the water.



**Post boxes**

In relation to post boxes, Norfolk Police say that there is an increasing rise in crime associated with post-delivery so post boxes should be of robust construction with max aperture size of 260mmx40mm and have anti-fishing properties (Secured by Design recommends letter boxes certificated to TS 009).

## 9.3 Other considerations

9.3.1 Informative – [Permits](#) [Environmental Permit for Flood Risk Activities](#)



An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

[Section 23 of The Land Drainage Act 1991 requires applicants who wish to affect the flow of an ordinary watercourse, for instance to culvert, dam, weir or install a headwall into a watercourse, to obtain consent from the drainage board concerned.](#)

### 9.3.2 Security

You should ensure you consider security at your site. This may already adequately be in place.

### 9.3.3 Low Impact Life on Board

In response to the consultation on this guide, the RBOA were keen to emphasise Low Impact Life On Board and, through RBOA, there is a wealth of advice in that respect. Low impact life on board is an expression from UK waterways boaters who care about the environment.

### [9.3.4 Renewable/low carbon energy](#)

[An operator may wish to consider renewable/low carbon energy. The Local Plan for the Broads has policies relating to this: see page 64 of the Local Plan for the Broads.](#)

## 10. Key messages – reminder

- a) You need to consider flood risk through a flood risk assessment and flood response plan.
- b) You need to consider the impacts of Climate Change.
- c) A management plan is required that details how you will manage the residential moorings. A template is included at [Appendix A](#).
- d) You need to keep a register of those who are living on the residential moorings.
- e) You should contact your District Council to confirm the approach to Council Tax.
- f) You need to provide adequate facilities for those living at the residential moorings. You may already have many of these in place<sup>10</sup>.
- ~~g) There are many permitted residential moorings around the country who have systems in place. They may not necessarily be relevant to the Broads or may not be relevant to your site or may not be how you want to run your site. But they give you an idea of how to do things. We strongly suggest you contact us to talk through your proposed approach in advance of putting it in place.~~
- h) A template to address many of the requirements in the policy and guide is included at [Appendix B](#).

## 11. Helpful links and where to go to get advice

The Residential Boat Owners' Association (RBOA), the British Waterways Marinas Limited (BWML) and Canal and Rivers Trust (CRT) have many useful webpages that cover a variety of topic areas or issues that may be relevant to you.

**Please note that just because the BWML, CRT or RBOA suggest a certain approach, it may not necessarily be acceptable in the Broads or indeed it may not be how you wish to run your site. The point of sharing these websites with you is to give you information on how things are done elsewhere. We strongly recommend that you contact us to talk about any specific approach you wish to take to make sure it is acceptable here in the Broads.**

This webpage covers many aspects of living on a boat: <https://bwml.co.uk/guides/a-guide-to-residential-living/>

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<sup>10</sup> There are many permitted residential moorings around the country who have systems in place. They may not necessarily be relevant to the Broads or may not be relevant to your site or may not be how you want to run your site. But they give you an idea of how to do things. We strongly suggest you contact us to talk through your proposed approach in advance of putting it in place.

This webpage talks about **Council Tax**. <https://bwml.co.uk/council-tax-for-residential-moorings/>

**You should contact your District Council to confirm the approach to Council Tax.**

This webpage shows **where the BMWL residential moorings are**. It also states what you get when you stay at one of their Marinas. <https://bwml.co.uk/residential-moorings/>

Life Afloat; Ever wondered what life is like living on a boat? This webpage has **videos about life afloat**: <https://bwml.co.uk/life-afloat/?src=residential>

This webpage shows how BWML approach **charging for electricity**: <https://bwml.co.uk/electricity/>

This website contains **BWML's Terms and Conditions and policies**: <https://bwml.co.uk/customer-info/>. And this website contains the **Terms and Conditions for the Canals and Rivers Trust**:

<https://www.watersidemoorings.com/Home/TermsAndConditions>

This website talks about **insurance**. It talks about a specific deal that BWML have with one particular policy provided. You may or may not be entitled to that deal, but the webpage may contain advice useful for those who live on boats: <https://bwml.co.uk/marine-insurance-for-bwml-berth-holders/>.

**The Residential Boat Owners' Associations (RBOA)**. Their website says: 'Established in 1963 the Residential Boat Owners' Association is the only national organisation which exclusively represents and promotes the interests of people living on boats in the British Isles. We represent all those who have chosen to make a boat their home'. The RBOA ensure they liaise with Navigation Authorities like the Broads Authority. <https://www.rboa.org.uk/>

**RBOA Code of Good Practice**. The Association would encourage all boaters who live afloat to follow this Voluntary Code of Good Practice: <https://www.rboa.org.uk/code-of-good-practice/>

**BOATSHIELD (& Outboard Engine Cover)**. This weblink from Norfolk & Suffolk Police offers advice on boat safety and security, also information about the Boatshield Scheme. <https://www.norfolk.police.uk/advice/roads-and-vehicles/boats>

**AWEIGH App**. Thousands of people enjoy the Broads throughout the year and the AWEIGH app has been designed to help those on and around the waterways. [apps.apple.com>app>aweigh Or play.google.com>store>apps>details>id=com](https://apps.apple.com>app>aweigh Or play.google.com>store>apps>details>id=com)

**BOAT SECURITY ADVICE - NORFOLK & SUFFOLK POLICE**. Norfolk & Suffolk Police advice on water safety and boat security: [https://www.norfolk.police.uk/sites/norfolk/files/boatshield\\_v1.pdf](https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf)

## ~~Appendix A – Adopted Policy DM37 – New Residential Moorings~~

### ~~Policy DM37: New residential moorings~~

~~The Authority will endeavour to enable delivery to meet its assessed need of 63 residential moorings.~~

~~Applications for permanent residential moorings will be permitted provided that the mooring:~~

- ~~a) Is in a mooring basin, marina or boatyard that is within or adjacent to a defined development boundary or 800m/10 minutes walking distance to three or more key services (see reasoned justification) and the walking route is able to be used and likely to be used safely, all year round or is in Norwich City Council's Administrative Area.~~
- ~~b) Provides an adequate and appropriate range of ancillary facilities on site to meet the needs of the occupier of the residential moorings (for example potable water, wastewater pump out (see j below), and electricity) or provides adequate access to these ancillary facilities in the vicinity of the residential mooring;~~
- ~~c) Would not result in the loss of moorings available to visitors/short stay use;~~
- ~~d) Would not impede the use of the waterway;~~
- ~~e) Would not have an adverse impact upon:
  - ~~i) the character and appearance of the site or the surrounding area arising from the moorings and the use of adjacent land incidental to the mooring;~~
  - ~~ii) protected species, priority habitats and designated wildlife sites;~~
  - ~~iii) the amenities of neighbouring occupiers; or~~
  - ~~iv) bank erosion.~~~~
- ~~f) Provides safe access between vessels and the land without interfering with or endangering those using walkways;~~
- ~~g) Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians;~~
- ~~h) Would not prejudice the current or future use of adjoining land or buildings;~~
- ~~i) Makes adequate provision for waste, sewage disposal and the prevention of pollution; and~~

~~j) Provides for the installation of pump out facilities (where on mains sewer) unless there are adequate facilities in the vicinity.~~

~~If more than one residential mooring is proposed, the proposal must be commensurate with the scale of development proposed for that settlement (as a whole).~~

~~Converting an entire basin, marina or boatyard to residential moorings would be judged on a case by case basis to assess and take account of the impact on infrastructure in the area (such as highways) and the impact on neighbouring uses.~~

~~Whilst the policy contains a general presumption in support of residential moorings in Norwich, the cumulative impact resulting from any proposal will be considered, along with the impact on the infrastructure and amenity of the area.~~

~~The economy policies of the Local Plan will also be of relevance and in Norwich, so too will the City Council's policies for proposals in Norwich.~~

~~Conditions will be used to restrict the number, scale and size of boats using the residential moorings. A management plan for the site and a register of those who live on boats will be required and will be covered by a planning condition imposed on any planning permission granted.~~

~~Proposals need to set out how provisions will be made for facilities associated with residential uses (such as rubbish, amenity space, external storage and clothes drying for example).~~

~~All such development will meet the requirements of the Water Framework Directive.~~

~~(Note: Refer to [www.gov.uk/guidance/pollution-prevention-for-businesses](http://www.gov.uk/guidance/pollution-prevention-for-businesses) for information on pollution prevention measures)~~

#### **Reasoned Justification**

~~The Authority acknowledges that the high environmental quality of the Broads and wide range of opportunities it offers for boating make the area a popular location. As a consequence, there is a significant associated demand for residential moorings. The provision of residential moorings must, however, be carefully managed to make sure the special qualities of the Broads and their enjoyment are protected.~~

~~Tourism makes a valuable contribution to the local economy, and a statutory purpose of the Broads is to provide opportunities for the understanding and enjoyment of the special qualities of the area by the public. To make sure there are sufficient facilities to allow visitors to enjoy the Broads, the Authority will resist proposals for permanent residential moorings where they would result in the loss of visitor/short term moorings or boatyard services.~~

~~To ensure that people living on boats have access to adequate facilities and services such as education, recreation, and domestic waste collection, and to minimise impact of new development on landscape character, the Authority will require new residential moorings to be directed to mooring basins, marinas or boatyards within walking distance of at least three of the key services listed below or in or adjacent to defined development boundaries (which could be within the Broads Authority Executive Area or in the planning area of our constituent districts). Residential moorings may also be appropriate on parts of the river in Norwich, subject to other policy considerations in particular the impact on neighbouring uses and impact on navigation of the river. Proposals for residential moorings will be expected to be commensurate in scale with the size of the settlement and the level of residential development proposed for the settlement by the relevant Local Planning Authority. Furthermore, converting an entire marina, basin or boatyard, or in Norwich the entirety of the river banks, may not be appropriate because of the potential impact on neighbouring uses and infrastructure in the area, as well as the consequences of the loss of the facility for non-residential boaters; the Authority will consider such proposals on a case by case basis.~~

~~The key services referred to in the policy could be three or more of the following. These key services reflect the Housing and Economic Land Availability Assessment methodology:~~

- ~~● A primary school~~
- ~~● A secondary school~~
- ~~● A local healthcare service (doctors' surgery)~~
- ~~● Retail and service provision for day to day needs (district/local shopping centre, village shop)~~
- ~~● Local employment opportunities which are defined as follows, which reflect areas with potentially a number of and variety of job opportunities:~~
  - ~~○ Existing employment areas allocated/identified in our districts' Local Plans; or~~
  - ~~○ City, Town or District Centre as identified in the Local Plan for the Broads or our District's Local Plan. We note that this means such centres count towards two of the three key services test; or~~
  - ~~○ These sites that are allocated in the Local Plan for the Broads: BRU2, BRU4, CAN1, HOR6, POT1, STA1, TSA3.~~
- ~~● A peak time public transport service to and from a higher order settlement (peak time for the purposes of this criterion will be 7-9am and 4-6pm)~~

~~Residential moorings that have the potential to affect a protected site or species will only be permitted where a project level Appropriate Assessment (under the Habitats Directive) can successfully demonstrate that there are no adverse effects on qualifying features on the site or a detrimental impact on the species.~~

~~Where permission is granted for a new permanent residential mooring, planning conditions and/or obligations will be used to secure agreements for the management of the mooring and surrounding land. This will be done to protect visual and residential amenity and make sure the use of residential moorings does not compromise public safety. The use of surrounding land for incidental purposes such as storage and seating can have a negative impact if incorrectly managed. Proposals will need to set out how they will address areas for the drying of clothes and amenity space, as well as any other related facilities for those living on the boats. The Authority does not expect marinas and boatyards to subdivide or demarcate areas of land to be associated with residential moorings.~~

~~Policy DM50 provides guidance on the forms of development permissible on the adjacent waterside environment associated with a mooring.~~

~~For the purposes of this policy, a 'residential mooring' is a mooring where someone lives aboard a vessel (capable of navigation), where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base.~~

~~For the purposes of this policy, it should be noted that there is an expectation that the moorings will be occupied by a vessel of standard construction and appearance and which is conventionally understood to be a boat. For the avoidance of doubt, the policy does not apply to houseboats. Houseboats are considered to be structures without means of independent propulsion and will be dealt with on a case by case basis due to their potential impact on character of the area.~~

~~The policy requires a management plan for the site as well as a register of those boats being lived on. These will be required through conditions on planning application(s). The management plan will help ensure the site as a whole is appropriately managed. This would normally cover things like noise, waste, delivery times etc. and would have contact details of who to contact if the management requirements of the site are not adhered to. A breach of this management plan would then be a breach of condition and could be enforced. The register of who lives on which boat will be maintained at all times.~~

~~Proposals for residential moorings must ensure they have adequately considered the following:~~

- ~~a) The technique/method of mooring the vessel. The Flood Risk Assessment (FRA) should show how the boat will be moored to prevent it being too tight or too loose. If the vessel is moored too tightly it could list, and by being too loose it could float~~

~~onto the landside of the quay heading or be cast adrift at times of flooding. Both scenarios have safety concerns for occupiers, possessions and other objects or vessels that could be hit by a loose boat, and should be addressed within the FRA.~~

- ~~b) A Flood Response Plan needs to be produced. While it is acknowledged that residential boats will float, the access to the boat could be disrupted at times of flood, causing the occupier to be stranded on board the boat. The Flood Response Plan needs to advise what the occupier should do at times of flood to ensure their safety—whether they should evacuate the boat in advance of flooding or take refuge in the boat and therefore have supplies to help them sit out the flood.~~
- ~~c) Finally, the FRA should include consideration of how the boat moored at the residential mooring will be monitored at times of flood to make sure it does not cause damage to other vessels, and to prevent damage to the belongings on board and the boat itself.~~

~~The Authority intends to produce a guide for residential moorings as well as a template to assist with the production of management plans. The Authority is aware of guidance being produced by other organisations on residential moorings and we will ensure we are involved with those guides and reflect them in our own guide.~~

~~Development proposals for residential moorings should provide a biodiversity net gain as a result of the development as there are likely to be significant opportunities for waterside biodiversity enhancement.~~

#### ~~Meeting the need for residential moorings~~

~~The Accommodation Needs Assessment completed in 2017 identifies a need for 63 residential moorings. This figure needs to be interpreted with some caution, as it is based on limited interviews with boat dwellers and on anecdotal estimates rather than a comprehensive count or survey of the people who live on boats.~~

~~The study also indicates that those living on boats do so from choice, rather than from an ethnic background, and that most are single people or childless couples.~~

~~The Local Plan seeks to address the need for residential moorings in several ways:~~

- ~~• Ten residential moorings have been permitted on appeal at Waveney River Centre and six sites have been allocated for residential moorings amounting to around 41 residential moorings. See Appendix K for the residential moorings trajectory which shows the total identified supply as 10 residential moorings.~~
- ~~• Some areas of the Broads have been identified in this Local Plan as suitable in principle for residential moorings and these are policies STA1 and HOR6. Although they are potentially suitable in principle, deliverability is not confirmed, therefore they are not allocated in the Plan and do not appear in the identified supply figures.~~



- ~~The Authority also intends to meet with marinas and boatyards that meet the locational criteria of the policy to discuss the potential for residential moorings.~~

~~The Residential Moorings Topic Paper (revised 2017)<sup>11</sup> and its addendum<sup>12</sup> has more information on meeting the need for residential moorings.~~

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<sup>11</sup> ~~[https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0019/1020475/Assessment-of-resi-moorings-nominations-update-and-topic-paper-July-2017.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0019/1020475/Assessment-of-resi-moorings-nominations-update-and-topic-paper-July-2017.pdf)~~

<sup>12</sup> ~~[https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0010/1356778/EP20-Assessment-of-residential-moorings-nominations-received-during-the-Publication-Consultation-January-2018-Amended-July-2018.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0010/1356778/EP20-Assessment-of-residential-moorings-nominations-received-during-the-Publication-Consultation-January-2018-Amended-July-2018.pdf)~~

## Appendix B—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](#) is available on the Broads Authority website.~~

~~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](mailto: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](#).~~

#### ~~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~~

~~e) 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 A – Residential Moorings management plan checklist

It is expected that a Management Plan will cover the following. This list is not exhaustive and there may be other aspects that need to be covered.

Checklist	✓
1. Site rules and/or terms and conditions.	
2. Noise – expectations relating to noise.	
3. Waste management – sewerage and rubbish and recycling.	
4. Management of increased vehicular movements.	
5. Storage provision for residential boaters.	
6. Details of water safety provisions.	
7. Contact details of who to contact if the management requirements of the site are not adhered to.	
8. State requirements on how vessels will meet the requirements of the bye-laws and legislation for example the need for boat safety certificates and appropriate insurance.	

## Appendix B – Residential moorings questionnaire

This simple questionnaire template covers most of the policy and guide requirements. It should be filled in and accompany applications for residential moorings.

Question	Answer
1. Have you completed a flood risk assessment?	
2. Have you completed a flood response plan?	
3. Have you completed a management plan?	
4. How will you provide the residential moorings with electricity? How will the electricity unit impact on/add to light pollution? Please mark on a plan of the site.	
5. How will you provide the residential moorings with potable water? Please mark on a plan of the site.	
6. How will you deal with sewerage arising from the boats on residential moorings? Please mark on a plan of the site.	
7. How will you deal with rubbish (including recyclable materials) arising from the boats on residential moorings? <a href="#">Where will you locate the store so it is not affected by high flows?</a> Please mark on a plan of the site.	
8. How will you address car and cycle parking for those who are using residential moorings? Please mark on a plan of the site.	
9. How will you address amenity space and landscaping? Please mark on a plan of the site.	
10. How will you provide storage for those who are using residential moorings? Please mark on a plan of the site.	
11. How does your scheme address light pollution? How does your scheme maintain dark skies?	

# Broads Authority

23 July 2021

Agenda item number 16

## Marketing and Viability Guide – approval of draft for final consultation

Report by Planning Policy Officer

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### Summary

The draft Marketing and Viability Guide has been subject to two stages of consultation and has been amended in response to comments received. However, as the second consultation was at the start of the 2020 Covid-19 lockdown, it seems prudent to give stakeholders another opportunity to see and comment on the draft document.

### Recommendation

To endorse the draft Marketing and Viability Guide for final consultation.

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## 1. Introduction

- 1.1. Several policies in the Local Plan for the Broads<sup>1</sup> will require an applicant or agent to carry out a robust marketing campaign and/or a viability assessment if a proposed development is promoting something different to the adopted policy position. The Marketing and Viability Guide has been produced to explain what is meant by marketing and viability, and which Local Plan policies have this requirement. It highlights to applicants how to carry out these processes and to provide information in the way the Broads Authority requires. By following this guide, applicants will reduce the chance of a delay in determining the subsequent planning application in relation to these requirements.
- 1.2. We consulted on the first draft Guide in September 2019, and on an amended version in March/April 2020. Comments received as a result of these consultations are at Appendices 1 and 2.
- 1.3. During the second consultation, movement and access to public venues were restricted due to the Covid-19 pandemic. We therefore extended the consultation period twice, and it ran for longer than originally planned. We also offered people the opportunity to request a paper copy of the document. Despite this, we would still prefer to have a

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<sup>1</sup> Local Plan for the Broads: <https://www.broads-authority.gov.uk/planning/planning-policies/development>

more comprehensive consultation, so we are consulting for a third and final time. We have assessed the comments received as part of the second consultation and made amendments accordingly. These amendments are shown as blue underline for additions and ~~red strikethrough~~ for text that is proposed to be removed.

## 2. Change from SPD to guide

- 2.1. As we have changed the requirement for a marketing strategy to be provided up front, and as this document is offering guidance, we consider it appropriate for this document to be a guide rather than a Supplementary Planning Document (SPD).

## 3. Consultation

- 3.1. The final draft Guide was presented to the Planning Committee at its meeting on 21 May, and was endorsed and recommended to the Broads Authority for public consultation.
- 3.2. The consultation is proposed to last for 7 weeks (slightly extended due to the summer holiday period).
- 3.3. The consultation process has been developed to meet the requirements of the Authority's Statement of Community Involvement<sup>2</sup>, which has been updated. The main changes to how we intend to consult on this document, taking account of Covid-19 social distancing restrictions, are that:
  - If someone wants to discuss the document, they can call us or request a video conference appointment.
  - No paper copies of the document will be placed in libraries, at Yare House or at district/county council offices (as would normally be the case). However, if someone wishes to have a paper copy, it can be sent to them. This will initially be free, but if we get many requests we may have to consider charging for postage and printing.

Author: Natalie Beal

Date of report: 28 May 2021

[Appendix 1 – Comments received as part of first consultation](#)

[Appendix 2 – Comments received as part of the second consultation](#)

[Appendix 3 – Draft Marketing and Viability Guide for consultation](#)

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<sup>2</sup> Current Statement of Community Involvement is here [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0024/209337/Final\\_adopted\\_SCI\\_formatted\\_July\\_2020.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0024/209337/Final_adopted_SCI_formatted_July_2020.pdf)

# Broads Authority

23 July 2021

Agenda item number 17

## Code of Conduct and declaration of interests

Report by Monitoring Officer

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### Purpose

This report notes the external legal advice provided to the Broads Authority on Disclosable Pecuniary Interests in relation to the setting of navigation charges.

The report also presents a draft revised Member Code of Conduct, based on the Local Government Association's new Model Code of Councillor Conduct, together with a revised Register of Interests form, for members' consideration.

### Recommended decisions

- (i) To note the external legal advice provided by Mr Jonathan Goolden on Disclosable Pecuniary Interests in relation to the setting of navigation charges and that his advice will be followed in future years;
  - (ii) To adopt the following documents, subject to any further amendments agreed by the Authority:
    - (a) Member Code of Conduct for Authority members, based on LGA's new Model Code of Councillor Conduct (as amended to retain paragraph 3.10 of the existing Code) (Appendix 1)
    - (b) Register of Interests' form for members (Appendix 3)
- 

## 1. Introduction

- 1.1. A question was raised at the Broads Authority meeting on 20 November 2020 regarding disclosable pecuniary interests (DPIs) when the Authority was considering the proposed navigation charges for 2021/22. The Monitoring Officer (MO) advised that three members had a DPI in the setting of those charges as directors and operators of private hire and leisure boats companies, and therefore should not participate in that item. One of the three members requested a second opinion on this matter, and the MO took external legal advice from Mr Jonathan Goolden, whose advice is summarised in section 2 of this report.
- 1.2. The matter of DPIs is included within the Authority's 'Code of Conduct for Members'. The Code was last updated in November 2018 and it is recommended it be replaced by



a revised Code, based on the new LGA Model Code of Councillor Conduct. If adopted, consequential amendments can be made to the 'Code of Conduct for members on Planning Committee and officers' (updated July 2017).

## 2. External legal advice on DPIs in relation to setting of navigation charges

- 2.1. Mr Jonathan Goolden is a Senior Partner in Wilkin Chapman LLP Solicitors. He is a highly experienced regulatory, public sector lawyer and former senior manager, has been a Monitoring Officer and is an Independent Person for two authorities. Mr Goolden is aware of the statutory basis within which the BA works and the extent of its role and purposes, and of the roles and responsibilities of its Navigation Committee.
- 2.2. The MO sought Mr Goolden's advice on the matter of the three members who had a DPI in the setting of navigation charges as directors and operators of private hire and leisure boats companies, and whether such a DPI was sufficiently direct also to apply to other matters that might impact on their businesses. Mr Goolden's advice in full was forwarded to all members on 19 April 2021 and is summarised in paragraphs 2.3 to 2.16 below.

### Mr Goolden's advice (summary)

- 2.3. Under the Localism Act 2011, the Broads Authority (BA) must promote and maintain high standards of conduct by members and co-opted members, and adopt a code of conduct. It must also maintain a register of interests of members, and a member must notify the MO of any DPIs. A member may not participate in a matter at a meeting if they have a DPI in that matter unless granted a dispensation under section 33 of the 2011 Act. The statute requires that the DPI be "in" the matter, not related to or about it. This implies a very direct relationship between the registered interest and the matter under consideration by the BA.
- 2.4. In addition to the requirement on members to register and act on DPIs, the Authority's own Code of Conduct provides for personal interests and prejudicial interests. Under paragraph 3.7 of the Code, a personal interest is one where a decision in relation to that business might reasonably be regarded as affecting the wellbeing or financial position of a member or their family or any person with whom they have a close relationship to a greater extent than the majority of other toll payers or inhabitants of the BA's area. Under paragraph 3.8, a personal interest is also a prejudicial interest if a member of the public with knowledge of the facts would reasonably regard that interest as so significant that it would prejudice the member's judgment.
- 2.5. Under paragraph 3.6 of the Code, a personal interest must be declared at the meeting. Under paragraph 3.9 of the Code, a member with a prejudicial interest must not only declare it but also not participate in the discussion or voting but that a member may apply for a dispensation (which may be subject to restrictions).

- 2.6. Under paragraph 3.10 of the existing Code, however, a member may declare, attend and vote on a number of matters including the setting of tolls where the extent of the interest is limited to owning a boat and thereby paying a toll. Owning a boat and paying a toll will in itself will not be a DPI unless that ownership was as part of a business, though were it not for this paragraph of the Code it might otherwise have amounted to a personal and or prejudicial interest.
- 2.7. The three members who list in the register of DPOs that they are directors and operators of private hire and leisure boats companies (and any other member who holds a paid position in or owns a business which pays navigation tolls) would have a DPI in any item of business for the setting of navigation tolls. By virtue of the Relevant Authorities (Disclosable Interests) Regulations 2012, they are required to register any employment, office, trade, profession, or vocation carried on for profit or gain and that includes a remunerated directorship in a business providing vessels for hire where either the business will be liable to pay tolls as an operator or it will be liable to pay tolls as a vessel owner or both.
- 2.8. Though there is a need for there to be a very direct connection between the DPI held and the item of business for the DPI to be “in” that item, the setting of tolls is so directly connected to the ownership and operation of vessels for hire that those members will have a DPI.
- 2.9. Even though an owner of a private vessel will also be affected by a decision on the setting of navigation tolls, that interest is not a DPI unless it is within one of the categories in the 2012 Regulations. The payment of a toll is not a contract with the Authority and no other categories are relevant. Therefore, the owner of a private vessel is in a fundamentally different position to a commercial boat hire operator when it comes to interests in navigation toll setting. A private vessel owner has a personal and or prejudicial interest by virtue of the Code (but not by the 2012 Regulations). As long as the member who owns a private vessel declares that interest they may, under paragraph 3.10 of the Code, participate and vote on the item of business.
- 2.10. It is very clear that but for a dispensation, the three members would not be able to participate in any way in the item of business. Even though a member may have some personal knowledge that might be of benefit to the Authority, if they have a DPI then they must withdraw completely from participation in the item, including making a statement, unless they have applied for and been granted a dispensation.
- 2.11. Under section 33 of the Localism Act 2011, a dispensation may be granted if the granting of it is in the interest of persons living in the Authority’s area or that it is otherwise appropriate to grant one. Section 33(1) of the Act provides specifically that a dispensation may be granted to relieve a member of either or both of the restrictions in section 31(4). Those restrictions are that a member with a DPI may not (a) participate, or participate further, in any discussion if the matter at the meeting and (b) participate in any vote, or further vote taken on the matter at the meeting. It is clear that a dispensation can permit participation only, or participation and voting. In theory it

would be possible to grant a dispensation allowing a member with a DPI to vote, though it would be impossible to vote in a meeting without joining it either physically in the room or so far as permitted by remote meeting rules, online, without that also being participation.

- 2.12. Critically, making a statement of representation to a meeting is participating in that meeting. The three members could be granted a dispensation to participate in the meeting if they wished to make statements, but it is not considered that the participation could then be limited to just making statements. A member is either in the room and participating or not.

This then leads on to the question as to whether granting the three members dispensations is in the interest of persons living in the Authority's area or that it is otherwise appropriate to grant them. This is a question of judgement for the MO as proper officer, but it is doubted that it is really necessary or appropriate, because:

- (a) it is the function of the Navigation Committee to represent the interests of toll payers generally and the BA will have regard to its views;
- (b) participation by three operators in the consideration of toll setting and not other operators appears to place those three operators at an advantage to others and be unfair;
- (c) participation by the three members does not sit easily with the Nolan principles of selflessness, integrity and propriety, and honesty. This is not to suggest that the three members are in any way not acting with personal integrity, just that their actions could be perceived to not be in accordance with those principles;
- (d) regardless of the Code, those three members are at risk of being perceived to exhibit apparent bias which could render the decision taken liable to legal challenge.

- 2.13. As to other situations where DPIs might arise for private hire boat operators, for example reports about marine safety or decisions that will incur costs for their businesses if higher safety standards are agreed, or changes in planning policy, there must be a direct connection between the item of business and the registered interest for a DPI to arise. The starting point is what is contained in the member's register.

(In his advice, Mr Goolden references two examples:

- One member has registered his directorship of a hire boat company as a paid employment, or office, and also registered that he owns the boatyard and moorings of the company and land adjacent, garden and moorings. That member would have a DPI in a planning application for that land. He would not have a DPI in a planning application for premises next door not owned by him, but might have a personal interest in a planning application for the next-door premises if a decision on that application might reasonably be regarded as affecting his wellbeing or financial position, but that would not be a DPI.

- In the case of a second member, a proposal by the BA to require all commercial hire boat operators to provide a one hour on the water training session for all hirers of craft over 13 metres in length would be sufficiently connected to his registered business as a number of such craft are in his hire fleet. He would have a DPI in the proposal as it will have a financial impact on the registered interest (it is pecuniary) and the interest is “in” the proposal in that it has a direct connection to his business. A proposal to undertake a general review of the provision of safety instructions to Broads’ users would not be sufficiently specific to have a direct connection to a particular hire boat business.)

2.14. Each case needs to be considered on its own facts, and only the member concerned can be fully aware of the nature of their own interests. Nonetheless, bearing in mind that to participate or vote on a matter with a DPI is a criminal offence, it is wise for members to err on the side of caution in acting on interests and to apply for a dispensation in plenty of time before a meeting if there are reasons why having a DPI might unreasonably prevent their participation.

2.15. Where a matter does not have a direct connection to a registered interest, it may still give rise to a personal and/or prejudicial interest. The test for a personal interest is whether the matter would affect the member’s wellbeing or financial position (or that of specified others). “Affect” is a wider definition than “in” for DPIs and includes measures which will have a causal relationship.

### MO’s summary of legal advice

2.16. Mr Goolden’s advice concurs with the MO’s view as to the existence of DPIs on the part of the three members concerned. It suggests that the granting of dispensations would not have been “otherwise appropriate” under s33 of the Localism Act 2011, for the reasons set out above. Indeed, at the Authority’s meeting on 20 November 2020, the MO was not willing to grant dispensations that might have allowed the three members to speak or vote in the debate on the setting of the charges. The extent of the DPIs is considered and explained in Mr Goolden’s advice. Therefore, the position is clear for the future for these three members in terms of any reports about the setting of navigation charges and also, in terms of the extent of their DPIs, in other matters coming before the BA.

## 3. DPIs and ‘local’ interests

3.1. As noted above, if a member has a DPI “in” any item of business, they cannot speak or vote in the debate, unless they have first applied for a dispensation in writing and this has been granted by the MO. As explained above, DPIs are statutory in nature, being set out in Regulations made in 2012, under the Localism Act 2011. This Act also requires certain authorities, including the Broads Authority, to adopt a code of conduct to regulate the behaviour of its members.

3.2. It is often the case that authorities will set out other ‘local’ interests under whatever code of conduct they have adopted. These local interests are usually things like

membership of outside bodies, to which the member is appointed by their authority; membership of charities, lobby groups, or other groups whose purpose is to influence public policy; or membership of other local authorities. These local interests are then declared in Part 2 of the register of interests, Part 1 being for the declaration of DPIs. With a local interest, a member can still speak and vote in any debate that concerns or is related to their interest, having declared the interest verbally, at the meeting. The rationale for this is so that the member can impart their local knowledge and expertise, gleaned from their membership of a local charity, or other local authority, for example.

- 3.3. In the register of interests form currently used by the Broads Authority, members declare their DPIs as specified in law. They also must declare 'clubs and societies' of which they are members. The register of interests' form does not differentiate between those interests which are DPIs and those which are not.
- 3.4. Aside from DPIs, the Code adopted by the Authority refers, in paragraphs 3.6-3.10, to personal and personal/prejudicial interests (also see Mr Goolden's commentary above on this part of the Code). Personal interests and personal/prejudicial interests, as set out in the Code, were types of declarable interests under the former National Model Code of Conduct. This was revoked by the Localism Act 2011.
- 3.5. Under the Code, if a member has a personal/prejudicial interest, as defined, in an item of business, they are also unable to speak or vote in the debate, unless they first obtain a dispensation that enables them to do so. Therefore, membership of clubs, societies or outside bodies could give rise to personal/prejudicial interests which preclude a member from taking part in an item of business. (Note that a member could be precluded from taking part if they are biased by virtue of their membership of an outside body, etc, or if there is the appearance of bias. However, bias and predetermination are common law concepts, separate from the Code and the Localism Act 2011).
- 3.6. The inclusion of personal and personal/prejudicial interests, as defined in the Authority's current Code, casts the reader back to previous types of interest. The implications of having a personal and personal/prejudicial interest under the Code is tantamount to having a DPI. For that reason, the Code is not as straightforward as it might be, if the interests were simply DPIs and other 'local' interests, as agreed and defined by the Authority. Also, the register of interests' form does not reference these personal and personal/ prejudicial interests, nor differentiate between them, specifically.

## 4. Code of Conduct – proposed revision

- 4.1. As noted in the introduction to this report, the Authority's Code of Conduct for Members (adopted November 2018) is under review, together with the Code of Conduct for members on Planning Committee and officers (adopted July 2017), and the Register of Interests' form.

- 4.2. The Local Government Association (LGA) has produced a new [National Model Councillor Code of Conduct](#) ('the model Code'). The draft model Code was subject to extensive national consultation and drafting changes, and has now been finalised (latest update 17 May 2021), with [accompanying guidance on the model code](#) published on 8 July 2021. The Authority's Audit and Risk Committee considered the evolving draft model code at its meeting on 21 July 2020 and contributed to the consultation.
- 4.3. For the purposes of this model code, a 'councillor' means a member or co-opted member of a local authority or a directly elected mayor. A 'co-opted member' is defined in the Localism Act 2011 Section 27(4) as 'a person who is not a member of the authority but who is a member of any committee or sub-committee of the authority, or a member of, and represents the authority on, any joint committee or joint sub-committee of the authority; and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee'. 'Local authority' includes county councils, district councils, London borough councils, parish councils, town councils, fire and rescue authorities, police authorities, joint authorities, economic prosperity boards, combined authorities and National Park authorities.
- 4.4. The model code is intended to provide a comprehensive and consistent model for all local authorities to use, and it is therefore recommended that the Authority adopts a new Member Code of Conduct, based on the model code. Using the model code and explanatory guidance will give the Authority greater clarity on interests and other code of conduct matters, including the distinction between those interests that are DPIs defined in the Localism Act 2011 and other 'local' interests that the Authority may wish to include as declarable interests. It is also recommended that the Authority updates its Register of Interests form to this effect.
- 4.5. The new model code uses the terminology of 'disclosable pecuniary interests' (see table 1 within the model code), 'other registerable interests' (see table 2 within the model code) and 'non-registerable' interests (see paras 7-10 within the model code). If adopted, members will be expected to use this terminology when registering and disclosing interests.
- 'Disclosable pecuniary interests': The model code reiterates the legal duty to register and disclose 'disclosable pecuniary interests' and lists what these are (see table 1 within the model code).
  - 'Other registerable interests': It also confirms that councillors 'must' register a specific set of 'other registerable interests' (see table 2 within the model code).
  - 'Non-registerable interests': The model code also covers the need to disclose interests, when a matter arises at a meeting, that do not fall into either of the above categories but which directly relate to a councillor's 'financial interest or wellbeing'. The code is clear that councillors 'must' disclose this type of interest when it arises (para 7). The code sets out when this type of interest will be deemed

to have arisen (para 8) and the two tests councillors should apply when considering whether or not they should participate and vote (para 9).

- 4.6. Officers have prepared a draft new Code of Conduct for Authority members to reflect the new LGA model Code of Conduct, but incorporating paragraph 3.10 of the existing Code to enable a member owning a boat and paying a toll (outside of a business) to attend and vote on matters concerning the setting of tolls. Some terminology has also been changed to reflect the Authority's status (e.g. referring to 'member' rather than 'councillor', and 'Broads Authority executive area' rather than 'council area').
- 4.7. For members' consideration, the draft Code is at Appendix 1, with an explanatory note at Appendix 2 and a draft new Register of Interests form at Appendix 3. For reference, the Authority's current Code is at Appendix 4.
- 4.8. This report seeks the views of members on these draft documents, with a recommendation that they are adopted by the Authority subject to any agreed amendments. The documents were considered by the Audit and Risk Committee on 20 July and that committee's feedback will be presented verbally at today's meeting.

Author: Christopher Bing

Date of report: 12 July 2021

Appendix 1 – Revised Member Code of Conduct (based on [National LGA model code](#))

Appendix 2 – LGA model code – explanatory note (17 Dec 2020)

Appendix 3 – Revised Register of Interests form

Appendix 4 – Current Code of Conduct for Members (Nov 2018) – for reference

# Broads Authority

## Member Code of Conduct (draft)

July 2021

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## Introduction

This Member Code of Conduct ('the Code') applies to all members and co-opted members (known collectively in this document as 'members') of the Broads Authority.

The Code is based on the Local Government Association's Model Member Code of Conduct (updated 17 May 2021) and is supported by guidance produced by the LGA. The Authority will review the Code regularly, taking note of the LGA's annual review of the model code.

## Purpose

The purpose of this Code is to assist you, as a member, in modelling the behaviour that is expected of you, to provide a personal check and balance, and to set out the type of conduct that could lead to action being taken against you. It is also to protect you, the public, fellow members, Authority officers and the reputation of the Broads Authority. It sets out general principles of conduct expected of all members and your specific obligations in relation to standards of conduct. The LGA encourages the use of support, training and mediation prior to action being taken using the Code. The fundamental aim of the Code is to create and maintain public confidence in the role of members and in the Authority.

The Code is not an exhaustive list of all legal obligations that fall upon members, and related protocols and guidance are referenced in the Members Handbook. These include:

- Protocol on Member and Officer Relations in the Broads Authority
- Standing Orders for the regulation of Authority proceedings
- Social Media Policy

## General principles

The Code promote the highest standards of ethics and conduct, and draws upon the [Seven Principles of Public Life](#), also known as the Nolan Principles. The following general principles have been developed specifically for the role of member.

In accordance with the public trust placed in me, on all occasions:

- I act with integrity and honesty
- I act lawfully
- I treat all persons fairly and with respect; and
- I lead by example and act in a way that secures public confidence in the role of member.

In undertaking my role:

- I impartially exercise my responsibilities in the interests of the local community
- I do not improperly seek to confer an advantage, or disadvantage, on any person

- I avoid conflicts of interest
- I exercise reasonable care and diligence; and
- I ensure that public resources are used prudently in accordance with the Authority's requirements and in the public interest.

## Application of the Code of Conduct

This Code applies to you as soon as you sign your declaration of acceptance of the office of member or attend your first meeting as a co-opted member, and continues to apply to you until you cease to be a member.

This Code of Conduct applies to you when you are acting in your capacity as a member, which may include when:

- you misuse your position as a member;
- Your actions would give the impression to a reasonable member of the public with knowledge of all the facts that you are acting as a member;

The Code applies to all forms of communication and interaction, including:

- at face-to-face meetings
- at online or telephone meetings
- in written communication
- in verbal communication
- in non-verbal communication
- in electronic and social media communication, posts, statements and comments.

You are also expected to uphold high standards of conduct and show leadership at all times when acting as a member.

The Authority's Monitoring Officer has statutory responsibility for the implementation of this Code. You are encouraged to seek their advice on any matters that may relate to the Code.

## Standards of member conduct

This section sets out your obligations, which are the minimum standards of conduct required of you as a member. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.

Guidance is included to help explain the reasons for the obligations and how they should be followed.

# General conduct

## 1. Respect

### As a member:

- **I treat other members and members of the public with respect.**
- **I treat Broads Authority officers and volunteers, and representatives of partner organisations, with respect, and respect the role they play.**

Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. As a member, you can express, challenge, criticise and disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack.

In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in members.

In return, you have a right to expect respectful behaviour from the public. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the Broads Authority, the relevant social media provider or the police. This also applies to fellow members, where action could then be taken under the Code, and Authority staff, where concerns should be raised in line with the Authority's protocol on member and officer relations.

## 2. Bullying, harassment and discrimination

### As a member:

- **I do not bully any person.**
- **I do not harass any person.**
- **I promote equalities and do not discriminate unlawfully against any person.**

The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The Equality Act 2010 places specific duties on local authorities. Members have a central role to play in ensuring that equality issues are integral to the Authority's performance and strategic aims, and that there is a strong vision and public commitment to equality across public services.

### **3. Impartiality of Authority officers**

**As a member, I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the Authority.**

Officers working for the Broads Authority must be politically neutral. They should not be coerced or persuaded to act in a way that would undermine their neutrality. You can question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, you must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

### **4. Confidentiality and access to information**

**As a member:**

- **I do not disclose information:**
  - a. **given to me in confidence by anyone**
  - b. **acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless**
    - i. **I have received the consent of a person authorised to give it;**
    - ii. **I am required by law to do so;**
    - iii. **the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or**
    - iv. **the disclosure is:**
      - 1. **reasonable and in the public interest; and**
      - 2. **made in good faith and in compliance with the reasonable requirements of the Authority; and**
      - 3. **I have consulted the Monitoring Officer prior to its release.**
- **I do not improperly use knowledge gained solely as a result of my role as a member for the advancement of myself, my friends, my family members, my employer or my business interests.**

- **I do not prevent anyone from getting information that they are entitled to by law.**

Local authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the Broads Authority must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations.

## 5. Disrepute

**As a member:**

**I do not bring my role or the Broads Authority into disrepute.**

As a member, you are trusted to make decisions on behalf of the Broads and its stakeholder interests, and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other members and/or the Authority and may lower the public's confidence in you or the Authority's ability to discharge your/its functions. For example, behaviour that is considered dishonest and/or deceitful can bring the Authority into disrepute.

You are able to hold the Authority and fellow members to account and are able to constructively challenge and express concern about decisions and processes undertaken by the Authority, while continuing to adhere to other aspects of this Code of Conduct.

## 6. Use of position

**As a member, I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.**

Your position as a member of the Authority provides you with certain opportunities, responsibilities, and privileges, and you make choices all the time that will impact others. However, you should not take advantage of these opportunities to further your own or others' private interests or to disadvantage anyone unfairly.

## 7. Use of Authority resources and facilities

**As a member:**

- **I do not misuse Authority resources.**
- **I will, when using the resources of the Authority or authorising their use by others:**
  - act in accordance with the Authority's requirements; and**
  - ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the Authority or of the office to which I have been appointed.**

You may be provided with resources and facilities by the Authority to help you carry out your duties as a member. Examples include office support and access to Authority buildings and rooms. These are to be used only in carrying out your role as a member effectively and are not to be used for business or personal gain. They should be used in accordance with the purpose for which they have been provided and the Authority's own policies regarding their use.

## 8. Complying with the Code of Conduct

### As a member:

- I undertake Code of Conduct training provided by the Broads Authority.
- I cooperate with any Code of Conduct investigation and/or determination.
- I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.
- I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct.

It is extremely important for you as a member to demonstrate high standards, have your actions open to scrutiny and not to undermine public trust in the Authority or its governance. If you do not understand, or are concerned about, the Authority's processes in handling a complaint, you should raise this with the Authority's Monitoring Officer.

## Protecting your reputation and the reputation of the Broads Authority

### 9. Interests as a member:

#### As a member, I register and disclose my interests.

Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of interests of members of the Authority.

You need to register your interests so that the public, Authority officers and fellow members know which of your interests might give rise to a conflict of interest. The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should disclose an interest in a meeting, but it can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be disclosed by you or other members when making or taking part in decisions, so that decision-making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of local governance is maintained.

You should note that failure to register or disclose a disclosable pecuniary interest as set out in **Table 1**, is a criminal offence under the Localism Act 2011.

**Appendix B** sets out the detailed provisions on registering and disclosing interests. If in doubt, you should always seek advice from the Monitoring Officer.

## 10. Gifts and hospitality

**As a member:**

- **I do not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the Broads Authority or from persons who may apply to the Authority for any permission, licence or other significant advantage.**
- **I register with the Monitoring Officer any gift or hospitality with an estimated value of at least £50 within 28 days of its receipt.**
- **I register with the Monitoring Officer any significant gift or hospitality that I have been offered but have refused to accept.**

In order to protect your position and the reputation of the Authority, you should exercise caution in accepting any gifts or hospitality which are (or which you reasonably believe to be) offered to you because you are a member. The presumption should always be not to accept significant gifts or hospitality. However, there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered. However, you do not need to register gifts and hospitality which are not related to your role as a member, such as Christmas gifts from your friends and family. It is also important to note that it is appropriate to accept normal expenses and hospitality associated with your duties as a member. If you are unsure, contact the Monitoring Officer for guidance.



## Appendix A – The Seven Principles of Public Life

The principles are:

### **Selflessness**

Holders of public office should act solely in terms of the public interest.

### **Integrity**

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must disclose and resolve any interests and relationships.

### **Objectivity**

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

### **Accountability**

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

### **Openness**

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

### **Honesty**

Holders of public office should be truthful.

### **Leadership**

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

## Appendix B – Registering interests

You must, within 28 days of your appointment as a member or co-opted member of the Authority, register with the Authority’s Monitoring Officer the interests which fall within the categories set out in **Table 1 (Disclosable Pecuniary Interests)** which are as described in “The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012”. You should also register details of your other personal interests which fall within the categories set out in **Table 2 (Other Registerable Interests)**.

You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.

“**Disclosable Pecuniary Interest**” means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in Table 1 below.

“**Partner**” means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

A ‘**sensitive interest**’ is as an interest which, if disclosed, could lead to the member, or a person connected with the member, being subject to violence or intimidation.

Where you have a ‘sensitive interest’ you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees, they will withhold the interest from the public register.

### Non-participation in case of disclosable pecuniary interest

Where a matter arises at a meeting which directly relates to one of your Disclosable Pecuniary Interests as set out in **Table 1**, you must disclose the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a ‘sensitive interest’, you do not have to disclose the nature of the interest, just that you have an interest. Dispensation may be granted in limited circumstances, to enable you to participate and vote on a matter in which you have a disclosable pecuniary interest.

### Disclosure of Other Registerable Interests

Where a matter arises at a meeting which **directly relates** to the financial interest or wellbeing of one of your Other Registerable Interests (as set out in **Table 2**), you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting, but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a ‘sensitive interest’, you do not have to disclose the nature of the interest.

### Disclosure of Non-Registerable Interests

Where a matter arises at a meeting which **directly relates** to your financial interest or well-being (and is not a Disclosable Pecuniary Interest set out in Table 1) or a financial interest or well-being of a relative or close associate, you must disclose the interest. You may speak on

the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

Where a matter arises at a meeting which **affects** –

- a. your own financial interest or well-being;
- b. a financial interest or well-being of a relative or close associate; or
- c. a financial interest or wellbeing of a body included under Other Registerable Interests as set out in **Table 2**

you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest, the following test should be applied.

Where a matter (referred to in paragraph 8 above) **affects** the financial interest or well-being:

- d. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
- e. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

There are some subjects in relation to the Authority that, once you have declared an interest, you may nonetheless attend a meeting and vote. These include:

- Setting of tolls, where the extend of the interest is limited to owning a boat and thereby paying a toll;
- Matters relating to schools, when you are a parent, guardian or governor of a child at a different school in the area.
- An allowance, payment or indemnity given to members.

Other subject matters may apply in local government, but these are unlikely in practice to apply to members of the Authority. Please ask the Monitoring Officer for information.

*To be appended:*

*Complaints procedure*

*Code of Practice for Planning Committee members and officers*

**Table 1: Disclosable Pecuniary Interests**

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

<b>Subject</b>	<b>Description</b>
<b>Employment, office, trade, profession or vocation</b>	Any employment, office, trade, profession or vocation carried on for profit or gain.
<b>Sponsorship</b>	<p>Any payment or provision of any other financial benefit (other than from the relevant authority) made to the member during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a member, or towards his/her election expenses.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.</p>
<b>Contracts</b>	<p>Any contract made between the member or his/her spouse or civil partner or the person with whom the member is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the relevant authority:</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
<b>Land and Property</b>	<p>Any beneficial interest in land which is within the executive area of the Authority.</p> <p>‘Land’ excludes an easement, servitude, interest or right in or over land which does not give the member or his/her spouse or civil partner or the person with whom the member is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.</p>

Subject	Description
<b>Licenses</b>	Any licence (alone or jointly with others) to occupy land in the executive area of the Authority for a month or longer
<b>Corporate tenancies</b>	Any tenancy where (to the member's knowledge)— (a) the landlord is the Authority; and (b) the tenant is a body that the member, or his/her spouse or civil partner or the person with whom the member is living as if they were spouses/ civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.
<b>Securities</b>	Any beneficial interest in securities* of a body where— (a) that body (to the member's knowledge) has a place of business or land in the executive area of the Authority; and (b) either— i. the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or ii. if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the member, or his/ her spouse or civil partner or the person with whom the member is living as if they were spouses/civil partners have a beneficial interest exceeds one hundredth of the total issued share capital of that class.

\*'director' includes a member of the committee of management of an industrial and provident society; 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services

and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

**Table 2: Other Registerable Interests**

You must register as an 'Other Registerable Interest':

- a) any unpaid directorships
- b) any body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by the Authority
- c) any body
  - (i) exercising functions of a public nature
  - (ii) directed to charitable purposes or
  - (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)of which you are a member or in a position of general control or management

(end of document)



## LGA Model Member Code of Conduct

### Explanatory Note

#### 1. Introduction

- 1.1 The LGA have published their Model Code of Conduct following consultation with the sector. At the time of writing this explanatory note, the LGA have temporarily withdrawn the publication. A revised LLG note will be produced with a live link to the code of conduct once it is re-published.

#### 2. Consultation

- 2.2 An online questionnaire was available for 10 weeks between Monday 8 June until Monday 17 August. A total of 1,463 responses were received by the LGA including members, officers, councils, stakeholder organisations and individuals.

#### 3. Key Results from the Consultation

The LGA have published the following key results from the consultation responses they received.

- Almost all survey respondents (97 per cent) supported the proposal that councillors demonstrate the behaviours set out in the Code when they are publicly acting as, identifying as, and/or giving the impression that they are acting as a councillor, including when representing their council on official business and when using social media.
- Just over half of the survey respondents (55 per cent), thought that the code was sufficiently clear about which parts of the code are legal requirements, which are obligations, and which are guidance. A third (36 per cent) thought it was not clear while nine per cent did not know.
- Respondents were generally evenly split regarding their preference for the tense of the wording used in the code, however, there was slightly more support for the personal tense (“I will”) which was chosen by 45 per cent over the passive tense (“Councillors should”) (40 per cent).
- Almost all survey respondents supported each of the 12 specific obligations to either a great or a moderate extent. However, there was slightly less support for the obligation to register any gift or hospitality with an estimated value of at least £25 within 28 days of its receipt than the others – 96 per cent compared to 99 to 100 per cent.
- Four in five survey respondents (80 per cent) thought that the concept of ‘acting with civility’ is sufficiently clear to a great or moderate extent. A further 12 per cent thought it was clear to a small extent while just seven per cent did not think it was clear.
- A combined total of 85 per cent of survey respondents thought the concept of ‘bringing the council into disrepute’ is sufficiently clear to a great or moderate extent. Nine per cent thought it was clear to a small extent while five per cent did not think it was clear.
- Most survey respondents (93 per cent) supported the definition of bullying and harassment used in the code in a local government context to a great or moderate degree while four per cent did so to a small extent.



- Respondents were evenly split about whether there was sufficient reference to the use of social media in the code, however, a slightly higher proportion of respondents (43 per cent) said no, than those who answered yes (41 per cent).
- Over four in five survey respondents (81 per cent) were in support of the code going beyond the current requirement to declare interests of the councillor and their partner to a great or moderate degree. A further eight per cent supported it to a small degree and another eight per cent did not support it at all.
- Almost all survey respondents (97 per cent) supported the proposed requirement that councillors do not accept significant gifts to a great or moderate degree. Two per cent supported it to a small degree while less than one per cent did not support it at all.
- Most survey respondents (72 per cent) supported £25 as the threshold for registering gifts and hospitality, although almost four in ten (39 per cent), felt that the amount should be reviewed annually with the code's review. Nine per cent of respondents thought that the threshold should be lower than £25 while 16 per cent felt that it should be higher.
- Respondents most commonly ranked explanatory guidance on the code as the most useful type of accompanying guidance, followed by supplementary guidance that focuses on specific areas, e.g., social media and case studies and examples of good practice.

#### **4. Key Points from the Final Member Code of Conduct**

(Numbers in brackets refer to pagination in the code of conduct)

##### **4.1 Definitions**

4.1.1 Councillor is defined as 'a member or co-opted member of a local authority or a directly elected mayor'.

4.1.2 A "co-opted member" is defined pursuant to the [Localism Act 2011 Section 27\(4\)](#)

4.1.3 Local Authority includes 'county councils, district councils, London borough councils, parish councils, town councils, fire and rescue authorities, police authorities, joint authorities, economic prosperity boards, combined authorities and National Park authorities'.

##### **4.2 Tense**

4.2.1 First person direct to Councillors.

##### **4.3 Nolan Principles**

4.3.1 Encompasses the Nolan principles. Also includes that 'public resources are used prudently in accordance with a local authority's requirements and in the public interest'.

##### **4.3 Application of the Code**

4.3.1 The Code applies to councillors when they are: -





- Acting in that capacity
- Representing the Council
- Claiming to act or represent
- Give the impression they are claiming to act or represent
- Refer publicly to their role
- Use knowledge obtained from their role

4.3.2 The Code specifically applies 'in electronic and social media communication, posts, statements and comments'.

#### 4.4 Standards

4.4.1 The word **Respect** (1.1) has replaced Civility (which was originally suggested in the draft code).

#### 4.5 Bullying, harassment and discrimination

4.5.1 There is a specific obligation to promote equalities and not to discriminate unlawfully against any person (2.3.1) with reference to the Equalities Act.

#### 4.6 Impartiality

4.6.1 Councillors must not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the local authority (3.1)

#### 4.7 Confidentiality

4.7.1 Councillors must not disclose information they have received which they believe or ought reasonably to be aware is of a confidential nature (4.1a&b).

4.7.2 Disclosure in the public interest and in good faith is allowed provided the councillor has consulted the Monitoring Officer prior to its release (4.1iv1,2&3)

#### 4.8 Disrepute

4.8.1 Councillors must not bring their role or authority into disrepute ((5.1).

#### 4.9 Use of Position

4.9.1 Councillors must not use their position improperly to their advantage or disadvantage (6.1).

#### 4.10 Use of Council Resources

4.10.1 Councillors must ensure that resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the local authority or their office (7.2b).

#### 4.11 Compliance

4.11.1 Councillors must commit to undertaking code of conduct training (8.1), cooperate with investigations (8.2) and comply with sanctions (8.4).



#### 4.12 Reputation

4.12.1 Declarations of interest must be registered and declared (9.1). Detailed provisions are contained within Appendix B. The code states 'If in doubt, you should always seek advice from your Monitoring Officer'.

#### 4.13 Appendix B

4.13.1 Registration of interests required are those which fall within the categories set out in Table 1 (Disclosable Pecuniary Interests) and Table 2 (Other Registerable Interests) of the code.

#### 4.13.2 Declaring Interests and Meeting Participation

- Disclosable Pecuniary Interests: -  
Councillors must declare, not participate, or vote and leave the room (subject to dispensation)
- Other Registrable Interests: -  
Councillors must declare, only speak if the public are allowed to speak, not participate in the discussion or vote and leave the room (subject to dispensation).
- Non-Disclosable Pecuniary Interest Directly Relating to Finance or Well-Being of Councillors or Relative or Close Associate: -  
Councillors must declare, only speak if the public are allowed to speak, not participate in the discussion or vote and leave the room (subject to dispensation).

#### 4.13.3 Table 1- Pecuniary Interests

Sets out an explanation of Pecuniary Interests and includes: -

- Employment or Trade
- Sponsorship
- Contracts (including partners lived with)
- Land or Property (including partners lived with)
- Licences
- Corporate Tenancies (including partners lived with)
- Securities (including partners lived with)

(Note a director includes a member of the committee of management of an industrial and provident society).

#### 4.13.4 Table 2- Other Registerable Interests

Sets out an explanation of Other Registrable Interests in respect of bodies to which councillors are appointed or nominated to by the council and includes: -

- exercising functions of a public nature



- directed to charitable purposes; or
- one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management.

#### 4.14 Gifts & Hospitality

4.14.1 Councillors receiving gifts or hospitality with a value of £50 or more must register these with the Monitoring Officer within 28 days (10.2). Any significant gift or hospitality refused must also be registered with the Monitoring Officer (10.3) (*note no timescale is placed against refused gifts*).

4.15 The LGA has committed to reviewing the Code on an annual basis to ensure it is still fit for purpose.

### 5. **Committee on Standards In Public Life (CSPL) Recommendations**

5.2 It is accepted that many of the recommendations made by the CSPL would require changes to the law. However, the following is noted: -

- Despite the Draft Member Code of Conduct including a bar on attending committees for up to 2 months as a sanction, the published code **contains no reference to a sanction of any kind**.
- Therefore, there is no power to suspend councillors, without allowances, for up to six months
- There is no reference to a role for the Local Government Ombudsman
- There is no discretionary power to establish a decision-making standards committee with voting independent members and voting members from dependent parishes
- There is no mention of an independent person.
- The code does not reference section 31 Localism Act 2011 (but it gives a nod towards it)
- Gifts and Hospitality has risen from the proposed £25 to £50 recommended by the CSPL
- There is some support evidenced for a change to the authorities for Disclosable Pecuniary Interests but only where a member is nominated or appointed by the council
- Broadly the Code encompasses the CSPL recommendation when a member is acting in an official capacity which includes reference to social media but this does require a change of legislation to engage presumption ((s27)(2) Localism Act 2011)

# Register of Interests form

Member: **type name here**

As a member of the Broads Authority, these are the interests which you are required to register with the Authority by section 30 of the [Localism Act 2011](#).

**Register of interests must be declared:**

- **within 28 days of becoming a member; and**
- **within 28 days of becoming aware of any new interest, or of any change to a registered interest.**

**Failure to register or disclose a disclosable pecuniary interest is a criminal offence under the Localism Act 2011.**

Where you have a **'sensitive interest'** you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees, they will withhold the interest from the public register. A 'sensitive interest' is as an interest which, if disclosed, could lead to the member, or a person connected with the member, being subject to violence or intimidation.

**'Disclosable Pecuniary Interest'** means an interest of yourself or of your partner if you are aware of your partner's interest.

**'Partner'** means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

**Please see the Broads Authority Member Code of Conduct and guidance notes for further information.**

In accordance with Chapter 7 of Part 1 of the Localism Act 2011

<b>Subject</b>	<b>Description</b>	<b>Details of member's interest</b>
<b>Employment, office, trade, profession or vocation</b>	Any employment, office, trade, profession or vocation carried on for profit or gain.	
<b>Sponsorship</b>	<p>Any payment or provision of any other financial benefit (other than from the Authority) made to the member during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a member, or towards his/her election expenses.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.</p>	
<b>Contracts</b>	<p>Any contract made between the member or his/her spouse or civil partner or the person with whom the member is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director or a body that such person has a beneficial interest in the securities of) and the Authority</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>	
<b>Land and property</b>	Any beneficial interest in land which is within the area of the Authority.	

Subject	Description	Details of member's interest
	'Land' excludes an easement, servitude, interest or right in or over land which does not give the member or his/her partner a right to occupy or to receive income.	
<b>Licenses</b>	Any licence (alone or jointly with others) to occupy land in the area of the Authority for a month or longer.	
<b>Corporate tenancies</b>	Any tenancy where (to the member's knowledge) <ul style="list-style-type: none"> <li>(a) The landlord is the Authority; and</li> <li>(b) The tenant is a body that the member, or his/her partner is a partner of or a director of or has a beneficial interest in the securities of.</li> </ul>	
<b>Securities</b>	Any beneficial interest in securities of a body where <ul style="list-style-type: none"> <li>(a) That body (to the member's knowledge) has a place of business or land in the area of the Authority; and</li> <li>(b) Either <ul style="list-style-type: none"> <li>i. The total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</li> <li>ii. If the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the member, or his/her partner have a beneficial interest</li> </ul> </li> </ul>	

Subject	Description	Details of member's interest
	exceeds one hundredth of the total issued share capital of that class.	
<b>Any other interests</b>	<p>You must register as an 'Other Registerable Interest':</p> <ul style="list-style-type: none"> <li>(a) any unpaid directorships</li> <li>(b) any body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority</li> <li>(c) any body <ul style="list-style-type: none"> <li>a. exercising functions of a public nature</li> <li>b. directed to charitable purposes or</li> <li>c. one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)</li> </ul> </li> </ul> <p>of which you are a member or in a position of general control or management.</p>	
<p><b>Gifts and hospitality</b> I have received a gift or hospitality worth £50 or over from the following persons or bodies or other organisations</p>	<p>This section only applies to gifts or hospitality received in your capacity as a member of the Authority.</p> <p>You do not have to specify the nature or value of the gift or hospitality but you may do so if you wish. If you are not sure of the value of the gift or hospitality, please estimate it.</p> <p>Also, you should register an accumulation of small gifts from the same source over a short period which add up to £25 or over.</p>	

Subject	Description	Details of member's interest
Toll paying	Annotate if you are a toll payer.	

**Member signature:**

\_\_\_\_\_

**Date:**

\_\_\_\_\_

**Received by the Broads Authority:**

\_\_\_\_\_

**Date:**

\_\_\_\_\_





# Code of Conduct for Members and Complaints Procedure

November 2018

Version 2.2

Updated 23.11.18

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## Introduction and Overview

- 1.1 This revised Code of Conduct for Members (“the Code”) adopted on 30<sup>th</sup> September 2016 sets out the conduct which is expected of members and co-opted members (“Members”) of the Broads Authority (“the Authority”) when they are acting in that capacity, as required by section 27 of the Localism Act 2011.
- 1.2 The Nolan Report set out the seven Principles of Public Life, which are incorporated into the Code as required by section 28 Localism Act 2011. The Authority also has a statutory duty under section 27 of the Act to promote and maintain high standards of ethics and conduct by its Members.
- 1.3 Members will be offered training on the Code whether by the Monitoring Officer or from a representative body and the Authority expects all Members to take advantage of such training, including refresher courses, to ensure that they are fully aware of the provisions of the Code and the standards expected of them in public.
- 1.4 Members are also urged to avail themselves of the Local Resolution Procedure under the Code for dealing with Member versus Member complaints and other disagreements and to ensure the effective use of the Authority’s resources. The aim of Local Resolution is to resolve matters at an early stage so as to avoid the unnecessary escalation of the situation which may damage personal relationships within the Authority and the Authority’s reputation.
- 1.5 The following pages set out the Code and guidance and it is intended to be consistent with the seven principles. It is also not an exhaustive list of all legal obligations, which fall upon Members and does not discharge members from their duty to ensure that at all times they act within the seven principles attached to the Code. The Authority also has its core values, which Members are asked to observe and follow. These are set out in section 2.
- 1.6 Members must ensure that they take appropriate action in relation to any Disclosable Pecuniary Interest. Failure to do so may result in a criminal conviction and a fine of up to £5,000 and/or disqualification from office for a period of up to 5 years.
- 1.7 Members should comply with the Code whenever they are acting in their official capacity as a Member including at full meetings, committee meetings and sub-committee meetings. The Code also applies to Members’ dealings with each other, with outside bodies, briefing meetings with officers, site visits, use of social media and in communication with the Authority, other than in a private capacity.
- 1.8 Freedom of expression is a right, which applies to all Members of the Authority. A Member’s freedom of expression attracts enhanced protection where the comments are political in nature. The criticism of opposing ideas

and opinion is considered to be part of democratic debate and it is unlikely that such comments would amount to a breach of the Code. Comments that breach the principle in paragraph 2.8 below may, in contrast, be a potential breach of the Code.

- 1.9 Members' attention is drawn to the Protocol on Member and Officer Relations in the Broads Authority, which sets out expectations of Members' conduct towards staff. The Authority has a Staff Code of Conduct for its staff which includes guidance on staff relations with Members, including on social media.
- 1.10 Members' attention is also drawn to the Authority's Standing Orders, which includes guidance on conduct within meetings of the Authority and its committees, including sanctions for disorderly conduct by Members within such meetings.
- 1.11 The Authority adopted in July 2017 Social Media Guidance for Members and Officers <sup>1</sup>.

## **2 Principles of Conduct and Core Values**

### **Principles of Conduct**

2.1 The Code promotes the highest standards of ethics and conduct and draws upon the Nolan principles of conduct as follows:

2.2 **Selflessness**

Members must act solely in the public interest. They must never use their position as Members improperly to confer an advantage on, or to avoid a disadvantage for, themselves or improperly to confer an advantage or disadvantage on others.

2.3 **Integrity and propriety**

Members must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. Members should not act or take decisions in order to gain financial or other material benefits for themselves, their families or friends. Members must declare and resolve any interests and relationships.

Note: Members should avoid putting Authority staff in breach of their own Code of Conduct, such as adding them as friends on social media platforms such as “Facebook”. Members should familiarise themselves with the Protocol on Member and Officer Relations in the Authority.

2.4 **Objectivity in decision making**

In carrying out their responsibilities including making appointments, awarding contracts, or recommending individuals for rewards or benefits, Members must make decisions on merit. Whilst Members must have regard to the professional advice of officers and may properly take account of the views of others, it is their responsibility to decide what view to take and, if appropriate how to vote on any issue.

2.5 **Accountability**

Members are accountable to the public generally for their actions and for the way they carry out their responsibilities as a Member. They must be prepared to submit themselves to such public scrutiny as is appropriate to their responsibilities.

2.6 **Openness**

Members must be as open as possible about all their actions and those of the Authority. They must seek to ensure that disclosure of information is restricted only in accordance with the law. Members should be transparent through being prepared to give reasons for their decisions and actions.

2.7 **Honesty**

Members must declare any private interests relevant to their public duties and take steps to resolve any conflict in a way that protects the public interest. Interests must be registered and declared in a manner which conforms to the procedures set out below.

## 2.8 **Leadership**

Members must promote and support these principles by leadership and example so as to promote public confidence in their role and in the Authority. They must respect the impartiality and integrity of the Authority's statutory officers and its other employees. Members should be willing to support the Code and willing to challenge poor behaviour whenever it occurs.

Note: The Protocol on Member and Officer Relations section 3 provides that officers can expect from Members leadership and that they take responsibilities for decisions made by the Authority and for defending them publicly.

## 2.9 **Stewardship**

In discharging their duties and responsibilities, Members must ensure that the Authority's resources are used both lawfully and prudently. They must ensure that the Authority's resources are not used improperly for political purposes (which include any party political purposes). Expenses must be claimed in accordance with the Authority's guidance and supported by receipts, and claimed reasonably promptly.

## 2.10 **Confidentiality**

Members must not disclose any information given to them which should reasonably be regarded to be of a confidential nature, including items discussed in the confidential sections of meetings. This duty of non-disclosure may no longer apply where either the consent of the person authorised to give it has been obtained, or there is a legal requirement to disclose. If in doubt, Members are encouraged to seek the views of the Monitoring Officer.

Note: The Protocol on Member and Officer Relations in the Broads Authority section 8 on Disclosure of Information by Members sets out the procedure in relation to disclosure of confidential information, which involves 72 hours prior notification in advance to the Chief Executive or Monitoring Officer. The Information Commissioner has issued helpful guidance on the Freedom of Information Act and General Data Protection Act which is available on the ICO website [www.ico.gov.uk](http://www.ico.gov.uk) or by calling 0303 123 1113.

## 2.11 **Equality and respect**

Members must treat others with respect and promote equality by not discriminating unlawfully against any person and by treating people with respect, regardless of their sex, race, age, religion, gender, sexual orientation or disability. Members should respect the impartiality and integrity of the Authority's statutory officers and its other employees.

Note: The Protocol on Member and Officer Relations sets out in detail the roles and responsibilities and the working relationships between Members and officers. Section 3 sets out expectations that each can expect from the other respect and courtesy and the highest standards of integrity.

## Core Values

- 2.12 In addition to the principles of conduct, Members should, so far as possible, reflect the Authority's Core Values, which have been drawn up by the Authority's staff and adopted by the Authority:
- 2.13 **Commitment** – We are committed to making a difference to the Broads for the benefit of all and we will have the courage of our convictions when faced with difficult decisions.
- 2.14 **Caring** – We are considerate and respectful of each other, working together to provide the best service we can.
- 2.15 **Open and honest** – We are open, honest and inclusive in our communication and in making decisions. We are approachable and available, reaching out to all groups.
- 2.16 **Sustainable** – We take the long-term view, are passionate about our environment and its ability to provide for a vibrant local economy and the well-being of local people.
- 2.17 **Exemplary** – We strive for excellence in all we do. We are ambitious, innovative and lead by example

### **3 Registering and declaring disclosable pecuniary and other non-pecuniary registrable interests and gifts**

- 3.1 A Member must within 28 days of taking office as a Member notify the Monitoring Officer of any disclosable pecuniary interest as defined by regulations made by the Secretary of State. This applies whether that interest is their own, their spouse's or civil partner's, or is the interest of someone with whom they are living with as a husband or wife, or as if they were civil partners. The interest will be included in the Authority's register of interests (a copy of which is available for public inspection and published on its web site).
- 3.2 In addition to 3.1, Members must within 28 days of taking office as a Member notify the Monitoring Officer of any disclosable pecuniary or non-pecuniary interest which the Authority has decided should be included in the register.
- 3.3 If an interest above has not been notified or entered in the register, then the Member must disclose the interest to any meeting of the Authority at which they are present, where they have disclosable interest in any matter being considered and where the matter is not a "sensitive interest" as described in the Localism Act 2011. In relation to sensitive interests, which include any concern that disclosure might lead to the Member being subject to violence or intimidation, Members should speak to the Monitoring Officer, who may agree to exclude details from any publicly available version of the register of interests.
- 3.4 Following disclosure of an interest not on the Authority's register or the subject of pending notification, Members must notify the Monitoring Officer of the interest within 28 days beginning with the date of disclosure.
- 3.5 Unless dispensation has been granted, a Member may not participate in any discussion of, vote on, or discharge any function related to any matter in which they have a pecuniary interest as set out in 3.1 above. In addition a Member must observe the restrictions the Authority places on their involvement in matters where they have a pecuniary or non-pecuniary interest as defined by the Authority.

#### **Disclosure of interests at meetings**

- 3.6 Where an interest described above or in the following paragraph in any business of the Authority has been declared and, where a Member is aware or ought reasonably to be aware of the existence of that interest and they attend a meeting of the Authority at which the business is considered, the Member must disclose to that meeting the existence and nature of that interest at the commencement of its consideration. If not apparent in advance from any agenda, as soon as the interest becomes apparent as being relevant to the business under consideration a Member must immediately declare it.
- 3.7 Members have a personal interest in any business of the Authority where a decision in relation to that business might reasonably be regarded as affecting their well-being or financial position or the well-being or financial position of a



member of their family or any person with whom they have a close relationship to a greater extent than the majority of other Toll payers or inhabitants of the Authority's geographical area or "National Park area", as the case may be, affected by the decision.

### **Non-participation in the case of other prejudicial interest**

- 3.8 Where Members have a personal interest (as set out in 3.7 above) they will also have a prejudicial interest, if the following also applies. That is, on an objective analysis, Members' judgement of the public interest would be affected through their financial position or that of a person or body which has been, or should have been, notified in the register of interest by the Member. The test to be applied is whether a member of the public with knowledge of the facts would reasonably regard the pecuniary interest as so significant that it would prejudice the Member's judgment.
- 3.9 Where there is such a prejudicial interest, the Member must not participate in any discussion of, vote on or discharge any function related to such prejudicial interest. An application may be made for special dispensation from the Authority in relation to this and the Member must observe any restrictions placed by the Authority in such circumstances.
- 3.10 There are some subject areas in relation to the Authority which, once an interest has been disclosed, a Member may nonetheless attend a meeting and vote. These include:
- Setting of Tolls, where the extent of the interest is limited to owning a boat and thereby paying a Toll.
  - Matters relating to schools, when the Member is a parent, guardian or governor of a child at a different school in the area. These include school meals, school transport and expenses.
  - An allowance, payment or indemnity given to Members
- 3.11 There are other subject areas which may apply in local government, but it is considered that these are unlikely in practice to apply to Members of the Authority. Please ask your Monitoring Officer for further information.

### **Gifts and hospitality**

- 3.12 Members must declare all gifts, benefits or hospitality with a value of over £25. Members may also, if they wish declare those with a value below this level. The Monitoring officer will enter details of the gift on a public register of gifts and hospitality.

## 4 Complaints Procedure

- 4.1 The Localism Act provides that, where there are complaints of misconduct, the Authority must have in place arrangements under which allegations can be investigated and arrangements under which decisions on allegations can be made. The following procedure applies to complaints made against a Member by another Member, or by officers or any other person.
- 4.2 In relation to officers, a complaint should be after consultation with their Director and may be made in relation to a breach of the Protocol on Member and Officer Relations.

### **Making a complaint**

- 4.3 The complaint should be made to the Monitoring Officer in writing or by e-mail. The address is:

Monitoring Officer, Broads Authority, Yare House, 62-64 Thorpe Road,  
Norwich NR1 1RY

E-mail address: [monitoring.officer@broads-authority.gov.uk](mailto:monitoring.officer@broads-authority.gov.uk)

- 4.4 A copy of the complaint form, which should be used for all complaints, is attached at Appendix 1. This form should also be used for making a complaint under the Local Resolution Procedure. Completion of a Complaint Monitoring Form at Appendix 1a is also requested, but is not compulsory. Complaints should be made within 3 calendar months of the matter complained of, unless the complainant can provide a good reason for not having done so.
- 4.5 In order to make a complaint, a Member will need to have reasonable belief that there has been a breach of the Code. In order to have a reasonable belief that a breach has occurred, there will need to be direct evidence which supports the complaint. Members should consult the Monitoring Officer for advice if they are in doubt. Where the breach is a very minor or technical one, or where there is no clear evidence that a breach occurred, the Monitoring Officer may advise Member of the likely threshold and suggest that the matter might be more appropriately dealt with through the Authority's Local Resolution Process.
- 4.6 Once received a complaint will be acknowledged by the Monitoring Officer within five working days.

### **Confidentiality**

- 4.7 As a matter of fairness and natural justice the subject Member should usually be told who has complained about them and received details of the complaint. However, in exceptional circumstances, the Monitoring Officer may withhold the complainant's identity if on request they are satisfied that the complainant has reasonable grounds for believing that they or any witness relevant to the complaint may be at risk of physical harm, or his or her employment may be jeopardised if their identity is disclosed, or where there are medical risks

(supported by medical evidence) associated with the complainant's identity being disclosed.

- 4.8 If a request for confidentiality is refused, the Monitoring Officer will explain the reason and give the complainant the option to withdraw the complaint, rather than proceed with his or her identity being disclosed.
- 4.9 The complaint will be acknowledged and the subject Member will be informed that a complaint has been made about him or her. Such notification will state that the complaint has been made; the name of the complainant (unless the complainant has requested confidentiality and this is being upheld, brief details of the complaint and the paragraphs of the Code which may have been breached. In very limited situations, the subject of the complaint may not be notified, in which case the Monitoring Officer will record his reason. Such situations may be where it is not reasonably possible to identify who the subject of the complaint might be.
- 4.10 Where specific details of complaints are passed to the local press and media, or posted on social media, this may prejudice an investigation and may also be a breach of the Code. Well-founded breaches of the Code should be reported to the Monitoring Officer and Members making allegations should not generate publicity in advance of the outcome of the complaint.

### **Initial Assessment**

- 4.11 In determining whether to investigate a complaint, the Monitoring Officer will adopt a three-stage process, all in consultation with an Independent Person. At each stage the Monitoring Officer may request further clarification or documentation from the complainant, without this forming part of any investigation.

Stage 1 – The Monitoring Officer will decide whether the complaint is within the Authority's jurisdiction or "capacity", which will include consideration of the paragraphs of the Code to which the complaint might relate. If there is no jurisdiction then the complainant will be informed that the complaint will not be considered further.

Stage 2 - The Monitoring Officer will decide whether there is direct evidence that a breach took place. The level of proof will be on the balance of probabilities, that is to say, whether it is more likely than not. If there is no direct evidence, or if the complaint is considered to be vexatious (see paragraphs 4.20 and 4.21 below), or the matters complained of took place more than 3 months ago and there is no satisfactory explanation for the delay provided, then the complaint will be dismissed.

Stage 3 – The Monitoring Officer will decide whether the complaint is suitable to be dealt with within the Local Resolution Procedure, or whether it should be the subject of a full investigation. The criteria which will be used for this analysis are set out in Appendix 2.

## **Local Resolution Procedure**

- 4.12 The Local Resolution Procedure is a process for low-level complaints including those made by one Member against another.
- 4.13 If the Monitoring Officer, in consultation with the Independent Person, decides to refer the matter to local resolution, then the complainant will be informed within 5 working days and the Local Resolution Procedure shall then apply (see section 5 below).
- 4.14 The criteria for referring the matter to the Local Resolution Procedure will include the following:
- Complaints that one member has failed to show respect and consideration for others
  - Complaints that one Member has made vexatious, malicious or frivolous complaints towards another.
  - Other low-level complaints which in the opinion of the Monitoring Officer, following consultation with an Independent Person, are suitable for informal resolution.

## **Formal Investigation**

- 4.15 If the matter is to be fully investigated, as opposed to being dismissed or referred to the Local Resolution procedure, the Monitoring Officer will appoint an Investigating Officer who will prepare an initial report and recommendation. An Investigating Officer may be an officer or solicitor of another authority or a person independent of local government. When appointing the Investigating Officer, the Monitoring Officer will write to the relevant parties informing them that the matter is to be fully investigated and informing them who will be responsible for conducting the investigation. The Monitoring Officer should give an indication as to likely timescale for the completion of the investigation, which should be within 28 days. Referring a matter for investigation does not mean that there have been any findings of fact. It simply means that the alleged conduct, if proved, may amount to a failure to comply with the Code and that some action should be taken in response to the complaint.
- 4.16 A draft report will be sent by the Investigating Officer to the parties for them to comment on prior to the Monitoring Officer receiving the final version.
- 4.17 The Monitoring Officer will consider the recommendation of the Investigating Officer's report. If the recommendation is that there has been no breach of the Code, the Monitoring Officer will consult the Independent Person. If having taken into account the views of the Independent Person the Monitoring Officer approves the recommendation of the report then the Monitoring Officer will write to the complainant and the Member concerned to inform them that there will be no further action. This will normally be undertaken within 10 working days of the receipt of the report. The Monitoring Officer will give reasons for the decision. There is no appeal or review of that decision by the Authority or any other person.

- 4.18 If the investigation concludes that there is evidence of a breach of the Code then the Monitoring Officer will consult the Independent Person and make a decision either to:
- (a) resolve the matter without the need for a hearing. That may include the application of those sanctions limited to those set out in paragraph 4.30 below. The Monitoring Officer will write to the complainant and the member concerned to inform them of the decision. The Monitoring Officer will give reasons for the decision. There is no appeal or review of that decision by the Authority or any other person; or
  - (b) convene a meeting of the Authority's Hearings Committee, to hear the matter.
- 4.19 In exceptional circumstances it may be considered by the Monitoring Officer and Independent Person that the Chair of the Authority should be invited to consider whether the member should be asked to withdraw from Authority duties pending the outcome of the Hearings Committee. There will need to be reasonable grounds for the belief that such a step is in the interests of the subject Member or the Authority.

### **Frivolous and Vexatious Complaints**

- 4.20 Complaints made against other Members or officers or people working on behalf of the Authority must be based upon fact and not motivated by malice or by political rivalry. Members should avoid making complaints which have little or no substance or where the evidence of any breach is weak or non-existent. Such complaints may be dismissed at the initial assessment stage. In the case of doubt as to whether a threshold has been met, advice should be sought from the Monitoring Officer. The making of frivolous or vexatious complaints may be conduct which will be considered a breach of the Code and dealt with under the Local Resolution Procedure.
- 4.21 Guidance on what circumstances may lead to a determination that a complaint is frivolous or vexatious are set out in Appendix 3. 3.

## Local Resolution Procedure

- 4.22 The Authority has adopted this Local Resolution Procedure in order to promote and maintain high standards of conduct amongst members. It is intended to assist in the swift resolution of issues, so as to avoid the unnecessary escalation of the situation which may damage personal relationships within the Authority and the Authority's reputation. This procedure is also intended to resolve matters on an informal basis, where this is appropriate.
- 4.23 For informal resolution of a problem involving a member identified or reported to the Chair, Chief Executive or Monitoring Officer (where a formal complaint has not been made) the request will be passed on to the Chair and Vice-Chair (in the event they are not the original recipient). Confidential meetings will then be arranged between relevant parties with the Chair and Vice-Chair to engage in the process and seek a resolution to the issues raised. Any meetings may take place at the Authority's offices or other locations as is convenient. The process will be confidential and without prejudice to the parties involved to bring a formal complaint if the matter is not resolved. In the event that the matter is not resolved the content of the discussions shall not be referred to in any subsequent complaint. There is no power for any matter referred under the informal process to be subject to any sanction under the Code of Conduct. <sup>3</sup>.
- 4.24 Complaints may be dealt with under this procedure as follows. Anyone who wishes to submit an allegation under this procedure should send the complaint (in the case of an officer following consultation with their Director) to the Monitoring Officer. Additionally, the Monitoring Officer may have referred a complaint to this procedure following consultation with an Independent Person. Following receipt of the complaint, or referral, the Monitoring Officer will act as follows:

### Stage 1

- 4.25 The Monitoring Officer will undertake a brief preliminary investigation to establish the facts and the areas of dispute. Possible resolutions will be canvassed with the complainant and then the Member about whom the complaint has been made.
- 4.26 Then Monitoring Officer will also consider, following this, whether another course of action or more formal investigation, is more appropriate.

### Stage2

- 4.27 A mediation meeting will be held between the person making the complaint, the Member against whom the complaint is made, the Monitoring Officer and (if considered appropriate) other persons invited by the Monitoring Officer. Such persons may include an Independent Person, the Chief Executive, Chair of the Authority, political group leader, or in the case of a complaint being made by an officer a companion or Director. The meeting may commence

with the parties in separate rooms and the Monitoring Officer acting as a mediator. The purpose of the meeting will be to try and resolve the matter without it going further.

### Stage 3

- 4.28 If the matter is not resolved at stage two and the complainant wishes to proceed with it, the matter will be referred to a local resolution hearing before the Hearings Committee (see section 6 below in relation to the constitution of the Hearings Committee). The person making the complaint will be asked to submit a statement in writing within 14 days and the member complained against will respond within 14 days. Either party may submit a statement from a witness.
- 4.29 Within 28 days of the written evidence a hearing will be set before the Hearings Committee. Any party may have at their own expense a companion or representative, provided that in the case of representation the Monitoring Officer and other party have been given 21 days' notice to this effect. Evidence will be limited to the contents of the statements. If any party does not attend, the hearing will proceed in their absence. The Monitoring officer will be available to advise the committee. After hearing oral evidence, the Hearings Committee will come to a conclusion on the allegation, which will be notified to the parties.
- 4.30 The possible outcomes to a hearing under the Local Resolution Procedure are:
- A finding that the matter does not warrant any further action to be taken
  - A recommendation to the Monitoring Officer that there be a change to procedures or that more formal investigation action be taken
  - A finding that the complaint be recorded by the Monitoring Officer as vexatious
  - A finding that the complaint is upheld, but no further action is required
  - A finding that the complaint is upheld and that the Member should be censured
- 4.31 Unless the complaint has been upheld, publicity will not be given to the names of the parties. The hearing before the Hearings Committee will be confidential.

3. Paragraph inserted 12.07.18

## **5 Hearings Procedure**

- 5.1 If a hearing is required, the Monitoring Officer will write to the subject Member proposing a date for the hearing. This date will normally be within six weeks of the investigation report and will be before the Hearings Committee. The Hearings Committee shall be constituted in accordance with Part B of the Authority's Standing Orders and shall have a quorum of three Members.
- 5.2 The Monitoring Officer will outline the hearing procedure, the Member's rights and ask for a written response from the Member within a set time to establish whether:
- the Member wishes to attend the hearing
  - the Member disagrees with any of the findings of fact in the investigation report and if so which findings and the reason for disagreement
  - the Member wishes to give oral evidence, or rely on written submissions
  - witnesses will be called by the Member to give evidence (there is no power on the part of the Authority to compel attendance by a witness)
  - they wish any part of the hearing to be in private
  - they wish any part of the investigation report or other documents to be withheld from the public
- 5.3 In complex cases, if the Monitoring Officer considers that a preliminary hearing is necessary to consider the matters in 5.2, they shall convene one.
- 5.4 Any party may have at their own expense a companion or representative, provided that in the case of representation the Monitoring Officer and other party have been given 21 days' notice to this effect.
- 5.5 The parties and the Hearing Committee will be sent a full bundle of documents for the hearing at least 5 days prior to the hearing.

### **Procedure at hearing**

- 5.6 The procedure at the hearing will be in accordance with a procedure to be determined by the Monitoring Officer. It will usually adopt the following procedure
- The Investigating Officer will present his/her report to the Hearing Committee
  - The Investigating Officer will be questioned on the report by any party and by the Hearings Committee
  - Evidence will be given with questions being asked by any party and by the Hearings Committee. The order will be the complainant first, then the Member the subject of the complaint and then any witnesses in such order as the Hearings Committee decides appropriate
  - The Hearings Committee will withdraw to consider their decision, with the outcome notified by the Chair. The decision will be confirmed in a



Decision Notice which will be sent to the parties within 5 working days of the hearing.

- 5.7 If the Hearings Committee concludes that there has been no breach of the Code, there will be no further action. There is no appeal or review of that decision by the Authority or any other person. The Hearings Committee will give reasons for its decision.
- 5.8 If the Hearings Committee concludes that the Member the subject of the complaint has failed to comply with the Code, then the Authority has delegated its powers to make such sanction as it considers it to be appropriate and proportionate in order to promote and maintain high standards.

### **Sanctions**

- 5.9 These sanctions may include any of the following:
- A request that the Member submit a written apology in a form specified by the Hearings Committee
  - A request that the Member undertake specified training
  - A request that the Member participates in such conciliation as may be specified
  - A requirement that the Member deals with Authority business through one specified point of contact
  - Placing such restrictions on Members access to staff which may be reasonable in the circumstances and in accordance with the Protocol on Member and Officer relations, providing that such restrictions do not prevent the Member from carrying out their duties
  - A requirement that the Member does not attend at the Authority's offices, unless attending statutory meetings
  - Reporting the Member to his/her County or District Council, Secretary of State as appropriate and reporting the matter to a full meeting of the Authority
  - Reporting the matter to a full meeting of the Authority with a recommendation that the Member has any privileges to which they are entitled removed or that they be removed from any appointment made by the Authority to any external body
  - Reporting the matter to a full meeting of the Authority with a recommendation that the Member be removed from any committee to which they are currently appointed.
  - No sanction

### **Publication of findings**

- 5.10 A summary of the complaint and findings will be reported to a full meeting of the Authority, for their information.



## Members' Code of Conduct Complaint Form

To be used if you wish to make a complaint that a Member or co-opted Member of the Authority, has failed to comply with the Members' Code of Conduct.

If English is not your first language, please contact us if you require help to complete this form.

### Your details

#### 1. Please provide us with your name and contact details

Title:	
First Name:	
Last Name:	
Address:	
Daytime telephone:	
Evening telephone:	
Mobile telephone:	
Email address:	

We will only use the information you provide to us for the purposes of processing your complaint. Your information, including any personal information you provide to us (such as name and contact details) may be shared with the people referred to below, or with other relevant authorities as required, only for the purposes of processing your complaint.

All comments and complaints are treated confidentially and will not disadvantage you in any future dealings with Broads Authority. It may not always be possible to keep your details confidential, such as where your complaint is about a third party or where particular legislation applies to your complaint.

We will tell the following people about this complaint:

- The Member(s) you are complaining about
- The Monitoring Officer to the Authority
- The Authority's Independent Person
- The Chair of the Authority
- The Chief Executive of the Authority

If you have serious concerns about your name and details of your complaint being released, please complete **section 6** of this form.

**2. Please tell us which complainant type best describes you:**

<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	A Member or co-opted Member of an authority
<input type="checkbox"/>	Member of Parliament
<input type="checkbox"/>	Local authority monitoring officer
<input type="checkbox"/>	Broads Authority employee or volunteer
<input type="checkbox"/>	Other (please provide details)

**Making your complaint**

- 3.** Once you have submitted your complaint, it will be considered by the Monitoring Officer of the Authority and after reasonable consultation with the Authority's Independent Person, who will assess, on the basis of your written submission and any additional relevant material, whether the alleged conduct might amount to a failure to comply with the Members' Code of Conduct.

The Monitoring Officer has the following range of options available to him/her: Formal Investigation (which will involve an investigation of the complaint), referral to the Authority's Local Resolution Procedure or no further action, for instance if it is considered that any failure to comply with the Code of Conduct is of a trivial nature.

- 4.** Please provide us with the name of the Member(s) you believe have breached the Broads Authority Members' Code of Conduct and, where the Member is also a Councillor, the name of their authority.

Title	First Name	Last Name	Authority Name

5. Please explain in this section (or on separate sheets) what the Member has done that you believe breached the Members' Code of Conduct. If you are complaining about more than one Member you should clearly explain what each individual person has done that you believe breached the Code of Conduct.

A copy of the Authority's Members' Code of Conduct can be found on the Broads Authority website at <http://www.broads-authority.gov.uk/>

Alternatively, a paper copy can be obtained from the Monitoring Officer to the Authority by writing to:

Monitoring Officer, Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, Norfolk. NR11RY

- You should be specific, wherever possible; about exactly what you are alleging the Member said or did. For instance, instead of writing that the Member insulted you, you should state what it was they said.
- You should provide the dates of the alleged incidents wherever possible. If you cannot provide exact dates it is important to give a general timeframe.
- You should confirm whether there are any witnesses to the alleged conduct and provide their names and contact details if possible.
- You should provide any relevant background information.
- You should tick the box to confirm that the facts set out are true

**Please provide us with the details of your complaint and the outcome from this complaints process that you would like to see happen. Continue on a separate sheet if there is not enough space on this form.**

Do you wish your complaint to be dealt with under the Authority's Local Resolution Procedure?

Yes/No

If you answered No, please briefly explain your reason:

I confirm by ticking this box and sending this form that the facts I have set out in my complaint are true

Date:

**Only complete this next section if you are requesting that your identity is kept confidential.**

6. In the interests of fairness and natural justice, we believe Members who are complained about have a right to know who has made the complaint. We also believe they have a right to be provided with a summary of the complaint. We are unlikely to withhold your identity or details of your complaint unless you have good reason to justify the Authority doing so.

Please note that requests for confidentiality or requests for suppression of complaint details will not automatically be granted. The Monitoring Officer to the Authority, in consultation with the Authority's Independent Person, will consider the request alongside the substance of your complaint. We will then

contact you with the decision. If your request for confidentiality is not granted, we will usually allow you the option of withdrawing your complaint.

However, it is important to understand that in certain exceptional circumstances where the matter complained about is very serious, we can proceed with an investigation or other action and disclose your name even if you have expressly asked us not to.

**Please provide us with details of why you believe we should withhold your name and/or the details of your complaint:**

### **Additional Help**

- 7.** Complaints must be submitted in writing. This includes electronic submissions. However, in line with the requirements of equalities legislation, we can make reasonable adjustments to assist you if you have a disability that prevents you from making your complaint in writing.

If you need support in completing this form, please let us know as soon as possible.

This complaint should be submitted to the Monitoring Officer to the Authority, by sending to the following contact addresses:

By post to: Monitoring Officer, Broads Authority, Yare House, 62-64 Thorpe Road, Norwich, Norfolk. NR11RY

Or by e-mail to: [monitoring.officer@broads-authority.gov.uk](mailto:monitoring.officer@broads-authority.gov.uk)

## Privacy and Data processing <sup>5</sup>.

8. The Authority will process any personal information in line with the Data Protection Act 2018 and the EU General Data Protection Regulation.

Information you provide to us on this form will be shared with certain individuals who undertake roles within the complaints process, including the subject Member, Independent Person, Investigating Officer (who may be external to the Authority) and members of the Hearings Committee.

You also acknowledge by making your complaint that personal information which you give us may be placed in the public domain should the matter proceed to a hearing.

The basis of processing will be that of public task i.e. tasks carried out by the Authority in the public interest or power vested in the Authority.

Your information will be retained for 7 years following the outcome of your complaint or last action taken in relation to it. We will process your data in accordance with Data Protection Principles using appropriate technical and organisational measures.

Broads Authority is the Data Controller in relation to your data. It has a Data Protection Officer (DPO) who can be contacted at the postal address on this form or at [dpo@broads-authority.gov.uk](mailto:dpo@broads-authority.gov.uk). Our DPO is currently our Monitoring Officer.

You have the right to see any personal information that we hold about you. Such requests are called subject access requests. If you would like to make a subject access request please contact the Authority's Data Protection Officer. We will respond to such requests within one month. There is no fee to make a request.

You may ask us to rectify any personal information which is incomplete or inaccurate. You may also ask us to erase such data once processing is no longer necessary or if you object to processing or consider that we are processing it unlawfully. We will consider such requests and if we refuse, we will give reasons.

<sup>5</sup>. Section 8 added 12.0718



**Private and Confidential**

**Code of Conduct Complaint Monitoring Form**

The Broads Authority is committed to the provision of equal opportunity and specifically to conducting its affairs in a manner which will not discriminate against, either directly or indirectly, any person on the grounds of: disability; gender; transgender; race; ethnic or national origin; religion or belief; age or sexual orientation.

To help us meet this commitment, it would be helpful if you would complete this form. This monitoring form will be separated from your complaint on receipt and will be used solely for the purposes of monitoring the process.

<b>Section 1</b> (please tick the boxes which apply)		
My age is:	Under 21	<input type="checkbox"/>
	21-30	<input type="checkbox"/>
	31-40	<input type="checkbox"/>
	41-50	<input type="checkbox"/>
	51-60	<input type="checkbox"/>
	61-64	<input type="checkbox"/>
	65 or over	<input type="checkbox"/>
My gender is:	Female	<input type="checkbox"/>
	Male	<input type="checkbox"/>

<b>Section 2</b> (please tick one box only)			
I would describe myself as:	White:	British	<input type="checkbox"/>
		Irish	<input type="checkbox"/>
		Any other	<input type="checkbox"/> please write in
	Mixed:	White and Black Caribbean	<input type="checkbox"/>
		White and Black African	<input type="checkbox"/>
		White and Asian	<input type="checkbox"/>
		Any other	<input type="checkbox"/> please write in
		Asian or Asian British:	Indian
		Pakistani	<input type="checkbox"/>
			<input type="checkbox"/>



	Bangladeshi Any other	<input type="checkbox"/> please write in
Black or Black British:	Caribbean African Any other	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> please write in
Chinese or other ethnic group:	Chinese Any other	<input type="checkbox"/> <input type="checkbox"/> please write in

Section 3		
Do you consider yourself to have a disability*?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Thank you for your co-operation. Please return this form with your complaint.

\*The Equality Act 2010 defines disability as ‘a physical or mental impairment which has a substantial and long-term adverse effect on a person’s ability to carry out normal day-to-day activities’.

**Criteria for consideration of a complaint by Monitoring Officer**

In deciding whether to accept or reject a complaint of breach of the Code, or to refer it to the Local Resolution Procedure, the Monitoring Officer has a wide discretion. He or she will take into account the following criteria, where relevant.

- Public interest factors including the seriousness of the alleged breach, whether there has been any breach of trust, the extent of any harm caused and whether there has been any discrimination.
- Proportionality by balancing the seriousness of the allegation against the resources required to investigate the allegation
- Whether there are any aggravating factors or significant mitigating factors
- Whether a prompt acknowledgment and apology has been offered
- Whether the complaint is one of a pattern by or against a Member
- Whether the complaint appears to be malicious, frivolous or vexatious
- Whether the complaint suggests that there is a wider problem as affects the Authority
- Whether training or conciliation would be the appropriate response
- Whether either the complainant or subject Member has indicated a preference for Local Dispute resolution

**Criteria for determination as to whether a complaint is frivolous or vexatious**

At the Initial Assessment Stage, the following criteria shall be used in determining whether a complaint is frivolous or vexatious:

- Whether the matters complained of occurred more than 3 calendar months earlier and if so whether any reason given for a delay in making the complaint is sufficient.
- Whether the complaint appears to be of “tit for tat” nature in that for example, the complainant has themselves been the subject of a complaint by the subject member.
- Whether in less-serious cases, the matter has already been the subject of reasonable and sufficient attempts by the subject member to apologise and make amends for any behaviour complained of.
- Whether the complainant has made other complaints under the Members’ Code of Conduct. If so, the number, nature and subject matter of those complaints will also be considered.
- Whether the subject matter of the complaint is a trivial matter out of proportion to its significance.
- Whether the complainant has adopted a “scattergun” approach: pursuing a complaint with the Authority and at the same time, with any number of the following such as a Member of Parliament, the Authority’s independent auditor, National Audit office, Government department, local police, solicitors, media and on social media.
- Whether the complaint arises from facts which have been the subject of a prior determination by a decision-making body.
- Whether the content of the complaint includes gratuitous comments about the subject Member or other third parties which could be considered insulting, abusive or defamatory in nature.

# Broads Authority

23 July 2021

Agenda item number 18

## Appointment of members to committees and other bodies

Report by Head of Governance

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### Purpose

The report seeks approval for Broads Authority member appointments to committees and other bodies for the year 2021/2022.

### Recommended decision

To confirm the Broads Authority member appointments for the year 2021/22 (until the Annual Meeting on 15 July 2022):

- (i) to Audit and Risk Committee, Navigation Committee, Planning Committee, Broads Local Access Forum and Hearings Committee (Table 1);
  - (ii) to outside bodies (Table 2); and
  - (iii) to the Tolls Reference Group (if retained) (Table 3).
- 

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### 1. Introduction

- 1.1. Members are appointed to committees and outside bodies for the forthcoming year at the Broads Authority's Annual Meeting in July. This year, the Authority is welcoming one new Local Authority appointee and two new Secretary of State appointments. As previously agreed by the Authority, the co-opted members of the Navigation Committee to the Authority are Simon Sparrow and Nicky Talbot.

- 1.2. In accordance with the agreed procedure, members are invited to express their preferences, in advance of the Annual Meeting, for the committees and outside bodies on which they would like to serve. These preferences are then reviewed by the Chairs' Group, taking into consideration the need for an appropriate balance of Local Authority and Secretary of State appointees, and a sufficient number of members, on each committee and outside body, and to minimise the potential for conflicts of interest.

## 2. Appointments to committees

- 2.1. Table 1 sets out the recommendations of the Chair's Group for member appointments to the Authority's committees in 2021/22.

**Table 1**

Recommended member appointments to committees - 2021/22

<b>Committee</b>	<b>Members</b>
<p><b>Audit and Risk Committee</b> At least 6 BA members, to include Chairs of BA and Navigation Committee</p>	<p>Chair of Broads Authority (tbc) Chair of Navigation Committee (Nicky Talbot) Matthew Bradbury Gail Harris Paul Hayden Tristram Hilborn Greg Munford Simon Roberts Michael Scott Matthew Shardlow Fran Whymark</p>
<p><b>Navigation Committee</b> 5 BA members and 8 co-opted members</p>	<p><b>BA members</b> Harry Blathwayt Stephen Bolt Matthew Bradbury Leslie Mogford Greg Munford</p> <p><b>Co-opted members</b> John Ash Linda Aspland Mike Barnes Andy Hamilton Simon Sparrow Nicky Talbot Paul Thomas Alan Thomson</p>

<b>Committee</b>	<b>Members</b>
<b>Planning Committee</b> At least 11 BA members	Harry Blathwayt Stephen Bolt Nigel Brennan Bill Dickson Andrée Gee Gail Harris Paul Hayden Tim Jickells James Knight Leslie Mogford Michael Scott Vic Thomson Melanie Vigo di Gallidoro Fran Whymark
<b>Broads Local Access Forum</b> 2 BA members	Harry Blathwayt Michael Scott
<b>Hearings Committee</b> (Chair of Audit and Risk Committee plus pool of 6 BA members)	Chair of Audit & Risk Committee Bill Dickson Gail Harris Greg Munford Simon Roberts Nicky Talbot Melanie Vigo di Gallidoro

### 3. Appointments to outside bodies

- 3.1. Table 2 sets out the Chairs' Group recommendations for member appointments to outside bodies.
- 3.2. The Authority appoints Trustees to the How Hill Trust and Norfolk and Suffolk Broads Charitable Trust, and also appoints members to Broads Tourism and the Upper Thurne Working Group to maintain a watching brief. The Authority can also appoint members as Directors (trustees) to the Whitlingham Charitable Trust, but this is currently in abeyance.
- 3.3. Members may recall discussions at a previous meeting on how members can best manage potential conflicts of interest when appointed to an outside body. As well as the ['Guidance for Authority members appointed to outside bodies'](#), the matter of registering and declaring interests is addressed in a separate item on this agenda, which is proposing a revision of the Authority's Member Code of Conduct.

**Table 2**

Recommended appointments to outside bodies

Outside body	Recommended appointments
BFI Elected Members Forum (see para 3.8 below)	Matthew Bradbury Matthew Shardlow (reserve)
How Hill Trust	Tim Jickells
Norfolk and Suffolk Broads Charitable Trust	Paul Hayden Simon Roberts
Whitlingham Charitable Trust	In abeyance
Broads Tourism	Paul Hayden
Upper Thurne Working Group	Harry Blathwayt

### Other appointments

- 3.4. The Authority's Chair represents the organisation at meetings of the 15 National Parks and the 10 involved in National Parks England.
- 3.5. The Authority has a lead member for safety in line with the issue's critical importance and the requirements of the Port Marine Safety Code. The Chair of the Navigation Committee fulfils this role.
- 3.6. The Chair and Vice-Chair of the Planning Committee share the specific responsibilities as member appointees to the Greater Norwich Development Partnership, Norfolk Duty to Cooperate - Member Forum and Norfolk Strategic Framework.
- 3.7. The Planning Committee usually appoints the Heritage Asset Review Group (HARG) from its own membership to advise on cultural heritage, including historic buildings and Conservation Areas, prior to any matters going to committee for consideration. It is proposed by the Chairs' Group that these sessions are extended to all members, to allow the whole membership to be informed and engaged in cultural heritage matters.
- 3.8. The Broadland Futures Initiative has an Elected Members Forum, which includes a Broads Authority member. This role is currently held by Matthew Bradbury (with Matthew Shardlow as reserve), appointed to the new EMF in January. It is the BFI's preference to maintain continuity in the EMF's membership.

## 4. Consultation on tolls setting

- 4.1. The Authority has in the past appointed a Tolls Reference Group for the specific purpose of reviewing the structure of the tolls. In light of the impact of Covid-19 on toll income and the local tourism industry in 2020/21, and to provide context for setting the following year's charges, all members (including co-opted members) were invited to a briefing session on 5 October 2020. This gave all members an opportunity to offer views and guidance to officers for the reports on proposed navigation charges for

2021/22 to the Navigation Committee on 22 October and the Broads Authority on 20 November. This process was very successful and it is proposed by the Chairs' Group to replicate it in future, replacing the need to appoint a Tolls Reference Group. However, if members would prefer to retain the Group in its current structure, the interests to be represented are set out in Table 3.

**Table 3**

Tolls Reference Group

<b>Representative</b>	<b>2021/22</b>
Chair of Broads Authority	
Chair of Navigation Committee	Nicky Talbot
Broads Authority members	
Broads Authority member – not a navigator	
Angling community	
Hire boat industry	
Private boating and sailing community	

Author: Maria Conti

Date of report: 15 July 2021



# Broads Authority

23 July 2021

Agenda item number 19

## Broads Local Access Forum Annual Report 2020/21

Report by Waterways and Recreation Officer

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### Purpose

This report presents the Broads Local Access Forum Annual Report for 2020/21 on the development and improvement of public access within the Broads.

### Recommended decision

To note the Broads Local Access Forum Annual Report 2020/21.

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## 1. Annual Report 2020/21

- 1.1. The Broads Local Access Forum Annual Report 2020/21 is at Appendix 1.
- 1.2. The Forum held four public meetings in the year to consider and agree its advice to the Broads Authority on access matters and potential improvements. Due to COVID-19 restrictions, all meetings were held remotely and live streamed on the Authority's website.
- 1.3. The Forum had a successful recruitment drive at the start of 2021, receiving many applications and selecting six new members to fill the Forum to its capacity of 22. The two Broads Authority members appointed to the Forum left the Authority prior to 31 March 2021, and the Authority will, at its annual meeting on 23 July, will be invited to appoint at least two members to the Forum.
- 1.4. During the year, the Forum continued to provide feedback to the Waterways and Recreation Officer on Integrated Access Strategy matters, project development and work progress. Forum members also began to develop their own initiatives and give presentations to the Forum, representing their relevant interest areas/groups.

Author: Lewis Treloar

Date of report: 23 June 2021

[Broads Plan](#) strategic actions: 6.1, 6.2

Appendix 1 – BLAF Annual Report 2020/2021

# Broads Local Access Forum

## Annual Report 2020/21

June 2021

Broads Authority  
Yare House  
62-64 Thorpe Road  
Norwich NR1 1RY

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## Statutory purpose

The Broads Local Access Forum is an independent advisory body established by the Broads Authority in 2003, under the Countryside and Rights of Way Act 2000.

The Act states that the purpose of the Forum is to be a statutory advisory body to provide guidance and advice to the Broads Authority and other organisations on the improvement of public access within the Broads, and to contribute to opportunities for open air recreation and the enjoyment of the area. In providing advice, the Forum will have regard to:

- The needs of land management
- The conservation of the natural beauty of the area
- The management and maintenance of recreational access whilst balancing this against the needs of nature conservation, agriculture, the interests of landowners and managers, navigation and countryside management projects within the Broads.

## The Forum's Vision

The Broads is an unrivalled wetland of natural diversity, heritage and special character. It is a place where people come to explore, enjoy and find spiritual refreshment. Access to the Broads should be clear and easy to use, respectful of wildlife and land management, meet users' needs and promote responsible and harmonious behaviour. The Broads Local Access Forum will champion access improvements and management, represent a wide range of interests and contribute to sustainability for the environment, communities and the economy.

## What has happened during the year?

### The Forum at work

The Forum delivered its purpose in a number of ways between April 2020 and March 2021:

- (i) Four public (virtual) meetings held to agree its advice to the Broads Authority and other organisations.
- (ii) [Review and adoption of a new constitution](#)
- (iii) Advertisement and selection of new members.
- (iv) Representation and guidance to the Norfolk Local Access Forum. Unfortunately, due to Covid, no Regional LAF meetings took place.
- (v) Provision of suggestions and advice on a number of projects being delivered.
- (vi) Presentations by members, giving their opinions and suggested ideas on behalf of their relevant interest groups. By doing so, they have helped to bridge the gap between Broads Authority staff and the relevant user groups.

### Challenges faced by the Forum

The Forum has faced some major challenges over the last year, particularly as Covid-19 has meant that face-to-face meetings and site visits have not been possible. Three members

also left the Forum, leaving a gap in some of the interest groups represented. The group overcame this obstacle by proactively searching for new members to fill the vacancies, which they did successfully. One of the main challenges the Forum continues to face is the continuing pressure on public funding for countryside access across all local authorities.

#### Advising the Broads Authority and other bodies

The Forum has given advice to a number of bodies over the year:

- Norfolk County Council, general Public Rights of Way (PROW) improvements and recommendations.
- River Wensum Strategy Group and the delivery plan.

The Forum has also advised the Broads Authority on:

- The Integrated Access Strategy prioritisation plan
- Angling provision and access within the Broads
- Restrictions over Open Access Land
- A number of individual projects for access improvements

#### Access reports and presentations

The Forum received the following access reports and presentations:

- [Integrated Access Strategy updates](#) – Waterways and Recreation Officer
- [Objectives of the Broads Angling Services Group \(BASG\) and current areas of focus](#) - BASG
- [Opening access to Environment Agency \(EA\) owned riverbanks](#) – Tony Gibbons
- [EXPERIENCE Cycle hubs project](#) – Cycling UK
- [Broadland Futures Initiative](#) – Environment Agency
- [Setting the Agenda](#) – Head of Construction, Maintenance and Environment

## Working in partnership

The Forum worked with the following partner organisations:

- Norfolk County Council
- Suffolk County Council
- Norwich City Council
- River Wensum Strategy Group
- Cycling UK
- Norfolk LAF
- Environment Agency
- BASG
- Broadland District Council
- Norfolk Trails

## Observers and advisors to the Forum

- Mike Auger, Norfolk County Council
- Matt Hayward, Norfolk County Council
- Ken Hawkins, Norfolk Local Access Forum
- Martin Sullivan, Norfolk Local Access Forum
- Marie-Pierre Tighe, Broads Authority
- Dan Hoare, Broads Authority
- Lewis Treloar, Broads Authority
- Kylie Moos, Broads Authority

## Who makes up the Broads Local Access Forum?

### Chair and Vice Chair

In June 2021, the Forum re-appointed Keith Bacon as Chair. The Vice Chair position is vacant. Mike Flett, who served as Vice Chair for a number of years, decided to step down from the role and from the Forum in January 2021.

### Members and representation

**Chairman: Keith Bacon** – Catfield

Representing archaeology and landscape heritage

**Vice Chair: Mike Flett** – Ludham

Representing Local Authority (Parish Councils) – **Left in Jan 2021**

**Kelvin Allen** - Downham Market

Representing Broads Authority - **Left in Mar 2021**

**Linda Aspland** – Wroxham

Representing waterborne recreational users and paddle sports

**Louis Baugh** – Neatishead

Representing landowners and managers

**Harry Blathwayt** – Ludham

Representing Local Authority (District Council), tourism and local business

**Liz Brooks** – Ludham

Representing equestrian riding and driving – **Left in Mar 2021**

**Robin Buxton** – Lingwood

Representing landowners and managers, tourism and local businesses

**Tony Gibbons** – Norwich

Representing angling

**Tim Harris** – Catfield

Representing nature conservation, archaeology and landscape heritage

**Dawn Hatton** – Norwich

Representing walking, people with disabilities and access for all

**Peter Mason** - Catfield

Representing walking, tourism and local business

**John Murray** – Lowestoft

Representing walking, people with disabilities and access for all

**Stephen Read** – Oulton Broad

Representing walking and waterborne recreational users

**Richard Webb** – Norwich

Representing walking and sailing

**Christopher Yardley** – Burnham Thorpe

Representing waterborne recreational users and nature conservation

New members

**Richard Atkins** - Surlingham

Representing paddle sports and walking

**Katie Baxter** - Wroxham

Representing paddle sports, tourism and local business

**Christine Cane** - Wymondham

Representing equestrian riding and driving

**Peter Dixon** - Hickling

Representing waterborne recreational users

**Martin Rendle** – Norwich

Representing paddle sports, tourism and local business

**Paul Saunders** - Norwich

Representing open water swimming