

Navigation Committee

Agenda 08 June 2023

10.00am

Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY

John Packman, Chief Executive – Thursday, 1 June 2023

Under the Openness of Local Government Bodies Regulations (2014), filming, photographing and making an audio recording of public meetings is permitted. These activities however, must not disrupt the meeting. Further details can be found on the [Filming, photography and recording of public meetings](#) page.

Introduction

1. To receive apologies for absence
2. To receive declarations of interest
3. To note whether any items have been proposed as matters of urgent business
4. Public question time – to note whether any questions have been raised by members of the public
5. **To receive and confirm the minutes of the Navigation Committee meeting held on 13 April 2023** (Pages 3-13)
6. **Summary of actions and outstanding issues following discussion at previous meetings** (Pages 4-18)

Reports for information

7. **Chief Executive's report and current issues** (Pages 19-27)
Report by Chief Executive
8. **Water plant management** (Pages 28-72)
Report by Head of Construction, Maintenance, and Ecology
9. **Construction, Maintenance, and Ecology work programme – progress update** (Pages 73-80)
Report by Head of Construction, Maintenance, and Ecology
10. **New Tolls System** (Pages 81-83)
Report by Head of ICT and Collector of Tolls

11. **Safety at Great Yarmouth** (Pages 84-90)
Report by Director of Operations
12. **Annual income and expenditure 2022/23** (Pages 91-98)
Report by Director of Finance
13. **Progress report on Charging at Ranworth moorings** (Pages 99-103)
Report by Chief Executive
14. **Local Plan Issues and Options consultation – responses** (Pages 104-149)
Report by Planning Policy Officer

Other matters

15. **To note the date of the next meeting – Thursday 7 September 2023 at 10.00am.
Location to be confirmed.**

Navigation Committee

Minutes of the meeting held on 13 April 2023

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Present

Alan Goodchild – in the Chair (from item 2), Harry Blathwayt, Stephen Bolt, Mark Collins, Peter Dixon, Leslie Mogford, Bob Neate, Rasmus Sawyerr, Michael Scott, Simon Sparrow, Paul Thomas and Daniel Thwaites.

In attendance

Lucy Burchnall - Head of Ranger Services, Esmeralda Guds - Governance Officer, Dan Hoare – Head of Construction, Maintenance and Ecology, Emma Krelle – Director of Finance, John Packman - Chief Executive, Rob Rogers - Director of Operations and Sara Utting – Senior Governance Officer.

Also in attendance

Jonathon Goolden – Monitoring Officer

1. Apologies and welcome

The Chief Executive welcomed everyone to the meeting.

Apologies were received from Greg Munford.

Openness of Local Government Bodies Regulations 2014

The Chief Executive (CE) explained that the meeting was being audio-recorded. All recordings remained the copyright of the Broads Authority and anyone wishing to receive a copy should contact the Governance Team. The minutes remained the formal record of the meeting. He added that the law permitted any person to film, record, photograph or use social media in order to report on the proceedings of public meetings of the Authority. This did not extend to live verbal commentary. The Chair needed to be informed if anyone intended to photograph, record or film so that any person under the age of 18 or members of the public not wishing to be filmed or photographed could be accommodated.

2. Appointment of Chair

The CE reported that nominations for Chair had been invited in line with the procedure adopted following the 18 May 2018 Broads Authority meeting but welcomed any further nominations at the meeting.

Nominations for Simon Sparrow and Alan Goodchild had been received.

Simon Sparrow was proposed by Leslie Mogford and seconded by Paul Thomas. Alan Goodchild was proposed by Mark Collins and seconded by Peter Dixon.

In accordance with Standing Orders, voting papers were issued to members at the meeting for them to write down the name of their preferred candidate from the nominations received. Simon Sparrow received 4 votes and Alan Goodchild received 8 votes.

Alan Goodchild was appointed Chair of the Navigation Committee.

Alan Goodchild in the Chair.

3. Appointment of Vice Chair

Peter Dixon was proposed by Alan Goodchild and seconded by Mark Collins. No other nominations were received.

Peter Dixon was appointed Vice Chair of the Navigation Committee.

4. Declarations of interest

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

5. Matters of urgent business

No items were proposed as a matter of urgent business.

6. Public question time

No public questions were raised.

7. Minutes of last meeting

The minutes of the meeting held on 12 January 2023 were signed by the Chair as a correct record of the meeting.

8. Summary of actions and outstanding issues following discussions at previous meetings

Members received a report summarising the progress of issues that had recently been presented to the Committee.

For the benefit of the new members, the CE explained that rather than discussing matters arising from the previous minutes, significant issues the committee had discussed before were listed and pursued so progress could be tracked.

The CE reported there were no further updates.

Members noted the report.

9. Appointment of two co-opted members to the Broads Authority

Members were asked to recommend the appointment of two co-opted members to the Broads Authority until 10 May 2024 as set out in Section 1(2)(c) of the Norfolk and Suffolk Broads Act 1988 as amended.

The Monitoring Officer explained that Schedule 4, paragraph 4(3) of the Act further stated that the Navigation Committee shall elect a Chair from among those of its members who are

members of the Authority. Given that Alan Goodchild had been elected Chair of the Committee, he would need to take up one of the seats on the Authority.

Alan Goodchild proposed, seconded by Michael Scott, that Peter Dixon be appointed as a member of the Broads Authority until 10 May 2024. No other nominations were received.

It was resolved that Alan Goodchild and Peter Dixon be recommended to the Broads Authority for appointment as the co-opted members to the Broads Authority until 10 May 2024.

10. Chief Executive's report and current issues

The CE introduced the report and commented that the three non-operational bridges in Great Yarmouth were still causing issues.

A member raised his concerns as Herring Bridge, Haven Bridge and Breydon Bridge all being out of action had consequences for the new Eastern IFCA vessel which was due to be launched in August 2023. The member requested whether the Broads Authority (BA) as a navigation authority could confirm the likelihood that all constructions and repairs to the three bridges would be completed at the estimated June 2023 date.

The Director of Operations (DO) responded that the BA had received the same details as others, which was that repairs on all three bridges were due to be completed this Summer. He added that repairs to Breydon Bridge, which was managed by National Highways, were delayed not just because of having to resolve the issue of lifting the ram, but also because of an investigation into an accident where a contractor was injured.

The Chair reported he had received an update earlier that day informing him that the trials to Haven Bridge had not been carried out as they were unable to test the power supply cables. He said that in his opinion Breydon Bridge could not be fixed until Haven Bridge was operational and could allow for the necessary equipment to come through. The Chair further reported that Herring Bridge was running to schedule from information he had received earlier.

Members noted the report.

11. Safety on the Broads update

The Director of Operations (DO) presented the report, supplemented by a presentation on water safety. Members were reminded that Safety on the Broads was a standing item on the agenda and fortunately often passed with nothing to report.

The DO stipulated that the Navigation Committee Chair by default would also become Chair of the Boat Safety Management Group.

A member asked whether the additional Rangers paid for by the 3% tolls increase in 2020 had been appointed. The DO explained that the additional seasonal Rangers were appointed in 2020 on a temporary basis, and that at the Broads Authority meeting on 20 January 2023,

members unanimously voted to retain the extra seasonal Rangers so 7-day patrolling would continue. The DO confirmed that 4 additional Seasonal Rangers, as well as a Compliance and Safety Ranger had been appointed and would start their duties as from 17 March 2023.

A member raised concerns about the poor de-masting facilities on Breydon Water and Great Yarmouth harbour. He asked whether consideration could be given for reviewing the opportunities of improving these facilities as he believed the current situation was quite dangerous. He further expressed his disappointment that the proposed pontoons at Herring bridge wouldn't be ready this season.

The Head of Maintenance, Construction and Ecology (HMCE) responded that a review in the past concluded that the exposure on Breydon Water wouldn't facilitate any pontoon installations and consequently the provision at Breydon was based on what structure would be able to withstand the exposure in that area. Conversations with interested parties were had in the past and the HMCE said he would be happy having those conversations again and keep the committee updated.

The Chair mentioned that the de-masting pontoon up-river from Vauxhall Bridge was a long way out of Yarmouth and wondered whether the pontoon should be nearer the bridge.

The HMCE explained that part of the Integrated Access Strategy was realising at least one mooring within each 30-minute cruising section. Gaining an additional mooring in this lower section of the river would meet that strategic objective. The next step would be identifying which piece of land for an additional mooring area the Authority could negotiate with the landowner.

A member commented that the BA should be commended for their response to the incidents which took place in August and September 2020, and that the measures taken had been proportionate and effective.

A concern was raised regarding the increasing number of paddle boards in close proximity with large motor cruisers. The member raised a further concern about handovers to dayboats and to what extent hire and day boats received the same or comparable level of scrutiny. He commented that at a practical level it was not feasible to give a hire day boat a 20-minute handover.

The DO responded that the Authority's view was not to categorize any user group higher than the other and that paddle boarders had the same rights to be on the rivers as other Broads users. He clarified that part of the new licensing meant that a paddle craft hirer would need to be licensed by the Authority, and hopefully this would result in seeing a better standard of water trials handovers. In regard to dayboats, the DO said that officers had witnessed a good handover generally. The rule of Care and Caution on the rivers applied to everyone, whether they were a sailor, motor cruiser or paddle boarder.

A member raised a concern around the dangers of helming and alcohol and asked what powers Rangers had when having to deal with incidents involving alcohol. The DO responded that Rangers didn't have powers to stop people from drinking but that the approach the

Authority had chosen to take was about balance and using their powers under care and caution, encouraging people to be safe and act responsibly while having a good time.

Members noted the report.

12. Channel marker policy

The Head of Ranger Services (HRS) introduced the report and made members aware of the new channel marker and Aids to Navigation policy within the Safety Management, System Document.

A member commented he was sorry to lose the white caps on the post on Breydon Water as they were easier to spot in the dark and fog.

Another member commented that the colour of the posts was not always noticeable when visibility was poor and so believed that the square or cone shaped box on top of the post was extra useful. He further commented that using white tops on red posts could be confusing as there was the risk of mistaking the post for a safe watermark. Regarding the benefits of posts versus buoys, the member commented that posts were not always dependable as sands in Breydon Water shift which meant posts might have to be moved from time to time if dredging was not possible. Buoys on the other hand were held down by several chains so wouldn't move.

The HRS responded that the Broads Authority inherited the posts when they took over Breydon Water from Great Yarmouth in 2012. She said that many rivers had a locally recognised way of marking channels and that it was allowed to deviate slightly from the guidance if this was set out clearly in the policy. She reported that the Authority was phasing out the white caps and confirmed these had always just been on green posts.

About the buoys, the HRS commented that the chains attached to these needed to be short so they wouldn't drift off too far with low tide. However, with strong winds and tides it was the lifting bobbing motion that moved the buoys. The HRS verified that buoys did move, and posts would work better in this area. The channel across Breydon is fairly stable and the posts accurately mark this. The Authority was aware of a few posts on the lower Bure where silt builds up on the inside of the marked channel. This was monitored by the ranger team and Rivers Engineer. This area was marked with signs warning boaters to keep clear of the banks.

The Chair added that the white caps were introduced as GRP caps (Glass Reinforced Plastic otherwise known as fibreglass) on initiative of the coast guard. This was done for safety reasons, as they were visible in the dark and numbered to aid the coast guard in identifying which post was referred to. The white caps were pointed to stop birds roosting on them.

The HRS confirmed that all posts were numbered, front and back.

Members noted the report.

13. Construction, Maintenance and Ecology work programme – progress update

The Head of Construction, Maintenance and Ecology (HCME) introduced the report and for the benefit of the newly appointed members explained that this report was a standing item on the agenda detailing four strands of BA's operational management of the waterways. These are dredging works; maintenance and provision of mooring facilities; vegetation management (water plants and riverside trees); and managing channel markers. Members were reminded that this was the point in the year when plans were laid out for dredging work and 24-hour moorings maintenance for the forthcoming financial year.

A member queried the dredging figures for the River Waveney in Appendix 1 page 65 as the figures showed that volume dredged had doubled while the cost had more than tripled. The HCME said he would double check whether the planned annual project cost of £50K was accurate to the 13 weeks dredged¹. He explained that as dredging at Oulton Broad kept changing, they were experiencing challenges with shifting baselines but would check the original plan for this current financial year and report back to the committee. The HCME confirmed that the figures for the actual project cost were correct, and that the biggest factor determining the cost was staff time and the value of having the plant and machinery on site.

A question was asked about water plant management of Floating Pennywort and Stoneworts, which were considered a big threat to navigation on the broads, and how the new machinery was able to help with this.

The HCME pointed out that there were two separate water plant management issues which should not be confused. Floating Pennywort present on the river Ant, was a non-native invasive species from South America which grows quickly and could therefore take over waterways, whereas Stoneworts in the Upper Thurne are native to the UK and protected under several conservation designations and the base of the SSSI designation at the Upper Thurne site. He reported that Stonewort growth at the Upper Thurne had been unprecedented for the last three years. Having three new water plant cutting vessels stationed in the Upper Thurne and between the Bure and the Ant, meant that the travel time between the northern rivers sites was reduced. Operators could be more reactive and reduce the time gaps between tasks.

A member asked whether the area of plant cutting in the marked channel of Hickling Broad could be extended. He continued he would like to see a recommendation for a further review

¹ on review of the Oulton Broad dredging figures, the running total of the actual cost figures for 2022/23 are correct. The variance in the ratio between volume and cost for the planned and actual figures is that the initial planned cost was too low. Not all resources needed by the project had been initially allocated, so the reporting has been against a baseline that rapidly changed as the project developed. As projects are planned well in advance, the likelihood of changes needing to be made to the overall work programme and therefore individual projects are high. I will seek a different way to report on project costs, that is less prone to reporting against short lived baselines or difficult to track if plans change.

of the situation in Hickling with the aim of improving navigation and where a balanced approach would be taken for allowing a bigger area for sailing while not significantly harming the improved ecology of the broad.

The HCME said the Authority was aware of a local boat yard at Hickling facing challenges in terms of user experience. The current strategy for Hickling was managing to maintain access within the marked channel by repeat water plant cutting and monitoring the growth again in May to see what the situation will be this year. The last three years the vigour of the plant growth had been significant and the HMCE agreed this was worthy of some level of review.

The Chair said he would like to thank the people involved in assisting keeping Mutford Lock open as this was the only access to open sea in the area. He acknowledged that until the bridge situation was sorted, some maintenance projects had to be put on hold and that this wasn't going unnoticed.

Members noted the report.

14. Income and expenditure update

Members received a report which presented the actual Navigation income and expenditure for the eleven-month period to 28 February 2023, and provided a forecast of the projected expenditure at the end of the financial year (31 March 2023).

For the benefit of the new members the Director of Finance (DoF) explained the format of the committee report. She further mentioned there was annual training in July which all members were invited to, covering the Authority's Statement of Accounts and the finances.

The DoF reported that the budget was set long in advance, so when setting the budget for 2022/23, interest rates on investment income were low. However, interest rates had risen considerably over the last financial year which had a positive effect on the income.

The DoF said that usually she was able to provide a verbal update on the latest actual figures, however on this occasion due to the end of the financial year, the 31 March figures were not available yet.

Members were updated that as from close of day on the 12 April 2023, 8249 tolls plaques had been issued which was an income of £3,023,395, compared with 2022 when 8268 plaques were issued with an income of £2,710,430. Most of the increase was due to the 13% tolls increase, bearing in mind that comparison could be quite different depending on when Easter falls.

In response to a question whether there was the option of paying tolls in instalments the DoF responded that currently the Authority didn't offer split payments as this had an impact on its cashflow. However, the new toll system which was currently under development would be exploring this option.

A member commented he believed that apportionment was counterproductive, attracting heat and negative attention away from the more serious challenges the Broads was facing. He

felt that landscape and navigation were two halves of the same coin and so favoured a strategic approach which would affect the whole landscape and navigation.

Another member commented that his understanding was that the extra funding from Defra was ring fenced and could not be spent on Navigation. This was confirmed as being the case.

For the benefit of the new members, the CE explained that in 2007 the BA reached an agreement with the Royal Yachting Association and British Marine, that the division between the Authority's two lines of income and expenditure would be removed. This was in the Private Bill which went to Parliament and was agreed by all, apart from Defra. The Minister at the time believed that maintenance of the navigation was providing a private benefit rather than a public benefit and therefore didn't want the National Park Grant to be used for this purpose. The CE and Chair at the time strongly argued this with the Minister but to no avail.

The CE continued saying that he believed there was a strong argument that maintenance of navigation was not a private matter but benefitted the public. He suggested that those who felt strongly about the Broads and navigation could argue for additional financial support for the maintenance of the waterways.

A Member asked where we stood with the recommendations of the Glover review.

The CE responded that he had seen little evidence of key findings coming out of the Glover review being pursued by Ministers. He said that the funding Defra had at their discretion was quite limited and Ministers were occupied with other concerns. The CE continued that instead, officers had been asked to draw up a list concerning capital requirements for navigation, ready to be submitted to Defra when the opportunity arose. The CE said he would like to stress the point to Defra that not just biodiversity, but the whole management of the Broads was regarded as important and that funding the navigation would support the second purpose of national parks, in promoting the enjoyment and understanding of the Broads. The CE continued that officers, members, and colleagues in the NSBA could and should work together on pushing back to MPs and Ministers in getting this point across and obtaining Defra's support.

Although agreeing with the point the CE was making, a member suggested approaching this argument carefully as the Minister could see the income of private funding as a reason to decrease National Park funding.

A member commented he was sad to see that the apportionment issue seemed to have driven a wedge between conservation and navigation and agreed that the Navigation Committee could possibly support the argument by getting some of the points made across.

Members noted the report.

15. Committee calendar 2023/24 - Navigation Committee dates

Members were asked to review the meeting dates for the forthcoming committee year.

There was a question about how the agenda was set and whether there was the opportunity for members to raise topics for the agenda.

The CE responded that the agenda was set by the Chair and CE and that there were strategic items the Authority was required to consult the committee on. He continued that it would be helpful if there was a program the Chair and he could discuss and work with, which would pick up on issues members would be particularly interested in and would like to see on the agenda.

The Monitoring Officer added that the Authority would like to have a conversation about focusing on a particular issue in a way that would bring expertise and views from stakeholders to the table. This would allow the committee to form opinions, which would support them when advising the Authority.

It was suggested that members would exchange any ideas for topics of interest amongst themselves before sharing these with the Governance Team.

Members noted the report.

16. Date of next meeting

The next meeting of the Navigation Committee would be held on Thursday 8 June, commencing at 10am.

The meeting ended at 11.57am

Signed

Chairman

Appendix 1 – Declaration of interests: Navigation Committee, 13 April 2023

Member	Agenda/minute	Nature of interest
Peter Dixon	13	Residence at Hickling Broad

DRAFT

Navigation Committee

08 June 2023

Agenda item number 6

Summary of actions and outstanding issues following discussions at previous meetings

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
Network Rail Swing Bridge £10 million Refurbishment program	19/10/2017	John Packman	Network Rail Whole Life Strategy planning for swing bridges and replacing Trowse Swing Bridge with fixed bridge.	<p>As expected, swing bridges expanded in July's high temperatures, with periods when they could not open. Somerleyton affected more than Reedham, which is kept cooler by prevailing wind. Following consultation with key user groups, 'High Impact' days (when groups on organised dates and higher usage of swing bridges expected) shared with Network Rail (NR), who had engineering staff on standby to respond to mechanical issues on these key dates. Officers continue to liaise with NR and communicate issues as they arise. Next meeting planned for Oct review performance of swing bridges during summer period.</p> <p>Oct 2019: Need for display of red flags at bridges and Christmas and Boxing Day cover raised at meeting with local NR manager in Oct. Following consultation with NSBA and other stakeholders, officers reinforced importance of retaining red flags and agreed, based on last year's evidence, that bridge operators do not need to be on duty on Christmas Day and Boxing Day.</p> <p>7 Jan 2020: Meeting held with NR, who are to examine business case for any replacement at Trowse bridge. Resignalling of whole system commences in February.</p> <p>4 Feb 2020: BA in phone discussion with Network Rail re Trowse - update to be provided at agenda item 11.</p> <p>May 2020: Following sensor replacement works at Somerleyton, Reedham & Oulton, Network Rail believes operational reliability of these bridges will be improved. As we enter Summer 2020 we will monitor opening and breakdowns to ascertain this reliability. BA and NR continue to discuss swing bridge issues. BA also in Working Group with Norfolk County Council, Norwich City Council, LEP, NR and Greater Anglia working on Trowse Bridge issues and gathering wider support and funding for replacement/ better operational reliability of this bridge.</p> <p>Jul 2020: Trowse Rail Bridge Working Group continuing to meet. Next phase of project is to meet with Train Services Director for Southeastern - meeting to include spokespeople from working group, incl. John Packman. Further updates provided when meeting date confirmed.</p> <p>Sep 2020: BA written officially to Norfolk County Council regarding Haven Bridge, Great Yarmouth.</p>	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				<p>Dec 2020: Update provided in CEO report (14/01/2021): Authority officers are involved in meetings to discuss the future of Trowse Swing Bridge and the development opportunities in East Norwich presented by three large brownfield sites, namely the Carrow Works, the Deal Ground and the Utilities Site. The Chief Executive and Director of Operations are members of a working group looking at the Trowse Bridge (along with Network Rail, Abellio Greater Anglia, Norfolk County Council, Norwich City Council and New Anglia). The Head of Planning and the Senior Planning Officer sit on another group looking at the development sites. There is an important relationship between the two issues and our officers are making sure that navigation interests are considered.</p> <p>Mar 2021: Director of Operations met with Network Rail (NR) to discuss the multi-million pound refurbishment of the swing bridges (Reedham, Somerleyton & Oulton due to commence in 2022. The NR scheme will see the lifting and turning mechanisms replaced to make the operation of opening and closing the swing bridges more reliable. At the start up meeting, the BA asked if the thermal expansion to the bridges in warm weather could also be addressed. This is being considered by NR. The BA is working with NR on communications, work planning and managing the navigation.</p> <p>July 2021: Director of Operations met with Network Rail contractors undertaking the swing bridge refurbishment to discuss the initial navigational requirements of the works. The refurbishment has been further complicated by the timing of the track closure, which will coincide with the school Easter holidays in 2022. The BA continues to advise on construction and navigational matters.</p> <p>Sep 2021: Network Rail's repair work of the swing bridges delayed to October 2022. Design work to commence beginning October 2021.</p> <p>Mar 2022: Dialogue with Network Rails Contractor for the swing bridge refurbishment programmes continues (Murphy's). A date of October 2022 has been agreed for the contractors access and they are planning on 2 x 52hr weekend works and a 16 day blockade. During this time the swing bridge will operate but with 2 x set opening times daily, these will be published nearer the date.</p> <p>May 2022: Senior Operations Officers continue to work with Murphy's to facilitate the delivery of this 10 million pound refurbishment of Reedham & Somerleyton Swing Bridges. Dates of the works have been shared with navigators and regular information will be supplied as the work dates get nearer.</p> <p>Sept 2022: The contractors (Murphy's) reported that due to mechanical parts coming from the Ukraine, a change to the work program is required. Swing Bridge works will start in September with weekend closures. Main works will commence in March 2023. A NTM has been issued and swing bridge openings have been agreed during work periods.</p>	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				<p>Oct 2022: The initial phase of the swing bridge refurbishments have been completed, this work was making space within the existing plant room to accommodate the updated mechanical opening gear. Phase two is being planned and will commence in 2023 when parts are available to install.</p> <p>Mar 2023: Recent update from Murphy's (Network Rail's contractors) is that the next phase of the refurbishment has been delayed until November 2023. Swing Bridges will operate (on demand) with no further restrictions in place until the work program commences again in Nov. No explanation has yet been given as to why the delay, The Director of Operations is chasing more information.</p> <p>May 2023: Works completed to date on the swing bridges include:</p> <ul style="list-style-type: none"> • Installed a beam in the control box that houses the swing bridge machinery. This will make the building strong enough for a temporary opening to be made in the wall. The opening will allow the old and heavy machinery to be moved out and replaced with modern equipment during the next stage of the project. • Carried out much-needed, extensive brickwork repairs to reinforce the control box. • Completed a full renewal and upgrade of the electrical system. • Upgraded and replaced the manual winch system. This allows the bridge to be swung open manually by the bridge operator if there are problems with the machinery, keeping trains and boat users moving. <p>Network Rail now expects further work on Reedham and Somerleyton swing bridges to take place in late 2023 and 2024. Boat users will be advised of any changes to the usual operation of the bridges via the Broads Authority.</p>	
Carrow Road Bridge Repairs	15/04/2021	John Packman	Briefing provided at Navigation Committee meeting in April, outlining Norfolk County Council's proposals for the repair of Carrow Road bridge. Further information is awaited from the County Council.	<p>10 Jun 2021: report on the Carrow Road bridge repairs presented to members with the Norfolk County Council (NCC) options report.</p> <p>The Navigation Committee is of the view that NCC's proposal to carry out a minimal repair to Carrow Road bridge, effectively welding it shut so it is unable to open to tall vessels, is totally unacceptable. It would be contrary to NCC's legal obligations under the Norwich Corporation Act 1920, which are to maintain and operate the bridge to allow vessels that require passage to pass. In our view, officers should refuse any Works Licence application for this superficial repair work and NCC should be encouraged to perform repairs in a way that maintains navigation rights to this historic and important gateway to Norwich, in accordance with the legislation. The Broads Authority would like to work with NCC to find a solution that meets the statutory obligations of both organisations.</p> <p>Aug 2021: The Chief Executive and Director of Operations met with officers of Norfolk County Council on 17 August to discuss the road bridge repairs following the report to Navigation Committee and NCC wanting to</p>	10/06/2021

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				<p>temporarily seal the bridge close for 5 years. The BA is offering collaborative working to find an agreeable solution that protects the rights of navigation.</p> <p>Oct 2021: No further update from NCC. RR and JP to arrange a future meeting with NCC (as reported at NC211021)</p> <p>Dec 2021: Norwich City Council, Norfolk County Council and The Broads Authority met on 8 December to discuss the works proposal submitted for licensing. It was a positive meeting with all partners understanding the different issues each organisation faced with the proposed construction method. Norfolk County Council officers agreed to re-look at road deck construction methods and the timing of the repairs to see if these can better link with the City Council's planned route improvements and still maintain the ability to open the Carrow Bascule bridge. An update was made in the Chief Executive's report, item 7 on the 13 January 2022 Navigation Committee agenda.</p> <p>Mar 2022: Following discussion between the Broads Authority and Norfolk County Council a report to 7 March County Council Cabinet meeting will contain the following short statement: Carrow Bridge, Norwich In last year's Highway Capital Report, the need to establish a longer-term solution for Carrow Bridge was highlighted. Discussions are ongoing with key partners, including the Broads Authority, to agree short-term and longer-term options for improvement at this sensitive part of the transport network. The programme of ongoing maintenance works continues on a regular basis.</p> <p>March 2023: The Authority has not received any further communications from NCC of additional repairs to Carrow Bridge.</p>	
Health and safety improvements to Hire Boat Licensing Conditions	14/04/2022	Linda Ibbitson-Elks	<p>To make British Marine's Quality Accredited Boatyard (QAB) Scheme a mandatory aspect of the Broads Authority Licensing Conditions.</p> <p>Agreed by Authority on 13/5/2022.</p>	<p>We have been working with British Marine and speaking to hire boat operators to ensure they are QAB accredited or working towards accreditation by 1st April 2023.</p> <p>Dec 2022: The Safety Team regularly meets with British Marines to monitor progress. BM now have 3 trained local QAB Assessors operating in Norfolk & Suffolk. The Authority Hire Boat Licensing Officer will be contacting Hire Operators who have not yet started the QAB process to remind them of the need to be accredited before the 2023 toll year starts.</p> <p>At the Broads Authority Committee meeting the Navigation Committees' recommendation to accept commercial licensing (paddle licensing) was accepted. This new licensing will move commercial operators from the BAPS and make it a hire boat condition for any operator letting paddle craft for hire to be licensed.</p> <p>March 2023: The new Licensing for Non-Powered Paddle Craft has been introduced to the 2023/24 tolls year. We are working with operators on teething issues around capacity numbers, but no major issues reported.</p>	01/04/2023

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
				<p>May 2023: All hire boat operators within the Broads have either been awarded the QAB or are working towards the British Marine standards. We have also had a good response from hirers of non-powered craft, with the new licensing requirements introduced from 1 April 2023. The Hire Boat Officer will be carrying out a series of ad-hoc checks over the summer of 2023 with hire companies to observe the hand-overs and show-outs to ensure adherence to the standards is maintained.</p>	

Date of report: 11 May 2023

Navigation Committee

08 June 2023

Agenda item number 7

Chief Executive's report and current issues May 2023

Report by Chief Executive

Purpose

To provide a briefing on significant matters relating to the maintenance and management of the waterways.

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1. Capital Funding Progress Report

- 1.1. All of the plant and equipment ordered for delivery by the end of March 2023 arrived on time. The barge/workboat was delivered on 3 May. Before commissioning into active service, the Truxor and water plant harvester have had some minor modifications to pass them through the Boat Safety Scheme requirements. The tractor and trailer will go into active service once the Authority's application for a Restricted Operators Licence has been approved, as our usage of this machinery falls under HGV requirements.

2. Risk to waterways users from water-borne disease in the Broads

- 2.1. At the Broads Authority on 12 May [a formal request from the Broads Local Access Forum was considered](#) regarding its approach to tackling the source of untreated sewage and addressing the lack of critical safety information for water users on water-borne diseases that may arise from such pollution.
- 2.2. The Environment Agency tests for Faecal Indicator Organisms (FIOs), such as E. coli and intestinal enterococci in order to understand the levels of bacterial pollution in water. However, this testing is only done as a statutory responsibility at Designated Bathing Water sites, of which the vast majority are coastal beaches. As such no FIO testing is currently carried out anywhere on inland waters in the Broads Authority executive area.
- 2.3. Recently, there has been interest in setting up bathing water sites on inland waterways and the River Waveney Trust is working with Anglian Water and looking at establishing one at Falcon Meadow in Bungay. Several criteria need to be met for DEFRA to designate an inland bathing water site, these include providing evidence of a need, for example sufficient numbers of swimmers, and also appropriate facilities such as toilets. The criteria do not include providing any data on water quality. However, in the example of Falcon Meadow, Anglian Water are working with the Waveney River Trust to establish what bacterial levels are present, prior to applying for formal designation. In all cases, once an application is approved then the site is added to the Environment Agency's monitoring schedule.
- 2.4. The Authority recognises water-borne diseases as a key hazard in the Safety Management System hazard log (which is how the Authority implements the Port & Marine Safety Code). The hazard log will be reviewed this year as part of the SMS Stakeholder Hazard Review, which occurs every five years.
- 2.5. The Authority's current position on open water swimming (as described on the Authority's [public website](#)) is that we "strongly advises against entering the water unless part of an organised event". The website guidance continues, "However, while recognising benefits to the health and well-being of participants, a balanced assessment must be undertaken as swimming in the Broads carries numerous risks."
- 2.6. The risks developed on the website include hypothermia, cold water shock, and visibility to vessels. It currently does not include water-borne diseases or risks from bacterial pollution.
- 2.7. The Broads Authority co-hosts the Broadland Catchment Partnership (BCP). A recent review of the Broadland Catchment Plan by the BCP has highlighted the potential threat to human health posed by untreated sewage pollution. This will be developed further in the future revision of the published Broadland Catchment Plan.
- 2.8. The Authority adopted the following recommendations:

- There should be no change to the Authority's current overall position on open water swimming, as per the text on the website [Outdoor swimming \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk)
- Carry out a review of the current communications for both open water swimming and paddle-sports, to include water-borne diseases as one of the hazards facing those taking part in these activities. The Authority's principal role should be the provision of information on what the public need to take into consideration before taking part in these activities and how to self-manage the risks.
- Work with partners to ensure safety messages align (where possible) and to expand the reach of communications.
- Through the Broadland Catchment Partnership, support the Environment Agency and Anglian Water in their implementation of the recent Defra announcement to make the reduction of sewage overflows a legally binding target, as per the Storm Overflows Discharge Reduction Plan published in August 2022.
- Support the River Waveney Trust's ambition for the establishment of an inland bathing water site at Falcon Meadow, Bungay. The site is beyond the limits of navigation but within the Authority's executive area, therefore the risks of boat collisions are significantly reduced, and a well-managed site should mitigate the other risks of outdoor swimming.

3. Navigation patrolling and performance targets

- 3.1. The report of the significant use of powers by the Rangers is at Appendix 1 and reflects a busy Easter. Appendix 2 shows the average navigation/countryside splits; these are higher on the navigation side with launch training being undertaken for the new Assistant Rangers over this time.

4. Sunken and abandoned vessel update

- 4.1. The list of sunken vessels is listed in Appendix 3. The local Rangers are actively chasing the owners of the 3 sunken vessels affecting the navigation area.

5. Planning enforcement update

- 5.1. There are no further enforcement matters with navigation implications to report.

Author: John Packman

Date of report: 30 May 2023

Appendix 1 – Rangers exercise of powers analysis

Appendix 2 – Ranger duties total time allocated and actual days

Appendix 3 – Sunken and abandoned vessels current position as at 23 May 2023

Appendix 4 – Prosecutions dealt with in court for non-payment of tolls since 13 April 2023

Appendix 1 – Rangers exercise of powers analysis 1 April – 15 May 2023

Table 1

Verbal warnings	Wroxham launch Wroxham and upper Bure	Irstead launch Ant	Ludham launch Hickling, Potter Heigham, upper Thurne	Ludham launch 2 lower Thurne and lower Bure	Norwich launch Norwich and upper Yare	Hardley Launch Reedham, Chet and middle Yare	Burgh St Peter launch Oulton Broad and upper/middle Waveney	Breydon launch Breydon water, lower Waveney and Yare
Care and caution	5	1	1	13	3	4		
Speed	343	113	51	57	18	26	14	12
Other	32	3	5	2	10	4		

Table 2

Written warnings	Wroxham launch	Irstead launch	Ludham launch	Ludham launch 2	Norwich launch	Hardley Launch	Burgh St Peter launch	Breydon launch
Care and caution								1
Speed	6						1	1
Other	4	3	4			5		
Special directions							3	

Table 3

Launch patrols	Wroxham launch	Irstead launch	Ludham launch	Ludham launch 2	Norwich launch	Hardley Launch	Burgh St Peter launch	Breydon launch
Launch staffed by ranger	45	44	43	43	45	43	44	45
Volunteer patrols								
IRIS reports	5	7	1	5	1	5	2	5

Table 4

Broads Control total calls (1 April to 15 May 2023)

Contact method	Number of calls
Telephone	2773
VHF	471
Total	3244

Appendix 2 – Ranger duties: total time allocated and actual days

Table 1

Broads Authority corporate duties

Work area	Annual allocation (days)	Actual days to date
Training	134	84.26
Broads Control	362	48.92
Team meetings, work planning	356	28.51
Partnership working	76	4.46
Assisting other sections	76	8.24
Billets and boatsheds	25	1.42
Launch – general		0.95
Trailers - general		1.28
Vehicle maintenance		0.14
Other equipment repair		1.08
Total	1029	179.26

Table 2

Navigation duties

Work area	Annual allocation (days)	Actual days to date
Patrolling	2136	319.53
Escorts	44	2.77
Prosecution files		1.62
Bankside tree management	58	
Obstruction removal	26	2.64
Channel markers and buoys	30	3.85
Signs and boards maintenance	34	5.14
Adjacent waters	110	16.76
Reactive mooring maintenance	104.5	3.18
Total	2542.5	355.49

Table 3

Conservation, recreation, countryside maintenance

Work area	Annual allocation (days)	Actual days to date
Fen management	191	0.54
Lake, riverbank restoration	126	
Invasive species control	32.5	0.47
Other conservation work	165	6.62
Pollution response		0.34
Visitor site maintenance	209	18.18
Public engagement	251	3.11
Public footpath work	44	0.27
Education work	69	
Total	1087.5	29.53

Team total up to 15 May 2023

Percentage Navigation: 92%

Percentage National Park: 8%

Appendix 3 – Sunken and abandoned vessels current position as at 23 May 2023

Description	Location found	Action	Notice affixed	Result
Motor Cruiser	Old River Yare, Thorpe	Vessel sunk at owners moorings	No	Not affecting the navigation
Motor Cruiser	Sutton/Stalham cut	Not able to raise with dredging rig. Vessel marked.	No	Not affecting the navigation
Motor Cruiser	River Yare, Thorpe	Vessel Sunk at owners mooring	No	Insurance company aware, chasing for vessel to be raised
Motor Cruiser	River Yare, Trowse	Vessel sunk behind rail bridge wooden fenders	No	Chasing owner.
Motor Cruiser	River Yare, Cantley	Vessel sunk at BA 24-hour mooring. Marked.	No	Chasing owner.
Yacht	Womack Water	Sunk at owners mooring	No	Liaising with owner

Appendix 4 – Prosecutions dealt with in court for non-payment of tolls since 13 April 2023

Type of vessel	Fined	Costs awarded	Victim surcharge	Compensation
Motor	£660.00	£220.00	£264.00	£301.20
Motor	£440.00	£220.00	£176.00	£250.38
O/B Dinghy	£220.00	£225.00	£88.00	£75.30
Motor	£370.00	£225.00	£148.00	£557.22

Navigation Committee

08 June 2023

Agenda item number 8

Water Plant Management

Report by Head of Construction, Maintenance & Ecology

Purpose

To describe the navigational issues posed by water plants to waterways users, the prioritisation of action by the Broads Authority, the consenting and permitting processes involved and how water plants are managed.

Broads Plan context

C3 - Manage water plants and riverside trees and scrub and seek resources to increase operational targets.

- Carry out annual regimes for water plant cutting in navigation channels in accordance with agreed criteria, and monitor impact on plant species, distribution, and abundance.

B1 - Restore, maintain, and enhance rivers and broads and use monitoring evidence to trial and implement further innovative restoration techniques.

- Seek funding to develop and implement river and broad restoration, maintenance and enhancement works for aquatic communities (incl. fish) at priority sites to meet WFD and SSSI objectives.
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1. Introduction

- 1.1. Globally water plants occupy almost all freshwaters and are uniquely adapted to life in, or on, the water. Abundance and presence of water plant species in the Broads is driven by ecological and human factors including light (penetrating through the water); availability of nutrients and chemicals (influencing growth); substrate (gravel or silt); grazing by birds (swans, coot etc); salinity (species have different tolerances); and direct physical impacts from human activity (managed cutting, or those chopped up by boat propellers). The relatively shallow waters and slow-flowing waterways provide a home for many species of water plants to thrive.
- 1.2. Where water plant growth in the Broads impacts on navigational access within the public navigation area, then the approach on management of water plant growth is initiated. The navigation area is defined in the [Norfolk and Suffolk Broads Act 1988 \(legislation.gov.uk\)](https://www.legislation.gov.uk), part 2, paragraph 8, as “*those stretches of the rivers Bure, Yare and Waveney, and their tributaries, branches and embayments (including Oulton Broad) which, at the passing of this Act, were in use for navigation by virtue of any public right of navigation*”. The Broads Authority’s approach to water plant management is outlined in the [Waterways Management Strategy & Action-Plan 2022-27 \(www.broads-authority.gov.uk\)](https://www.broads-authority.gov.uk), section 4.2.
- 1.3. The benefits to navigation from removal of seasonal growth of water plants is that risks of vessels having propellers, keels and rudders caught up with vegetation are reduced. Navigational impacts such as loss or reduction of propulsion, steerage or headway can have serious safety implications in busy waterways; there is potential for costly vessel maintenance from lift-out requirements and any mechanical repairs; as well as reduced quality of experience for recreational users who may be inexperienced or not prepared for dealing with such situations.
- 1.4. The conservation designation of all the SSSI/SAC/SPA (also called designated sites) waterbodies in the Broads includes water plant species and communities, which in many areas either have targets monitored by Natural England for an increase in abundance and/or an increase in the geographic range of threatened species. The government target condition for SSSI’s is “Favourable – recovering”. Where water plant management occurs in the designated sites, the Authority is required to gain assent from the regulator, Natural England. This requirement is driven by elements of the [Wildlife and Countryside Act 1981 \(legislation.gov.uk\)](https://www.legislation.gov.uk), [Countryside and Rights of Way Act 2000 \(legislation.gov.uk\)](https://www.legislation.gov.uk) and [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk). Ecological impacts of such maintenance works need to be assessed for the potential to cause damage to or affect the condition of a designated site. Appropriate controls, monitoring and mitigation are therefore required to be put into place by the Authority. This approach ties in with also achieving the biodiversity objectives for the Broads, see [Broads Biodiversity & Water Strategy 2019.pdf \(www.broads-authority.gov.uk\)](https://www.broads-authority.gov.uk).

1.5. Similarly, the Environment Agency aims to achieve Water Framework Directive (WFD) targets of at least “good” ecological status in all the major broads, plus all of the rivers. The WFD assessment includes water plants as one of the ecological elements. Table 1 gives examples of some key waterbodies and their current ecological condition.

Table 1. Condition and status of some key broads waterbodies. (Source: Natural England [Designated Sites Viewer](#); Environment Agency [Catchment Data Explorer](#) and Broads Authority data (accessed 23/5/23))

Site	Natural England unit condition (and date last assessed)	EA WFD lake status (and date last assessed)	Broads Authority water plant abundance score 1 = low, 10 = high (2022)	Broads Authority water plant abundance trend (2018-2022)
Target	Favourable - recovering	Good	N/A	N/A
Hickling Broad	Unfavourable – Declining (Dec 2013)	Moderate (2019)	7.47	Increase
Horsey Mere	Unfavourable – Declining (Sept 2010)	Moderate (2019)	1.64	No change
River Bure (Horstead to St Benets)	N/A	Moderate (2019)	7.23	N/A
Barton Broad	Favourable - recovering (Nov 2010)	Poor (2019)	1.19	No change
River Ant (Dilham to River Bure)	N/A	Moderate (2019)	4.67	N/A
Rockland Broad	Unfavourable - No change (Aug 2018)	Moderate (2019)	5.99	Increase
River Wensum (New Mills to Trowse Eye)	N/A	Moderate (2019)	1.69	N/A

Table 1 shows that the Natural England unit condition status is now out of date. Natural England are planning to move to SSSI condition assessment based on designated ecological features rather than whole units, so tracking of water plant condition in the SSSI broads shall improve once this new reporting is updated. Of the four sites shown in Table 1, only Barton Broad meets SSSI unit condition targets, which is more based on anticipated ecological recovery following reduction of nutrient inputs in the catchment. However, it should be noted that Barton Broad has very low water plant abundance. The Environment Agency ecological status is more up to date and reflects chemical as well as ecological (such as water plants) elements. None of the sites listed achieves “good” status, with waterbody status largely being driven by the negative influence the poor water quality has in the Broads. The Authority’s own water plant monitoring gives an abundance score for each site, with 1 being low and 10 very high. Broads Authority water plant data is shared with partners on an annual basis so updating their assessments is possible.

- 1.6. Invasive species pose hazards to navigation through rapid infestation of waterways; negatively impacting vessel movements and routine maintenance. Species such as floating pennywort, already present in the Rivers Waveney (upstream of Bungay) and on the River Ant (Honing Lock to Wayford Bridge) require continuous removal effort if the worst impacts are to be avoided. Total eradication is the aim of removal operations, but the plant can regrow from very small fragments. This effort involves staff time from the Authority and numerous partner organisations.
- 1.7. The Authority itself has powers to conserve natural features of the Broads through control activities within the navigation area through the [Norfolk and Suffolk Broads Act 1988 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1988/10),

“13(1) The Authority may, for the purpose of conserving the natural beauty of any area—

(a) close to navigation any area at the edge of any waterway within the navigation area; or

(b) restrict navigation in any such area to specified classes of vessel.”

In practice, this power is not typically directly applied. A collaborative approach with waterways users, landowners and regulators has led to the prioritisation and scope of water plant cutting and other maintenance activities, which considers the species and habitat impacts of all maintenance activities. This process is outlined in principles, aims and objectives of the [Waterways Management Strategy & Action-Plan 2022-27 \(www.broads-authority.gov.uk\)](https://www.broads-authority.gov.uk)

2. Where water plant management occurs

- 2.1. Where water plants have a significant impact on vessels making safe passage the Authority has prioritised these areas based on the channel width impacted, height of plants and volume of boat traffic.
- 2.2. The areas of the public navigation in the annual water plant cutting programme are: -
- Bure – Coltishall Lock to Belaugh
 - Ant – Tyler’s Cut to just downstream of Wayford Bridge
 - Upper Thurne – Hickling Broad marked channel, Catfield Dyke, Waxham Cut, Meadow Dyke, West Somerton to Martham Ferry
 - Wensum– New Mills to Trowse Eye
 - Yare - Thorpe River Green, connecting dykes and channels through Rockland and Bargate Broads
 - Waveney – Geldeston, Barsham to Beccles
- 2.3. Where cutting occurs in designated sites or where other constraints are required, the timing of cutting and the expiry of the current assent is listed in Table 2.

Table 2. Water plant cutting where permits are required.

River	Stretch	Type of Cut	Designated Site	Assent gained	Specific timings
Thurne	Hickling Broad channel & Catfield Dyke	In channel (& encroaching reed)	Yes	Yes - expiry (30/09/27)	Cut late May to 30 th Sept
Thurne	Somerton – Martham Ferry	In channel (& encroaching reed)	Yes	No* ¹	
Thurne	Waxham Cut	In channel (& encroaching reed)	Yes	No* ¹	
Yare/Wensum	New Mills – Thorpe Island	In channel	No. Fish spawning area	Not required	Thorpe Island after 15 th June
Yare	Bargate & Rockland Broad	In channel	Yes	Yes - expiry (30/09/27)	15 th July to 30 th Sept

*1 – HRA submitted to NE but refused on grounds of uncertainty. Cutting proceeds under BA as competent authority. HRA to be discussed & re-submitted as part of wider 5yr cutting plan covering all cut areas in 2023.

- 2.4. In recent years the volume and height of water plants has increased in more river stretches, and in areas outside the typical marked channels or popularly used areas of

the open broads. This has also led to increased requests for cutting in areas not within the Authority's remit to manage, such as private dykes, marinas, and other adjacent waters. Where broads open to public navigation have experienced increasing amounts of water plant growth, this has led to impacts on some sailing club activities, which tend to use a greater area of the broads surface outside the marked channels.

- 2.5. Hickling Broad is the site with most current challenge in terms of multiple users experiencing difficulties with, or constraints on, their intended activities due to abundant growth of water plants. Hickling Broad Sailing Club has experienced reduced participation in some events in the plant growth season; some day-boat operators instruct hirers not to venture upstream of Potter Heigham Bridge; and several boatyards have reported regular callouts to Hickling Broad to recover hired vessels that have lost propulsion due to entanglement with water plants. The most abundant species currently growing in Hickling Broad is a species called intermediate stonewort. This is a very rare native species that within the UK only grows in the broads of the Upper Thurne. As such, the landowner Norfolk Wildlife Trust and the statutory bodies, Natural England, and the Environment Agency, all have targets to protect this species and the associated community of other water plants that grows alongside it.
- 2.6. The Authority manages the marked channel through the centre of Hickling Broad, the approach to Catfield Dyke and the dyke between the Pleasureboat Inn and Whispering Reeds boatyard that connects to the parish slipway. This allows access to the village, moorings, and associated facilities for all waterways users.
- 2.7. In 2017 the Authority conducted a trial of cutting stonewort outside the marked channel to establish the impacts of cutting on plant growth. The trial followed consultation with Natural England, who granted assent for the limited cutting, based on the Habitat Regulations Assessment the Authority was required to prepare. The trial area was monitored for three years to follow the impacts of the cutting event. The draft report was first presented to the Upper Thurne Working Group, as the key stakeholders with a direct interest in the trial and its findings. Following feedback from the group and a peer review process that was significantly hampered by COVID and staff changes, the report has now been finalised and is presented as Appendix 1 to this report.

3. Cutting specifications

- 3.1. Cutting water plants and removing the arisings aims to maintain a water depth that allows unrestricted passage for most boats. The Authority's water plant harvesters can cut at variable depths, up to a maximum depth of 1.5 m below the waterline. Variation in water levels needs to be considered at the time of cutting so that any drop in water level does not then cause issues from the remaining uncut plants. The environmental standard operating procedure (ESOP) which guides the Authority's maintenance work states that water plants will not be cut any lower than 30 cm from the bed of the channel (this is increased to 40 cm for some designated sites), to ensure some plant biomass and root networks are left in situ. See ESOP 1 – Cutting water plants

[Environment standard operating procedures \(broads-authority.gov.uk\)](https://broads-authority.gov.uk). Most areas of the Broads waterways are highly suitable for water plant growth, so a regular rotation of cutting is planned. However, water plants soon regrow when conditions are suitable, which leads to a requirement for multiple cuts which become more reactive as the season progresses.

- 3.2. Typically, water plants are cut between May and September, but are not removed entirely from the cut areas (see Figure 1). This ensures the biodiversity and sediment stabilisation benefits provided by water plants is preserved. Maintaining some viable habitat with the physical structure provided by water plants, the food it provides and the shelter for aquatic species is important for invertebrates, fish, and waterfowl. The root network and plant biomass above the channel bed reduces sediment transport downstream, by holding the sediment together and reducing the flow velocity across the sediment surface. Water plants growing at the margins of rivers help to reduce bank erosion decreasing the input of sediment into the waterways and provides nesting opportunities for waterfowl. For this reason, uncut margins are left intact. Periodic management of the uncut vegetation at the margins is tackled in the autumn either via the water plant harvester vessels, or through dredging operations. At Broads Authority 24-hour moorings, or other publicly accessible short stay moorings, the cutting specification is as close to the piled edge as is practicable.

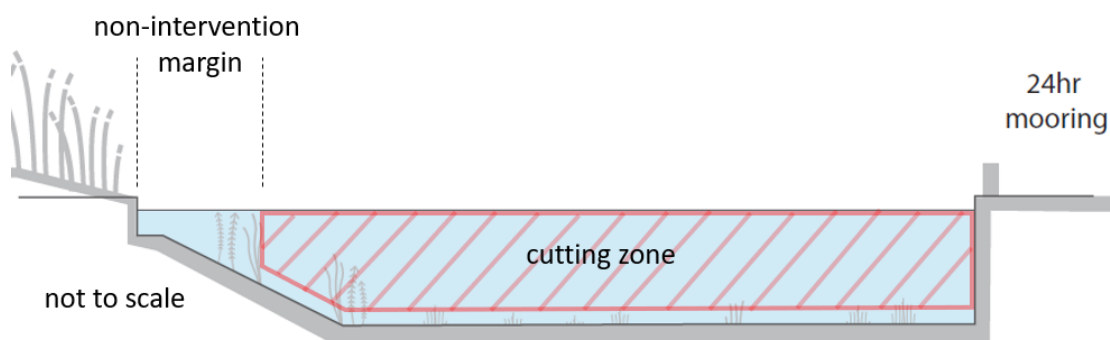


Figure 1. Example river profile showing water plant cutting zone (red hatching) adjacent to natural bank (left) and public moorings (right)

- 3.3. A method statement is produced to guide the cutting operations in each area. An example is given in Appendix 2 for the River Bure. The method statement covers instructions and maps for the operators including cutting height above riverbed, non-intervention margins, working procedure, disposal of cut arisings to land and ecological notes.
- 3.4. The Authority currently has three water plant harvesting vessels. Flexibility is required in how the staff resource is deployed, to meet the reactive demands of where and how well water plants are growing. The ranger team monitor the level of growth across the waterways and feedback to the maintenance team to help prioritise actions. This is also supported by reports from stakeholders and the public who contact Broads Control. As

the internal staff resource is finite and a range of other waterways management tasks are needed to be performed throughout the year, fluctuations in the number of days spent of water plant cutting means reciprocal variations in the time spent on other tasks is required. This is a dynamic management task and is tracked through staff time sheets. Reporting on the annual figures for staff time spent on all the navigation maintenance activities is via the Construction, maintenance & ecology report presented at the Navigation Committee meeting each June (see Agenda item 14).

- 3.5. Arisings from cutting are typically placed in low heaps (less than one metre high) on the bankside of the managed waterways. Given the structurally weak stems and leaves of water plants, they quickly dry out and shrink. The waste disposal guidance provided by the Environment Agency aims to ensure that bankside habitat is not significantly impacted and that conditions that promote significant leaching of nutrients from the heaps of cut vegetation are minimised, this means disposal locations need to be assessed prior to use and not all bankside locations are suitable for disposal.
- 3.6. Ecological monitoring of the water plant species in the actively cut river stretches (see section 2.2) is cyclical. Typically, two rivers are monitored per year by Broads Authority ecologists. However, in 2023 all the river stretches managed for water plants will be surveyed. This additional effort reflects the increasing plant biomass in all of the cut stretches and the need for more information prior to considering extending the cutting areas. Annual hydroacoustic monitoring is carried out in August and October in Hickling Broad, each year to determine the overall percentage of plant cover as per the Natural England assent conditions for this site. The Broads annual water plant survey, which takes in some of the broads sites where plant cutting occurs in marked channels (Hickling, Martham North, Rockland) has some points that fall within the cut areas. The scope of the Broads annual survey is for a variety of purposes but is frequently referenced in terms of ecological conditions within sites where cutting occurs. All three of these survey types are reported here for 2022 [Broads Annual Water Plant Monitoring Report 2022.pdf \(www.broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/monitoring-report-2022.pdf)

4. Financial implications

- 4.1. The total costs of maintaining the water plant cutting operation across the navigable area are comprised of the capital cost of the water plant harvesters, the annual maintenance costs of the vessels, staff time operating the harvesters during cutting and monitoring the water plant communities.
- 4.2. Over the past six years, the operational staff time spent on the cutting activity has varied as per the demands of water plant growth. Figure 2 shows a graph of staff time and how it has varied. The peak in 2022/23 was the greatest amount of time spent by the Authority in any one year. The mild spring in 2022, exceptionally clear water in most rivers and the low river levels due to drought, all contributed to generating a large growth of water plants across the Broads.

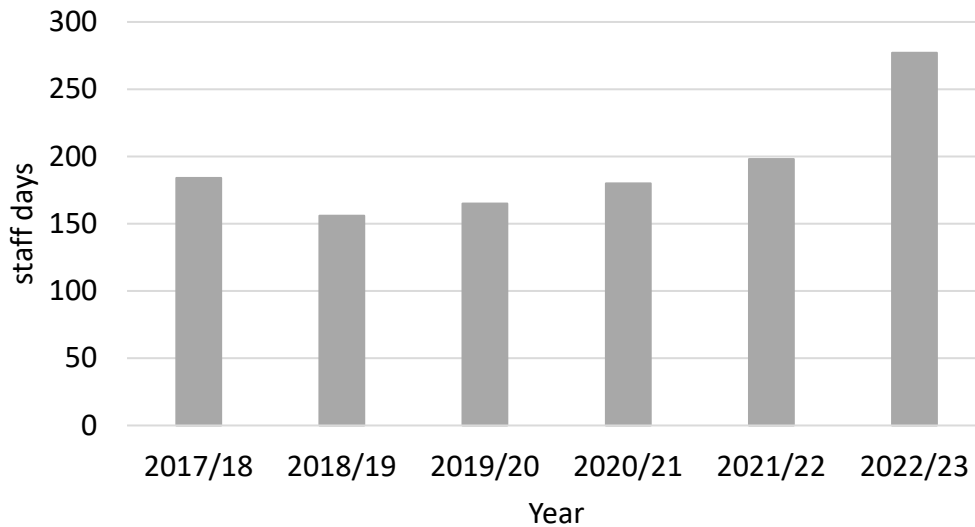


Figure 2. Total staff days per year spent on water plant cutting.

During the financial year 2022-23, there was a total of 277 days spent by the operations technicians on the water plant cutting and disposal activities on the navigation area. This was just over 10% of the total working time available for the operations technicians for all navigation management activities in the year. The ecologists spent 25 days on tasks directly related to water plant cutting, including preparing method statements, gaining permissions and plant monitoring in cut areas. The plant & equipment team spent 80 days on the maintenance and annual refit requirements for the two harvesting vessels in the fleet at that time. Taking into consideration the staff time actual cutting and all associated operational overhead calculations for transport, premises and staff management, the value of the work in 2022/23 was £64,500.

- 4.3. Total cost of invasive species removal work from the navigable waterways by Broads Authority operational staff in 2022/23 was approximately £19,900. This included input from ecologists, rangers, and operations technicians. In addition to these staff costs, the Authority makes regular budget contributions to partnership removal programmes.

5. Risk implications

- 5.1. Within the Operations Directorate Risk Register water plant cutting activity is relevant to the following risks: -
- 5.2. Loss of navigation due to engineering or environmental issue (Performance). Initial risk level “medium”. Controls identified to manage this risk includes: -
- Monitor and review aquatic plant cutting regime to ensure it is fit for future demands and a changing seasonal climate.
 - Purchase of one an additional brand new Berky water plant harvester vessel
 - Annual winter refit programme for each water plant harvester by the plant & equipment team at the Dockyard

Residual risk following these controls is “medium”.

5.3. Ecological degradation (Reputation). Initial risk level “high” – controls identified to manage this risk includes: -

- Regular review of Environmental Standard Operating Procedures to ensure work processes cover all significant hazards to the environment.
- Consultation with stakeholders and regulators on the water plant cutting activities in Protected Sites like Hickling Broad
- Complete the actions listed in the [Waterways Management Strategy & Action Plan 2022-27](#) – (see Table 5. Water plant management objectives, page 35)

Residual risk following these controls is “medium”.

6. Conclusion

6.1. Going forward, if water clarity continues to improve, as it has most notably in the River Bure, River Yare and in Hickling Broad/Heigham Sound, then the proportion of Authority operational time in managing water plants is not likely to drop back down below 10%. This level of commitment in 2023/24 is achievable with some in-year reprioritisation of other tasks, such as dredging or riverside tree management. Any longer-term increases in annual water plant cutting requirement or any expansion of the areas to be regularly cut, would demand a more fundamental rethink. Options to release more operations technician time for water plant cutting includes permanently reducing the duration of time spent on other tasks or requesting additional revenue budget to allow procurement of additional external resource to back fill in other areas. The most likely areas to reduce would be dredging and riverside tree management. Dredging currently occupies about 60% of all operations technicians’ time, so can most afford some time reduction. Riverside tree management can be shifted to delivery by rangers in the winter and/or using additional revenue budget to contract in external resource.

6.2. With three harvesters now in the fleet, making the most efficiency of the operator’s time available has increased slightly. Typically, the cutting is carried out by two members of staff who move their vessels between sites as demand requires. Two vessels will now be stationed in the northern rivers and one in the south, which reflects cutting requirement and waterways users’ needs. Vessel travel time between sites will reduce in the northern rivers, which will allow greater flexibility and reactivity to issues that arise and will also reduce any downtime in cutting if a vessel requires repairs during the season. The brand-new vessel did not unfortunately come with an additional operator, so the likelihood of operating three harvesters at one time is very low. There will as be an additional burden on the plant & equipment team each year, as there are now three vessels to maintain.

- 6.3. The current challenge is how does the Authority meet all its statutory obligations and maintain accessible waters within the public navigation, for as many different user groups as possible. Ecological conditions in the Broads are steadily improving because of decades of investment in nutrient reduction from point sources, such as sewage treatment works, and more diffuse sources, such as from agricultural practice in the wider Broadland catchment. There is also risk of increased occurrence of invasive non-native plant species in the Broads waterways. Waterways users have experienced navigation in waters that were relatively free of water plants, and now have genuine safety concerns and expectations that all aspects of the navigable space will be managed to meet those expectations. The Authority is open to managing the navigable waterways of the Broads for all purposes, but financial, ecological, and legal constraints all combine to shape the water plant cutting programme that has developed to this point. If deviations from the current approach are decided as a priority by the Authority, then staff resource will need to be redirected to tackle those financial, ecological, and legal constraints.
- 6.4. If changes to the current approach to water plant management are required, it is proposed that there will be prior consultation with the Navigation Committee.

Author: Dan Hoare

Date of report: 22 May 2023

Background papers:

[Norfolk and Suffolk Broads Act 1988 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

[Waterways Management Strategy Action Plan 2022-27.pdf](#)

[Broads Annual Water Plant Monitoring Report 2022.pdf \(www.broads-authority.gov.uk\)](https://www.broads-authority.gov.uk)

[Broads Plan](#) strategic objectives:

C3 - Manage water plants and riverside trees and scrub, and seek resources to increase operational targets

Appendix 1 – [Experimental cutting of stonewort in Hickling Broad, 2017-2019](#)

Appendix 2 – [Water plant cutting method statement for the River Bure](#)

EXPERIMENTAL CUTTING OF STONEWORT IN HICKLING BROAD, 2017-2019

May 2023

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Experimental Cutting of Stonewort in Hickling Broad, 2017-2019
Final Report 2023

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Origination

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1. Introduction

1.1 Background

Hickling Broad is the largest broad within the Norfolk and Suffolk Broads system, with approximately 120 hectares of open water. Recent Broads Authority hydrographic surveys show a water depth outside the marked channel of less than 1.2 m at mean low water level. The bed of the broad is mostly comprised of soft mud overlain with a layer of fluidised sediment. Hickling Broad contains species and habitats of high conservation importance, including several rare and important species of charophyte, or stonewort (Barker et al., 2008). Hickling Broad is also an important recreational and race sailing waterbody, popular with a broad spectrum of water user groups. However, plant growth outside of the marked channel can impede sailing vessels, and improvements in water quality have led to increases in water plant growth which can exacerbate this issue. This then creates a challenge for year-round access for all craft to the whole of the broad, without compromising the biodiversity, or breaching the legislation designed to protect it.

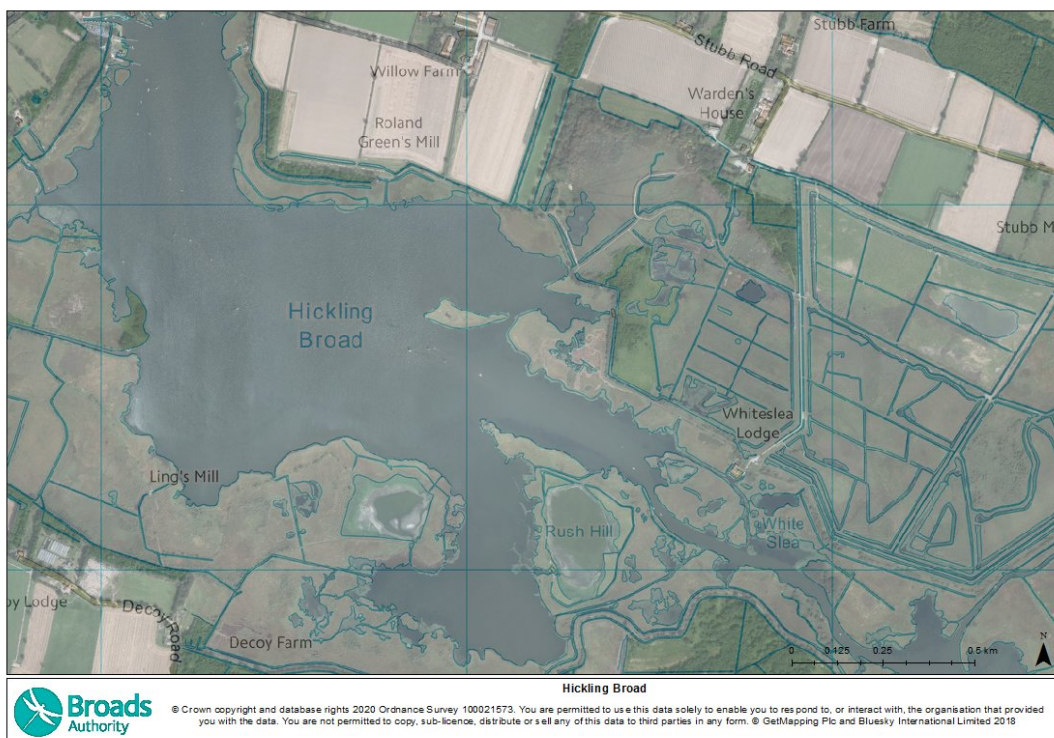


Figure 1: Map of Hickling Broad

The Broads Authority has a duty to maintain the navigation area for the purposes of navigation to such standard as appears to it to be reasonably required; and to take such steps to improve and develop it as it thinks fit. Vigorous plant growth in recent years has therefore presented a number of challenges around managing navigational access on a site dominated by a protected water plant community (Jackson et al., 2001).

The water plant growth in Hickling Broad has been managed within the marked channel through a programme of dredging projects and routine water plant cutting in the growing season (Table 1). Outside of the marked channel, dense growth of water plant near to the water surface has implications for boat handling and safety; sailing boats with deeper keels (typically drawing 90 cm) may become impeded by the plants. Not only sailing boats but windsurfers, canoers, paddleboarders and anglers also utilise a much greater proportion of the open water of the broad, compared with motor vessels which largely stay within the marked channel.

Table 1: History of Broads Authority water plant management across Hickling Broad (1994 - 2017)

Period	Description
1994 - 1998	A cutting and monitoring programme for Spiked water-millfoil (<i>Myriophyllum spicatum</i>) and pondweeds (<i>Potamogeton</i> species) which covered approximately a third of the open water area of the broad
1998	An experimental 50 x 50 m plot of Intermedia stonewort (<i>Chara intermedia</i>) cut and monitored.
1999	Trial plots of Intermediate stonewort cutting extended (38 ha).
2000 - 2006	Trial of Intermediate stonewort cutting suspended due to lack of growth.
2016 onwards	Annual cut of all plants within the marked channel when certain criteria are met was initiated as water plant abundance increased.
2017	Criteria met for experimental charophyte cut in small plots. One cut was carried out and then monitored for three seasons (this report)
2017-2019	Cutting of non-Chara species outside of the main channel in a limited strip either side of the marked channel

In most years prior to 2020, there has been limited plant growth in the central area of the broad, and within the marked channel; probably as a consequence of lower water clarity and poorer light conditions at the sediment surface in this deeper part of the broad. This central area is likely to be subject to greater sediment disturbance by motorboat traffic as well as wind generated wave action. These forces act on the mobile, unconsolidated

sediment that tends to focus in the centre of the waterbody, and therefore creating poorer water quality conditions. Increased plant growth in recent years however, extending out from the broad margins and towards the marked channel, has resulted in significant impacts on water user groups who access areas outside the marked channel. Between 2017 and 2019, low water levels exacerbated the issue, with water plants being brought closer to the water surface.

In 2017 abundant plant growth, in conjunction with unresolved issues for recreational users of the broad, gave rise to a proposal for an experimental water plant cut, outside of the marked channel. This trial was developed in consultation with Natural England (NE), Environment Agency (EA) and the landowner, Norfolk Wildlife Trust (NWT), brought together under the Hickling Broad Enhancement Project. Given the uncertainty and limited international scientific literature around the impacts of cutting stonewort, the proposal included a specific trial of cutting stonewort in Hickling Broad.

1.2 Aims and Objectives

The trial was built upon a significant body of earlier research into stonewort growth in Hickling Broad (Harris, 2000; Jackson, Georgiou & Crooks, 2001). The purpose of this trial was to provide a better understanding of the impact of repeat cutting on the height, density and overall integrity of the stonewort bed; the stonewort species composition within the bed; and to generate robust data to inform discussions around the future management of water plants.

To focus the data gathering and statistical analysis, it was hypothesised that, in comparison to control areas, cutting would result in a:

- a) reduction in overall plant height,
- b) reduction in overall plant cover,
- c) decrease in charophyte prevalence within the plant community.

The aim of this report is to summarise the findings of the three years of water plant monitoring conducted after cutting and produce recommendations for the future management of the water plant communities in Hickling Broad.

1.3 Project constraints

1.3.1 Cutting and collecting water plants

Routine cutting and collecting of water plants across the Broads is carried out with Berky type-6520 water plant harvesters; a work vessel with adjustable cutting bar height, reciprocating blades and integral conveyor belt system to collect the cut material. In terms of planning specific cutting operations, the geo-positioning of this type of vessel is highly influenced by wind; the overall limitations in manoeuvrability of a long vessel with a submerged and heavy cutter head attachment; and the absence of permanent marks by which to accurately locate in an open water environment. Typically, this type of vessel

operates best in straight lines, with the ability to raise and lower the cutter head. Given these constraints, the size, shape and location of the cut areas needed to be as simple and repeatable as possible, without demanding complicated locating by the operator.

1.3.2 Criteria for permission for cutting stoneworts

There are legal restrictions, as regulated by Natural England, on activities and developments that might affect a designated site such as Hickling Broad. Central to the project was the set of ecological criteria and thresholds, established in consultation with the Hickling Broad Enhancement Project board, which had to be achieved before any cutting could take place. These criteria were:-

- Water plants were causing problems reported by water users,
- “favourable condition” (as defined within the Conservation Regulations 2010) for stoneworts was being achieved within the open water unit of the Hickling Broad SSSI. This was specifically defined for this SSSI unit by Natural England as characteristic Chara species present at >60% of plant survey sample points in the Broads Authority’s June plant survey,
- A dense stonewort bed covered the study area,
- Plant growth reached within 60 cm of the water surface (at mean low water (MLW)).

2. Methodology

2.1 Experimental Design

Hydroacoustic and rake based water plant survey methods routinely used in Hickling Broad were reviewed and considered when developing this project's experimental design (see [Broads Annual Water Plant Survey Report 2016 \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk)). In 2016, hydroacoustic surveys identified a dense stonewort bed in the north western section of Hickling Broad. A central 2.4ha (100 x 240m) study area was designated across this area, this was then apportioned into discrete 'cut', 'non-cut' and 'control' plots. Ten cut and ten non-cut plots of 20x20m in size, were alternated in two parallel rows, giving a 'checkerboard' effect. Twenty adjacent 20x20m plots were treated as the control (see Figure 2).

2.2 Stonewort Cutting

In early summer 2017, the criteria for permission to cut stonewort were met. The experimental cut was undertaken on 26th July 2017. This mid-season cutting date was chosen to minimise the impact of cutting on the ability of the plants to over-winter successfully. Before cutting began, mean water level was obtained from Environment Agency water level telemetry data and referenced to gauge boards on the broad. This level was then used to set the cutter bar to the appropriate depth of 40cm above the bed. The [Environmental Operating Procedure 1: Water Plant Cutting](#) governed the cutting methodology and outlined operational safeguards for this experiment. The ten cut plots were mapped to generate GPS coordinates and provide clear operational instructions for the harvester operator. Hydroacoustic survey was conducted to gather the "before cutting" data. The water plants removed from each cut plot were sampled, with species identified, relative composition of the plant community estimated and wet weight measured.

Over 2018 and 2019 the ecological criteria (see Appendix 1) were not met that would permit repeat annual cutting, and the project was limited thereafter to monitoring only. The project concluded at the end of growing season in 2019.

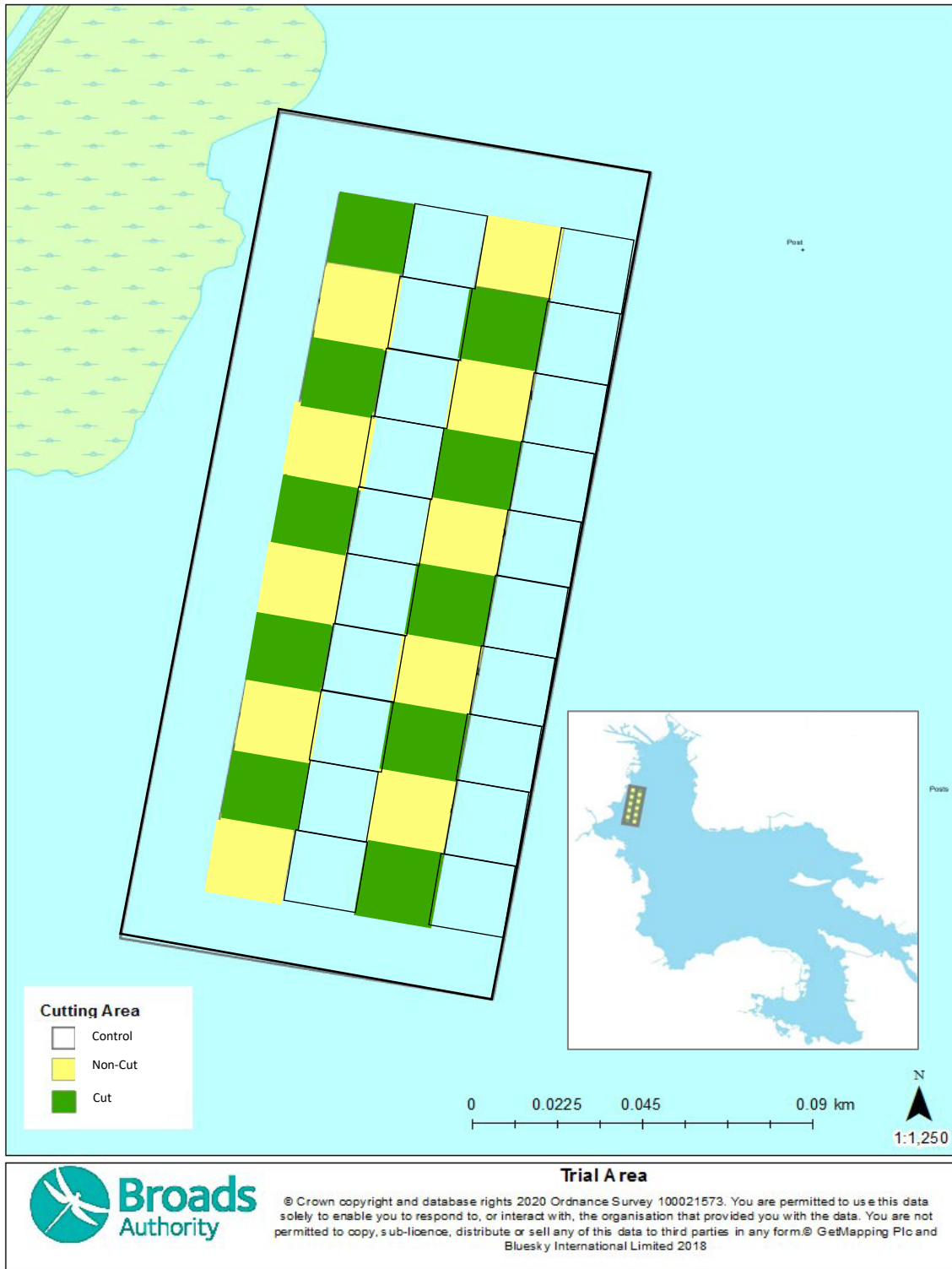


Figure 2: Checkerboard trial cut layout with control (light blue), non-cut (yellow) and cut plots (green) detailed

2.3 Monitoring

2.3.1 Hydroacoustic Surveys

Once the first water plant cutting had been completed, repeat hydroacoustic monitoring was undertaken, to quantify overall plant height, area covered and volume.

Hydroacoustic survey equipment, utilising sonar technology, is commonly used for detection, assessment, and monitoring of underwater physical and biological objects. Boat-mounted hydro-acoustic equipment can be utilised to detect the depth of a water body (bathymetry), as well as the presence or absence, distribution and size of underwater plants. Such survey equipment measures the range to an object and its relative size by producing a pulse of sound and measuring the time it takes for an echo to return from the object and the amplitude of the returned echo. The range is calculated as a function of the speed of sound and the time it takes for the echo to return.

The hydroacoustic surveys were conducted by navigating a survey boat along set transects across the study area, maintaining a constant speed. The equipment used in the surveys included a BioSonics DT-X, single beam (10°), 420 KHz transducer, with an on-board control unit and operating laptop. All data recorded was geo-referenced through connection to an external GPS receiver. This allowed subsequent quantitative analysis of the data using Sonar5-Pro post-processing software, developed specifically with a vegetation analysis component. The survey dates are presented in Table 2.

Using the Sonar5-Pro software, the sediment surface of each transect file was identified, as well as the less intense return derived from the upper surface of the water plants. Transects were divided into 1m sections to enable identification of the cut areas within the data and exclude any uncut areas on the boundaries of the Cut plots or where patches of plants had been missed by the cutter.

All features taller than 9 cm above the inferred sediment surface were recorded as water plants during data processing in order to reduce the likelihood of recording false positive results. This level was selected by adjusting the heights at 1 cm increments between 5 and 15 cm during the processing of the initial May survey. The outputs (frequency distribution) for cover (5% increments) at the different heights were assessed, with 9 cm the lowest value considered to produce a normal distribution pattern. The 9 cm threshold was then used for all surveys for consistency.

The derived results from the processing of the hydroacoustic data were then used to calculate water plant height, percentage cover (PAI) and percentage volume of plants within the water column (PVI). All water depth data was corrected for variation through reference to local water level datums. Overall means were calculated for each survey for the study area, the ten cut treatment plots (combined), the ten non-cut treatment plots and the control transects using geographic information system (GIS) software (ArcGIS).

Table 2: Details of the cutting and monitoring programme conducted from 2017-2019

Date	Activity	Purpose
2017		
25 July	Hydroacoustic survey	Pre-cut survey
27 July	Water plant cutting	Reduce growing plants height and volume
23 August	Hydroacoustic survey	First post-cut monitoring survey
26 September	Hydroacoustic survey	Second post-cut monitoring survey
17 October	Species ID survey	Species identification and abundance
24 October	Hydroacoustic survey	Final post-cut monitoring survey
2018		
14 May	Hydroacoustic survey	Survey to establish status of potential cutting
15 July	Species ID survey	Species identification and abundance
16 July	Hydroacoustic survey	Survey to establish status of potential cutting
20 August	Hydroacoustic survey	Monitoring survey
24 August	Species ID survey	Species identification and abundance
15 October	Hydroacoustic survey	Monitoring survey
2019		
1 May	Hydroacoustic survey	Monitoring survey
27 June	Species ID survey	Species identification and abundance
2 July	Hydroacoustic survey	Monitoring survey
22 August	Species ID survey	Species identification and abundance
11 October	Species ID survey	Species identification and abundance
14 October	Hydroacoustic survey	Monitoring survey

2.3.2 Species Identification Surveys

Two rake survey throws were undertaken within each cut plot to identify species present and quantify the relative abundance of each species. The methodology to generate the species abundance values, was as per the annual Broads water plant survey [Broads Annual Water Plant Monitoring Report 2019.pdf \(www.broads-authority.gov.uk\)](#). The dates of the species identification surveys are presented in Table 2.

Replicate species survey were carried out in the control areas in 2019. To provide the background and context to the water plant community across the wider broad, data on species present and their relative abundance was utilised from the routine annual water plant surveys.

2.4 Statistical Analysis

All statistical analysis of data across all three years of the trial was undertaken in R v. 4.2.2. The data did not follow a normal distribution and data transformation failed to produce a suitably normally distributed dataset. Consequently, Mann-Witney U tests were used to identify any statistically significant differences between the different plot types plots.

3. Results & Discussion

3.1 Consolidation of Treatment Plots

The cutting trial was originally undertaken based on a checkerboard design that allowed for 'non-cut', 'cut' and 'control' plots. On investigation of the data, it was found that there was little difference between the non-cut and cut plots over each trial month.

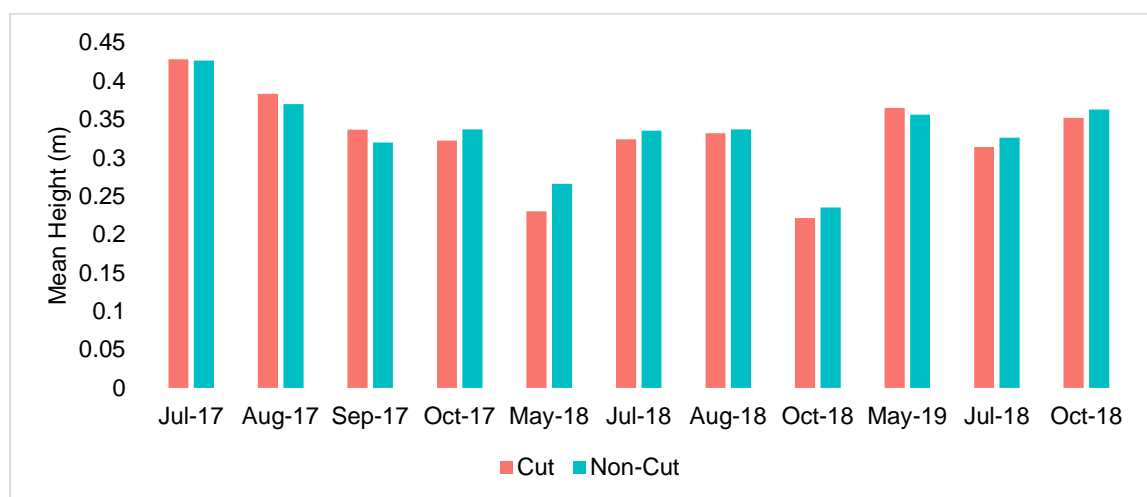


Figure 3: Average plant height between 'cut' and 'non-cut' treatment plots over the trial period.

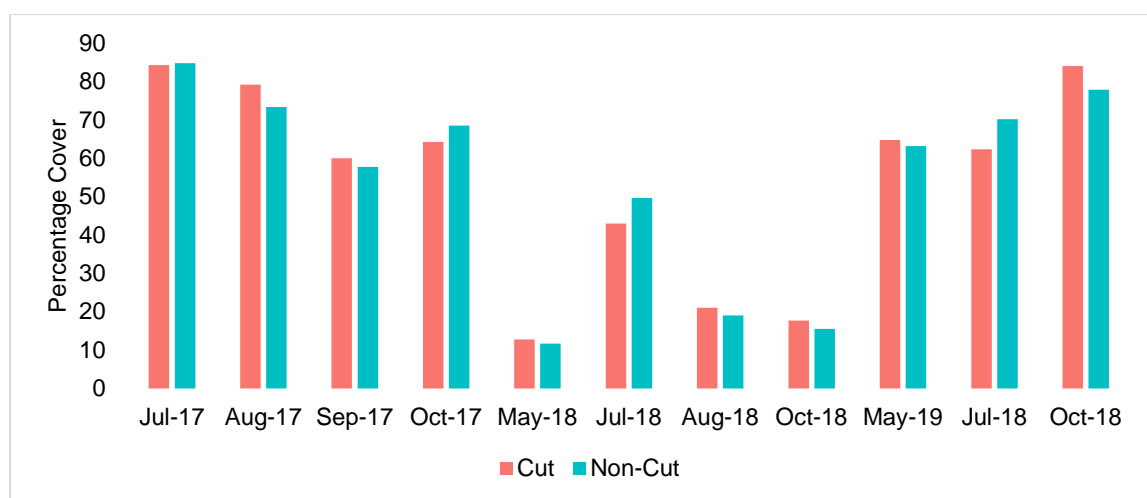


Figure 4: Average percentage cover between 'cut' and 'non-cut' treatment plots over the trial period.

Mann-Whitney U tests identified no statistically significant difference in mean plant height and percentage cover between cut and non-cut plots through 2017 and 2019. A statistically significant difference was identified in mean height between the cut and non-cut plots from August to October 2017 (Table 3). In 2018, no statistically significant differences were observed in percentage cover across the cut and non-cut plots. In July 2019 a statistically

significant difference was observed between the cut and non-cut plots ($W = 68984$, $P < 0.001$). However, this was not seen in any of the other trial months in 2019 (Table 3)

Table 3: Mann-Whitney U values (W) for mean plant height and percentage cover across the Non-Cut and Cut plots over each trial month.

Month	Mean Height (av.)		Percentage Cover (av.)	
	W	Significance	W	Significance
Jul-17	502318	0.5123	492110	0.8678
Aug-17	477076	0.7672	450072	<0.05*
Sep-17	296797	0.05432	296449	<0.05*
Oct-17	351968	0.08166	363686	<0.001*
May-18	5064.5	0.08926	4049.5	0.2891
Jul-18	47529	0.3154	49069	0.08319
Aug-18	9607	0.6579	8674.5	0.3321
Oct-18	4495	0.3215	4635	0.5199
May-19	68582	0.4349	36580	0.3904
Jul-19	63014	0.249	68984	<0.001*
Oct-19	34306	<0.05*	65019	0.534

Given the lack of statistically significant differences between the non-cut and cut plots outside of the summer and autumn months of 2017, it was decided to combine the two separate plots into one 'treatment' block. Non-cut and cut plots thereafter formed the combined treatment area to be compared against the control. This also had the advantage of equalising the number of treatment plots (20) to the number of control plots (20), which helped to meet the assumptions in the subsequent statistical testing.

3.2 Plant Height

In the initial pre-cut survey, mean plant height in the treatment blocks was found to be 3 cm lower than in the control blocks prior to cutting in 2017. This height difference was statistically significant ($W = 2082409$, $P < 0.001$, see Table 4). Following cutting, the treatment blocks were still significantly shorter than the control in August and September 2017, but the difference between the treatment and control increased to approximately 7-8 cm. By October this statistically significant difference in height was no longer observed (See Figure 5). No difference between the treatment and control plots was observed through the

spring and summer of 2018. A small difference was found in October 2018 ($W = 28363$, $P < 0.05$). In 2019, no statistically significant difference was observed between the control and treatment plots in May or October. A statistically significant difference between the plots was found in July 2019 ($W = 258626$, $P < 0.001$), however it was found that this occurred because of higher plant growth in the treatment plots compared to the control plots.

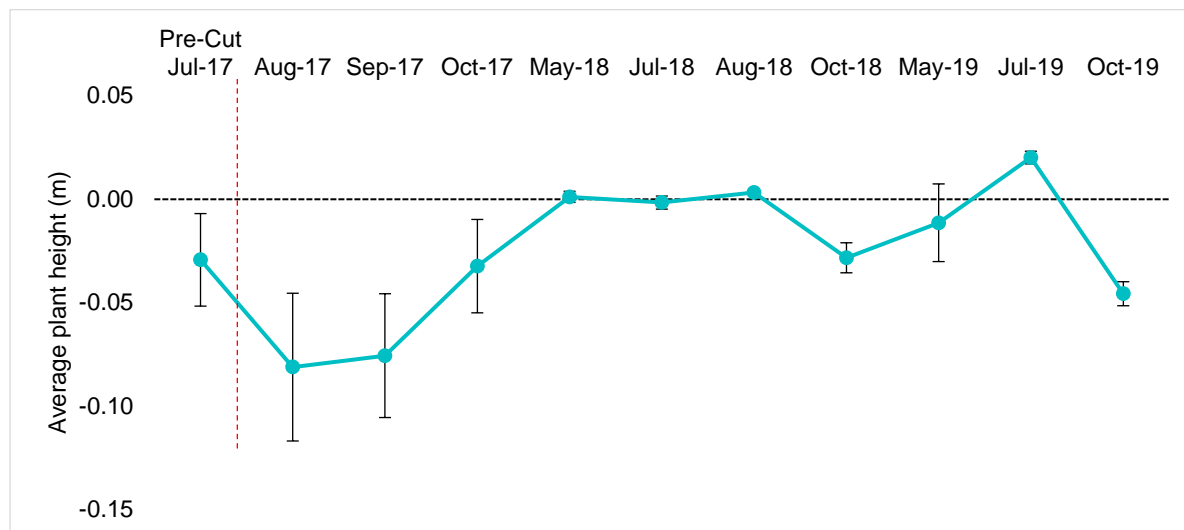


Figure 5: Line graph illustrating the variation in average plant height between treatment and control blocks across all trial months. Red dashed vertical line indicates the point of the cut. Error bars reflect the standard deviation of each point.

Table 4: Mann-Whitney U values (W) and associated significance levels for plant height. * indicates statistically significant results.

Year	Month	W	Significance
2017	July	2082409	< 0.001*
	August	1638887	< 0.001*
	September	1578917	< 0.001*
	October	1530538	2.79
2018	May	23672	0.08
	July	182170	0.85
	August	55576	0.43
	October	28363	< 0.05*
2019	May	288015	6.04
	July	258626	< 0.001*
	October	357286	4.93

With the height data bulked for each calendar year, average plant height was lower in the treatment plots in 2017 by around 14 cm compared to control. This equates to about a 12% difference in height. In 2018 and 2019 there was little observable difference in height between treatment and control (see Figure 6). 2019, the treatment plots were only 3% lower in height compared to control, but not to any statistically significant level.

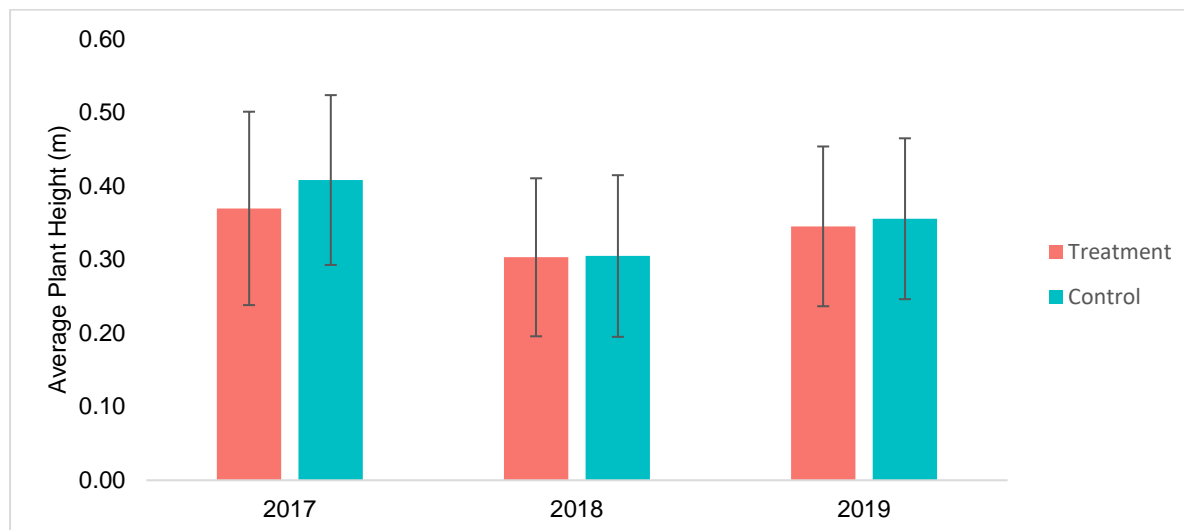


Figure 6: Bar graph illustrating average plant height between treatment and control blocks across the period of the cutting trial.

3.3 Plant Cover

From the individual surveys, significant differences in percentage cover between the control and treatment plots was observed throughout much of the study. For two years after the cutting, the treatment plots had significantly lower percentage cover of plants compared to control (see Figure 7 and Table 5). The reduced cover of plants was greatest in the late summer of 2017 and 2018. By May 2019, the continued pattern of reduced percentage cover of plants was no longer apparent in the treatment plots.

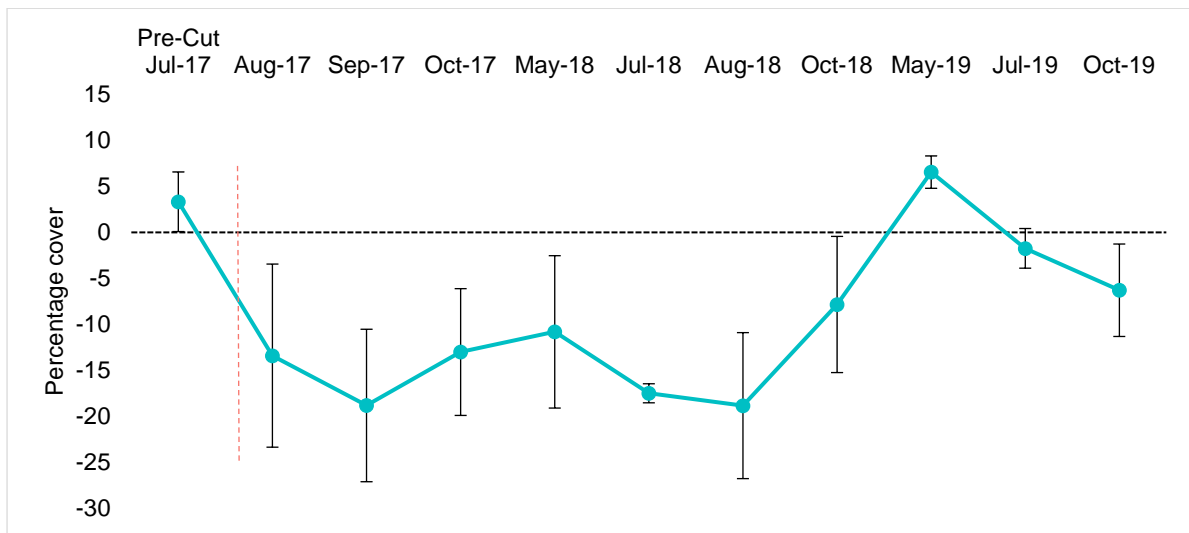


Figure 7: Line graph illustrating the difference in average percentage cover in the treatment plots (blue line) compared to control (black zero line). (red dashed line indicates when cutting occurred)

Table 5: Mann-Whitney U values (W) and associated significance levels for percentage cover. * indicates statistically significant results.

Year	Month	W	Significance
2017	July	1588858	<0.05*
	August	1445819	<0.001*
	September	1824486	<0.001*
	October	1985436	<0.001*
2018	May	329739	1.93
	July	360876	<0.001*
	August	349376	<0.001*
	October	286523	<0.001*
2019	May	286572	6.55
	July	357329	0.05*
	October	388726	1.982

With the percentage cover data bulked for each calendar year, the 2017 treatment plots had approximately 17% less plant cover compared to control. This had increased to 36% less cover in 2018. Note the lower red bars in Figure 8 for 2017 and 2018. However, by 2019 the plant cover was very similar between treatment and control with very similar variance for each.

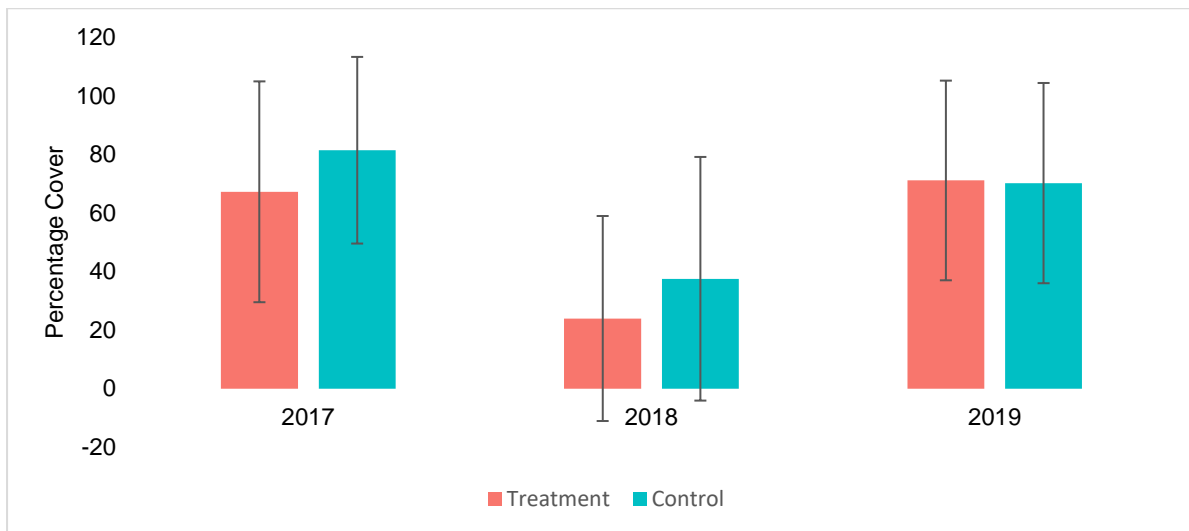


Figure 8: Bar graph showing annual average percentage cover of water plants between treatment and control

3.4 Species Composition

Species surveys supported the hydroacoustic monitoring of the treatment plots over the monitoring period. However, when it came to full analysis of the data, it became apparent that over the three years of monitoring, variations in how species data was gathered and quantified had occurred. As a result, a more limited data set is presented than set out in the methodology.

Figure 9 shows the variation over the monitoring period of intermediate stonewort, which has the scientific name *Chara intermedia*. *Chara intermedia* was initially the dominant stonewort species present in the experimental cutting area. The method used to quantify plant abundance was the same as used in the routine Broads annual water plant survey. In 2017 *Chara intermedia* had a greater abundance in the experimental cutting area compared to the whole of the broad. This is perhaps unsurprising, as the broad encompasses many different areas of mixed species, bare sediment areas and sample points within the marked channel. The experimental cutting was focussed within a large and contiguous stonewort bed.

However, by 2018 a significant drop in the abundance of *Chara intermedia* was observed in the treatment plots. This was mirrored by a similar trend across the broad a whole. Whilst the abundance of *Chara intermedia* increased again in 2019 in the treatment plots, it was still less abundant compared to 2017 (Figure 9). Given the similar patterns in the abundance of *Chara intermedia* over the three years, it would suggest that 2018 was generally a poorer year for *Chara intermedia* across the whole broad and not just in the treatment plots.

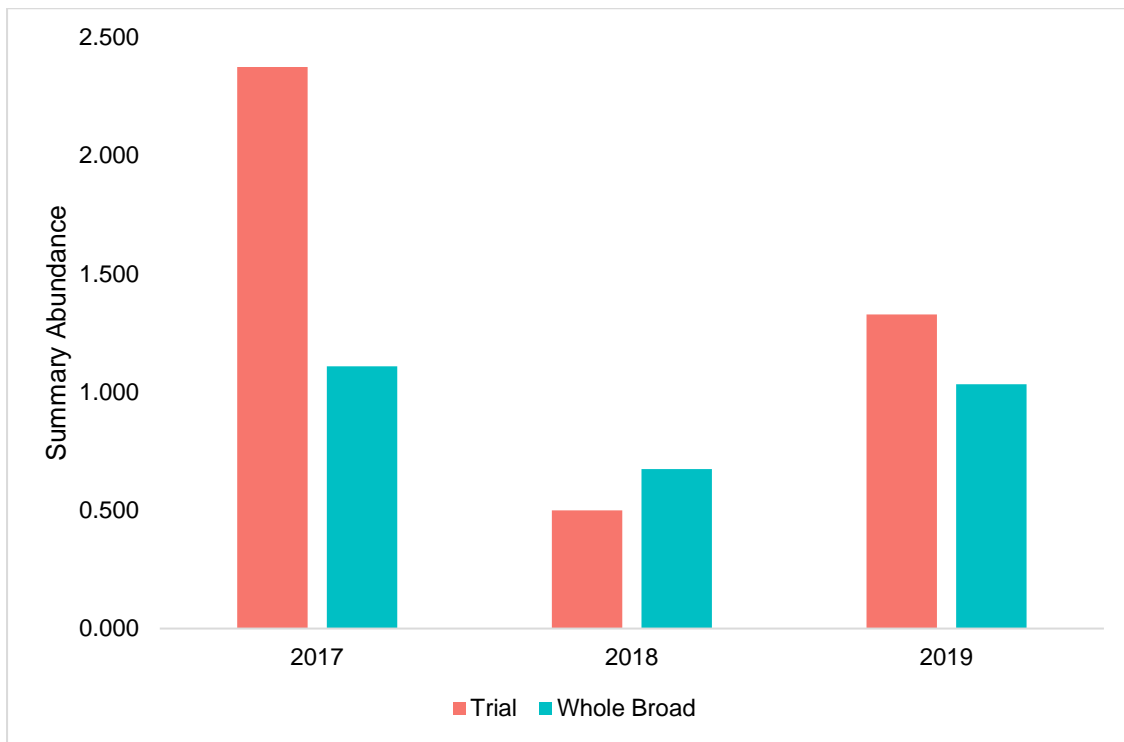


Figure 9: Abundance of intermediate stonewort in the treatment plots (red bars) and the whole broad survey (green bars)

The other consistently collected data was the relative abundance of the water plant species within the cut plots during 2017 and 2019 (Figures 10 and 11). Both years had 20 separate samples collected in the cut plots. Figure 10 shows the dominance of *Chara intermedia* in the cut plots during 2017, comprising 72% of the total abundance of all water plants. The second most abundant species was Baltic stonewort (*Chara baltica*), at 14%. In 2017 all stonewort species combined made up 93% of the total abundance of water plants species in the cut plots.

2017

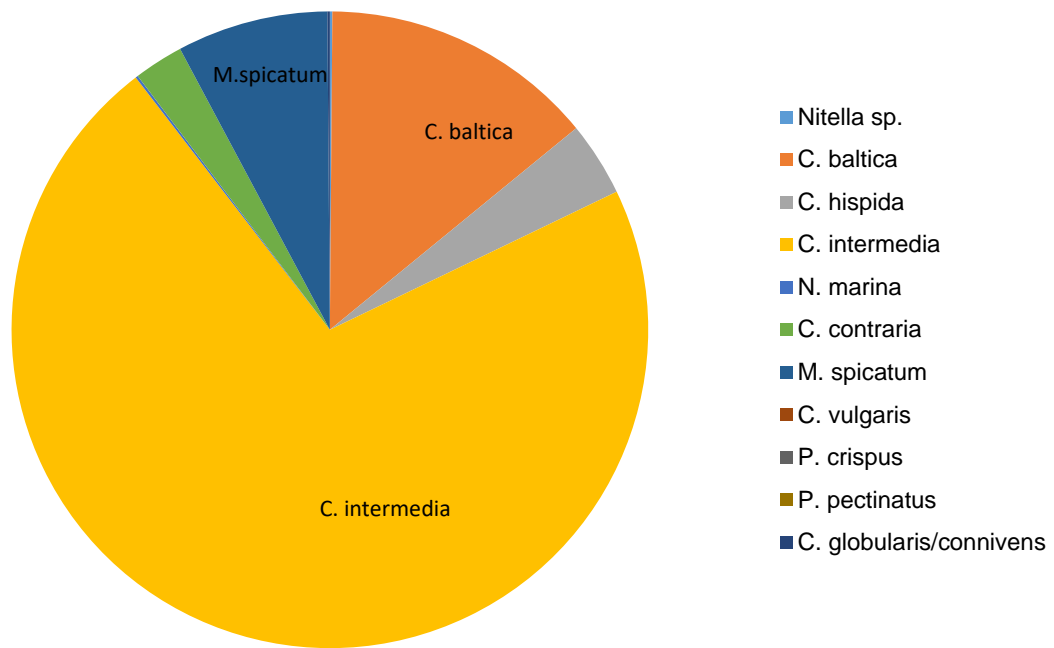


Figure 10: Relative abundance of plant species in "cut" plots during 2017

By 2019, the abundance of stonewort species in the cut plots had reduced to 46% of the whole water plant community. Presence of holly-leaved naiad (*Najas marina*) and spiked water milfoil (*Myriophyllum spicatum*) had increased, largely at the expense of *Chara intermedia*.

2019

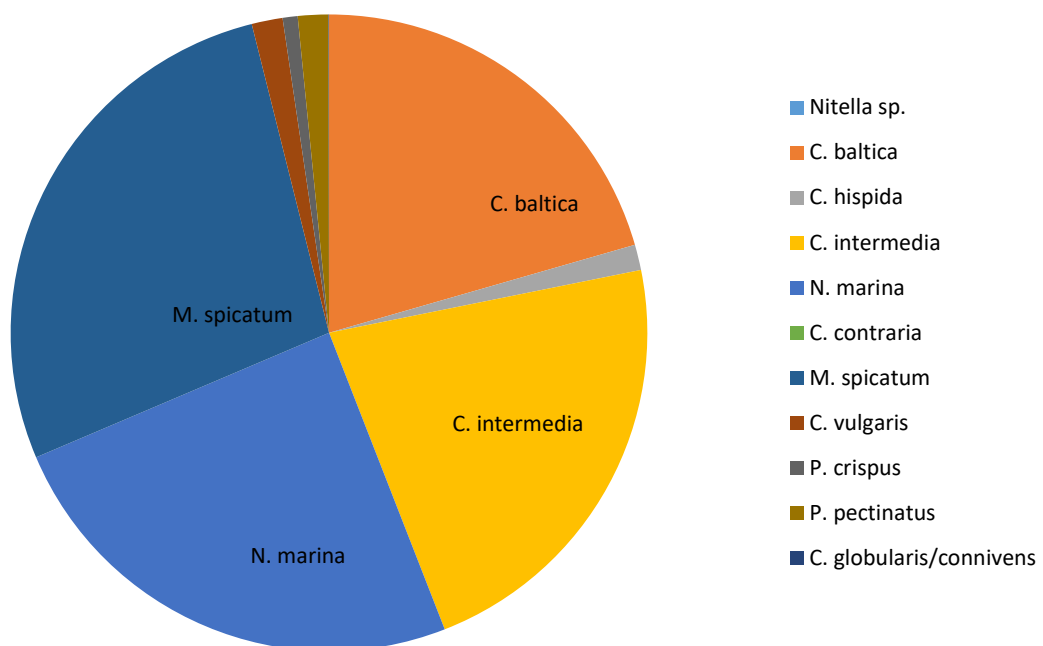


Figure 11: Relative abundance of plant species in "cut" plots during 2019

In comparison with the composition of the water plant community the whole broad (see [Broads Annual Water Plant Monitoring Report 2019.pdf \(www.broads-authority.gov.uk\)](http://www.broads-authority.gov.uk), graph 4 for Hickling), there was not a similar decline in stonewort species in the broad, as observed in the cut plots over the monitoring period. In 2017 stoneworts made up 41% of the total abundance across the broad. In 2019 this had increased slightly to 49%. This indicates that there was not a wider shift from stoneworts to other vascular plant species across the whole broad, and that the decrease in stoneworts observed within the cut plots was a local one. Whilst this observation is gained from data from just two years and cannot have the same kind of statistical treatment applied, due to the type of numerical data and the way in which it was collected, we can see that something happened within the cut plot areas to radically alter the plant community.

From the plant community composition data for 2017 and 2019, the Shannon-Weiner Diversity Index (H) was calculated. This index ranges from 0, which is low diversity, to 1, which is high species diversity.

Table 6. Shannon-Weiner diversity indices for plant community data in experimental plots

Plot type	2017	2019
Control	No Data	0.04
Cut	0.32	0.46

In the control plots in 2019 the Shannon-Weiner Index was very low (close to 0), suggesting dominance presence of a restricted range of species, as is typical in a stonewort bed. Compared to control, species diversity was significantly greater in the cut plots, $H = 0.46$. The greater species diversity in the cut plots is supported by the range and proportion of species shown graphically in Figure 11.

Between years in the cut plots, the Shannon-Weiner Index increased from, 0.32 in 2017 to 0.46 in 2019. Stonewort beds characteristically have relatively low species diversity (H closer to 0), so the increase in the Shannon-Weiner Index over time does not correspond with the conservation objectives for the site of stable, low diversity stonewort bed. The number of plant species present in the cut plots increased between 2017 and 2019. The increased Shannon-Weiner Index in 2019 was influenced by presence holly-leaved naiad (*Najas marina*), curled pondweed (*Potamogeton crispus*) and fennel-leaved pondweed (*Potamogeton pectinatus*)

The main conclusion from the experimental cutting area is that there was a large shift in the dominant species from *Chara intermedia* in 2017 to *Myriophyllum spicatum* in 2019.

In comparison to the trial cut area, there was no particular increase in the non-charophyte species recorded across the whole of Hickling Broad in the annual water plant survey from 2019.

4. Conclusion

Cutting had an immediate effect on plant height and cover. The checkerboard design of the initial “cut and “non-cut” plots as separate treatments, was shown to be a weakness in the experimental design and the data from these two plot types was successfully combined. The control plots were in close proximity to the treatments, but through robust statistical analysis of plant height and cover, the control was shown to be reliable. Planned repeat cuts of the water plants was not possible, as conditions in the wider broad changed. This took the experiment outside of the permitted criteria (see Appendix 1) in which repeat cutting could occur. However, hydroacoustic monitoring continued for three seasons after the cutting event, providing valuable data on the response of water plants to this impact.

The key findings of this trial are summarised, and whether each hypothesis could be supported.

4.1 Plant Height

The cutting did affect the mean height of water plants during the study period. In 2017 statistically significant differences were identified between treatment and control plots during the first season following cutting, but these were not observed in the following years.

The hypothesis that cutting would result in a reduction in overall plant height is supported by statistically significant differences in plant height, when compared to the control area, but only for a time-limited duration of one growth season.

4.2 Plant Cover

Percentage cover of plants was significantly lower in the treatment plots for two seasons following cutting. By the third season (2019) differences in cover were not apparent.

The hypothesis that cutting would result in a reduction in overall plant cover is supported by statistically significant differences in plant height, when compared to the control area, but only for a time-limited duration of two growth seasons.

4.3 Species composition

In the treatment plots, dominance by stonewort species, particularly *Chara intermedia*, had changed two years after cutting, to a more even mix of stoneworts and other vascular plants, mainly holly-leaved-naiad and spiked water milfoil. From the limited, but comparable species data in the cut plots, Shannon-Weiner Diversity Index indicates an overall increase in water plant diversity between 2017 and 2019. Increased species diversity the context of stonewort dominated plant beds is a negative trend in conservation terms, as it indicated

other vascular and perhaps more common species have established in what was once dense stonewort growth.

The hypothesis that cutting would result in a decrease in charophyte prevalence within the plant community is not supported statistically, but the data gathered shows that the plant community in cut plots was more diverse, and contained less stonewort, than in control areas.

Appendix 1: Charophyte Cutting Decision Process

Table showing the decision process for the experimental chara cut.

Year 1		Years 2 & 3	
Are water plants causing a problem for water users within the priority area?		Is there clear evidence that the previous year's trial cut impacted on the cover and growth of charophytes in the study area?	
Yes	No	Yes	No
Have Favourable Condition targets for Chara community been met?			Are water plants causing a problem for water users within the priority area?
Yes	No	No	Yes
Is there a 2.3 ha contiguous Chara bed with plants within 60 cm of the water surface?			Have Favourable Condition targets been met?
Yes	No	No	Yes
Start experimental charophyte cutting & monitoring programme	No charophyte cutting		Is there a 2.3 ha bed with plants 60 cm in height?
		No	Yes
		No cutting required. Continue with monitoring programme	Recommence cutting and monitoring programme

Appendix 2: Species List

Species list for species ID surveys undertaken across all three years of the trial

Scientific Name	Common Name
<i>Chara baltica</i>	Baltic stonewort
<i>Chara globularis/connivens</i>	Fragile/convergent stonewort
<i>Chara hispida</i>	Bristly stonewort
<i>Chara intermedia</i>	Intermediate stonewort
<i>Chara sp.</i>	Chara species
<i>Chara vulgaris</i>	Common stonewort
<i>Myriophyllum spicatum</i>	Spiked water milfoil
<i>Najas marina</i>	Holly-leaved naiad
<i>Potamogeton crispus</i>	Curled pondweed
<i>Potamogeton pectinatus</i>	Fennel-leaved pondweed
<i>Chara contraria</i>	Opposite stonewort

Method Statement

Task:	Water Plant Harvesting – Upper Bure	
Job Code:	Site Location:	Grid Reference & What 3 Words:
NAV BUR	River Bure	From: TG 26746 19452 (train.loss.invoices) To: TG 29552 17213 (townhouse remodel.dairy)
Proposed Start Date:	Proposed Duration:	Completion Date
May/June	4 months	September
Main contact for task:	Erica Murray 07789954147	

Description of Works (Methodology & Sequence of work):

Specification

- Cutting Height

Cutting height for the **River Bure** is specified as **no lower than 30cm above the bed** to preserve the aquatic macrophytes. The maximum cutting depth of the water plant harvester is 150 cm; good practice to periodically check water depth as channel depth could be deeper or shallower than specified.

- Margin

Between Horstead and Wroxham the river is between 13m and 27m wide – **leave 3m uncut margin from either bank**

Please note: Operator judgment is needed when channel depth or width become lower/smaller.

See Additional Maps section for further information regarding cutting at specific locations

Working method

Cutting:

- Only cut aquatic plants if they are causing a navigation issue
- Only cut aquatic plants to specified depth - check gauge boards for water depth prior to cutting and adjust cutting height as necessary to ensure plants are cut no lower than 30cm above the river bed
- Propellers to be raised to the surface when navigating at river margins, particularly when collecting fragments of cut plants that are floating on the surface
- All cut material must be removed from the river and placed on the river bank

Disposal:

- Cut material can be disposed of at the designated disposal sites only (see maps).
- It is not best practise to pile the material too high. Piles to be no higher than 1m after final disposal.
- Where space allows, disposal area should be split so only half of the bank stretch is used each year.
- Dispose of one load then move along to the adjacent section of bank to limit disturbance to the reeded edge.
- Cut material should be placed on the top of the bank to the furthest extent that the conveyor belt can reach; this is c.2.5 to 3m for the Harris & Megan harvesters. This distance ensures that the material remains on the bank whilst allowing mobile invertebrates to escape back into the river.

Be aware of any nesting birds in the marginal vegetation. Coots and Great Crested Grebes commonly nest in floating vegetation on the water, and warblers and Reed Buntings commonly nest in the taller marginal vegetation. **If any birds are seen nesting within 10m of the works area, an Ecologist should be called.**

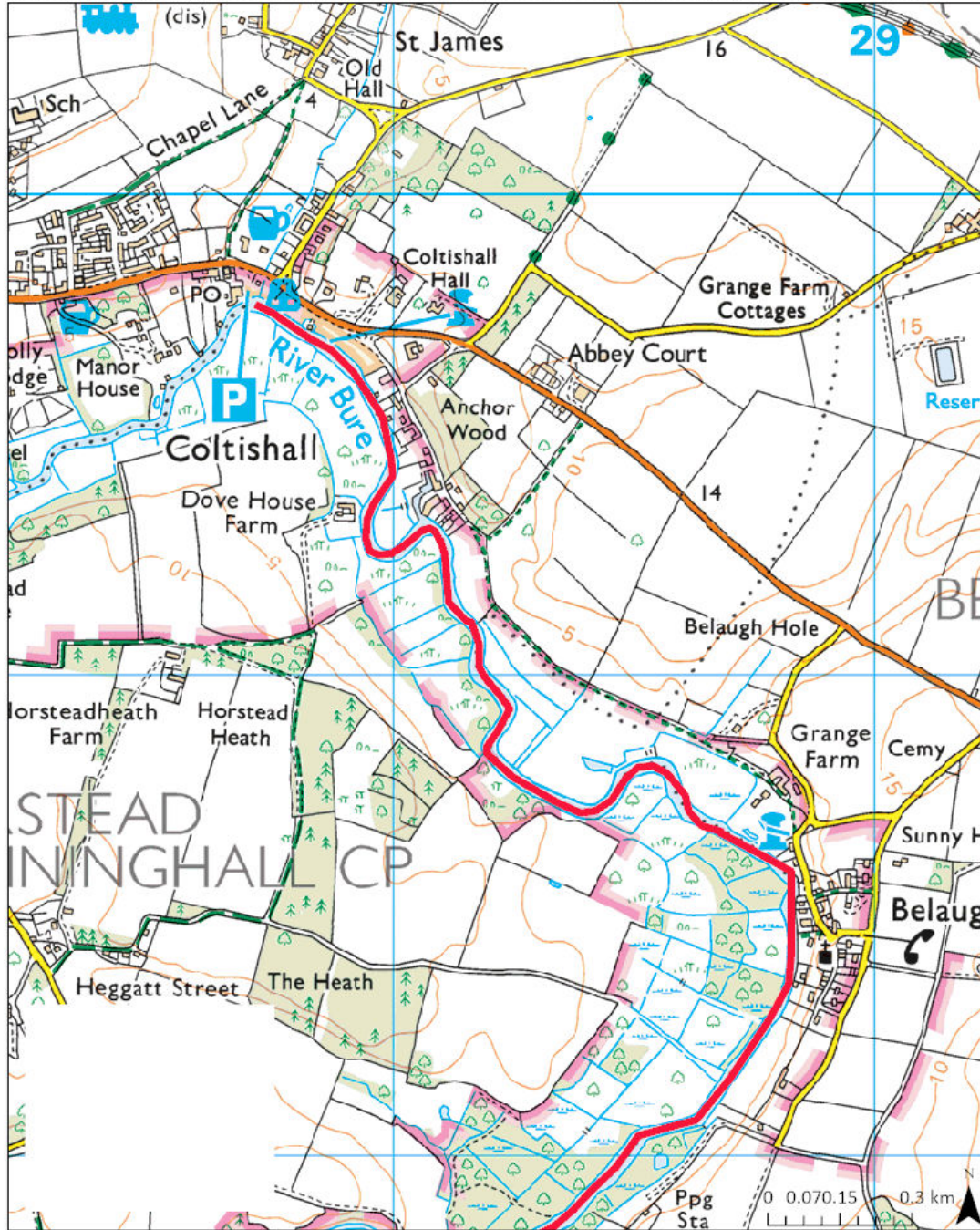
PLEASE SEE DOCUMENTATION FOR OPERATION TO MONITOR WATER TEMP & DISSOLVED OXYGEN TO ASSESS SUITABLE CUTTING CONDITONS.

Method Statement

Aquatic Plant Harvester Route - Coltishall to Belaugh

Scale: 1:10,000

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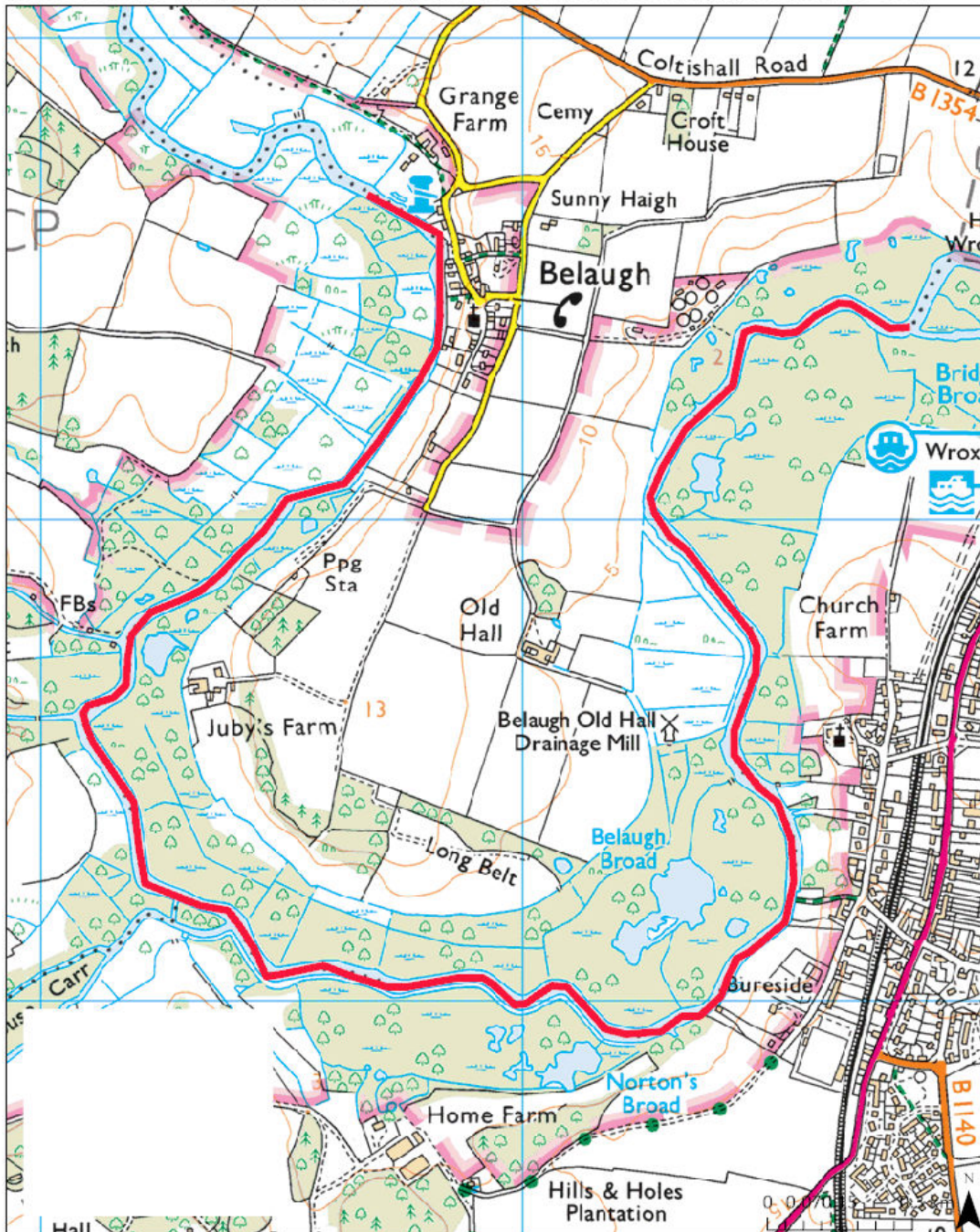
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Method Statement

Aquatic Plant Harvester Route - Belaugh to Bridge Broad

Scale: 1:10,000

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Method Statement

Operational Details (Access, Egress, Materials, Plant, Equipment & Storage):	
2.	Directions to site; see maps
3.	Directions to work areas; see maps
4.	Work area specific hazards listed; Nesting Birds & boat traffic
5.	Temporary works identified; none
6.	Explicit instructions if fires are planned; none
7.	Way out; see maps

Site Emergency Plan:	..\..\..\Management\Operational Safety Files\Site Emergency Plans & Hazard Maps\UpperBure_Site_Emergency_Plan.doc
Risk Assessment:	Senior OpTech to complete
COSHH Assessments:	
Consents Obtained:	Cutting area and disposal sites are not within a designated site so permission from NE is not required.
Contractors Details:	n/a
Plant/Materials Required:	Aquatic plant harvester, associated PPE
Biosecurity or Waste requirements:	To reduce the risk of the invasive Killer Shrimp, <i>Dikerogammarus villosus</i> , being spread to other aquatic sites in the Broads, the machine should be steamed cleaned once it has finished work on the River Bure.
Site Welfare Requirements: (Portaloo if >5 working days)	<i>(NB: Tarps can be collected from Dockyard for shelter)</i>
Arrangements for the Public:	n/a
Other Site Contact Details or Information:	<ul style="list-style-type: none"> • ESOP 1 – Cutting Aquatic Water Plants • ESOP 2 – Biosecurity • ESOP 13 – Breeding bird mitigation • Sediment Management Strategy – a standard 3m margin is left to either bank where the river width can accommodate this. <p>Op Techs – please record on map which parts actually required cutting, and how many loads were deposited at each disposal point.</p>

	Signature	Date
Ecologist	Erica Murray	17/02/2023
Supervisors	<i>Sue Stephens</i>	03/04/2023

Additional Maps & Drawings:

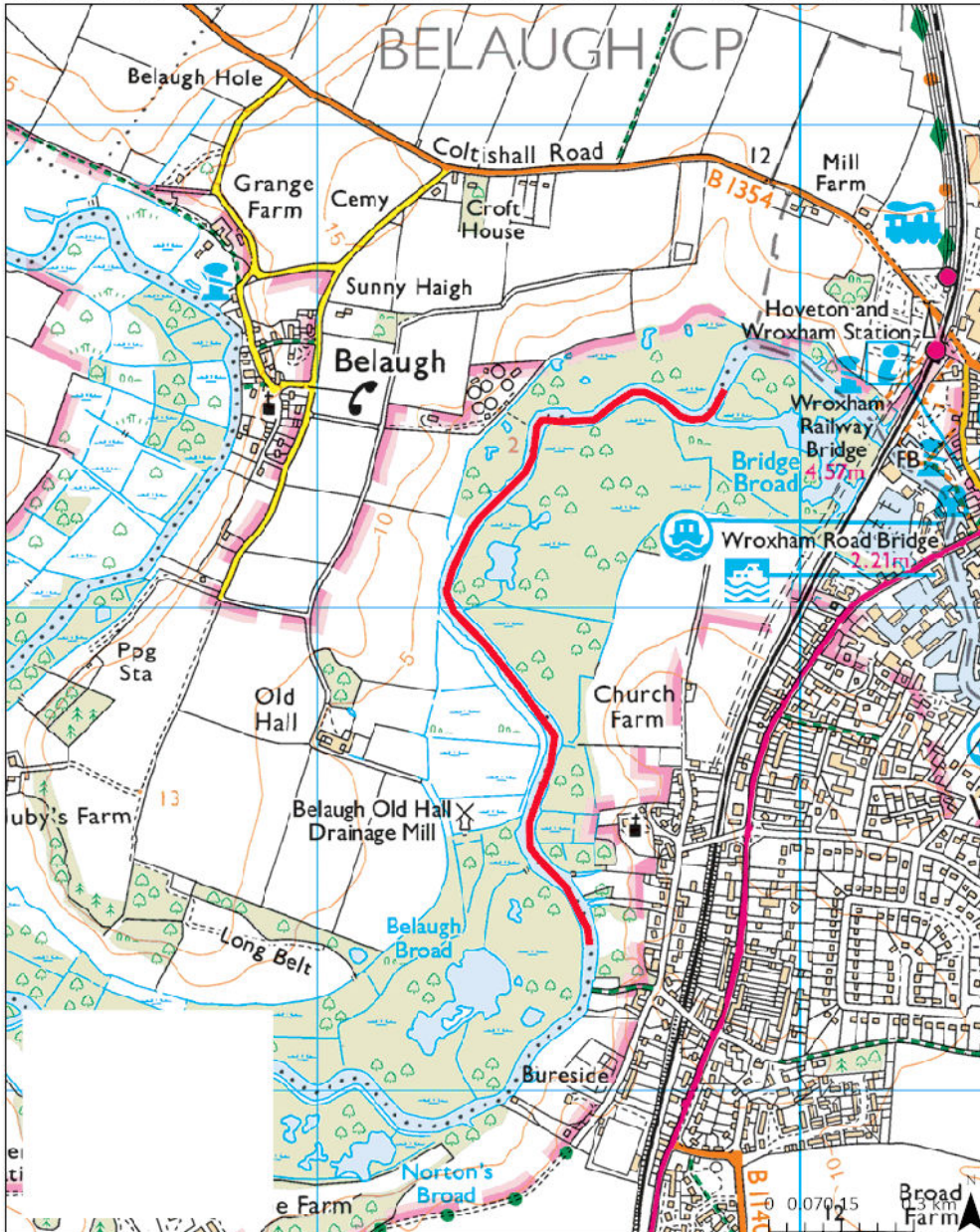
Locations where aquatic plant cutting can take place at the harvester operators' discretion:

- between Bridge Broad & Caen Meadow
- the bends upstream of Caen Meadow towards Belaugh

Aquatic Plant Harvester route - Bridge Broad to Caen Meadow

Scale: 1:10,000

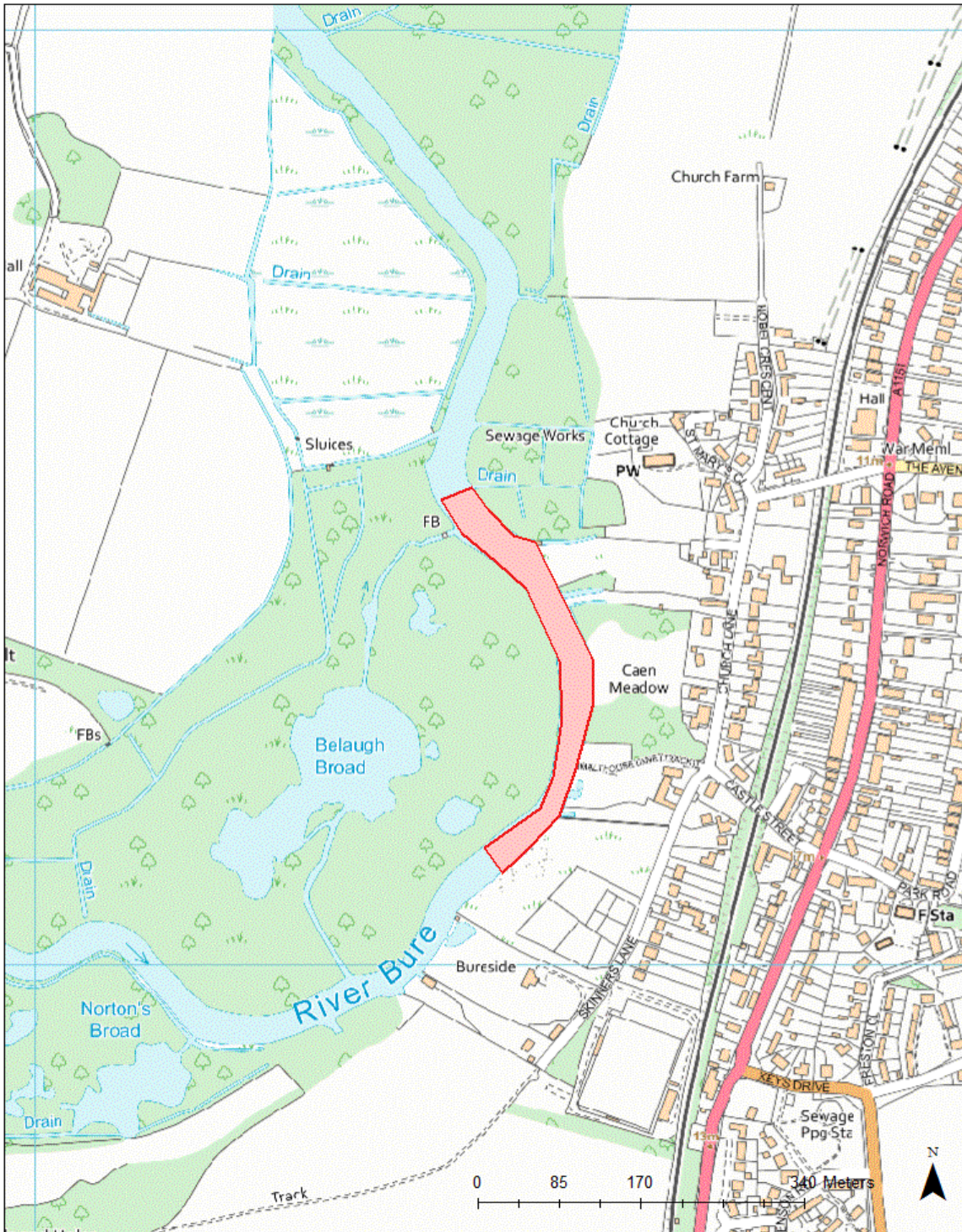
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Method Statement

- Cutting area near Caen Meadow: Cutting section mainly on bends either side of Caen Meadow.



Caen Meadow Weedharvester cutting zone

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Caen Meadow Disposal Site

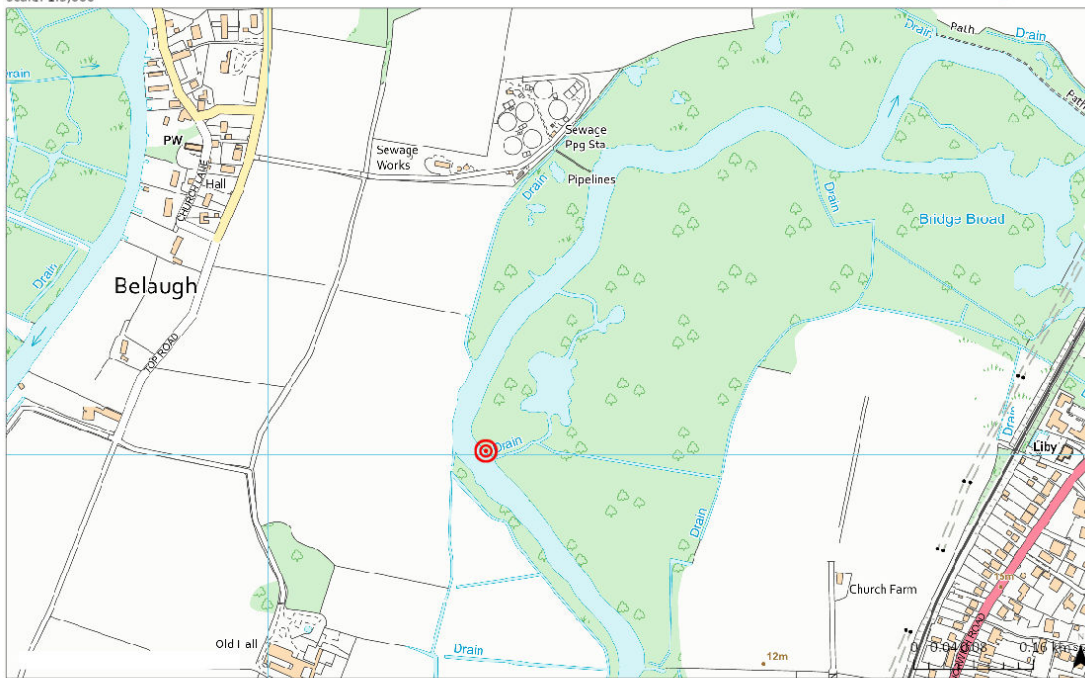


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New - Disposal point between Bridge Broad & Caen Meadow

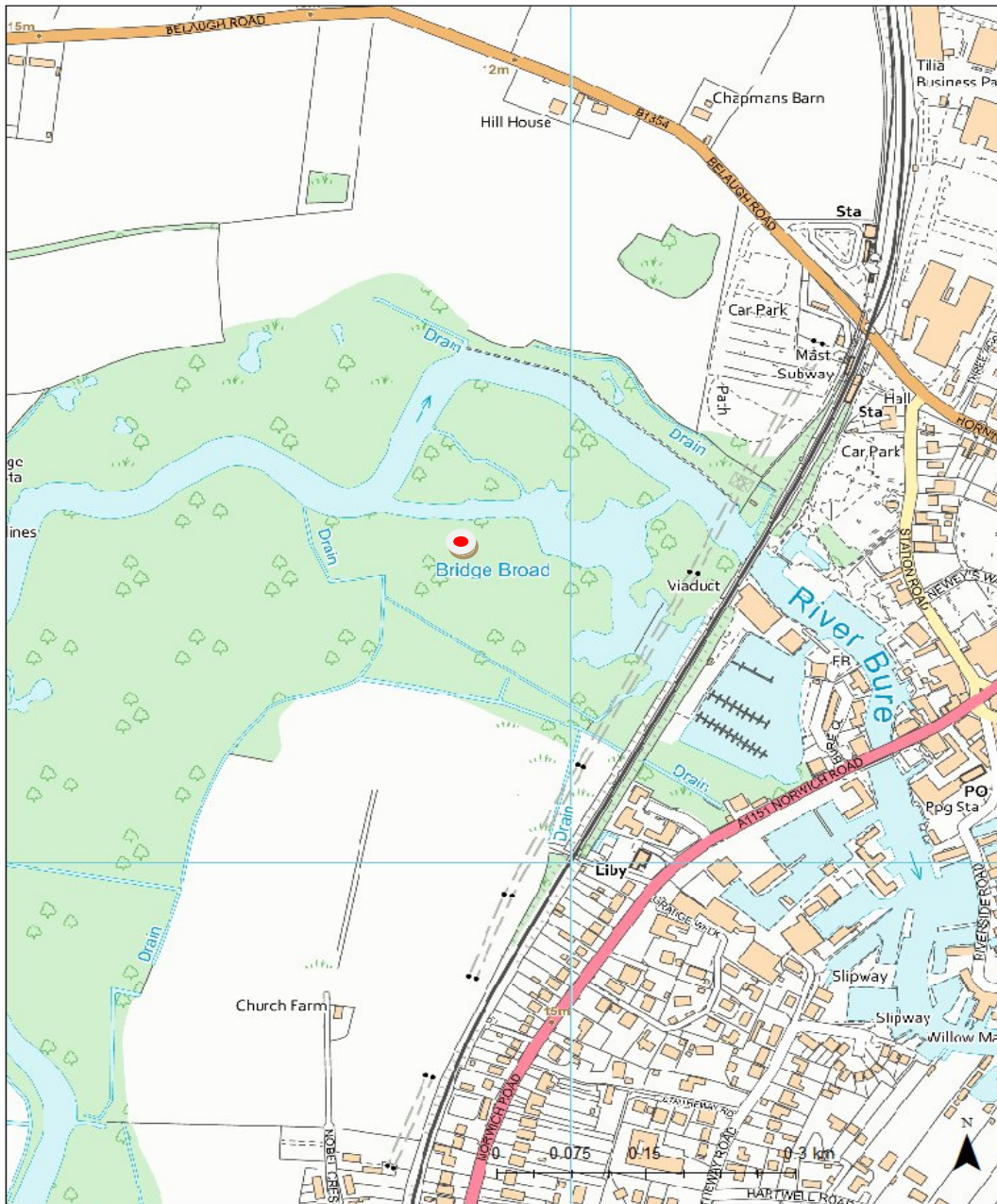
Disposal Point between Bridge Broad and Caen Meadow

Scale: 1:5,000



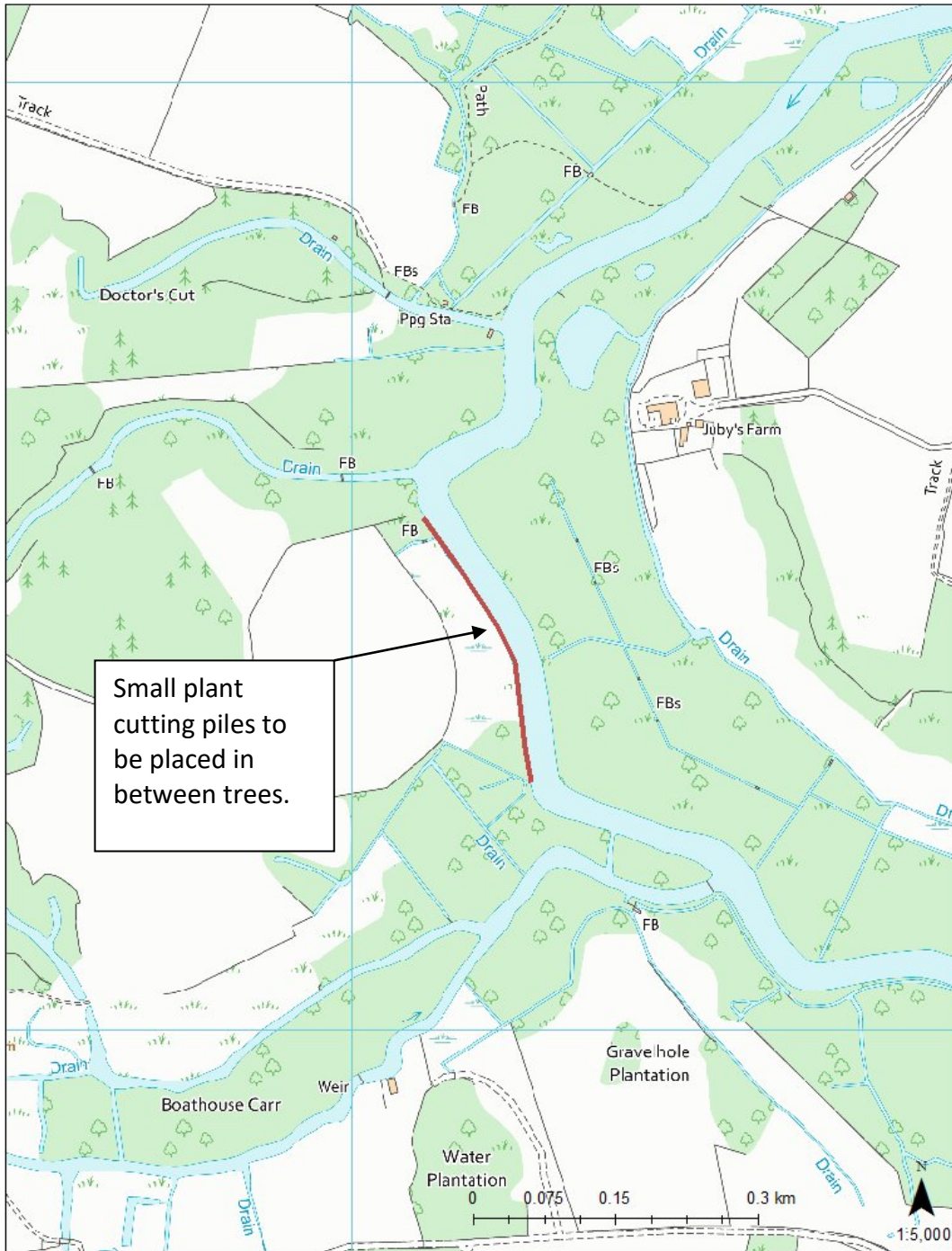
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Bridge Broad Disposal Site



Bridge Broad disposal site (marked with red circle).

Disposal site between Belaugh & Caen Meadow



Disposal point between Belaugh & Caen Meadow

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Navigation Committee

08 June 2023

Agenda item number 9

Construction, Maintenance & Ecology work programme progress update

Report by Head of Construction, Maintenance & Ecology, and Ecology & Design Supervisor

Purpose

To give an update on the Broads Authority's management activities to maintain public navigation, develop mooring facilities for public use and demonstrate the effective use of available resources in managing the Broads waterways. Members are asked to give their preference in response to the question posed in section 1.3.

Broads Plan context

C1: Maintain navigation water depths to defined specifications, reduce sediment input, and dispose of dredged material in sustainable and beneficial ways.

C2: Maintain existing navigation water space and develop appropriate opportunities to extend access for various types of craft.

C3: Manage water plants, riverside trees and scrub, and seek resources to increase operational targets.

C4: Maintain and improve safety and security standards and user behaviour on the waterways

Contents

1.	Maintaining water depths for navigation	2
2.	Maintaining safe public mooring facilities	3
3.	Our resources	3
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	Appendix 1 – Final annual dredging figures 2022-23 (April 2022 to end March 2023)	5
	Appendix 2 – Final percentage of operational staff time spent on navigation work types (year April 2022 – March 2023)	7
	Appendix 3 – Annual dredging plan 2023-24	8

1. Maintaining water depths for navigation

- 1.1. The detailed breakdown in Appendix 1 gives progress and volumes for the dredging programme for the whole of 2022/23 (April 2022 to end March 2023). A total of 41,870 m³ of dredged sediment was removed from the prioritised sites. This figure represents 141% of the programmed target of 29,750 m³ for the year. The additional sediment volume dredged has largely been due to a significant change in the work programme which saw a team remain at Oulton Broad instead of starting a new project on the Upper Bure. Since the previous report, dredging on the River Ant upstream of Barton Broad has continued, as has the work at Oulton Broad.
- 1.2. Of the detail on each project in Appendix 1 the information on actual work achieved is the highly accurate. The process of capturing actual revenue budget expenditure, staff time spent, plant and equipment usage is robust and regularly updated. What has proved to be more difficult in recent years is setting a dredging programme at the start of each year, which then remains as planned and happens as expected. One of the challenges for the team who plan these works is getting far enough ahead in terms of landowner agreements, planning permission, assent from Natural England, Environmental Permits etc. Where variations to the draft plan then occur within the year, this shifts from the baseline originally stated, so all tracking of actual work is then against an out-of-date baseline. This then causes issues in terms of interpretation of Appendix 1 and the requirement for lots of commentary on why project delivery has had to change.
- 1.3. Members' views are sought on the format and content of the regular Appendix 1. Should this remain unchanged with commentary provided on variations to both project baselines and actual delivery? The alternative proposal is to remove the planned cost column, as this is not particularly instructive over the true cost of the work, especially when the scope of works is often not fully set or complete.
- 1.4. Appendix 2 shows the final proportions of operations technicians' time spent on navigation management activities for the whole of 2022/23. The total number of days spent on navigation tasks was significantly impacted by staff sickness in 2022/23. This led to a reduced number of days able to be spent overall. When looking at the staff days worked in percentage terms (final column of Appendix 2) the dredging tasks ended up with a slightly greater proportion of staff time being dedicated to them. Other work areas that had less time spent on them were mooring maintenance and other navigation maintenance tasks. The other work area with significant additional time spent on it was water plant cutting. Water plant growth was vigorous and, in more areas, than previously experienced. As such, this reactive work was a priority to maintain access in the public navigation.
- 1.5. The forward dredging programme for 2023/24 is shown in Appendix 3. Of particular note is the deferred project from 2022/23 for dredging in the Upper Bure, extending from Coltishall Lock down to Hoveton Viaduct. An application for planning consent has been submitted for construction of a temporary lagoon to dewater the sediment. A

date for decision at Planning Committee is awaited. Other major projects are the final months of dredging to complete the Peto's Marsh project by the end of July, using the dredged material from Oulton Broad. The dredging on the River Ant also continues, targeting shoals between Barton Broad and Wayford Bridge. Some dredging will also take place at the downstream end of Stalham Dyke.

2. Maintaining safe public mooring facilities

- 2.1. The installation of replacement timber quay heading and horizontal barge boards by contractors at Horning Marshes 24-hour mooring is nearly completed. The 137 m section is on track to be re-opened for public use slightly ahead of the end date published in the Boating News webpage [Temporary closure Horning Marshes 24hr mooring due to Maintenance works \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/news/2023/06/08/temporary-closure-horning-marshes-24hr-mooring-due-to-maintenance-works).
- 2.2. The next project in the plan for timber refurbishment is a 30 m section of Commissioners Cut 24 hour mooring on the River Yare. This will be carried out by contractors in July.

3. Our resources

- 3.1. The final items to be delivered from the capital spending plan from the additional Defra grant to support the management of SSSIs and species recovery in the Broads was a new motorised barge. This 15 m long vessel will act a support boat, capable of transporting fuel, materials or waste products, as well as containing site welfare facilities during projects.

4. Water plant management

- 4.1. The background on this topic, and the current challenges, are covered in the report on water plant management, agenda item 8, [Navigation Committee 8 June 2023 \(www.broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/news/2023/06/08/navigation-committee-8-june-2023).
- 4.2. As an update on this season's water plant management activities, the first round of cutting has been completed already for all of the planned areas of the northern rivers. No issues have yet (as of the date of writing this report) been raised for any of the areas in the southern rivers.
- 4.3. The initial hydroacoustic survey of Hickling Broad, which is a requirement for assessing whether cutting can happen in the marked channel has unsurprisingly shown there are lots of plants. Therefore, from late May, cutting is permitted through until September. The survey showed that 83% of the bed of the broad was covered with water plants. This is 15% more coverage than the same time in 2022. The plant growth within the marked channel has also increased this season, with waste capacity at the established disposal points being nearly reached before all the cutting has been achieved. Additional disposal points within the site are being explored, as well as waste removal to composting facilities, which requires additional budget and staff time considerations.

Author: Dan Hoare, Sue Stephenson

Date of report: 24 May 2023

Background papers: water plant management, agenda item 12, [Navigation Committee 8 June 2023 \(www.broads-authority.gov.uk\)](#)

[Broads Plan](#) strategic actions: C1, C2, C3, C4

Appendix 1 – Final annual dredging figures 2022-23 (April 2022 to end March 2023)

Appendix 2 – Final percentage of operational staff time spent on navigation work types (year April 2022 – March 2023)

Appendix 3 – Annual dredging plan 2023-24

Appendix 1 – Final annual dredging figures 2022-23 (April 2022 to end March 2023)

Project title Dredge site and sediment re-use location	Active Broads Authority dredging weeks completed/ planned	Planned volume removed m³	Actual volume removed m³	Planned annual project cost ¹	Actual project cost
River Ant Sutton Broad to u/s Hunsett Mill (May-Jul 2022) River Ant - Wayford to Barton (Feb-Mar 2023)	22/20	12,000	10,210	120,090	110,660
<i>Phase 1 – 6,830 m³ dredged. Early completion in order to install marker posts in Barton Broad. Remainder to be picked up in 2023/24 Phase 2 – early commencement (Feb 2023) whilst river traffic low. 3,380 m³ dredged</i>					
River Waveney Oulton Broad to Peto's Marsh (May '22 – July '23)	30/13	10,000	19,520	50,780	202,260
<i>ONGOING – initial planned cost was set too low and other project developments have occurred, hence disproportional jump in actual cost</i>					
River Bure Malthouse Broad to Ant mouth setbacks (Oct-Feb)	15/9	6,750	9,830	98,390	61,420
<i>COMPLETE – Replacement project for the deferred Upper Bure (Belaugh to Wroxham) dredging</i>					
River Bure Plough dredging Lower Bure (Mar)	Contractor	1,000	2,000	5,000	6,000
<i>COMPLETE</i>					

¹ project costs include staff time for all elements (pre-works ecological mitigation, site set-up, active dredging & site restoration); BA plant; & budgetary expenditure (equipment hire, survey costs, contractor costs, mitigation works, materials & consumables etc); within the reporting period.

Project title Dredge site and sediment re-use location	Active Broads Authority dredging weeks completed/ planned	Planned volume removed m³	Actual volume removed m³	Planned annual project cost ¹	Actual project cost
River Yare	2/0	0	310		
<i>COMPLETE - Opportunistic removal of sediment from the bar at the entrance to Hardley Dyke and Haddiscoe Cut</i>					
Site Restoration Beccles, Raveningham, Hardley Flood	-	-	-	13,020	17,810
Future site preparation Survey, mitigation & set-up	-	-	-	9,960	7,290
Dredging support activities Maintenance of ancillary dredging kit, etc	-	-	-	-	29,610
Total	69/42	29,750	41,870	297,240	435,050

Appendix 2 – Final percentage of operational staff time spent on navigation work types (year April 2022 – March 2023)

Navigation work type	Staff days planned – Days	Staff days planned – % of annual total	Staff days worked – Days	Staff days worked – % of annual total
Dredging	1800	60%	1678	64.2%
Mooring maintenance & repairs	660	22%	408	15.6%
Riverside tree management	85	3%	68	2.6%
Water plant cutting	190	6%	277	10.6%
Other navigation works	250	9%	184	7%
Total	2985	100	2615	100

Appendix 3 – Annual dredging plan 2023-24

Project title	Active Broads Authority dredging weeks completed/planned	Planned volume removal m³	Planned annual project cost²
River Waveney Dredging at Oulton Broad to Peto's Marsh (April-July)	16	7,600	£98,430
River Ant Dredging between Wayford Bridge & Barton Broad and a section of Stalham Dyke (April-July)	17	12,230	£115,740
River Bure Dredging between Coltishall & Hoveton Viaduct to lagoon (Sept-March)	30	13,630	£176,510
River Yare Dredging at Haddiscoe Cut to setback near Reedham (Oct-Feb)	13	6,590	£80,630
Total	0/81	37,550	471,310

Navigation Committee

08 June 2023

Agenda item number 10

Replacement Toll Management System

Report by Collector of Tolls

Purpose

To seek the views of the Navigation Committee on two issues concerning the functional capability of the proposed replacement toll system to ensure it is fit for purpose for a minimum period of five years.

Broads Plan context

Theme C: Maintaining and enhancing navigation.

1. Introduction

- 1.1. The existing policies and processes for collecting and charging tolls are broadly the same as those in place when the function was performed by the Great Yarmouth Port Authority.
- 1.2. The tolls year runs from 1 April to 31 March following. The annual toll charge is payable on any vessel kept or used in the navigation area, or adjacent waters, for more than 28 days in any toll year; it is not a twelve-month charge. Short visit tolls are available for periods up to a maximum of 28 days in any toll year.
- 1.3. Tolls are not transferable to any other vessel and no return of tolls is made in the event of cancellation of the toll before the end of the toll year.
- 1.4. An on-line payment system was developed in 2010 with assistance from an outside company funded by a programme called Implementing Electronic Government which provided finance to local authorities and national parks to develop applications to make use of the Internet. The present software cost around £88,000 and has worked well including through the COVID pandemic. Two students from UEA developed an app for mobile devices so Rangers and the general public could check whether a vessel had paid its toll and had a current Boat Safety Certificate.
- 1.5. The current system is now nearing its end of life and one of the Authority's strategic priorities is to develop a replacement. The initial task is to develop a specification for the work and then assess the costs of additional functionality.

- 1.6. The replacement system should be agile enough to respond to policy and process changes to provide a minimum life span of five years.

2. Potential functional changes

2.1. **Payment by Instalments**

One of the main requests from private toll payers has been a wish to pay the charge in instalments. Currently, because of the administrative overhead, this is only possible for hire boat yards (because of the size of the annual payments), and individuals that demonstrate financial hardship (for which specific arrangements are negotiated).

- 2.2. It is proposed that, considering the seasonal nature of boating on the Broads, the new online system will have the option for boat owners to spread the cost of their tolls over 4 monthly payments.

- 2.3. The advice of Members is sought as to whether there would be a minimum amount due to be eligible for payment by instalment. For the current year 14% of all toll accounts totalled £50 or less, 29% are for £100 or below and 49% of toll accounts total £200 or less.

2.4. **Replacement vessels during the tolls' year**

A further area of feedback from owners is when they sell a boat part way through the year and then buy a previously unlicensed craft they are required to purchase a further annual toll.

- 2.5. The current requirement is that an annual toll is payable on any vessel kept or used on the Broads for more than 28 days in any toll years. Therefore, a vessel sold after that period does not attract a return of tolls as the amount paid is the appropriate toll for the period of use.

- 2.6. Private vessels kept on the Broads for less than 28 days in any toll year can have a short visit toll. The majority of short visit tolls are purchased for boats with a length of 8 meters or less, on average the 28-day toll for these craft equates to around 75% of the appropriate annual toll.

- 2.7. The Committee is asked to consider whether changes should be made to lessen the impact on owners who sell a licenced boat part way through the year and then buy a previously unlicensed craft.

- 2.8. Following the 2005 tolls review, new craft registered with the Authority, or craft being registered to a new owner and not previously licensed, on or after 1 January, receive a 50% discount on the appropriate annual toll up to 31 March. The total value of those discounts last season was £3,981.45.

- 2.9. The main boating season is seen by many as being from Easter to the end of October each year. Most new boat registrations occur between March and October. In 2022 there were 1184 new registrations, just 7% of those occurred between November and the end of February.

- 2.10. When considering changes to charging structures it is important to assess the overall impact on all aspects of the system as they are interrelated.

3. Financial implications

- 3.1. The introduction of payment by instalment will reduce the level of interest earned on navigation income during the toll year.
- 3.2. Changes to the tolls charging policy, refund policy or the tolls year may impact on income.

4. Risk implications

- 4.1. Receipt of toll income early in the financial year enables early sight of any unexpected drop in income.
- 4.2. There is a risk that missed or cancelled payments would impact on administrative resource.

Author: Bill Housden

Date of report: 23 May 2023

Navigation Committee

08 June 2023

Agenda item number 11

Safety at Great Yarmouth

Report by Director of Operations

Purpose

Following the publication of the MAIB report into the fatal accident at Great Yarmouth and the Coroner's inquest into the resulting death, this report examines the safety issues at Great Yarmouth.

Broads Plan context

Theme C: Maintaining and enhancing the navigation

Recommended decision

To note the report.

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1. Introduction

- 1.1. It is imperative that all those involved in safety on the Broads waterways learn from any accidents that take place on inland waters and continue to drive-up safety standards. The Department of Transport's Marine Accident Investigation Branch (MAIB) examined the capsizing of the Breakaway V on the River Bure on 19 July 2003. The findings of this investigation were instrumental in the Broads Authority promoting a Private Bill

through Parliament to give it additional powers to licence hire boats and introduce compulsory third-party insurance and other safety measures.

- 1.2. While the Broads are generally a safe boating environment, tragically in 2020/21 there were 5 reported fatalities within our waterways: three related to boating, one of which was the subject of a MAIB investigation.

2. Diamond Emblem 1

- 2.1. The publication of the revised Code for the Design, Construction and Operation of Hire Boats (Hire Boat Code) was delayed at the request of the MAIB following the tragic events of Ferry Marina's hired vessel 'Diamond Emblem 1', on 19 August 2020, when a woman sadly lost her life at Great Yarmouth.

- 2.2. On 27 October 2020, Graham Wilson the Deputy Chief Inspector of Marine Accidents made the following recommendation to the Association of Inland Navigation Authorities:

2020/129 Revise the Code of Practice for Hire Boats to include:

"A requirement for in-water trial, before handover, to assess the competence of those expected to drive the boat, irrespective of their previous experience or length of hire of the vessel (3.3.4)."

The Association of Inland Navigation Authorities (AINA) and British Marine subsequently accepted that recommendation in full and the Hire Boat Code was amended accordingly.

- 2.3. At its meeting on 18 March 2022 the Broads Authority adopted the new Hire Boat Code in its entirety into its licensing conditions and included the requirement that all operators must be accredited under British Marine's Quality Accredited Boatyard scheme (from 1 April 2023).
- 2.4. In May 2022, the MAIB report was published with the following recommendations for the Broads Authority:

The Broads Authority is recommended to:

2022/114 Make the British Marine and Visit England Quality Accredited Boatyard Scheme a requirement of the Broads Authority's Hire Boat and Hire Operators licensing provisions in addition to its own internal inspection regime.

2022/115 Review its licensing conditions for hire boat operators to ensure that:

- Licences are only issued when a complete set of the required signed and
- dated documentation is submitted by the operators.
- An appropriate level of verification is conducted on a change of ownership.

of companies to ensure that the new owners are operating their vessels in accordance with the applicable requirements.

2022/116 Retain a copy of Declarations of Conformity and other associated information demonstrating compliance with the requirements of the Recreational Craft Directive (RCD) for all boats operating in their waters.

- 2.5. At the May 2022 meeting, the Broads Authority accepted the MAIB recommendation 2022/114 and incorporated the QAB into the licensing conditions for hire craft (powered and sail). Recommendation 2022/115 had already been accepted as this presented minor changes to our Hire Boat licensing processes.
- 2.6. In response to recommendation 2022/116, the Authority is committed to retaining RCDs for a seven-year period after a vessel enters into hire service. It will retain documentation associated with a boat's compliance with both the Boat Safety Scheme standard and the Hire Boat Code for the full period that the boat continues to operate in its waters, and the Authority considers that this provides an appropriate level of documentary oversight given the context and enforcement of these standards.
- 2.7. On 17 May 2023, the MAIB, stated that the Broads Authority had "*implemented appropriate actions*".
- 2.8. On 12 April 2023, the Norfolk coroner Yvonne Blake listed Miss Laura Perry's medical cause of death as "*multiple injuries and drowning, or as a consequence of entrapment beneath a boat following a fall into the water*". The Coroner heard evidence presented by Graham Wilson, Deputy Chief Inspector at the MAIB, who led the investigation. Mr Wilson stated that "*such a benign situation, but within the space of 44 seconds things went horribly wrong*".

3. Additional Measures

- 3.1. At the 20 November 2020 meeting, the Broads Authority meeting adopted a package of measures with the aim of further enhancing safety on the Broads' waterways. The package included:
 - Increased Ranger staff and patrols between April & November, maintaining a 7-day launch presence on the network to encourage safety.
 - Increased the Hire Boat Licensing Officer time from 1 day a week to 3 days.
 - A suite of free online instructional videos, developed in conjunction with the Broads Hire Boat Federation, RNLI, Maritime Coastguard Agency, and British Canoeing to provide safety advice and information.
 - An increase in the number of 'Super Safety Events' where random spot checks are conducted for vessels on our waters. These multi-agency events help educate boaters on a variety of safety issues from boat handling, and speed, as well as looking for vessel defects, non-wearing of life jackets and any hazardous boating issues.

- Developed closer ties with relevant organisations through regular meetings with the Broads Hire Boat Federation, the Royal Yachting Association, British Marine, and The Norfolk and Suffolk Boating Association, as well as Broads Beat, Maritime Coastguard Agency and the Drowning Prevention Forum.

4. Role of the Broads Authority

- 4.1. The Broads Authority (Pilotage Powers) Order 1991 confirms that the Broads Authority is a “Competent Harbour Authority” as defined in the Pilotage Act 1987, and as such the Authority falls under the requirements of the Port Marine Safety Code.
- 4.2. Unlike a port, the Broads Authority is designated a “Special Statutory Authority”, affording the area the same level of protection as a National Park, but with tailor-made legislation relating to navigation. The Authority, therefore, balances the navigational duties and powers of a harbour authority with the conservation and recreational duties and powers of a National Park authority. These duties and powers are principally set out in the Norfolk and Suffolk Broads Act 1988.
- 4.3. The Broads Authority, as Duty Holder for the Broads, has developed a Safety Management System (SMS) in accordance with the requirements of the Port Marine Safety Code taking cognisance of the advice in the Guide to Good Practice on Port Marine Operations.

5. Analysis of Risk Factors and Mitigation Measures

- 5.1. Passage through the Lower Bure and across Breydon presents challenges with the main risk factors being the strong tides, low bridges, and narrow channel. These factors are outside the Authority’s control. But there are several existing control measures to assist a safe passage, including:
 - Published information on the conditions and how to safely navigate this area (including broadcaster and on the website)
 - Signage in advance of the area from all directions
 - Specific safety video covering this area, available online.
 - Ongoing campaign to encourage lifejackets to be worn, especially in tidal areas.
 - Safety information specifically for this area is covered in hire boat handovers.
 - We have gauge boards at the bridges on the lower Bure and advanced gauge boards on the lower Bure, Turntide Jetty and Burgh Castle moorings.
 - Ranger patrols 7 days a week in the summer when the tide reduces the clearance on the lower Bure bridges to 7’6” or less and when there are adverse weather conditions (strong winds, fog, etc) between 8 am and 6 pm.
 - Yacht station is staffed 8 am to 8 pm in summer, to assist boaters on site and to answer telephone enquiries on tide times, advice on how to cross Breydon and

mooring availability at the yacht station. Yacht Station staff post tide times every day on Broads Authority social media channels.

- The Broads Authority ran specific training at Great Yarmouth Yacht Station in 2021 (it will be offered again in 2024) for hire company show-out staff, to familiarise them with the specific challenges presented on the Lower Bure and Breydon water. This course includes tuition from the RNLI, BroadsBeat and the Coastguard, explaining how their experience and assets are used to maintain safety.
- 5.2. The Authority's officers are continually reviewing safety in this area. Over the last few years and working with the Secretary of the Broads Hire Boat Federation, extra buoys have been placed, in addition to the posts, on Breydon to help keep navigators in the channel and we have put in a new yellow post and signage at Turntide jetty.
 - 5.3. The Authority has also been working with a company to look at electronic bridge height sensors but after reviewing this for a year the sensors are not currently able to provide an accurate enough reading to be able to rely on these instead of the current gauge boards. We will continue to look at this system as the technology improves. The current method of indicating bridge heights, whilst basic, is accurate and reliable.
 - 5.4. The conditions on the Lower Bure and Breydon mean that helms, along with any crew members, need to be alert when manoeuvring in this area. For most vessels, this is successfully managed (sometimes under the guidance of Quay Rangers or Rangers). The MAIB findings into the tragedy on Diamond Emblem 1 stated that an issue with understanding the dual controls experienced by the vessel hirers, and a failure to understand where the engine stop button was located, were contributory factors to this incident.
 - 5.5. There is no speed limit past Great Yarmouth Yacht Station; the 5mph limit signed at this location is advisory, although the byelaws do apply, and vessels would need to exercise care and caution when navigating in this area. The strong tide in this area means it can be necessary for boats to ensure they have enough speed to maintain steerage, if yacht station staff see anyone in difficulty, they will give advice as required.

6. Financial implications

- 6.1. Great Yarmouth Yacht Station provides a vital safe haven for vessels wanting to transit across Breydon water and staff are on hand from April to November to assist vessels to moor, provide daily tide times as well as answering telephone calls on bridge heights, weather conditions and mooring availability. The Great Yarmouth Yacht Station's gross expenditure (22/23, including staff salaries) was £120,367 (net costs £68,536).
- 6.2. The costs for patrolling Breydon are approximately £93,000 for 2022/23.
- 6.3. Last year (April 2022 to March 2023), the Breydon Rangers gave bridge advice to 385 vessels, 184 vessels were turned back due to being too high to pass the bridges, investigated into 6 bridge strikes, 34 groundings, issued 13 Memorandum of

Navigational Warnings and Breydon was closed 5 times due to adverse weather conditions.

6.4 The table below shows the maintenance costs for the last three years on the Lower Bure and Breydon.

Lower Bure and Breydon Water	2021/22	2022/23	2023/24
Lower Bure plough dredging (contractor)		£6,000	
Lower Bure gauge boards replacements (contractors)	£800	£1,860	
Lower Bure/Breydon in-house dredging	£8,250		£8,250
Breydon Channel marker post purchase	£35,122	£4,950	
Breydon Channel marker installation (in-house)	£16,402		£44,250
Total	£60,402	£12,810	£52,250

7. Risk implications

- 7.1. The Port Marine Safety Code establishes an agreed national standard for port marine safety and formalises the duties and responsibilities for safety and environmental protection within Broads Authority waters. The Code is applicable to all harbour authorities, and compliance is not optional.
- 7.2. The Code requires that all harbour authorities base their powers, policies, plans and procedures on a Formal Safety Assessment (FSA), and that they maintain a Safety Management System to control the risks that are identified to a level which is As Low As Reasonably Practicable (ALARP).
- 7.3. Under the Broads Authority FSA, the passage of Great Yarmouth & Breydon Water has its own risk assessment, highlighting the challenges this section of the system has, due to height restrictions from low bridges, fast tides, areas of shallow water, narrow channel, and the busy waterway. The Risk Assessment gives the passage of Great Yarmouth & Breydon Water a score of 5, meaning a medium risk.
- 7.4. The Broads Authority Formal Safety Assessments will be reviewed in the winter of 2023 by the Boat Safety Management Group. This review will consider the risks, cross reference the accident data, assess any new risks and look at mitigation measures. A report will be presented to the Navigation Committee on its findings.

8. Conclusion

- 8.1. As part of the Authority's commitment to enabling safe boating on the Broads, a Navigation Safety Policy has been developed which states the Authority will:
 - Maintain an effective Safety Management System to enable the Broads Authority to undertake and regulate marine operations in a way that safeguards the Broads, its users, the public and the environment.

- Monitor and manage the navigation of vessels within the Broads limits.
 - Consult widely with Broads Authority employees, Broads users and other relevant stakeholders in respect of navigational safety issues.
 - Ensure that an efficient, safe, and appropriate level of Pilotage is available in accordance with the Pilotage Act 1987.
 - Ensure that an efficient, safe, and appropriate level of Pilotage is available in accordance with the Pilotage Act 1987.
 - Place and maintain navigational marks where they will be of best advantage to vessels.
 - Disseminate any relevant navigational safety information to Broads users.
 - Regularly review the effectiveness of the Broads Authority legal powers, byelaws, and directions in respect of navigational safety.
 - Evaluate the safety performance of the Broads Authority through reporting systems contained within the Safety Management System.
 - Employ suitably qualified personnel and provide the necessary training to ensure that they are competent within the roles they are required to perform, and ensure sufficient resources are available to implement procedures and systems effectively.
 - Ensure the craft used within the Broads Authority have the required certification and are fit for purpose, and the crew are appropriately trained and qualified for the tasks they are likely to perform.
- 8.2. This policy will be reviewed on an annual basis with due consideration given to any changes to the operating environment, the organisation and legislation.
- 8.3. The Broads Authority invests considerable resources into the safety on the water and supplies additional measures on the Lower Bure and Breydon, to reflect the challenges this area can present.
- 8.4. The Broads waterways remain a safe and enjoyable location for recreational craft activities, but as with any waterborne activity, care, caution, knowledge and understanding of key aspects (weather, tide, bridges, passage, safety etc) needs to be considered prior to commencement.

Author: Rob Rogers

Date of report: 18 May 2023

[Broads Plan](#) strategic objectives: Theme C: Maintaining and enhancing the navigation

Appendix 1 – MAIB report on the investigation of the fatal person overboard from the motor cruiser Diamond Emblem 1 at Great Yarmouth Yacht Station, River Bure, England on 19 August 2020
[Diamond Emblem 1 report published by Marine Accident Investigation Branch \(broads-authority.gov.uk\)](#)

Navigation Committee

08 June 2023

Agenda item number 12

Annual Income and Expenditure 2022/23

Report by Director of Finance

Purpose

To inform the Committee of the summary of the Authority's income and expenditure for the 2022/23 financial year, analysed between General (National Park) and Navigation funds. Original and Latest Available Budget information is provided for comparison.

Broads Plan context

Financial performance underpins all the strategic objectives of the Broads Plan.

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1. Introduction

- 1.1. The Broads Act 2009 requires the Authority to prepare a report as soon as reasonable possible after the end of each financial year describing the navigation income received by it and the navigation expenditure incurred by it in that year.

2. Actual income and expenditure 2022/23

- 2.1. The tables in Appendix 1 sets out the Authority's income and expenditure attributed to General (National Park Grant) and Navigation funds for the financial year ended 31 March 2023. To the extent that they are included within the Authority's Statement of Accounts, these figures are subject to audit and formal approval by the Authority's external auditors. For comparative purposes, the Original and Latest Available Budget (LAB) figures are also shown. This information is published on the Authority's website.

- 2.2. The actual outturn for 2022/23 was a deficit of £145,512 for Navigation compared with a budgeted LAB deficit for the year of £206,119. The original budget was for a deficit of £137,119. The final forecast outturn was a deficit of £172,065.
- 2.3. Total core income for the year was £3,869,111, which was £110,721 above budget, principally due to the favourable variances of £45,978 within Hire and Private Craft, where boat numbers did not decrease as much as predicted. There continued to be smaller favourable variances within Short Visit and Other Toll income budget lines. There was a favourable variance of £55,570 within the interest budget line, with interest rates increasing over the financial year.
- 2.4. Other income performed better than budget predictions. This was due to the disposal of old equipment and increased income from electric card sales and electric recharges.
- 2.5. Total net navigation expenditure in 2022/23 was £4,014,624, which was £50,115 above the budget. This was predominantly due to the pay award implemented being above the 2% budgeted and increased legal charges.

3. Earmarked reserves

- 3.1. The earmarked reserves have funded the following expenditure:
 - Property Reserve includes the planning application for the replacement hut at Reedham Quay (£73) and the rental income from land at Oulton Broad (£2,000). The increase to reserve balance is due to the annual contribution to the Mutford Lock Reserve (£25,000).
 - Plant, Vessels, and Equipment Reserve includes replacement cost of two vehicles and the deposit for a third (£37,810). It also includes the proceeds from the sale of the two vans and the disposal of old dockyard equipment (£12,168). The expenditure has been offset by the annual contributions to the reserves (£135,050).
 - Premises Reserve includes the annual contributions to the reserves (£35,000).
 - CANAPE Reserve has funded the project expenditure less the grant reimbursement.
 - Computer Software includes the annual contribution (£6,600).
- 3.2. After the year-end transfer of interest, the closing position on the earmarked reserves is as follows:

Table 1

Navigation Earmarked Reserves

Reserve name	Balance at 1 April 2022 £	In-year movements £	Closing reserve balance £
Property	(476,457)	(37,937)	(514,394)
Plant, Vessels, and Equipment	(362,576)	(119,732)	(482,308)
Premises	(125,777)	(38,517)	(164,294)
CANAPE	(238,136)	6,443	(231,693)
Computer Software	(101,638)	(8,967)	(110,605)
Total	(1,304,584)	(198,710)	(1,503,294)

4. Summary

- 4.1. The total Navigation deficit for 2022/23 was lower than the budgeted and the forecast deficit. The main reason for the variance between the forecast and actual position was the increased income set out in paragraph 2.3.
- 4.2. Whilst investment income has exceeded expectations due to the increased rates implemented by the Bank of England these rates are expected to drop in the future, much closer to their forecast level of inflation of 2%. This means that the level of return in future years may reduce.
- 4.3. 2022/23 sees the first repayment of £50,000 between the Navigation and National Park Reserve which means the balance on the Navigation Reserve at the end of 2022/23 is £611,587, this is above the minimum 10% at 15.2%. However, it should be noted that as the £50,000 per annum transfer back to National Park, continues in 2023/24, alongside the planned expenditure in the Financial Strategy, this will reduce the Reserve down to 13.8%. This will be refined later this year when the level of tolls for 2024/25 is considered.

Author: Emma Krelle

Date of report: 19 May 2023

[Broads Plan](#) strategic objectives: All

Appendix 1 – General and Navigation income and expenditure 2022/23

Appendix 1 - General and Navigation income and expenditure 2022/23

The Broads Authority Act 2009 requires the Authority to prepare a report as soon as reasonably possible after the end of each financial year describing the navigation income received by it and the navigation expenditure incurred by it in that year. The table below sets out the Authority's income and expenditure attributed to general (National Park Grant) and navigation funds for the financial year ended 31 March 2023. These figures are derived from the annual Statement of Accounts which is subject to audit and formal approval by the Authority's external auditors, Ernst & Young (EY). For comparative purposes, the final approved budget figures are also shown.

Further details are available on request from the Director of Finance, Yare House, 62-64 Thorpe Road, Norwich NR1 1RY or by email from emma.krelle@broads-authority.gov.uk.

The Draft Statement of Accounts for 2022/23 have not yet been scheduled for audit by EY. Once the audit has been completed the final version of the Statement of Accounts for 2022/23 will be presented to the next available Broads Authority.

Table 1

Income

Income Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Income General £	Actual Income Navigation £	Actual Income Consolidated £
National Park Grant	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	(4,784,591)	0	(4,784,591)
Hire Craft Tolls	0	(1,186,000)	(1,186,000)	0	(1,186,000)	(1,186,000)	0	(1,204,264)	(1,204,264)
Private Craft Tolls	0	(2,489,000)	(2,489,000)	0	(2,489,000)	(2,489,000)	0	(2,516,714)	(2,516,714)
Short Visit Tolls	0	(48,000)	(48,000)	0	(48,000)	(48,000)	0	(54,089)	(54,089)
Other Toll income	0	(32,390)	(32,390)	0	(32,390)	(32,390)	0	(35,474)	(35,474)
Interest received	(3,000)	(3,000)	(6,000)	(3,000)	(3,000)	(6,000)	(58,570)	(58,570)	(117,141)
Total Income	(3,417,078)	(3,758,390)	(7,175,468)	(3,417,078)	(3,758,390)	(7,175,468)	(4,843,162)	(3,869,111)	(8,712,273)

Table 2

Operations

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
Construction & Maintenance Salaries	516,520	865,960	1,382,480	516,520	865,960	1,382,480	529,556	883,049	1,412,605
Equipment, Vehicles & Vessels	223,304	521,042	744,345	229,303	535,041	764,344	162,133	378,311	540,444
Water Management	3,000	76,840	79,840	3,000	76,840	79,840	2,245	50,311	52,557
Land Management	56,820	0	56,820	56,820	0	56,820	68,861	0	68,861

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
Practical Maintenance	226,330	424,865	651,195	226,330	479,866	706,196	122,812	491,986	614,798
Waterways & Recreation Strategy	24,050	30,050	54,100	24,050	30,050	54,100	83,961	26,898	110,859
Rangers Salaries	260,046	606,774	866,820	260,046	606,774	866,820	264,940	618,193	883,132
Ranger Services	21,432	179,438	200,870	21,432	179,438	200,870	12,283	133,015	145,298
Safety	38,395	85,035	123,430	38,395	85,035	123,430	66,224	87,252	153,476
Project Funding	11,011	1,089	12,100	11,011	1,089	12,100	11,370	1,126	12,496
Operational Premises	100,107	135,583	235,690	100,107	135,583	235,690	87,097	113,745	200,842
Premises Head Office	187,355	76,525	263,880	187,355	76,525	263,880	204,937	81,488	286,425
Management & Admin	98,209	48,371	146,580	98,209	48,371	146,580	93,942	46,270	140,213
Operations Income	(102,766)	(24,040)	(126,806)	(102,766)	(24,040)	(126,806)	(184,411)	(38,867)	(223,278)
Total Operations	1,663,812	3,027,532	4,691,344	1,669,811	3,096,532	4,766,344	1,525,950	2,872,777	4,398,726

Table 3
Strategic Services

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
Development Management	459,756	4,484	464,240	459,756	4,484	464,240	485,026	4,590	489,616
Strategy & Projects Salaries	165,119	10,231	175,350	165,119	10,231	175,350	177,635	9,903	187,538
Biodiversity Strategy	11,900	0	11,900	11,900	0	11,900	17,819	0	17,819
Strategy & Projects	1,000,636	0	1,000,636	1,000,636	0	1,000,636	886,841	104	886,944
Human Resources	88,860	61,750	150,610	88,860	61,750	150,610	103,739	74,581	178,320
Volunteers	43,980	29,320	73,300	43,980	29,320	73,300	42,234	28,156	70,390

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
Communications	460,266	83,710	543,976	344,994	83,710	428,704	421,137	85,351	506,489
Visitor Centres & Yacht Stations	360,178	179,793	539,970	360,178	179,793	539,970	325,412	172,598	498,009
Management & Admin	77,055	33,023	110,078	77,055	33,023	110,078	87,077	37,319	124,396
Strategic Services Income	(1,308,908)	(69,450)	(1,378,358)	(1,193,636)	(69,450)	(1,263,086)	(1,224,446)	(67,690)	(1,292,136)
Total Strategic Services	1,358,841	332,861	1,691,702	1,358,841	332,861	1,691,702	1,322,473	344,911	1,667,384

Table 4
Finance and Support Services

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
National Park Grant	0	0	0	0	0	0	1,375,231	0	1,375,231
Legal	70,000	30,000	100,000	70,000	30,000	100,000	133,793	44,780	178,573
Governance	167,473	82,487	249,960	167,473	82,487	249,960	155,082	76,353	231,435
Finance & Insurance	241,377	211,369	452,746	241,377	211,369	452,746	240,858	218,122	458,980
Collection of Tolls	0	193,760	193,760	0	193,760	193,760	0	196,866	196,866
ICT	264,958	130,502	395,460	264,958	130,502	395,460	257,757	126,955	384,713
Asset Management	94,723	75,886	170,609	94,723	75,886	170,609	62,326	67,360	129,686
Chief Executive	75,682	49,558	125,240	75,682	49,558	125,240	75,347	49,428	124,775
Finance & Support Services Income	(21,000)	(7,000)	(28,000)	(21,000)	(7,000)	(28,000)	(22,222)	(12,903)	(35,125)
Total Finance & Support Services	893,213	766,562	1,659,775	893,213	766,562	1,659,775	2,278,174	766,961	3,045,134

Table 5

Projects and Corporate items

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
Heritage Lottery Fund	(97,306)	0	(97,306)	(97,306)	0	(97,306)	(159,737)	0	(159,737)
CANAPE	(27,341)	(27,341)	(54,681)	(27,341)	(27,341)	(54,681)	11,402	11,402	22,804
Pension Lump Sum Payments	76,200	50,800	127,000	76,200	50,800	127,000	76,200	50,800	127,000
Apprenticeship Levy	17,438	2,162	19,600	17,438	2,162	19,600	10,759	2,890	13,649
Cyber crime	0	0	0	0	0	0	0	0	0
WRE	0	0	0	0	0	0	7,500	0	7,500
Total Projects & Corporate Items	(31,008)	25,622	(5,387)	(31,008)	25,622	(5,387)	(53,876)	65,092	11,216

Table 6

Contributions from earmarked reserves

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
Property	(146,780)	2,000	(144,780)	(146,780)	2,000	(144,780)	(42,222)	1,927	(40,295)
Plant, Vessels & Equipment	(93,524)	(240,221)	(333,745)	(93,524)	(240,221)	(333,745)	(25,228)	(25,642)	(50,870)
Premises	(49,794)	(46,186)	(95,980)	(49,794)	(46,186)	(95,980)	(5,433)	0	(5,433)
Heritage Lottery Fund	97,306	0	97,306	97,306	0	97,306	159,737	0	159,737
Upper Thurne	(18,000)	0	(18,000)	(18,000)	0	(18,000)	932	0	932
Catchment Partnership	(20,870)	0	(20,870)	(20,870)	0	(20,870)	(22,466)	0	(22,466)
CANAPE	27,341	27,341	54,681	27,341	27,341	54,681	(11,402)	(11,402)	(22,804)
Match funding (EXPERIENCE)	(46,016)	0	(46,016)	(46,016)	0	(46,016)	(29,038)	0	(29,038)

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
Computer Software	0	0	0	0	0	0	0	0	0
UK NP Communications Team	(2,078)	0	(2,078)	(2,078)	0	(2,078)	(33,628)	0	(33,628)
Total Contributions from reserves	(252,415)	(257,067)	(509,482)	(252,415)	(257,067)	(509,482)	(8,749)	(35,117)	(43,866)

Table 7
Net (Surplus) / Deficit

Expenditure Type	Original Budget General £	Original Budget Navigation £	Original Budget Consolidated £	Latest Available Budget General £	Latest Available Budget Navigation £	Latest Available Budget Consolidated £	Actual Expenditure General £	Actual Expenditure Navigation £	Actual Expenditure Consolidated £
Grand Total	215,365	137,119	352,484	221,364	206,119	427,484	220,810	145,512	366,322

Navigation Committee

08 June 2023

Agenda item number 13

Progress report on charging at Ranworth moorings

Report by Head of Communications

Purpose

This report provides the Committee with an update on the policy of charging for mooring at Ranworth since the Broads Authority decision in January 2023 after consultation with the Committee.

Broads Plan context

Theme C: Maintaining and enhancing the navigation

Recommended decision

To note the report.

1. Introduction

- 1.1. In January of this year, after consultation with the Navigation Committee, which was favourable to the idea, the Broads Authority resolved to introduce a £5-day rate and a £10 overnight charge at the site.
- 1.2. The introduction of a mooring charge for the Broads Authority moorings at Ranworth was long argued for by the late Charles Cator and his family, who currently charge £12 to moor on the island - where there are no facilities. The charge was introduced from 1 April 2023 and appears to have had the positive impact on the local economy that Charles Cator predicted. More boats can moor with the assistance of the Broads Authority's staff and more hire boats have been using the site. According to conversations between Authority officers and staff at the pub and the café/restaurant, both have seen a significant uplift in their trade. The Granary Restaurant is taking on an additional chef and trainee chef in response to demand.
- 1.3. The experience of introducing a modest charge for mooring at Ranworth has been encouraging. The fee structure has encouraged boats not intending to stay overnight to leave at 17:00hrs and increased the turnover of vessels at the site. Visitors have also been pleased to have help mooring from the members of staff.

- 1.4. For the period 1 April to 20 May, 1,627 mooring fees have been paid, producing an income of £9,787. Only 7 moored boats have been recorded as refusing to pay, all of which were privately owned, and 3 hire craft have left after being told of the charges, during this period.

2. Legal Implications

- 2.1. The consistent advice from NpLaw and Birketts is that the Authority can levy a mooring fee at this site. Although the number of private boat owners refusing to pay has been very small, further advice has been taken from Birketts on how to recover the mooring fee and the Authority's costs. Following consultation with the solicitors, new signage at the site informs the public of the terms for mooring (See Appendix 1) and a process developed for dealing with non-payers by issuing a penalty charge by way of a Mooring Contravention Notice (MCN). The MCN states that if the mooring charge of £5 or £10 is paid within 14 days, there is no further penalty. If the charge remains unpaid, there is a £60 penalty.
- 2.2. The basis of the penalty charge for non-payment is that the mooring is on private land (owned by the Authority). As landowner the BA is entitled to charge for use of the mooring. This is established by making the use of the quay subject to the unilateral acceptance of advertised contractual terms. The terms are advertised by being displayed on a sign visible to the boat user when mooring. Non-payment gives rise to a claim for breach of contract and / or damages for trespass. The courts have upheld the right for a penalty fee to be imposed for non-payment in these circumstances.
- 2.3. Authority staff provide a printed copy of the terms to anyone refusing to pay the appropriate mooring fee.

3. Financial implications

- 3.1. The introduction of charges at Ranworth will bring additional income into the Navigation budget. It also has implications on the allocation of Ranworth costs between National Park and Navigation.
- 3.2. Within the accounting policies in the statement of accounts (page 35) it states:
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.
- 3.3. The Visitor Services Supervisor provided an estimate of how much income we hope to raise through the introduction of charges, and this was compared to the income the centre took from National Park sales. The calculation is as follows:

Income Source	National Park £	Navigation £	Consolidated £
National Park Sales from the TIC	15,500	0	15,500
Navigation Sales from mooring fees	0	40,000	40,000
Total Income	15,500	40,000	55,500
% split	28%	72%	100%

3.4. The running costs for centre (£3,000) remain relatively minor due to the Authority owning the premises. Most of the facility costs remain in staff time (£55,560). From observation to date, the majority of staff time is devoted to helping boaters moor up, taking their fees and providing them with information. The actual income and expenditure will be reviewed at the end of the financial year to check the % split based on evidence.

Author: Rob Leigh

Date of report: 18 May 2023

[Broads Plan](#) strategic objectives: C1, E1

Appendix 1 – Ranworth mooring sign designs

Appendix 1 – Ranworth mooring sign designs



24hr moorings

Maximum stay 24hrs - no return within 24hrs

In an emergency contact coastguard on 999 | Broads control 01603 756056

Broads Authority Navigation Byelaws 1995. Byelaw 61: It is an offence to moor for longer than the permitted period. Byelaw 66: It is an offence to prevent, obstruct or hinder the lawful mooring of any vessel.

Overnight £10 • Daytime £5 (10am-5pm)

Small boat dyke • £3 for powered vessels, daytime only

www.broads-authority.gov.uk



Notice to All Boats | Welcome to Ranworth Staithe – owned and operated by the Broads Authority

1.1 All are welcome to moor here. In doing so you are agreeing to enter a contract for mooring with the Broads Authority and to comply with its terms and conditions which are set out on this notice.

1.2 You are also agreeing to pay mooring charges of:

- £10 overnight (until 10am the following morning)
- £5 per day or any part thereof until 5pm
- £3 for powered vessel using the small boat dyke (daytime only)

Charges apply unless you have been notified by the Broads Authority that you or your craft is exempt.

Maximum mooring period of 24 hours – No return within 24 hours as per navigation byelaws 1995.

To make payment of the relevant charge, you should go to the Ranworth Visitor Centre upon arrival. If the Visitor Centre is closed when you arrive, payment should be made prior to your departure. Cash or card is acceptable. Your payment will contribute to the maintenance and operating costs of the site.

1.3 The Broads Authority assumes no liability for loss or damage and mooring is at your own risk.

1.4 We will process your data in accordance with Data Protection Principles and the legal basis is vested in us under the Norfolk and Suffolk Broads Act 1988 (as amended) along with the Vessel Registration Byelaws 1997. Your information will be used for performing these statutory functions and purposes. This includes the processing of your data for the good management of the navigation area.

1.5 Please be aware that failure to pay the mooring charge will be a breach of the Contract and will result in the issue of a Mooring Contravention Notice (MCN) incurring a penalty fine of £60 in addition to our recovery costs. Further details on how and when the fine can be paid, will be set out in the MCN.

For enquiries about this notice please email moorings@Broads-Authority.gov.uk or write to Broads Authority (moorings), Yare House, 62-64 Thorpe Road, Norwich, NR1 1RY.

Navigation Committee

08 June 2023

Agenda item number 14

Local Plan Issues and Options consultation- responses

Report by Planning Policy Officer

Purpose

The Local Plan Issues and Options consultation ran from 3 October to 9 December 2022. We received around 600 comments reported in the Appendix, which includes the comments and proposed responses from the Authority. Those with navigation interest are highlighted.

1. Introduction

- 1.1. Each local planning authority must prepare a Local Plan that sets the planning policies in its local area. The Local Plan is important when deciding planning applications, as all decisions must be made in accordance with its policies, unless there are strong reasons not to do so. The Broads Authority has started the review of the Local Plan for the Broads. The draft Issues and Options version was presented to Navigation Committee in June 2022 before public consultation [Issues and Options \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)
- 1.2. This first round of public consultation on Local Plans is the Issues and Options consultation. It ran from 3 October to 4pm on 9 December 2022.
- 1.3. Included at Appendix 1 are the comments, name of respondents as well as the proposed responses from the Authority. Those with relevance to navigation are highlighted. Members are asked to consider the comments and responses and provide feedback.
- 1.4. The comments received are useful and helpful and will help us as we produce Local Plan policies. The Authority appreciates the time taken by the respondents to give us their thoughts.
- 1.5. The Issues and Options document that was consulted on can be found [here](#).

2. Quay heading in front of quay heading

- 2.1. One of the specific matters that we talked about in June 2022 related to placing replacement quay heading in front of existing quay heading and the issue of, over time, reducing the navigable width of the waterbody.

- 2.2. Landowners may want to improve a quay heading in a particular area to maintain it in a good condition, to reflect a change of how an area is used, or to replace the quay heading at the end of its life. They may do this by placing new piling and quay heading in front of the original quay heading, rather than removing the original quay heading. The new quay heading tends to be placed 10cm to 50cm in front of the old quay heading. Timber quay heading tends to be replaced every 10 to 15 years and steel quay every 20 to 30 years.
- 2.3. Placing new quay heading in front of existing quay heading at a typical distance of 10cm to 50cm reduces the width of the river in that particular location. This is a particular issue in narrower areas with high volumes of river traffic. Importantly, reducing navigable space impacts on the ability of users to navigate safely. One of the statutory purposes of the Broads Authority is to protect the interests of navigation. The Local Plan for the Broads has a strategic policy (SP13) that seeks to protect and enhance the navigable water space.
- 2.4. In planning terms, we tend to use the strategic policy SP13. Under the Broads Act 1988, certain schemes require a Works Licence and one of the considerations in issuing these licences is impact on navigation. Taking these together, we usually request that replacement quay heading is not placed more than 30cm in front of the original. However, the reason we are raising this as an issue is that in some areas we are at a critical point and need to safeguard navigation from further encroachment.
- 2.5. You will see that we received some responses to the related question (number 23) in the Issues and Options document. These are highlighted in the list of comments received.
- 2.6. Working together, the Head of Ranger Services (Navigation Officer), Head of Construction and Maintenance and Ecology, Planning Policy Officer and GIS Officer at the Broads Authority are looking into this issue further and we will report back to the Navigation Committee later this year.

Author: Natalie Beal

Date of report: 18 May 2023

Appendix 1 – Issues and Options consultation - Comments received and proposed Broads Authority responses

Appendix 1 – Issues and Options consultation - Comments received and proposed Broads Authority responses

Part of document (numbers denote question number)	Organisation	Comment	Response	Action for next version of the Local plan
1	Anglian Water	3.2.Anglian Water recognises that the Broads is an important area for biodiversity and that a landscape scale approach to nature recovery, delivered through Local Nature Recovery Strategies, provides opportunities to ensure wetland habitats are resilient over the longer term.	Background information noted.	No further action
1	Anglian Water	3.3.Given the tightly drawn boundary of the Broads Executive Area, we note that close working with neighbouring local planning authorities is imperative for the Authority, and ensures that appropriate levels of growth can, if required, be located outside the Executive Area to help sustain local businesses such as by meeting local housing needs to provide longer term resilience.	Background information noted.	No further action
1	Anglian Water	3.4.IIIThe 'Pressures on the Broads' section identifies a range of environmental issues which we recognise and require a multi-stakeholder approach. Our Biodiversity Strategy has been informed by consultation with key environmental stakeholders including government agencies and NGOs and emphasises our reliance on the natural environment to help maintain water quality and quantity. For these reasons we recognise our role in protecting the natural environment within our region, and addressing issues such as habitat loss, invasive non- native species, unsustainable abstraction, pollution, and climate change.	Background information noted.	No further action
1	Anglian Water	3.5.IIIAnglian Water has the biggest natural environment programme in the sector (WINEP – Water Industry National Environment Programme) with over £811 million worth of projects aimed at environmental enhancement between 2020-2025. We are also leading the way in the design and delivery of natural wetlands that perform the dual purpose of delivering net zero water treatment and habitat creation for biodiversity. This summer we announced the building of 26 new wetlands across the region, to be modelled on our flagship River Ingol wetland that opened in 2019 in partnership with the Norfolk Rivers Trust.	Background information noted.	No further action
1	Bradwell Parish Council	We would like to see it maintained as an area of natural beauty, with more careful monitoring of the boats and pleasure craft that present a clear danger to this habitat.	Noted. That is the general aim of the policies in the Local Plan - to protect and enhance the area. But we do need to allow appropriate development to happen in appropriate locations.	No further action.
1	Broads Society	Challenges exist for attracting new generational visitors into areas such as National Parks whilst also fewer younger or new customers are engaging in leisure marine activities. This demographic is looking for, and using, new entry areas such as variations and niche versions of accommodation experiences, canoeing, surfing and paddle boarding. Their digital communication preferences and their desire for activities are aligned to short burst experiences to enjoy and share online and are being termed 'Pay & Play'. The British Marine Futures report states brands and organisations must empower this audience to 'do, feel and share' to remain relevant.	Noted. Not directly relevant to land use planning, but could be weaved into the context section. Will also pass comment on as part of the review of the Broads Sustainable Tourism Strategy.	Weave into context section and pass on comment as part of the review of the Broads Sustainable Tourism Strategy
1	Broads Society	The following new diverse leisure industry classifications have also emerged. •IIIConsidered, occasional (being, higher cost & occasional activities) •IIIFrequent, habitual (being, lower cost & frequent activities)	Noted. Not directly relevant to land use planning, but could be weaved into the context section. Will also pass comment on as part of the review of the Broads Sustainable Tourism Strategy.	Weave into context section and pass on comment as part of the review of the Broads Sustainable Tourism Strategy
1	Broads Society	The challenge must now be to help Broads businesses rapidly establish the offering that will engage the audience who will help shape, support and participate within the Broads National Park. This help being agile planning and planning support from joined up Authorities enabling the capture of rapidly changing economic opportunities. This demographic will be the one to provide the long-term tourism and visitor revenue, the time, energy and volunteering pool vital for the sustainability and resilience needed for the challenges ahead.	Noted. Not directly relevant to land use planning, but could be weaved into the context section. Will also pass comment on as part of the review of the Broads Sustainable Tourism Strategy.	Weave into context section and pass on comment as part of the review of the Broads Sustainable Tourism Strategy
1	Broads Society	The British Marine report provides a framework to aid organisations and businesses to attract this participation: •IIIEngage & Promote •IIIImproved marketing / targeted diversity / adventure & challenge / strategic partnerships •IIIPathways & Locations •IIDemand led / Broader delivery / Strengthen pathways & access routes •IIIStaying Active & Connected •IIIEncourage participation / Benefits of club membership / Volunteering	Noted. Not directly relevant to land use planning, but could be weaved into the context section. Will also pass comment on as part of the review of the Broads Sustainable Tourism Strategy.	Weave into context section and pass on comment as part of the review of the Broads Sustainable Tourism Strategy
1	East Suffolk Council	While it is for the Broads Authority to set out an appropriate context and explain the history of the area, East Suffolk Council welcomes the explanation of the relationship between the Broads Authority area and the constituent district and county councils. It is important that this continues to form part of any future Local Plan documents.	Noted.	No further action
1	Historic England	Historic England support paragraph 7.8 which describes in helpful detail, the unique nature of the Broads as a result of human activity and makes clear that the landscape forms a defining element of the historic environment in the area.	Support noted.	No further action.
1	RSPB	Page 23 7.6 (and sections 7.8, 7.9 and 7.10) seems to overstate the importance of boats vs land activities. We agree that access by water is a unique feature in the Broads, but evidence shows a change in focus and what visitors are looking for and pace needs to be kept with this change.	These sections provide context and highlight how the Broads are important in different ways. There is no evidence provided in the representation to propose changes to the text.	No further action.
1	RSPB	7.7 – Norfolk hawker is no longer as rare or threatened. Is there an opportunity to select another ambassador species e.g., fen orchid, which is only found in the Broads?	Noted. Will amend text.	Amend text.
1	RSPB	Given the emphasis currently being placed on landscape scale conservation (from individual enGO's to for example LNRS) is there merit in making mention of this to bring to life the sentiment described in the final para? Follows on from section 7.5 where mention needs to be made about integrating interests and important assets to enhance the whole without adverse impact on any individual interest/aspect. We contacted RSPB for clarification and they said: Only through greater collaboration and joint planning can beneficial landscape scale change for biodiversity and agriculture be achieved.	Noted and in delivering the Broads Plan, there is greater collaboration.	No further action for the Local Plan.
1	South Norfolk Council	In general Principle 1 and 2 appear consistent with the Norfolk Strategic Planning Framework (NSPF) in relation to recognising the very distinct issues facing the Broads Authority Area and its importance in bringing to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity. The Council would question whether "full scientific certainty" is a reasonable threshold to apply. In this respect the Council notes that the Planning Practice Guidance on appropriate assessments talks about ensuring that there is "no reasonable scientific doubt" and considering whether plans or is likely to result in "significant harm". It is suggested that having "no reasonable scientific doubt that there will be significant harm" would be a better, and more realistic principle to apply instead of "full scientific certainty", which would, on first appearances, appear to be a particularly high, and possibly unachievable threshold.	Comments noted. This section is called 'policy context' and refers to other policy documents that are relevant to the Local Plan. These are quotes from another document - the Broads Plan. That is the Management Plan for the Broads. That is now adopted and had its own consultation process over the last two years or so.	No further action.

Part of document (numbers denote question number)	Organisation	Comment	Response	Action for next version of the Local plan
1	South Norfolk Council	Principle 3 is consistent with the NSPF in relation to effective plan making and the Council welcomes the opportunity to work in partnership with the Broads Authority in respect of the production of its local plan.	Support noted.	No further action.
1	Suffolk County Council	Suffolk County Council would welcome further detail on the historic and particularly archaeological background of the Broads in this section. Section 7.8 touches on the unique quality and distinctiveness of the built environment of the Broads but could go into more detail on the significance of this and how this distinctiveness has evolved historically. More emphasis on the area's archaeological potential and importance, to help develop understanding of and protect the historic evolution of the Broads would be welcomed. We note reference to the exceptional potential for waterlogged archaeology, this could be expanded upon. The Suffolk County Council Archaeological Service (SCCAS) would welcome further engagement and could provide additional guidance if required.	Noted. Will weave this suggestion into the text.	Weave into context section.
1	Suffolk County Council	Suffolk County Council would also welcome expansion of section 7.11. The National Census 2011 data provided gives a good overview of the demographics of the Broads community. We also welcome reference to the 2019 Indices of Multiple Deprivation and that these maps have been assessed as part of the separate Deprivation Topic Paper. The areas identified as more deprived will require specific attention in terms of supporting access to services (including health services), access to open space and play space (including to the excellent recreational opportunities available within the Broads), provision of good quality housing and opportunities for active travel.	Noted. Will weave this suggestion into the text.	Weave into context section.
1	Suffolk County Council	Additional health outcome data for the Broads population is available from both the Suffolk Observatory and Public Health England's Fingertips Tool. The County Council would draw attention to the Joint Strategic Needs Assessment for Suffolk which aims to accurately assess the health needs of a given local population with a view to improving the physical and mental health and wellbeing of individuals and communities. There are also a number of place-based needs assessments, including for Lowestoft and South Waveney which provide further information on housing, education and poverty that affect health and wellbeing in these communities. These are often referred to as the 'wider determinants' of health. The County Council's Public Health team would welcome further engagement throughout the preparation of the Local Plan and can provide further area specific data and advice as required. The County Council supports recognition of the need for good access to recreation opportunities provided by the Broads as this supports the health and wellbeing of communities both within the Broads and beyond. Policies should support improvements to public rights of way throughout the Broads to improve and maintain access.	This is useful information, especially for the health section of the Local Plan and Sustainability Appraisal.	Use information in health section and engage with Suffolk CC about the health section of the Local Plan.
1	Woodbastwick Parish Council	There are insufficient public footpaths to encourage locals and visitors to enjoy the Broads landscape.	Comments noted.	Pass comment to Waterways and Recreation Officer.
1	Woodbastwick Parish Council	Easy access by and emphasis on water-based activities limits enjoyment of the Broads to those who have the financial means to hire or own water craft. It is not readily accessible to people from deprived communities;	Comments noted. Think the comment should read "those who do <u>not</u> have the financial means".	Pass comment to Waterways and Recreation Officer.
1	Broadland Council	In general Principle 1 and 2 appear consistent with the Norfolk Strategic Planning Framework (NSPF) in relation to recognising the very distinct issues facing the Broads Authority Area and its importance in bringing to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity. The Council would question whether "full scientific certainty" is a reasonable threshold to apply. In this respect the Council notes that the Planning Practice Guidance on appropriate assessments talks about ensuring that there is "no reasonable scientific doubt" =. It is suggested that "no reasonable scientific doubt" would be a better, and more realistic principle to apply instead of "full scientific certainty", which would, on first appearances, appear to be a particularly high, and possibly unachievable threshold.	Comments noted. This section is called 'policy context' and refers to other policy documents that are relevant to the Local Plan. These are quotes from another document - the Broads Plan. That is the Management Plan for the Broads. That is now adopted and had its own consultation process over the last two years or so.	No further action.
1	Broadland Council	Principle 3 is consistent with the NSPF in relation to effective plan making and the Council welcomes the opportunity to work in partnership with the Broads Authority in respect of the production of its local plan.	Support noted.	No further action.
2	Anglian Water	Engagement with stakeholders is an iterative process through plan preparation, including through the Duty to Cooperate and Statements of Common Ground. We welcome continued dialogue with the Broads Authority and will support the plan process through providing information and advice to underpin the evidence base and enable the adoption of a sound local plan. The Plan and SA objectives also aim to ensure that there are positive social outcomes for local communities, and the health and wellbeing of people living, working and visiting The Broads.	Support noted.	No further action.
2	Anglian Water	3.6. Whilst Anglian Water is not a prescribed body in relation to the Duty to Cooperate, we actively engage with Local Planning Authorities in the preparation of their Local Plans through providing advice and data to inform preparation of evidence base documents and responding appropriately to consultations on Local Plans or other local development documents.	Noted.	No further action.
2	Bradwell Parish Council	We think it would be a mistake to remove the duty to Cooperate.	Noted. It will be down to Government reforms. But we work closely with our districts and other DTC Authorities regardless of the Duty.	No further action.
2	Broads Society	The Society would hope that the strength of the current legislation is retained to ensure that cross-border cooperation with other local authorities is retained to the same extent. This could be particularly critical when dealing with issues relating to 'residential moorings' and 'liveaboards' when there might be a number of agencies involved in planning and 'non-planning' issues resulting from these activities.	Noted. It will be down to Government reforms. But we work closely with our districts and other DTC Authorities regardless of the Duty.	No further action.
2	Brooms Boats	Broom Boats believes in the strength of cross border cooperation and that the current legislation promoting this should be retained.	Noted. It will be down to Government reforms. But we work closely with our districts and other DTC Authorities regardless of the Duty.	No further action.
2	East Suffolk Council	East Suffolk Council welcomes the recognition of the relationship between the Broads Authority area and the northern part of East Suffolk and is satisfied that the Broads Authority is meeting the Duty to Cooperate insofar as East Suffolk Council is concerned. We look forward to continued co-operation with the Broads Authority in progressing the preparation and implementation of the new Local Plan. In particular we welcome continued liaison on cross boundary matters such as housing, water resource management, sustainable transport and habitats and biodiversity.	Support noted.	No further action.
2	RSPB	As presented in the Issues and Options 'a requirement to assist' seems an appropriate way to proceed.	Noted.	No further action.
2	Suffolk County Council	Suffolk County Council consider the Authority's approach to the Duty to Cooperate to be appropriate and appreciate the engagement that has taken place so far.	Support noted.	No further action.

Part of document (numbers denote question number)	Organisation	Comment	Response	Action for next version of the Local plan
2	Woodbastwick Parish Council	People who live within the boundaries of the Broads have no elected representative contributing to decisions made by the Broads Authority on issues that directly affect them. A representative on the Broads Executive from the District Council and County Council are not elected by and does not represent the residents.	The constitution of the Broads Authority is defined in the Broads Act, which the Broads Authority must comply with Norfolk and Suffolk Broads Act 1988 https://www.legislation.gov.uk/ukpga/1988/4/section/1 . It would be for the Parliament to agree on a different constitution for the Broads Authority. There is no provision under the Act for directly elected members, but the 9 appointments from the constituents councils are elected representatives from their respective councils.	No further action.
2	Woodbastwick Parish Council	We do not agree that there is any constructive engagement with the Parish Council and local community;	About the Duty to Cooperate which Question 2 refers to, we consult far and wide on the local plan, including with drop-in sessions where the public is invited to attend and where officers are available to respond to queries. The Planning Inspector will assess how the BA has met its duty to cooperate requirements at the Local Plan examination stage. More widely that the Duty to Cooperate, we consult the public when producing/reviewing other key strategic plans, such as the Broads Plan which was consulted upon during the summer 2022. We send regular briefings to all parish councils lying partly within the Broads, and officers will continue to engage with individual parish councils on local issues of concern. Here are more details about how to contact us: https://www.broads-authority.gov.uk/about-us/how-we-work/broads-engage	No further action.
2	Great Yarmouth Borough Council	The Borough Council is satisfied by the co-operation undertaken by the Broads Authority, particularly with respect to the commissioning of joint studies such as the Great Yarmouth and Broads Local Housing Needs Assessment 2022 and the Great Yarmouth and Broads Gypsy, Traveller & Residential Caravans Accommodation Assessment, and looks forward to continuing to cooperate on strategic and other issues of mutual interest.	Support noted.	No further action.
3	Anglian Water	3.7.The SWOT analysis in the Issues and Options document demonstrates the challenges in preparing a Local Plan to deliver long term sustainable and resilient development and supporting infrastructure in The Broads Executive Area, which is consistent with its three statutory purposes.	Noted.	No further action.
3	Bradwell Parish Council	The SWOT analysis raises some important issues and the threats are very worrying. A need to focus on sea defences and for us all to adopt a low carbon lifestyle is obvious.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Broads Society	Threat Threat to Hire Boat operators where new qualification demands (ie QAB) are imposed at additional costs by using single source suppliers hence non-market competitive based pricing.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Broads Society	Threat Threat to Hire Fleet operators if a level playing field is not guaranteed by audit regarding Hire Fleet minimum time spent per standard for safe operation of the vessel and of navigation irrespective of experience or other factors. The appropriate level of resources must be applied accordingly by each Hire Boat operator.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Broads Society	Threat Non agile planning processes and policies threaten the ability for organisations to react to environmental impacts such as flooding or market conditions such as economic opportunities of increased tourism (whilst these could be planned and enabled to be green and sustainable) and endanger the survival of businesses which threaten not only the livelihoods of existing staff and the loss of heritage skills but also apprentices learning old and new skills.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Broads Society	Threat Lost opportunity to engage agile planning processes with local authority partners and organisations to enable energy saving opportunities as a priority and as demanded by Government and UN.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Brooms Boats	Threat Threat to Hire Boat operators where new qualification demands (ie QAB) are imposed at additional costs by using single source suppliers hence non-market competitive based pricing.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Brooms Boats	Threat Threat to Hire Fleet operators if a level playing field is not guaranteed by audit regarding Hire Fleet minimum time spent per standard for safe operation of the vessel and of navigation irrespective of experience or other factors. The appropriate level of resources must be applied accordingly by each Hire Boat operator.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Brooms Boats	Threat Non agile planning processes and policies threaten the ability for organisations to react to environmental impacts such as flooding or market conditions such as economic opportunities of increased tourism (whilst these could be planned and enabled to be green and sustainable) and endanger the survival of businesses which threaten not only the livelihoods of existing staff and the loss of heritage skills but also apprentices learning old and new skills.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Brooms Boats	Threat Lost opportunity to engage agile planning processes with local authority partners and organisations to enable energy saving opportunities as a priority and as demanded by Government and UN.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	East Suffolk Council	East Suffolk Council do not have any specific comments on the SWOT analysis, it provides a sensible analysis of the strengths, weaknesses, opportunities and threats in relation to the Broads Plan.	Support noted	No further action.
3	RSPB	Strengths – a good and extremely varied selection of bullet points Complementary to 9.2 c) is the fact that a high proportion of the SSSI units in the Broads are in favourable or unfavourable recovering condition, which signifies mostly appropriate actions and management operations are being undertaken – but clearly more can and should be done. Additional – a mix of accessible locations and less accessible locations promoting a range of enjoyment opportunities to suit audience needs and avoid unnecessary disturbance of fragile habitats and secretive species	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.

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3	RSPB	Weaknesses a) Change 'many' to 'a proportion' and add 'conflicting water regimes – species and habitats vs agriculture leading to complex and costly hydrological interventions.' y) Suggest change to 'Susceptible to climate change impacts such as variable rainfall patterns and increased incidence of saltwater incursion leading to significant habitat and landscape change' Add – adverse pressure and hence deterioration of natural assets resulting from 'over-patronisation' by visitors. An example might be Horsey/Winterton dunes	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	RSPB	Opportunities a) Transition to more brackish conditions provide opportunity to create saltmarsh which could trap Carbon. We question whether option e) is viable in terms of freight on rivers given the rate of sedimentation and potential obstructions? It would be helpful to understand where freight would be off-loaded. Plus, to facilitate freight access on rivers might require dredging which would increase potential for saline incursion to move further upstream. g) is critical add the word 'future' before complementary. Early investigations are needed to prepare for impacts resulting from climate change as are agreeing design and a 'landscape development plan.' i) does this sit better under the 'strengths' section as it is a statement of fact? n) agree. Could this have additional comment such as '... and their role in preserving these qualities.' u) Add 'promoting greater focus on environmental enhancements...'. New – gradual transition to vehicles powered by non-fossil fuels, leading to reduction in pollution, quieter transport modes.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	RSPB	Threats Suggest altering iv) – change in grazing regimes as floodplain grassland becomes unable to support grazing animals, economically and on welfare grounds (increased salinity, lack of drinking water for stock resulting from drought). Suggest rewording to place emphasis on 'marked changes to rainfall patterns from too much to too little making it hard to plan for, and manage businesses, traditional industries and the landscape alongside coping with proposed increase in housing.' New under c) or modify ii) – deterioration/change in the landscape character of the area as saline impacts become more prominent and spread upriver. Would there be merit in ordering the most important opportunities and threats, so they appear at the top to focus effort and application of resources, rather than just providing a long list of possibilities?	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Suffolk County Council	Suffolk County Council suggest the SWOT analysis could highlight the following as strengths: • The Broads represent a significant area for outdoor recreation and access to green space, supporting the mental and physical wellbeing of residents and visitors of all ages, through provision of open space for physical activity and creation of opportunities for social engagement.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Suffolk County Council	We suggest the SWOT analysis could highlight the following as opportunities: • Improvement of access to the Broads for residents and visitors with limited mobility, contributing to a reduction in isolation for vulnerable groups • Potential for making the Broads 'Dementia Friendly' both for residents and visitors living with dementia	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Woodbastwick Parish Council	There is a danger that the Broads is seen as a recreational area for white middle-class communities.	Comment noted.	Pass to Waterways and Recreation Officer
3	Woodbastwick Parish Council	Insufficient regard to develop an improved network of footpaths at a low cost, environmentally friendly, healthy, affordable activity that is accessible to all communities and all socio-economic groups	Comment noted.	Pass to Waterways and Recreation Officer
4	Anglian Water	The Local Plan includes a number of objectives that aim to protect the highly valued natural environment of The Broads, address climate change impacts and conserve and enhance water quality and resources. It is considered that the Sustainability Appraisal (SA) objectives will provide a sound basis for assessment of Local Plan objectives and policy options for the next stage.	Noted.	No further action.
4	Anglian Water	The strategic objectives of the existing Local Plan include reference to a buoyant and successful economy and supporting a prosperous and sustainable tourism economy. The SA objective SOC5 to maximise opportunities for new/additional employment is compatible with the plan objectives where they underpin the statutory purposes for the Broads Authority.	Support noted.	No further action.
4	Anglian Water	3.14. We are supportive of the Vision for The Broads regarding biodiversity, nature recovery and meeting the challenges of climate change. Further commentary is included in our responses to the specific sections of the document which address these topics.	Support noted.	No further action.
4	Anglian Water	3.15. We agree with the proposed changes to the objectives, to support the vision and policies as they emerge. We agree that nature-based solutions should factor in OBJ6 regarding water quality and such solutions also provide benefits for biodiversity and nature recovery, resilience to the impacts of climate change, carbon sequestration, and health and well-being. 3.16. We support the proposed inclusion of net zero and adaptation to climate change in OBJ7 given the vulnerability of The Broads to the impacts of climate change.	Support noted.	No further action.
4	Bradwell Parish Council	We agree with the objectives and also feel the issue of second homes needs to be addressed.	Suggestion about addressing second homes noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	Broads Society	With regard to the potential changes to the objectives, the Society has no problem with including specific mention of Dark Skies under Objective 2. There are some concerns about the inclusion of 'warm, energy efficient homes' under Objective 9 as it is felt that this should be down to Building Regulations legislation and not Planning legislation.	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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4	Broads Society	OBJ14 – potential to refer to the tension between tourism and sustainability? It is important to recognise that as in the response to Question 1, without attracting visitors, and specifically new generational visitors, to the Broads, revenues supporting the eco system that is The Broads will only place pressure on what is possible in the protection of The Broads. It is impossible to react to ‘Tensions between tourism and sustainability’ with an approach of non- approval of planning, of embracing visitors to the area for fear of increased traffic movements, of stopping businesses adapting to market conditions and market requirements. Instead, the approach should be collaborative, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism. Broom Boats believes that Building Regulations should be the foremost advisory for building design and ensuring that appropriate materials and technologies are used relevant to the significant impact environmental effects are having.	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	Brooms Boats	OBJ14 – potential to refer to the tension between tourism and sustainability? It is important to recognise that as in the response to Question 1, without attracting visitors, and specifically new generational visitors, to the Broads, revenues supporting the eco system that is The Broads will only place pressure on what is possible in the protection of The Broads. It is impossible to react to ‘Tensions between tourism and sustainability’ with an approach of non approval of planning, of embracing visitors to the area for fear of increased traffic movements, of stopping businesses adapting to market conditions and market requirements. Instead, the approach should be collaborative, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	Designing Out Crime Officer, Norfolk Police	Agree with OBJ2 the mention of Dark Skies specifically and OBJ9 – could include warm, energy efficient homes – I think this should go further to include ‘safe’ i.e. specifically Secured by Design standard safe in both the physical security of the homes and CPTED (crime prevention through environmental design) principles applied to the development as a whole.	Suggestions to OBJ9 seem logical.	Weave into Objective 9 reference to warm, energy efficient and safe homes.
4	East Suffolk Council	The Council, earlier in the year, responded to the draft Broads Management Plan and commented that it supports the vision. East Suffolk support the additional objectives as outlined in the consultation document (dark skies, nature recovery, net zero, energy efficient homes, second homes, tensions between tourism and sustainability). Many of these issues link to the context of the Broads Authority area and reflect emerging or recently established national policy which Local Plans should take account of.	Support noted.	No further action.
4	Historic England	Support. OBJ8 specifically addresses address the need to protect, maintain and enhance the historic environment, and is very much welcomed. This strong objective will help positively shape the Plan’s strategic policies. Overall the objectives demonstrate an integrated approach to the conservation of the historic environment which sees the interrelationship between conservation and other spatial planning goals recognised within several different policies rather than in isolation. For example, OBJ3 and 14 embody a wider understanding of the historic environment has helped inform these objectives which will also help deliver the conservation and enhancement of the historic environment.	Support noted.	No further action.
4	RSPB	Is it possible to mention in the Vision or Objectives how these statements are going to be realised, by whom and how progress is going to be monitored and resources applied to achieve them? Is there an opportunity to amend the objectives so they’re a little smarter? Suggested subtle changes to consider would be: 1.For the lifetime of this plan retain the Broads as a regional, national and internationally important landscape asset, valued and respected by people who live and work here and those who visit. 2.To create and maintain at least 10 areas and locations which provide true tranquillity, dark skies and wildness and offer a tangible sense of being remote and distant from the day-to-day world 3.To protect, maintain where needed and enhanced where feasible the landscape character and setting of the Broads to retain the unique, highly valued, and attractive environment.	Regarding the vision - the Broads Plan and Local Plan for the Broads as well as other related strategies, are the ways to achieve the vision. Suggestions for amending the objectives noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	South Norfolk Council	In broad terms the objectives appear consistent with the NSPF. The key issue for the Broads, as it is elsewhere, is ensuring the plan resolves the difficult balance of protecting and enhancing the environment whilst enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Noted. Representation does not suggest changes or highlight issues.	No further action.
4	Suffolk County Council	We note the vision sets the Authority’s target of achieving ‘net zero’ carbon by 2040. Suffolk County Council has declared a climate emergency with the aim of achieving net zero by 2030.	Noted.	No further action.
4	Suffolk County Council	Suffolk County Council supports the potential change to OBJ9 to include reference to warm, energy efficient homes. Good quality housing has a direct relationship with improved health outcomes for residents. We would draw attention to the Marmot Review, (2020) The Marmot Review 10 Years On – Health Equity in England. This review states that ‘poor quality housing harms health and evidence shows that exposure to poor housing conditions (including damp, cold, mould, noise) is strongly associated with poor health, both physical and mental.’	Support noted.	Weave into Objective 9 reference to warm, energy efficient and safe homes.
4	Suffolk County Council	We would also support the inclusion of a specific reference to archaeology in OBJ8 in addition to the area’s historic environment and cultural heritage.	Agreed.	Weave into Objective 8 reference to archaeology.
4	Suffolk County Council	In addition, Suffolk County Council would support reference to nature recovery in OBJ4.	Support noted.	No further action.
4	Woodbastwick Parish Council	Easier access is required to fulfil objective 11	Noted. We have and will be reviewing the Integrated Access Strategy.	Pass on comment to Recreation and Waterways Officer.
4	Broadland Council	In broad terms the objectives appear consistent with the NSPF. The key issue for the Broads, as it is elsewhere, is ensuring the plan resolves the difficult balance of protecting and enhancing the environment whilst enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Noted. Representation does not suggest changes or highlight issues.	No further action.

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5	Anglian Water	<p>3.17. Anglian Water is the statutory sewerage undertaker for the Broads, and the statutory water provider for part of the Broads. We therefore have a network of assets throughout the Executive Area which we maintain and invest in improvements where necessary. Our Drainage and Wastewater Management Plan (DWMP) is in preparation with a view to publish by the end of May 2023 and highlights the known and expected future risks to drainage and identifies solution strategies to mitigate these. In addition, we are also preparing our Water Resources Management Plan (WRMP24) which will be available for consultation soon – and will set out how we intend to achieve a secure supply of water for our customers whilst protecting and enhancing the environment from 2025 to 2050. The WRMP24 will align with the draft Water Resources East Regional Water Resources Plan which addresses the future needs and aspirations for water across all sectors – this is currently open for consultation.</p> <p>3.18. Both the DWMP and WRMP set out a long-term vision for future management and investment of our assets and will inform our Price Review (PR24) and our Long-Term Delivery Strategy.</p> <p>3.19. We agree that the Local Plan should focus on previously developed land where it is not vulnerable to flood risk and existing infrastructure can be utilised.</p>	Support noted.	No further action.
5	Designing Out Crime Officer, Norfolk Police	Option F) What kind of development, if any do you think your part of the Broads would benefit from Norfolk Constabulary request that as a condition of planning and to support partnership working for any new developments that they are in line SBD standards and guidelines to ensure that the Broads towns and villages remain safe and do not see an increase of crime and disorder due to poor design.	Noted. This is more for design policy.	Ensure design policy refers to SBD standards and guidelines.
5	East Suffolk Council	East Suffolk Council have provided some analysis of most relevant areas in response to question 40 below. Other points have been picked up under other responses as appropriate.	Noted.	No further action.
5	RSPB	<p>c) Are there any other issues that affect your community/your part of the Broads that you would like to be considered in the preparation of the new Local Plan?</p> <p>Recognition that the Broads is a sink for many unwanted adverse inputs e.g., pollutants, nutrients etc., which originate outside the area. Thus, a tightly joined up approach is essential to ensure down-stream or down- contour isn't affected by adverse inputs brought into the Broads by gravity.</p>	Noted. We do work on a catchment basis. Indeed, Nutrient Neutrality is a key aspect of the comment.	Continue partnership working.
5	RSPB	<p>d) What changes do you expect to see over the next twenty years in your part of the Broads that the Local Plan may need to cater for?</p> <p>As a result of climate change the water resource and its availability will change. To make wise use of this commodity we need to encourage users to save and not waste and be respectful of this precious asset.</p>	Agreed. We asked about future development and water use in this consultation document.	See responses to water use questions.
5	RSPB	<p>f) What kind of development, if any, do you think your part of the Broads would benefit from?</p> <p>Green infrastructure to promote access to specific parts of the Broads, nominally referred to as honey pot sites, thereby focusing visitor pressure to allow retention of other, remote places where very few or no visitors go to, and a sense of remoteness and wilderness is maintained.</p>	Noted and there is a role for the Broads Plan, Integrated Access Strategy and Sustainable Tourism Strategy in addressing this.	Share comment with other officers at the Broads Authority.
5	Sequence UK LTD/Brundall Riverside Estate Association	<p>2.11 The Brundall Riverside Estate Association does not wish to comment in detail in response to this question and some of the matters raised are covered in more detail in response to other questions.</p> <p>2.12 As set out above, the Riverside Estate comprises boatyards, marinas and other businesses and a number of private residential and holiday homes. It is a relatively large mix of businesses and residential/holiday use, directly adjacent to the current settlement limit for Brundall and a sustainable location, particularly in relation to Brundall railway station. Therefore, as set out in our response below, the Association would consider that this should be recognised by inclusion within a development boundary.</p> <p>2.13 The nature of the estate continues to evolve, particularly challenges to the more traditional boatyard and marina uses and therefore the Local Plan, and draft Design Guide should be flexible and allow for appropriate change and diversification, not being overly-prescriptive as it is difficult to predict for 20 years in advance.</p> <p>2.14 The Brundall Riverside Estate Association would also make the point that recent developments and the extension or replacement of chalets with more modern construction has been a positive, in particular this has rejuvenated some more tired looking plots and this has had a knock-on effect of greater pride in the location and further enhancements such as roads, boundary treatments and planting/landscaping, as well as further investment.</p>	Noted. The Brundall Riverside Estate area has policies addressing various parts of the area and these will be checked, amended if needed and rolled forward.	Liaise with Sequence when looking at the Brundall policies.
5	Upton Parish Council	a) the area of the Broads within the boundaries of Upton is much valued. The area of open space is mostly managed by the Norfolk Wildlife Trust and the Environment Agency. The space to walk and sit quietly is appreciated, and the opportunities to see wildlife and flora.	Noted. Good to hear how the Broads is much valued by the local community.	No further action.
5	Upton Parish Council	b) the cutting of footpaths in the area is not frequent enough. Some become almost impassable by mid summer. There seems to be cutting of access to fishing platforms by the EA but very infrequent cutting for walkers.	<p>The following specific stretches of footpath in the Upton/Acle area are cut by the Broads Authority:</p> <ul style="list-style-type: none"> • IllAcle Bridge to Upton on the south side of the river. • IllFootpath along the south side of Upton Dyke. • IllAcle Bridge to Acle. <p>Any issues relating to grass cutting along these stretches, please contact the Broads Authority via the website https://www.broads-authority.gov.uk/contact-us</p> <p>All other footpaths are cut by Norfolk County Council, as can be viewed via this link http://maps.norfolk.gov.uk/highways/</p> <p>Any issues on these paths, please use Norfolk County Council's reporting form https://www.norfolk.gov.uk/roads-and-transport/roads/report-a-problem#prowicons</p>	None
5	Upton Parish Council	c) Given that the BA receives tolls from boat users, it would seem fair that the BA should help with the cost of litter removal from the boat dyke car park and staithe. In the summer, people moor up and put bags of rubbish next to the litter bin that is provided by Broadland DC. There are clearly insufficient refuse collection points in the BA area.	The Broads Authority are not responsible for boat waste but the responsibility lies with the relevant local authorities within the Broads area.	None
5	Upton Parish Council	d) the BA needs to plan for increased numbers of tourists - refuse collection, parking and public toilets.	The Broads Authority are not responsible for boat waste but the responsibility lies with the relevant local authorities within the Broads area.	None

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5	Wroxham Parish Council	a) "When asked what is special about Wroxham, residents repeatedly noted its waterside location and community spirit. The combination of setting, size and natural beauty, combine to make Wroxham a unique place to live. For more than 100 years Wroxham has been regarded as The Capital of The Norfolk Broads. It lies at the heart of the Broads National Park and has a range of housing in woodland and waterside settings. Adjacent to a thriving hub of tourism it nevertheless offers areas of tranquillity for those seeking a high quality of living." Wroxham Neighbourhood Plan (WNP).	Information noted.	Consider this comment as produce Preferred Options version of the Local Plan.
5	Wroxham Parish Council	b) The Council would like to see the former Windboats site on the Norwich Road developed into a residential development that provides housing for older people as permanent residences with attractive public spaces and a public right of way from Staithe Way Road to the Norwich Road. In addition, the Council would like the boundary along the Norwich Road with Bridge Broad to be improved. It is currently an unattractive dilapidated fence. The regular flooding in this area also needs to be addressed. Flooding often blocks the footpaths on either side of the Norwich Road adjacent to Bridge Broad and Norfolk Broad Direct and also at the entrance of Bridge Broad Close. Pedestrians, particularly those from the nearby sheltered housing complex, are often prevented from accessing the facilities over the bridge in Hoveton due to this flooding. The Parish Council have been in correspondence with Highways on the matter but have been told a scheme to raise the road is too expensive.	Noted and we will treat this as a suggested site to be considered.	Add to sites to look into for allocation.
5	Wroxham Parish Council	c) Housing for older people (WNP policy HBE5), new small retail outlets (BUS1), new businesses that diversify employment opportunities (BUS2), small scale sustainable tourist developments (BUS3), improvement in the public space around the Wroxham-Hoveton river bridge and the condition of the river bridge itself (COM1), improved community amenities especially space for leisure activities and pre-school provision (COM2), riverside/Broad public open spaces (COM3 & ENV1), a reduction in traffic congestion (TRA1), improved walking and cycling in particular the provision of a Green Loop providing a safe and pleasant walking and cycling route off the A1151 (TRA3).	Reference to Wroxham Neighbourhood Plan noted.	Consider all Neighbourhood Plans as produce the Preferred Options.
5	Wroxham Parish Council	d) Switch to electric vehicles and therefore a need for charging points both residential and public. An increase in extreme weather creating hot dry and then very wet periods which could be mitigated by an increase in trees and planting and flood ready infrastructure. Also better working practices by the BA to work together with the EA on water abstraction licencing to prevent the rivers running dry. An increase in traffic created by large developments on the A1151 at Rackheath and on the NDR at Salhouse etc.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
5	Wroxham Parish Council	e) See point b.	Noted.	See point b
5	Wroxham Parish Council	f) See point c	Noted.	See point c
5a	Bradwell Parish Council	Parks and natural habitats such as Bluebell Woods. Community Centres and Recreation facilities.	Following further conversations, this site is not in the Broads Authority Executive Area. We have policies relating to community centres and recreation facilities.	No further action.
5b	Bradwell Parish Council	We would like to see the Bluebell Woods area improved to be more of a community recreational area.	Following further conversations, this site is not in the Broads Authority Executive Area.	No further action.
5c	Bradwell Parish Council	The poorly thought-out plan to imprison Bluebell woods, Bradwell in the middle of an industrial estate.	Following further conversations, this site is not in the Broads Authority Executive Area.	No further action.
5d	Bradwell Parish Council	Rising sea levels causing more localised flooding. More problems with drought type conditions.	Noted.	No further action.
5e	Bradwell Parish Council	None,	Noted.	No further action.
5f	Bradwell Parish Council	More open spaces and natural habitats for wild life.	Noted.	No further action.
6	Bradwell Parish Council	It seems eminently sensible to plan for climate change to minimise the impact.	Support noted.	No further action.
6	East Suffolk Council	East Suffolk Council welcome the inclusion of the climate change checklist. However, the checklist asks what the impact level is (small, medium, significant etc) which could be rather subjective. Therefore you may want to consider if there is value in providing more space on the checklist for applicants to demonstrate how they have considered and mitigated for future climate changes. A section could also be added regarding the related time impacts – i.e. 'immediate / future impact, plus the frequency (e.g. annually / every 10 years), as some mitigation measures may require ongoing maintenance or investment.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
6	RSPB	The approach is limited to built development. Given the intrinsic link between built development and development/management elsewhere in the Broads we suggest comment is made and planning undertaken to describe the predicted impact on floodplain habitats. There is a link here to both agriculture and focus of questions 30 and 31 and the aspiration to make the Broads an attractive and viable place to visit and enjoy. This could be compromised if development either directly or indirectly leads to the deterioration of the landscape and natural assets.	Comment noted. However, all the Local Plan can really cover is built development. Whilst there is benefit in making information available about wider issues, this is better done through other documents such as the Broads Plan the Local Nature Recovery Strategy.	No further action.
6	Sequence UK LTD/Brundall Riverside Estate Association	2.16No objection to the climate change checklist being rolled forward from the current local plan. We welcome the suggested amendments to making the questions clearer but the reserve the right to comment further when those amendments are published.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
6	South Norfolk Council	Whilst this would bring awareness to climate change in new developments and in turn be consistent with Agreement 20 of NSPF, the overall aim and justification for the climate change checklist needs further detail and justification. For example it would be useful to clarify who would be filling this checklist in and whether this needed to be an environmental specialist? It would be beneficial to understand what type of development would require a checklist. In addition, the impact seems to be measured by 'nil, small, medium, significant' but the Council couldn't identify where there was guidance on what each category meant. Again, further clarity on who would be completing this element in order to make a judgement would be beneficial as would explanation of what evidence, or what types of evidence, would be required to demonstrate the judgements made. Overall, it is considered that further information is required to understand what the checklist would achieve and its specific impact on decision making e.g. if a development falls within the 'nil' category would this warrant a refusal, or is this just an aid to understanding of the extent to which the development has specifically considered climate change?	Noted. The checklist is not new; it was part of the currently adopted Local Plan. But comments are useful and will be considered as we produce climate change policies.	Consider comments we produce climate change policies.
6	Suffolk County Council	Suffolk County Council supports the Local Plan's position on climate change and the use of the accompanying climate change checklist.	Support noted.	No further action.

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6	Broadland Council	Whilst this would bring awareness to climate change in new developments and in turn be consistent with Agreement 20 of NSPF, the overall aim and justification for the climate change checklist needs further detail and justification. For example it would be useful to clarify who would be filling this checklist in and whether this needed to be an environmental specialist? It would be beneficial to understand what type of development would require a checklist. In addition, the impact seems to be measured by 'nil, small, medium, significant' but the Council couldn't identify where there was guidance on what each category meant. Again, further clarity on who would be completing this element in order to make a judgement would be beneficial as would explanation of what evidence, or what types of evidence, would be required to demonstrate the judgements made. Overall, it is considered that further information is required to understand what the checklist would achieve and its specific impact on decision making e.g. if a development falls within the 'nil' category would this warrant a refusal, or is this just an aid to understanding of the extent to which the development has specifically considered climate change?	Noted. The checklist is not new; it was part of the currently adopted Local Plan. But comments are useful and will be considered as we produce climate change policies.	Consider comments we produce climate change policies.
7	Anglian Water	3.23.IIIWe support the approach to energy efficient buildings including embodied energy of buildings – this aligns with advice in The Broads Design Guide. However, there is an opportunity to also reference water efficient buildings to emphasise the benefits of minimising potable water demand from new developments, as this helps to minimise energy use (and carbon) in wastewater treatment and potable water treatment and distribution, but also helps to reduce the energy consumption of new buildings particularly for hot water if water efficient fittings are utilised.	Noted. The issue of water efficiency was discussed elsewhere in the Issues and Options.	See water efficiency section.
7	Bradwell Parish Council	The movement towards net zero energy supply needs to be accelerated.	Support for net zero noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Broads Society	The Society agrees with the approach to not set a standard for energy design of new buildings in the new Local Plan for the Broads at this time.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Brooms Boats	Broom Boats believes that Building Regulations should be the foremost advisory for building design and ensuring that appropriate materials and technologies are used relevant to the significant impact environmental effects are having.	Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Designing Out Crime Officer, Norfolk Police	Research conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO2 per annum. This is roughly equivalent to the total CO2 output of 6 million UK homes. The environmental benefits of Secured by Design are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage. It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows, and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.	Noted. This is more for design policy.	Ensure design policy refers to SBD standards and guidelines.
7	East Suffolk Council	It is important for the Local Plan to emphasise that Building Regulations set the legal minimum standards and for the Plan to encourage developers to deliver homes that exceed these standards for energy performance. Norwich City Council has delivered the Goldsmith Street development to Passivhaus standards and East Suffolk Council is developing the former Deben High School site in Felixstowe to provide 61 Passivhaus homes. These could be cited as examples, albeit of larger scale development, to inspire and promote good design and to show it is realistic and achieved. Clarification of the approach to residential solar PV installations (alongside heat pump installations) would also be useful.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	East Suffolk Council	It is worth noting that East Suffolk Council have recently adopted a Sustainable Construction Supplementary Planning Document (April 2022), which is available to view here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf . This SPD includes information about how sustainable construction methods and materials used in new development can reduce the construction and operational impact on our environment, wildlife, climate change and health and wellbeing. It also provides guidance on how the operating efficiency of existing buildings can be improved through retrofitting.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Norfolk Wildlife Trust	Whilst not directly asked in this question, we also support the plan including policy which would require progressive increased energy efficiency measures and reference the best practice set out in the joint publication by the Royal Town Planning Institute and the Town and Country Planning Association, The Climate Crisis – A Guide for Local Authorities on Planning for Climate Change https://tcpa.org.uk/wp-content/uploads/2021/11/tcpartpicimateguide_oct2021_final.pdf	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Norfolk Wildlife Trust	we are supportive of policy changes to deliver low and zero carbon new build, and believe that the inclusion of a zero carbon new build policy would be an achievable and deliverable policy that would bring clear benefits for climate change mitigation. We refer to the adopted zero carbon new homes policy in Reading City Council's local plan as evidence of the deliverability of such a policy.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	RSPB	The statement 'CO2 emissions from new build homes must be around 30%...' needs tightening as developers tend to aim for the minimum figure. Incentivising developers to aim above 30% should be investigated. We don't understand why the reduction figure of 27% for shops and offices, is different from homes?	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Sequence UK LTD/Brundall Riverside Estate Association	2.18Agree with the approach set out within the consultation to not set a specific policy as this is covered within the building regulations.	Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	South Norfolk Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV charging points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Suffolk County Council	To support Suffolk County Council's ambition of achieving carbon neutrality by 2030, the Suffolk Climate Emergency Plan was produced. This in turn is supported by a table of key actions which include supporting the county's Local Authorities to develop policies requiring new homes to be built in line with the 2025 Future Homes and PAS 2035 standards, including heat pumps or new heat networks or connection to existing heat networks. We would therefore support the inclusion of policies that embed these requirements for new homes in the Broads.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Broadland Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV charging points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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8	Bradwell Parish Council	If electric vehicle charging points can be provided without a major impact on the broads then they should be implemented.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
8	Broads Society	The Society agrees with the approach to not set a standard for electric vehicle charging points in the new Local Plan for the Broads. However, it is important that electric vehicle points, where proposed, are viewed positively within planning applications where sustainable travel is being encouraged to enable businesses to react to changing market conditions and environmental impacts.	Noted. Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce the Preferred Options and any policy on parking.
8	Brooms Boats	Standards for electric vehicle charging should be outside of the Local Plan.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
8	Brooms Boats	It is important that electric vehicle points, where proposed, are viewed positively within planning applications where sustainable travel is being encouraged to enable businesses to react to changing market conditions and environmental impacts.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
8	Designing Out Crime Officer, Norfolk Police	Residential parking spaces should be perpendicular and to the front of dwellings they are meant to serve, in order to maximise the opportunities for natural surveillance. This feature will become more relevant with the increase of the electric charging of vehicles on driveways. This should be factored in when designing new housing developments in line with SBD guidelines.	Noted. This is more for design policy.	Ensure design policy refers to SBD standards and guidelines.
8	East Suffolk Council	As is correctly set out in the consultation document, under Building Regulations a new residential building with associated parking is required to provide an EV charging point. However we would still recommend requiring EV charging points on developments with on-plot parking as part of planning policy. Consideration could also be given for EV charging provision in community buildings, e.g. village halls and public car parks. A position on on- street/ lamppost EV chargers could also be included.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
8	RSPB	Will this be incentivised? If electric vehicle charging points aren't developed in line with proposed removal of fossil fuel powered vehicles there is likely to be competition for this service.	Noted, but this seems more a national issue and not one which the Local Plan can address.	No further action.
8	Sequence UK LTD/Brundall Riverside Estate Association	2.20 Agree with the approach set out within the consultation to not set a specific policy as this is covered within the building regulations.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
8	South Norfolk Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV charging points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
8	Suffolk County Council	Suffolk County Council suggests reference is made to the Suffolk Guidance for Parking which provides further information on electric vehicle charging points.	Noted. Refer to Suffolk and Norfolk CC parking guidance.	Refer to Suffolk and Norfolk CC parking guidance.
8	Broadland Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV charging points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
9	Broads Society	The Society feels that it is helpful to have a preferred hierarchy approach particularly for new development but does not think that any proscribed approach is necessary which would require new development and extensions to be 'heat-pump ready'. This could add an unnecessary financial burden on developers and residents. Instead, the approach should be collaborative and viewed positively within planning applications, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	Brooms Boats	The approach should be collaborative and viewed positively within planning applications, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	Designing Out Crime Officer, Norfolk Police	Option c) Yes reducing / eradicating oil tanks which are vulnerable to theft and criminal damage (when not locked or surrounded by the recommended layers of security) and replaced with other heating sources would be supported by Norfolk Constabulary to reduce crime.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	Sequence UK LTD/Brundall Riverside Estate Association	2.22 The Brundall Riverside Estate Association do have concerns with regard to the energy hierarchy set out above. Such an approach would go beyond the building regulations requirements and it is not clear from the consultation as to who would make the assessment as to whether a development is acceptable in terms of the hierarchy. 2.23 It is presumed this would be undertaken by Broads Authority's Planning Officers unless a specialist role is created but this would create a further pressure on planning resource and it is not clear whether there is appropriate in-house expertise to make judgements on the proposed hierarchy. 2.24 By contrast, the drainage hierarchy is implemented by specialist officers within the Lead Local Flood Authority (LLFA) at Norfolk County Council. Even then, this can be problematic even where applicants have legitimate grounds to justify a drainage solution further down the hierarchy where 'higher' options are not viable. 2.25 There is a concern that such an approach could be overly restrictive and place a burden on developers, in going beyond building regulations requirements. In particular the reference to extensions meeting the hierarchy would seem inappropriate if it is required to be of a higher standard than the main dwelling. 2.26 We would therefore suggest that the proposed heating hierarchy is not appropriate.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	South Norfolk Council	Consistent with the Agreement 3 of the NSPF. However, there is no reference to domestic wind power sources and whether there are any circumstance in which this may be deemed an appropriate solution within the Broads. The Council also considers that there may be a significant opportunity to encourage the use of water source heat pumps and this should be given due consideration in the policies of the Local Plan.	There is reference in the Issues and options to wind and small scale wind - section 18. Noted regarding watersource heat pumps.	When reviewing the renewable energy policy, consider how to address water source heat pumps.
9	Suffolk County Council	Addressing the way homes are heated in Suffolk is considered an important component of reaching carbon neutrality across the Suffolk. In addition to supporting policies that require new buildings to include heat pumps or new heat networks, Suffolk County Council also supports the uptake of heat pumps in existing buildings in line with the actions accompanying the Suffolk Climate Emergency Plan. We support the heating hierarchy set out at section 13.5 and would support the requirement for new developments to be heat pump ready.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	Broadland Council	Consistent with the Agreement 3 of the NSPF. However, there is no reference to domestic wind power sources and whether there are any circumstance in which this may be deemed an appropriate solution within the Broads.	There is reference in the Issues and options to wind and small scale wind - section 18. Noted regarding watersource heat pumps.	When reviewing the renewable energy policy, consider how to address water source heat pumps.

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9a	RSPB	Looks sensible. Are you differentiating between ground source and air-source heat pumps? Either way it makes sense to make clear both methods should be considered as valid.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9a	Bradwell Parish Council	We only agree with a-d.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9a	East Suffolk Council	East Suffolk Council's view is that planning policy should support low carbon and renewable energy but should not be setting detailed requirements. Building Regulations should set the requirements for energy performance at the national level. Building Regulations set carbon emission standards without specifying the type of heating/hot water system required. This approach allows for new technologies to come forward that are more energy efficient/low carbon. Given the timeframes of Local Plans, it is important that there is sufficient flexibility to accommodate technological advances in this area. As above, clarification of the approach to residential solar PV installations (alongside heat pump installations and potentially geothermal) would be useful.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9b	RSPB	It would make sense to work towards phasing out fossil fuel source systems and again incentivise with Government grants or other.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9b	Bradwell Parish Council	The approach should be for net zero emissions.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9b	East Suffolk Council	Notwithstanding our more general comments against question a) above, the principal behind the introduction of some form of heating hierarchy sounds sensible. As noted in the consultation document, any new Local Plan will need to consider the impact that any new standards may have on the feasibility of installing oil and gas boilers in new homes in the future.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9c	RSPB	An essential approach to take to smooth the transition. Perhaps impossible to predict but design and installation should allow adaptation at a future date if new technology arrives to further enhance efficiency.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9c	Bradwell Parish Council	We should move to a situation where all developments are heat pump ready.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9c	East Suffolk Council	As outlined in our response to question a) above, East Suffolk Council's view is that Building Regulations, not planning policy, are best placed to specify requirements for heating and/or hot water systems. Building Control Officers have the knowledge and expertise to assess the technical information submitted alongside applications and can carry out the necessary onsite checks to ensure work has been carried in accordance with plans. Developments being 'heat network ready' where viable is expected to be a future national requirement – this could also be added as a consideration, but may be less relevant to the Broads due to the generally lower heat and population density.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Anglian Water	3.24.III We support the approach relating to embedded carbon. Anglian Water's Net Zero Strategy seeks to be net zero by 2030 and reduce capital (embedded) carbon by 70% from a 2010 baseline. This reinforces the need for sustainable, resilient development and supporting infrastructure to minimise carbon emissions and avoid future redundancies/abandonment.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Bradwell Parish Council	Yes, we should strive for less embodied carbons.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Broads Society	The Society feels that this could have an adverse impact on the design quality of new build or replacements/extensions. Also it should be another element that could be usefully incorporated into Building Regulations legislation rather than Planning legislation if felt necessary.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Brooms Boats	Broom Boats believes that Building Regulations should be the foremost advisory for building design and ensuring that appropriate materials and technologies are used relevant to the significant impact environmental effects are having.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	East Suffolk Council	As the Broads Authority will be aware, there can be a significant time gap between a development receiving planning permission and work starting on site, and some larger developments can take years to complete. As such, developers may require a degree of flexibility to enable them to source alternatives when there are material shortages, supply chain delays, or changes in price. The RICS Whole life Carbon assessment for the built environment is recommended as an approach for identifying opportunities to reduce emissions over the course of a building's lifetime. www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessment-for-the-built-environment-november-2017.pdf The Construction Material Pyramid produced by the Centre for Industrialised Architecture is also a useful tool understanding the impact of different building materials and calculating the carbon emissions. www.materialepyramiden.dk	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Historic England	As a general rule traditional building materials have lower embodied carbon than modern materials. For example, timber-framed buildings have masses of carbon locked up in their component parts, and the longer they are with us the better this figure becomes. Brick buildings are generally the product of charcoal firing, again considered relatively low carbon although there were always emissions associated with this. Stone buildings are again zero carbon particularly as the stone was quarried by human graft. Most modern building materials now come with a much higher carbon footprint, mainly because of mechanisation, but also because of high temperature kilns which burn high carbon fuels. To this end traditional building materials should be encouraged where appropriate, particularly where development could impact on the setting of historic buildings. This will also help development integrate with the local character and vernacular of the Broads.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	RSPB	Sensible stance to take to drive the message home about importance of the approach.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Sequence UK LTD/Brundall Riverside Estate Association	2.28The Issues and Options document picks up on the main challenge here which is the need to balance the use of materials with embodied carbon, with design constraints. In this context, there is the potential for conflict with the draft Design Guide and quite prescriptive materials preferences, which we in turn have concerns with, covered within Section 3 of this response. 2.29Again noting the requirements of building regulations which already set a high standard for sustainable construction, we are concerned with the reference to 'requiring' applicants to choose materials that have less embodied carbon and would therefore recommend the use of the phrase 'encourage' rather than 'require.'	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.

Part of document (numbers denote question number)	Organisation	Comment	Response	Action for next version of the Local plan
10	South Norfolk Council	As previously noted within the plan, there is existing legislation in place i.e., Building Regulations which covers energy design of new buildings and the requirement of EV charging points. On this basis, the Council has some reservations about the appropriateness of included a separate planning policy requiring the use of less embodied carbon materials. In addition, it is unclear what the implications of that assessment would be in terms of determining application i.e. is a minimum threshold proposed? Careful consideration would also need to be given to the viability and deliverability implications of such an approach taking into account proposed objectives 9, 12.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Suffolk County Council	Suffolk County Council supports the approach of requiring applicants to choose materials that have less embodied carbon as a key element of achieving carbon neutrality by 2030. Assessments of embodied carbon should also include demolition of existing buildings.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Broadland Council	As previously noted within the plan, there is existing legislation in place i.e., Building Regulations which covers energy design of new buildings and the requirement of EV charging points. On this basis, the Council has some reservations about the appropriateness of included a separate planning policy requiring the use of less embodied carbon materials. In addition, it is unclear what the implications of that assessment would be in terms of determining application i.e. is a minimum threshold proposed? Careful consideration would also need to be given to the viability and deliverability implications of such an approach taking into account proposed objectives 9, 12.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Anglian Water	3.25.We agree that greywater recycling should be included in the Local Plan Review in conjunction with rainwater harvesting as an integrated water management approach to ensure resilience, particularly with increased risks of drought as a result of climate change.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Bradwell Parish Council	We agree with a-c especially c when houses could be built with a southerly aspect.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Broads Society	The Society has no objection to the topic areas set out in this section. The extent of 'Encouraging retrofit over re-build – the re-use and improvements to buildings could be included in DM40 and DM48' – although this is generally supported, it is important that the economic viability of buildings within a business has to be understood and considered thoroughly as part of the planning consideration process.	Noted. Will consider this as we produce the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Brooms Boats	The extent of 'Encouraging retrofit over re-build – the re-use and improvements to buildings could be included in DM40 and DM48' within planning approval would need to be defined as the economic viability of buildings within a business, for example, has to be understood and considered thoroughly.	Noted. Will consider this as we produce the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
11	East Suffolk Council	East Suffolk Council support the proposed additions to the existing policies. There will be significant retrofit projects being delivered across the region from which there will be learning and potential opportunities for collaboration. The Suffolk & Norfolk 'Reclaim the Rain' project could be a reference point for other water related sections beyond greywater.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	East Suffolk Council	The Council would support and encourage the Local Plan seeking to implement recommendations in the recently adopted East Suffolk Cycling and Walking Strategy (www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/). The Strategy identifies cycling and walking infrastructure improvement recommendations for the whole of East Suffolk including the part within the Broads. The Broads Authority have endorsed the Cycling and Walking Strategy at their Planning Committee meeting in November 2022, and this could therefore form a key piece of evidence for the Local Plan. Whilst this comment is made under the climate change section of the consultation document, it should be acknowledged that the Cycling and Walking Strategy also seeks to improve health and wellbeing and contribute to other objectives (see paragraph 1.1 of the Strategy).	Noted. We will use this comment as we produce the transport section of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
11	RSPB	Yes, need to encourage retrofit over rebuild. There should also be a move to encourage and promote improvement of buildings already constructed as these structures will have a disproportionate negative impact on climate change. Needs to become mainstream and for householders to become aware – along the same lines as battery powered cars. Yes, for grey water recycling and harnessing rainfall, not just for gardens but if treated with UV for first time (not recycled per se) household use. Yes, to household orientation to make the most of solar energy generation.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Sequence UK LTD/Brundall Riverside Estate Association	2.31No specific comment on these matters. Repeating comments above, greywater recycling can be encouraged but should not be mandatory, particularly if this goes above building regulations requirements. 2.32With regard to retrofit vs re-build, each case needs to be considered on its own merits and therefore we would not consider it appropriate to restrict the demolition and rebuild of properties. Indeed there may be very good reasons for demolition on structural and safety grounds, and/or issues of viability. 2.33Whilst the intentions with regard to design are noted in terms of passive solar gain etc. care needs to be taken as to how this would be incorporated into any design policy as this is one of a number of design considerations which would be relevant for development. For example the siting and orientation of a building needs to consider the site context and residual amenity as well as potential for solar gain.	Noted. Will consider this as we produce the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Suffolk County Council	We support the inclusion of policies encouraging retrofit, greywater recycling and the positioning of buildings for solar gain. These are all measures which would contribute positively towards Suffolk County Council's aim of achieving carbon neutrality by 2030.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Designing Out Crime Officer, Norfolk Police	Secured by design guidance's supports both retrofit and rebuilds.	Support noted.	Consider crime with any approach that looks to address retrofit.
12	Anglian Water	3.26.As previously indicated, we consider that the carbon implications for the spatial distribution of development should inform sustainable locations for new development, i.e., focussing development in locations that require less infrastructure to deliver growth such as where there is existing capacity/headroom within our sewerage network and water recycling centres, which will reduce both capital (embedded) and operational carbon.	Noted. Access to services and facilities is a key consideration when we assess sites put forward through the call for sites. AWS have been consulted on the sites that have been put forward.	No further action.
12	Bradwell Parish Council	Build more homes with a southerly aspect with more focus on net zero heating systems.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.

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12	British Sugar/Rapleys	The adopted policies on renewable energy proposals (Policies DM14 and DM15) require development proposals to maximise the energy efficiency and energy conservation measures. In response to Question 12, we consider that the Local Plan Review should go further to encourage and support existing businesses seeking to reduce carbon emissions for their operations through renewable energy development.	Noted. We already have a policy on renewable energy which could be used. So would other topic-based policies like landscape impact and the natural environment. But we do ask as part of this, about changes to the approach to wind power and you respond to question 20. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Note this suggested amendment to DM14 and DM15 and consider changes as policy is drafted for the Preferred Options.
12	East Suffolk Council	As the Broads Authority will be aware, East Suffolk Council, at its Full Council meeting on Wednesday 24 July 2019, voted unanimously to declare a recognition of the climate emergency and to step up its positive work on environmental issues to help fight climate change. Further detail on the work being undertaken by East Suffolk Council is available on our website at: https://www.eastsuffolk.gov.uk/environment/climate-change/our-climate-commitment/	Noted.	No further action.
12	East Suffolk Council	Local Plans and planning policy are key to helping deliver development which can adapt to and mitigate the effects of climate change on people and wildlife. To support policies in both Local Plans East Suffolk Council recently adopted a Sustainable Construction Supplementary Planning Document (April 2022), which is available to view here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf . The Broads Authority may wish to consider if a similar approach would be appropriate for the Broads Authority Area. Additionally, The Broads Authority may want to consider the Net Zero Carbon Toolkit when looking at the design of new homes and the retrofitting of existing homes: www.greensuffolk.org/net-zero-carbon-toolkit-housing/	Noted. We are aware of the SPD. We do have a guide, but that is likely to need to be updated and we will use the ESC experience in doing that.	Take into account the two documents suggested when working up policies in the Local Plan.
12	Historic England	Historic England (Heritage Counts) research shows that sympathetic refurbishment and retrofit can reduce the carbon emissions of historic buildings by over 60% by 2050. The UK's Committee on Climate Change has identified retrofitting existing homes as one of five priorities for government action (CCC, 2019). The Heritage Counts research also demonstrates that the speed at which carbon is reduced in buildings has a greater impact than the scale of retrofit showing that the sooner actions are taken the more effectively we can address carbon in buildings.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
12	Historic England	Embodied carbon is a significant source of carbon emissions that is largely overlooked. Buildings contribute to global warming over their whole lives and the Heritage Counts research confirms that if we do not count embodied carbon we underestimate the emissions of a new building by up to a third.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
12	Historic England	When a typical historic building - the Victorian Terrace- is sympathetically refurbished and retrofitted, it will emit less carbon by 2050 than a new building. But only if the whole life carbon of the building is considered. Retrofit, refurbishment and conversion also generate embodied carbon emissions, so the amount of materials used, the carbon content of materials and how retrofit is carried out need to be key considerations of any retrofit project.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
12	RSPB	Yes. Creation of corridors for nature like the B-lines proposals, where road edges aren't mown, where native, flowering plants are seeded in, where houses, streets, public places, spaces, and allotments all contribute towards creating and managing habitat for wildlife to enhance the urban environment, allow residents to better manage their health and welfare and create an attractive, cared-for urban zone.	Noted. Will consider this comment as we produce the natural environment policy.	Consider this comment as produce Preferred Options version of the Local Plan.
12	South Norfolk Council	Overall, this section appears generally consistent with the aims of the NSPF in relation to climate change and renewables. However, careful consideration will need to the risks of duplication or repetition when imposing, and future proofing, local standards where other legislation requires certain industry standards, for example in relation to energy efficiency, including in terms of the viability and deliverability of development.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
12	Suffolk County Council	It is recommended that the Natural Capital Evidence Compendium for Norfolk and Suffolk is included as part of the evidence base for the plan. The compendium presents information on the wealth of natural assets in the counties, including land, soils and sub surface, habitats and species, freshwater, coastal and marine, and atmosphere. It was developed by Norfolk and Suffolk County Councils and the University of East Anglia. The compendium has been compiled to present publicly available data on the natural environment in one place. While the information is presented at a regional scale, and online, a GIS based version which will allow for a more local interrogation of the information, is being developed.	This was assessed as part of the Literature Review for this Sustainability Appraisal Scoping Report.	No further action.
12	Suffolk County Council	The compendium also sets out the risks to these assets, and lists priorities for the Norfolk and Suffolk 25 Year Environment Plan. The Broads Local Plan should reflect these priorities in strategic objectives and policies, where appropriate.	This was assessed as part of the Literature Review for this Sustainability Appraisal Scoping Report.	In light of no specific proposed amendments to objectives and policies, no further action.
12	Suffolk County Council	Suffolk County Council has declared a climate emergency with the aim of achieving net zero by 2030. The Suffolk Climate Change Partnership commissioned Ricardo Energy and Environment to produce a report identifying the actions that can be taken across a variety of sectors to meet net zero and the challenges presented.	Noted.	No further action.
12	Suffolk County Council	The Local Plan should seek opportunities to facilitate sustainable travel, including support for improvements to key walking and cycling infrastructure and bus priority routes. Policies should support the provision of travel plans for new development.	Noted. We do have such policies in our transport section.	No further action.
12	Broadland Council	Overall, this section appears generally consistent with the aims of the NSPF in relation to climate change and renewables. However, careful consideration will need to the risks of duplication or repetition when imposing, and future proofing, local standards where other legislation requires certain industry standards, for example in relation to energy efficiency, including in terms of the viability and deliverability of development.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Anglian Water	3.27. Whilst recognising that evidence for local plans should be proportionate, planning measures to address climate change mitigation and adaptation should, if possible, provide a complete policy position that would set out the current baseline of emissions within the Broads and show the pathway to reducing emissions by 78% 2035 and to net zero by 2050 as set out in the Climate Change Act. We note that The Broads Authority has recognised a climate emergency with a 2030 target to be carbon neutral for its own operations and has already implemented strategies and plans for climate adaptation and mitigation.	The BA have calculated the baseline emissions. And as AWS identify, there are other plans and strategies and workstreams looking into carbon emission for the Broads and the BA. Planning is an element of that, but development is also guided by national standards, in particular the building regulations.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Bradwell Parish Council	Fundamentally we need more trees to counteract greenhouse gases, so we need a positive programme of planting more evergreen trees in the area.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Designing Out Crime Officer, Norfolk Police	Yes maintenance of vegetation as to not negatively impact surveillance opportunities, including inhibiting lighting from nearby streetlights, or to provide hiding places along footpaths is encouraged.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.

Part of document (numbers denote question number)	Organisation	Comment	Response	Action for next version of the Local plan
13	East Suffolk Council	Of the options put forward, East Suffolk Council would support either option b (amend policies DM8 and DM13 to include a greater emphasis on trees, woodlands, hedges, and shrubs) or option c (a new policy on the subject of trees, woodlands, hedges and shrubs). Option b may be the most logical considering the existing policies, especially DM13. A separate policy on the issue of trees etc. does not appear to be explicitly needed and could be covered by amendments to DM13, however this will depend on the level of detail the Broads Authority considers appropriate.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	RSPB	14.4 c) is the best option and enhancing planting (making sure the right species of tree is planted in the right place) to create both a carbon sink and provide a cooling mechanism in urban environments. There needs to be a longer-term approach so that previous policies to remove hedges and then 20 years later incentivise replanting are no longer followed. Trees, hedges and woodland need to be viewed less as field boundaries and more of a biodiversity asset and as means of mitigation for climate impacts. Native species, exemplary management and thoughtful planning and location to enhance the environment and creating habitat and corridors facilitating the movement and flux of wildlife.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Sequence UK LTD/Brundall Riverside Estate Association	2.37The cited policies DM8 and DM13 do not make specific reference to trees, hedges etc. and therefore it would seem sensible to either update those policies or include references within a new policy. Care should be taken that any policy is not overly prescriptive and consistent with national planning guidance such as the Framework, as well as the British Standard (BS) on trees.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Suffolk County Council	Suffolk County Council would support having a new policy for trees, woodlands, hedges and shrubs which covers management, maintenance and protection of existing as well as creation of new. However, the Authority should consider how such a policy would be enforced and how administration of it, including any monitoring, would be resourced. In the event that the Hedgerow Regulations are withdrawn, as part of the Government's Agricultural Transition Plan, the Authority would need to consider how it would resource any enforcement or monitoring responsibilities which may result from replacement regulations or national policy on the protection of trees and hedgerows.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Suffolk County Council	Suffolk County Council is in the process of preparing the Local Nature Recovery Strategy (LNRS). Trees and hedges will feature strongly in the mapping requirements for the strategy. Existing trees and hedges will be mapped to establish a baseline from which opportunities for enhancement to tree, hedge and scrub habitat can be agreed collaboratively (between the Broads Authority and Suffolk County Council) as nature recovery priorities. These enhancements will then be included in the county-wide LNRS.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Wroxham Parish Council	WPC support a separate policy for trees etc. Trees are second only to water as a feature of the Broads. Trees featured heavily in feedback from residents during the WNP consultation and continue to be really important to residents. Trees are more and more important in addressing climate breakdown.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Bradwell Parish Council	We should give strong consideration to options c and d,	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	East Suffolk Council	East Suffolk does not have a policy that specifically relates to the use of peat. However (as already highlighted under other answers) East Suffolk Council has declared a climate emergency and is committed to helping communities become sustainable and protecting habitats and biodiversity. The introduction of Biodiversity Net Gain, and the unique properties of peat as a habitat highlight the need for this resource to be protected even more, therefore a stronger policy direction would be beneficial. Due to the potential impacts of peat excavation, option d (change the emphasis to reduce significantly the amount of peat excavated in the first place) appears to be the most favourable as it provides a balanced approach to providing greater controls whilst not preventing small scale development where needed. Reference to the Peatland Code could be considered.	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Historic England	We welcome the direct reference to waterlogged heritage and archaeology. While we recognise that there would need to be circumstances where some small-scale development would be considered, we would welcome a change in emphasis to reduce the amount of peat excavated in the first place by making the policy stance stronger (option d).	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Mrs S Lowes	Peat to stay where it is.	Support for a policy to address the excavation of peat noted.	Other than continuing to consider the peat policy, no further action, .
14	Norfolk Wildlife Trust	we support the cessation of peat extraction, which does not appear to be directly reflected in the options for this question. We would also support the creation of new peat areas in the future, so support option f.	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	RSPB	Options d and f in combination. Excavating peat to commence development is untenable and there should be a presumption against this. The only acceptable circumstance where surface peat might be 'excavated' is within fens and reedbeds to create shallow turf ponds with the express aim of restoring habitats to benefit certain species. By inference excavating peat only occurs in very low-lying areas, which would be extremely susceptible to flooding and at the forefront of the impacts of climate change. Need to take a firm stance now to prevent development at the expense of peat. Instigating projects to start the process of reinstating peat should also start, but care needs to be taken on sites chosen. Any site likely to be flooded in the future should be prepared for another climate change mitigation solution, such as creation of wet woodland or if nearer the coast, saltmarsh as both these habitats have positive Carbon sequestration abilities. OF equal importance is ensuring sufficient water is available to maintain peat soils at an appropriate level of wetness to optimise Carbon capture and prevent formation of methane (which happens when peat soils are submerged).	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Suffolk County Council	As Minerals Planning Authority, Suffolk County Council would support a firmer stance on the excavation of peat so that less peat is excavated and there is a stronger requirement to dispose of peat in a way that prevents it drying out. Paragraph 210 of the NPPF prohibits policies that allow for new sites or extensions to existing sites for peat extraction and goes onto prohibit the granting of planning permission for peat extraction from new or extended sites.	Noted. This is not about peat extraction, but excavating a soil that happens to be peat as part of a development. Support for firmer stance noted.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Suffolk County Council	Consideration of the potential for creating new areas of peat is also supported. Peatlands function as carbon sinks, capable of absorbing and storing large quantities of carbon dioxide. The creation of additional peat would support Suffolk County Council's commitment to achieving carbon neutrality.	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.

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14	Suffolk County Council	Suffolk County Council would also support the protection of peatland where it provides important biodiversity habitat and where there is exceptional archaeological potential. Any policies relating to the protection or creation of peatland should be linked to the LNRS which, when complete, should inform Local Plans and will carry weight as a mandatory mechanism of the Environment Act 2021.	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Woodbastwick Parish Council	It is not clear from the text whether peat is being extracted for commercial horticultural use. If this is the case it should cease.	The Local Plan does not talk about extraction of peat, it talks about excavation as part of development. Agreed that peat is not to be extracted.	No further action.
15	Bradwell Parish Council	We should look carefully at higher energy efficiency for existing house stock.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Broads Society	the Society feels that the Authority should not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Brooms Boats	Local or National Government approaches together with Building Regulations should prevail.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Designing Out Crime Officer, Norfolk Police	(regarding extensions) where required Norfolk Constabulary will continue work with applicants and planning officers to ensure that any significant re-builds or extension to existing premises for the purposes of reduction in energy use (both commercial and domestic) are also meeting security standards detailed in Secured by Design guidance.	Noted. So if we were to have a retrofit policy, it could include security.	If include a retrofit policy, consider including secured by design principles.
15	East Suffolk Council	Given the current cost-of-living/ energy crisis, it is likely that more people will be looking for advice on how to improve their home's thermal efficacy and reduce energy consumption. Where appropriate, there may be opportunities to include such advice (or links to advice) within the Local Plan or in supporting documents (SPDs). The Net Zero Carbon Toolkit and information provided on Energy Saving Trust website may be of use regarding the retrofitting of existing homes. www.greensuffolk.org/net-zero-carbon-toolkit-housing/ https://energysavingtrust.org.uk/energy-at-home/	Support for an advisory approach to address this issue noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	East Suffolk Council	Some thermal upgrades may not require planning permission but will require Building Regulation Approval. East Suffolk Building Control provide an advice sheet on thermal upgrades: www.eastsuffolk.gov.uk/assets/Planning/Building-Control/Common-projects-guidance/Thermal-upgrades-to-your-house.pdf	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Norfolk Wildlife Trust	we support this in principle due to the benefits it will bring for the conservation of Norfolk's wildlife in the future, but are unable to offer any technical comments on how this would be achieved.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	RSPB	Yes. Comments as for Q11 above. Householders need to be encouraged morally and supported financially to plan for and bring about change in how they use and provide energy for their homes. Currently ground and air source heat pumps are probably too expensive for most homeowners to consider installing (even with grant support). As time passes and technological advances are made leading to reduced cost, householders need to be persuaded to convert. Creating model households as exemplars and case studies for householders to follow will be essential.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Sequence UK LTD/Brundall Riverside Estate Association	2.41This would appear to be a matter that would fall outside the scope of planning, and is more of a campaign or financial support that could be brought forward by the Broads Authority. However the current planning system cannot, and in our view should not, look to impose standards upon existing houses.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	South Norfolk Council	Improving the energy efficient of housing stock is clearly important, both in terms of the cost to the individual and in terms of achieving climate change objectives. However, it is unclear how this could or would be achieved through the authority's development plan policies. It may be that this is something that needs to be achieved through other interventions of the authority. There are limitations to how much can be achieved directly through a local plan and management of development that requires planning permission.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Wroxham Parish Council	yes, needs to be more focus on insulating existing properties and grants need to be open to more people. We understand that this is the case at Norwich City Council.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Broadland Council	Improving the energy efficient of housing stock is clearly important, both in terms of the cost to the individual and in terms of achieving climate change objectives. However, it is unclear how this could or would be achieved through the authority's development plan policies. It may be that this is something that needs to be achieved through other interventions of the authority. There are limitations to how much can be achieved directly through a local plan and management of development that requires planning permission.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Bradwell Parish Council	Plans to extend should have a requirement for higher energy retention.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Broads Society	the Society feels that the Authority should not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Brooms Boats	Local or National Government approaches together with Building Regulations should prevail.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	East Suffolk Council	East Suffolk council would support the inclusion of support, encouragement and guidance on improving the existing buildings energy use in either the Local Plan or a supporting Supplementary Planning Documents.	Support for an advisory approach to address this issue noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	RSPB	Yes. For older build these situations might provide an opportunity for a complete rethink of energy provision for such houses where an extension is proposed.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Sequence UK LTD/Brundall Riverside Estate Association	2.43It is noted that any extension is likely to be built to higher energy performance standards than the host, where there have been advances in the building regulations. However again there is no mechanism within the planning process to allow for upgrades to the host building and we would suggest it would not be reasonable in any event. Such a policy is likely to have to be administered by a condition on any extension planning approval but such a condition would not meet the tests under paragraph 56 of the Framework as they would not be necessary (to make the development acceptable), relevant to the development to be permitted, enforceable and reasonable in all other respects.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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16	South Norfolk Council	As with question 10, careful consideration will need to the risks of duplication or repetition when imposing, and future proofing, local standards where other legislation requires certain industry standards, for example in relation to energy efficiency, including in terms of the viability and deliverability of development. This is particularly relevant given the high house prices referred to in the threats section of the SWAT analysis that may limit resident's ability to move within their local area in order to meet changing housing needs and demands, that might otherwise be address through the extension of their existing home.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Wroxham Parish Council	yes, see WNP ENV5, although this needs updating to reflect the rapidly changing climate situation. WPC will look to review the WNP in 2023 after the May elections.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Broadland Council	As with question 10, careful consideration will need to the risks of duplication or repetition when imposing, and future proofing, local standards where other legislation requires certain industry standards, for example in relation to energy efficiency, including in terms of the viability and deliverability of development. This is particularly relevant given the high house prices referred to in the threats section of the SWAT analysis that may limit resident's ability to move within their local area in order to meet changing housing needs and demands, that might otherwise be address through the extension of their existing home.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Bradwell Parish Council	Ideally all homes should have an A EPC so the minimum requirement should be for a improvement of one level e.g. a D to a C rate EPC.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Broads Society	the Society feels that the Authority should not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Brooms Boats	Local or National Government approaches together with Building Regulations should prevail.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	East Suffolk Council	Again, East Suffolk council would support the inclusion of support, encouragement and guidance on improving existing buildings EPC levels either the Local Plan or a supporting Supplementary Planning Documents.	Support for an advisory approach to address this issue noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	RSPB	Yes. This provides another opportunity to educate and influence homeowners to adopt the best ways to power and insulate their homes.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Sequence UK LTD/Brundall Riverside Estate Association	2.45For the same reasons as question 16 above, this policy could not be enforced as it would fall outside the scope of planning and it would not meet the tests for conditions. As a general principle, conditions and planning obligations can only be used to make the development that is being applied for acceptable. It is therefore not appropriate to use that planning permission to resolve existing issues, for example the energy performance of the host property.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	South Norfolk Council	As with other questions in this section, it is slightly unclear how the authority is proposing to achieve the change it is seeking through the local plan. Even if this could be achieved, without knowing the differences between the different levels of EPC ratings, including cost implications, then it is considered that it would be difficult to understanding what would be reasonable in terms of setting a standard, again taking account of housing affordability challenges and effects on viability. The Council also considers that careful consideration would need to be given to ensuring that any requirement would comply with the relevant test for conditions and obligations.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Broadland Council	As with other questions in this section, it is slightly unclear how the authority is proposing to achieve the change it is seeking through the local plan. Even if this could be achieved, without knowing the differences between the different levels of EPC ratings, including cost implications, then it is considered that it would be difficult to understanding what would be reasonable in terms of setting a standard, again taking account of housing affordability challenges and effects on viability. The Council also considers that careful consideration would need to be given to ensuring that any requirement would comply with the relevant test for conditions and obligations.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Bradwell Parish Council	Adopt option B and C.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Broads Society	the Society feels that the Authority should not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Brooms Boats	Local or National Government approaches together with Building Regulations should prevail.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	East Suffolk Council	The Committee on Climate Change 'UK housing: Fit for the future?'(2019) report outlines that decarbonising and adapting the UK's housing stock is critical for meeting legally binding emissions targets by 2050. As already outlined in other answers, East Suffolk Council recently adopted a Sustainable Construction Supplementary Planning Document (April 2022), which is available to view here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf . This SPD includes specific guidance on energy efficiency but does note the difficulties of applying new standards to the existing housing stock when retrofitting works generally sits outside of the planning system and is therefore not affected by planning policy. The East Suffolk SPD encourages developers to be aware of the requirements of the Building Regulations in this regard.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Mrs S Lowes	Many properties in the area have old heating systems and the residents rarely have the funds to change these. How many people have the funds to make their existing homes efficient? Some may need extra room but not have sufficient funds to do both.	Noted. Although could improving energy performance of a dwelling save money in the long term?	Consider this comment as produce Preferred Options version of the Local Plan.
18	RSPB	Option b) is our preferred choice	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Sequence UK LTD/Brundall Riverside Estate Association	2.47We would suggest that option a is appropriate here to await other initiatives as options b and c cannot be delivered through the current planning system and indeed we would consider it unreasonable to do so.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.

Part of document (numbers denote question number)	Organisation	Comment	Response	Action for next version of the Local plan
18	South Norfolk Council	Overall, the Council is minded that in many instances the best option is to rely on Local or National Government changes. Any proposal to extend an existing regulatory regime would need to be carefully considered to ensure that it is reasonable and proportionate and does not result in undesirable consequences, such as making it less desirable or affordable for local people to remain in their existing house and community.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Suffolk County Council	As set out above under section 13 – Climate Change, Suffolk County Council would support policies aimed at improving the energy efficiency of existing homes in line with the aims and actions set out in the Suffolk Climate Emergency Plan. Improving the energy efficiency of houses would also improve the quality of these homes, particularly in terms of heat retention and reduction of damp. This in turn is known to have significant benefits for the physical and mental wellbeing of residents. Policies could also support renewable energy generation, with caveats for historic buildings to account for impacts to historic fabric, setting and significance of heritage assets.	Support for addressing existing stock and the benefits noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Broadland Council	Overall, the Council is minded that in many instances the best option is to rely on Local or National Government changes. Any proposal to extend an existing regulatory regime would need to be carefully considered to ensure that it is reasonable and proportionate and does not result in undesirable consequences, such as making it less desirable or affordable for local people to remain in their existing house and community.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Anglian Water	3.28.Anglian Water works closely with LPAs and developers to encourage the use of Sustainable Drainage Schemes (SuDS) and surface water attenuation wherever possible, minimising the amount of water entering our foul drainage network. Anglian Water has also opted to adopt surface water systems since 2009, incorporating them into our own network so that we can ensure they are properly maintained and operated. We positively approach opportunities for partnership working to deliver SuDS that deliver protection of our assets and wider benefits for existing buildings and communities.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Bradwell Parish Council	Option B	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Broads Society	The Society considers that 'Option b' would be a sensible option to ensure that at least some element of future proofing has been considered.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Brooms Boats	Option B	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	East Suffolk Council	Of the options put forward in the consultation document, East Suffolk Council considers option b (require the applicant to detail what measures they will take to improve the existing situation) to be reasonable so long as it is done in a manner proportionate to the proposed development. In addition, the Broads Authority may want to consider extending the application of the policy to cover flooding from surface water and other sources, in addition to Flood Zone 3.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Norfolk County Council	The Lead Local Flood Authority (LLFA) would support option B of the 2 options set out in 17.5 "Require the applicant to detail what measures they will take to improve the existing situation, with the level of improvement proportionate to the scale of new development proposed (if indeed the property does not have resilience measures or may benefit from more)." Where finished floor levels cannot be raised above the flood level and properties are in areas where there is known historic flooding or risk of flooding shown on surface water/ rivers and sea flood maps for planning.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Norfolk County Council	Information on where flooding has been reported historically within the Broads Area can be found within the following published Section 19 reports, see table 1 below, these also contain recommendations which, in some cases, include resilience measures. FIR/037 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/fir037-broadland-various-2013-2017.pdf FIR/036 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/south-norfolk-2013-2016-fir-036.pdf FIR/010 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/hemsby-and-ormesby-st-margaret-great-yarmouth-2014.pdf FIR/008 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/norwich-and-broadland-2014.pdf FIR/048 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/norfolk-6-october-2019-fir048-amended-sept-2020.pdf FIR/056 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/norfolk-6-october-2019-additional-properties-fir056.pdf FIR066 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/fir066-south-norfolk-winter-flood-event-2020-21.pdf	Information noted and thanks.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Sequence UK LTD/Brundall Riverside Estate Association	2.49Given that this is existing housing stock, any enhancements to flood resilience could only come forward with planning applications for those properties, which would then be subject to the normal requirements in meeting current standards for flood resilient construction. Therefore we would suggest there is no requirement for a policy on his matter (option a). 2.50The above however does give a further ground to a more flexible approach to extended or replacement chalets as these would be constructed to a better level of flood resilience than the current property.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	South Norfolk Council	It will be important to ensure that any approach is proportionate. It is likely to be reasonable for the authority to expect flood risk measures to be incorporated in replacement buildings. This may well also be the case for extensive rebuilds or refurbishments. However, the Council has reservations about whether it would be proportionate or reasonable to expect extensive improvements to the fabric of an existing building where the extensions or alteration to a building are limited or minor in nature, have themselves incorporated proportionate flood risk mitigation measures and do not otherwise exacerbate existing flood risk.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Suffolk County Council	As a Lead Local Flood Authority (LLFA), Suffolk County Council consider development should be located away from areas at highest flood risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. It may be appropriate to implement a policy that any permitted development in an area at risk of flooding must be flood resilient or flood compatible and demonstrate that it will not increase flood risk.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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19	Broadland Council	It will be important to ensure that any approach is proportionate. It is likely to be reasonable for the authority to expect flood risk measures to be incorporated in replacement buildings. This may well also be the case for extensive rebuilds or refurbishments. However, the Council has reservations about whether it would be proportionate or reasonable to expect extensive improvements to the fabric of an existing building where the extensions or alteration to a building are limited or minor in nature, have themselves incorporated proportionate flood risk mitigation measures and do not otherwise exacerbate existing flood risk.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
20	Bradwell Parish Council	Fundamentally we need to look at and use other forms of energy generation including wind other than burning fossil fuel.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced, being aware of any Government policy change.
20	British Sugar/Rapleys	We consider that the current approach to wind energy not to allocate suitable areas for wind turbines is restrictive, as it would effectively rule out wind energy development by existing businesses wishing to reduce carbon emissions from their operations. We note that this approach is based on the Renewable Energy Topic Paper (2016) which focused on commercial scale turbines rather than domestic microgeneration and assessed landscape sensitivities of small scale (up to 20m) and medium scale (20-50m) wind turbines within broad area segments.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced, being aware of any Government policy change.
20	British Sugar/Rapleys	The current approach, which is not based on a site specific assessment, will result in a blanket ban on any size of wind energy developments, including those which are smaller than 20m and/or can be sensitively designed and located. As such, we request that the Local Plan Review process assesses the suitability of wind turbines on a site specific basis where existing businesses are seeking to adapt to climate change and reduce carbon emissions from their existing operations. In the context of the significant industrial development within the Cantley Sugar Factory area, it is considered that wind turbine proposals of appropriate scale and siting could be accommodated without causing significant harm to amenity and views. We therefore consider that an opportunity to reduce carbon emissions should not be overlooked by a blanket ban without site specific considerations.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced as well as policy CAN1 is checked and produced (see comments from British Sugar on CAN1), being aware of any Government policy change.
20	East Suffolk Council	The current approach seems reasonable in relation to commercial scale wind turbines, and East Suffolk welcome the strong link to the Landscape Sensitivity Study which provides an evidence base to justify the position taken. The position regarding small scale turbines is not as clear, and the Broads Authority should consider what additional evidence may be needed in order to support a policy approach in these circumstances.	Noted.	If change approach, consider evidence needed.
20	RSPB	Given the Broads is a favoured location for wintering waterfowl, which move between the continent and then when in the UK between counties and protected sites, wind turbine installation on land would create problems, both on the grounds of potential mortality and impact on landscape character. This also holds true for larger species such as common crane, Eurasian bittern, resident geese and swans, larger birds of prey and large flocks of smaller birds arriving in winter from Europe. Many species could be impacted through striking rotating blades or by having the suitability of favoured foraging, hunting and breeding sites compromised.	Noted.	Ensure consider impact on birds.
21	Bradwell Parish Council	There should be limited expansion of the use of Wind turbines that has limited impact on the environment.	Noted	Consider this comment as produce Preferred Options version of the Local Plan.
21	Broads Society	The Society considers that the current approach of non-allocation should be maintained given the intrinsic value of the Broads specific landscape.	Support for non allocation noted.	Consider this comment as produce Preferred Options version of the Local Plan.
21	Brooms Boats	All technologies must be considered in view of the significant impact facing the Planet.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced
21	East Suffolk Council	As set out in our answer to question 20 above, East Suffolk Council would support further assessment of the sensitivity of the Broads Authority area landscape to smaller scale wind turbines. Depending on the outcome of that work, there may be scope to revisit the policy wording to allow for the potential opportunity for small scale turbines, subject to the caveats identified by the 2015 Ministerial Statement which remain relevant.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
21	Mrs S Lowes	Wind energy – Norfolk is flat. Wind turbines on land will detract from the benefit of tourism and locals. Maybe smaller ones there are not on show.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
21	RSPB	As stated in the response for Q20 the Broads is not suited to wind turbines. Other renewables should be prioritised, such as appropriate solar and household heat source. Land to the north of the Broads, which might be considered suitable could prove unsuitable due to the movements of wintering birds between the Broads and north Norfolk coast.	Support for non allocation noted.	Consider this comment as produce Preferred Options version of the Local Plan.
22	Bradwell Parish Council	We should designate Bluebell Woods and fill out the required form.	Following further conversations, this site is not in the Broads Authority Executive Area.	No further action.
22	East Suffolk Council	East Suffolk Council's approach is that Neighbourhood Plans are encouraged to identify Local Green Spaces. We agree that Local Green Spaces in Neighbourhood Plans do not need to be repeated in the Local Plan.	Noted.	No further action.
22	Suffolk County Council	Suffolk County Council would refer to its Guidance on Neighbourhood Planning in Suffolk. This guidance is due to be updated with further advice on the designation of local green space next year (2023). We are aware that in some cases sections of highway verge have been nominated for designation as local green space. In these cases, Suffolk County Council would request that we are notified of the nomination.	No new LGS came forward as a result of this call for sites. We will share the existing ones with you and you can check to see if you have any issues.	Share current LGS with Suffolk CC.
23	Bradwell Parish Council	We should adopt option C.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	Broads Society	The Society favours the 'Geographic risk-based approach' detailed in 'Option b'.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	Brooms Boats	Option B however economic viability regarding business needs is vital and hence requires a collaborative approach.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	East Suffolk Council	East Suffolk Council's view is that the Broads Authority are best placed to determine which of the options best deliver against the statutory purposes of the Broads Authority in protecting the interests of navigation. However, an approach based on the evidence of risk (option b) would seem sensible as this will allow for the policy to focus on those areas where a critical point has been reached.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.

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23	Mrs S Lowes	Old quay heading should be removed.	Support for quay heading in the same location rather than in front noted.	Consider this comment as produce Preferred Options version of the Local Plan.
23	RSPB	Prioritisation for replacement of quay head must go to locations where the heading protects bank integrity first and foremost and provision of mooring facilities second. We recommend the construction cost in terms of CO2 becomes part of the validation process, just as for materials and design of residential developments.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	Sequence UK LTD/Brundall Riverside Estate Association	2.58We note the issues that have been raised within the consultation document but are concerned that this is a matter that does need to be considered on a site-by-site basis and therefore the options set out within b) or c) are too prescriptive and inflexible, particularly where navigation matters will also be a factor. Therefore we would recommend that no specific policy would be more appropriate, although guidance only could be provided within the Design Guide or an SPD to ensure there is some form of assistance on this issue.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Norfolk Wildlife Trust	Water efficiency in new buildings – due to the existing pressures on water availability in the region, and the benefits for wetland sites of more efficient water use, as a minimum we support the optional higher water efficiency standard of 110 litres/person/day for residential development, but would also support the 80l/person/day standard used in Greater Cambridge if deliverable. We therefore support options c and d.	Support for higher water efficiency standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Anglian Water	3.29.We disagree with option a) as our own analysis has shown that 55 out of the 59 local planning authorities in the Anglian Water region have, or are working towards, the higher optional standard of 110 litres/head/day given that the region is identified as a region under ‘serious water stress’. The option to not have a policy standard for water efficiency is not considered to be a reasonable alternative. 3.30.As a minimum we would support option b) the continued approach of the optional standard of 110 l/h/d. In supporting the Greater Cambridge Local Plan, we are working with key stakeholders, to evidence more ambitious water efficiency standards to assist local planning authorities in their local plan preparation. We aim to share this with local planning authorities when we have a fully evidenced and agreed approach, which would assist in progressing option c).	Support for 110l/h/d or more efficient standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Anglian Water	3.31.We are also leading a £6m Ofwat Innovation Project to develop a national framework for integrated water management in all new developments, showing how rainwater harvesting and reuse, SuDS, nature-based solutions, and water efficiency measures can drastically reduce the water and carbon footprint of new housing developments - the Enabling Water Smart Communities project.	Noted. Will liaise with AWS on this initiative to see if any role for the Local Plan for the Broads.	Liaise with AWS.
24	Anglian Water	3.32.We are supportive of initiatives such as water neutral development to ensure that there is no increase in the total water use as a result of new development – meaning the additional water demand on the environment arising from a new development is zero. The experience of local planning authorities in the Sussex North Water Supply Zone (such as Crawley and Horsham) is due to abstraction having a detrimental impact on a number of designated habitats sites in the Arun Valley, as set out in a Position Statement from Natural England. LPAs within Sussex North are unable to determine applications for new development in the supply zone unless applications can demonstrate they are ‘water neutral’. Anglian Water has provided advice on water neutrality to both Crawley and Horsham and further information can be found on the Waterwise website . If this option is taken forward, the challenge will be to ensure developments are much more water-efficient (including through rainwater harvesting and greywater reuse) and to identify sufficient local ‘offsets’ to enable water neutral development to come forward.	Noted. Will liaise with AWS on this - perhaps this is something for the region rather than just the Broads.	Liaise with AWS.
24	Bradwell Parish Council	We should continue with option b and explore ways of reducing this as outlined in option c.	Support for 110l/h/d or more efficient standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Broads Society	The Society would support continuation of the current policy detailed in ‘Option b’.	Support for 110l/h/d noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Brooms Boats	Option B however economic viability regarding business needs is vital and hence requires a collaborative approach.	Noted. This standard is for residential. BREEAM standards would relate to businesses.	Consider this comment as produce Preferred Options version of the Local Plan.
24	East Suffolk Council	As already outlined in other answers, East Suffolk Council recently adopted a Sustainable Construction Supplementary Planning Document (April 2022), which is available to view here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf This SPD includes specific guidance on water efficiency in new dwellings, including reference to the 110 litre/ person/ day water efficiency standard. The development a new Local Plan provides an opportunity to reconsider standards, and East Suffolk Council would support the Broads Authority investigating the reasonableness of seeking a standard that designs for less water a day than 110 l/h/d.	Support for 110l/h/d or more efficient standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	RSPB	As a minimum option c) should be chosen (in Denmark for example households aim for a max use of 80l/h/day). ‘Working towards water neutrality’ is stronger than the phrase ‘investigate the potential to require water neutrality.’ There shouldn’t be an option of making no reductions/improvements in a part of the country already recognised to be in a state of severe water stress. Indeed, the disconnection between housing targets and the requirement that water companies must provide for a target number of houses needs resolving. If there isn’t the possibility of sustainably providing a supply of water and managing household outputs to achieve nutrient neutrality without huge investment the proposal to construct new houses might be considered untenable.	Support for 80 l/h/d or more efficient such as water neutral noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Sequence UK LTD/Brundall Riverside Estate Association	2.60The matter raised at paragraph 21.5 of the consultation document is particularly pertinent here that there is limited large scale development within the Broads and therefore water use and pressures are significantly less than the cited examples in Sussex and particularly Greater Cambridge. Accordingly we would suggest that water usage for new development should not be reduced below the current 110 l/h/d rate, particularly as this would appear to be consistent with the other Norfolk authorities.	Support for 110l/h/d noted. Although, even though the numbers of new dwellings or replacement dwellings are low in the Broads, if designed to less than 110l/h/d, that will still make a difference in water usage and water bills.	Consider this comment as produce Preferred Options version of the Local Plan.
24	South Norfolk Council	As a minimum the authority should continue with the current policy approach of 110 l/h/d, consistent with Agreement 22 of the NSPF. Whilst it is reasonable for the authority to explore lower usage standards, or water neutrality the imposition of any such standard will need to be particularly carefully balanced against viability and deliverability issues.	Agree and noted. Yes, any lower usage would need justifying and viability tested.	If look into a lower standard, need to justify it and check viability impact.

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24	Suffolk County Council	Suffolk County Council support higher water efficiency measures in light of the county being in a water stressed area as identified by the Environment Agency in 2021 in its Water Stressed Areas-Final Classification 2021 document..	Support for 110l/h/d or more efficient standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Broadland Council	As a minimum the authority should continue with the current policy approach of 110 l/h/d, consistent with Agreement 22 of the NSPF. Whilst it is reasonable for the authority to explore lower usage standards, or water neutrality the imposition of any such standard will need to be particularly carefully balanced against viability and deliverability issues.	Agree and noted. Yes, any lower usage would need justifying and viability tested.	If look into a lower standard, need to justify it and check viability impact.
25	Bradwell Parish Council	We should adopt options b and d.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Broads Society	The Society feels that this could adequately be dealt with by 'Option b'. The challenge must now be to help stakeholders and businesses rapidly establish the offering that will engage the audience who will help shape, support and participate within the Broads National Park. This help being agile planning and planning support from joined up Authorities enabling the capture of rapidly changing economic opportunities.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Brooms Boats	Option B with consideration to t he challenge that is to help businesses rapidly establish the offering that will engage the audience who will help shape, support and participate within the Broads National Park. This help being agile planning and planning support from joined up Authorities enabling the capture of rapidly changing economic opportunities. Ref British Marine Futures report and The Glover Landscapes Review 2019	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Designing Out Crime Officer, Norfolk Police	From a policing perspective to ensure any refurbishment or new development is free from crime generators (and fear of crime) which can be achieved by building to Secured by Design standards.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	East Suffolk Council	East Suffolk Council would welcome the inclusion of a specific policy relating to tranquillity as part of the Broads Local Plan. As is rightly set out in the consultation document, much of the Broads area contains high levels of tranquillity and this should be protected. Such a policy could operate as a stand alone policy as per option c), or it could incorporate the dark skies policy. If the two policies are kept separate, it will be important to ensure significant cross referencing between the two in order to reflect the strong relationship between tranquillity and dark skies. If the Broads Authority have robust evidence relating to specific tranquil areas then these could also be included in the policy.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Historic England	We would welcome policy intervention addressing tranquillity in the Local Plan. The setting of heritage assets (designated and non-designated) can make an important contribution to their significance. The setting of a heritage asset is defined as the surroundings in which a heritage asset is experienced, and tranquillity, remoteness and wildness can be important attributes affecting how a heritage asset is experienced. While we don't have a specific preference in terms of the options presented, we would request that the historic environment - specifically it's contribution to the significance of heritage assets - is a factor in determining the appropriate policy response.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Mrs S Lowes	In terms of tranquillity, through traffic speeding causes noise. High windmills in the area will be a blight on the Broads. People come here for peace and quiet and for the dark skies. Light pollution will ruin this. Noise levels of traffic on the A149 s something many tourist boaters have listed as a reason for not staying in PH.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	RSPB	Option e). This also needs to extend to encompass promoting visitor access, however, it is recognised that maintaining and enforcing tranquil zones will be problematic, if the locations chosen have unrestricted/open access.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	South Norfolk Council	It is reasonable to consider tranquillity within the local plan, however the Council is concerned that this could be a highly subjective criteria that, if misused, may restrict even relatively minor or trivial impacts. Therefore, careful consideration needs to be given to ensuring that any policy criteria to ensure that it was proportionate and not unduly restrictive and that it could be objectively and consistently applied so that it is unambiguous and that it is evident how a decision maker should react to a development proposal. This will help provide certainty of outcomes to applicants and ensure the efficient processing of applications by the authority. To this end, identifying areas that can reasonably be considered tranquil and subject to additional restrictions may be a more predictable approach if it can be achieved. This may also allow for more engagement in the identification of such areas and a more accurate assessment of the impact of any associated restrictions. As always, careful consideration would need to be given to the impact of further restrictive designations on enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Advice noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Wroxham Parish Council	WNP support option d.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Broadland Council	It is reasonable to consider tranquillity within the local plan, however . Careful consideration would need to be given to ensuring that any policy criteria could be objectively and consistently applied so that it is unambiguous and that it is evident how a decision maker should react to a development proposal. This will help provide certainty of outcomes to applicants and ensure the efficient processing of applications by the authority. To this end, identifying areas that can reasonably be considered tranquil and subject to additional restrictions may be a more predictable approach if it can be achieved. This may also allow for more engagement in the identification of such areas and a more accurate assessment of the impact of any associated restrictions. As always, careful consideration would need to be given to the impact of further restrictive designations on enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Advice noted.	Consider this comment as produce Preferred Options version of the Local Plan.
26	Bradwell Parish Council	We feel that there needs to be more focus on crops to feed the nation, so we are more independent on the effects of international events. So if this means subsidies then so be it.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
26	Broads Society	The Society generally supports the current Policy DM27.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
26	East Suffolk Council	Appropriate diversification of farming is generally supported by East Suffolk Council. Paragraph 84 of the National Planning Policy Framework states that policies should enable, 'the development and diversification of agricultural and other land-based rural businesses'. It is agreed that the approach should ensure land is not fragmented and that any diversification is supportive of the existing farm and does not reduce the farm's overall viability. In accordance with policy DM27 of the Broads Local Plan utilising existing structures where possible is recommended.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.

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26	RSPB	We don't subscribe to the principle that as a general principle 'farmers may need to make changes less beneficial to the countryside'. Can you expand or give examples of what this might entail, because as presented this statement appears very open-ended and unregulated? We do not contest the principle of farm diversification making farms more viable, but there need to be limits agreed to ensure a sustainable approach is adopted.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
27	Bradwell Parish Council	Bearing in mind my answer above then the purpose should be linked to food production in line with the farms original use.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
27	Broads Society	The Society supports the idea that farms should not be fragmented but also feels that other uses not strictly related to the farm could be acceptable as long as they were closely related, locationally, to the existing built form of the farm.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
27	East Suffolk Council	East Suffolk Council supports ensuring that farms are not fragmented which helps protect the viability of the wider area. This allows a greater degree of control over the land, avoiding new planning units with inappropriate or disruptive uses. The East Suffolk Council - Suffolk Coastal Local Plan (September 2020) takes a similar approach within Policy SCLP4.7 which requires farm diversification to ensure farming remains the predominant use on the site.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
27	East Suffolk Council	The fragmentation of land may have a wider impact on the character of the area (whether positively or negatively). The important landscape character attributes are defined in the Broads Authority Landscape Character Assessment, and it is important to note the strong relationships between the landscape character within East Suffolk as defined in the Waveney District Landscape Character Assessment: https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf . Any adverse character impacts could have cross-boundary impacts.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
27	RSPB	Agree with the principle of not allowing subdivision and fragmentation and that all land needs to be managed or 'developed.' There are huge benefits to wildlife in providing a network of locations (fields if you like) which provide rough ground for species such as owls. Not every speck of land needs to be worked. Longer term planning and contribution to the greater good of the landscape should be encouraged.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
28	Bradwell Parish Council	You definitely need to ask for supporting information on how the diversification project/proposal will enable the farm to be viable.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
28	Broads Society	The Society considers that the submission of a viability statement is a great way of getting the applicant to focus on whether or not any proposal is really financially viable and beneficial to them in practical terms.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
28	East Suffolk Council	Farm diversification allows for non-agricultural uses ensuring the farms continued viability. This can mean that jobs are retained, and food security is continued. The Broads Authority may wish to note that policy SCLP4.7 of the East Suffolk Council - Suffolk Coastal Local Plan requires similar viability information stating that diversification is supported subject to, 'e) The diversification is supported by detailed information and justification that demonstrates that the proposals will contribute to the viability of the farm as a whole and its continued operation'.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
28	East Suffolk Council	In developing a policy approach for this area, the Broads Authority may wish to consider stating that the level of supporting viability information should be of a scale appropriate to the size of development and set out that details of what viability information is appropriate in either the policy or within an appendix.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
28	RSPB	Yes, to requiring additional information on viability, especially the time frame for the proposed projects. As stated clearly market trends will play a large part in directing choices about direction of farm business but retention of a set approach for a longer period will offer greater value, except when unforeseen circumstances show the proposed direction of travel is no longer viable.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
29	Bradwell Parish Council	Limit farm diversification so the focus is on availability for food production going forward.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	Broads Society	The Society would agree that conversion is preferable to new build (particularly in relation to holiday accommodation provision). However, there are site specific instances where new build would be acceptable and should not be ruled out. A criteria based policy which could allow new build would be a better way forward than restricting it totally.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	Designing Out Crime Officer, Norfolk Police	Norfolk Constabulary will continue to work with the Planning Officers and applicants for any significant new build to encourage and implement Secured by Design standards.	Seems the suggestion is for agricultural development to address secured by design.	Consider this comment as produce Preferred Options version of the Local Plan.
29	East Suffolk Council	It is often beneficial to seek the retention and conversion of an existing building, as opposed to new development, particularly where it ensures the retention of buildings with positive character impact. As the issues and options document states it also potentially reduces the carbon impact.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	East Suffolk Council	The East Suffolk Council - Waveney Local Plan includes policy WLP8.15 for new self-catering tourist accommodation. The policy states that new permanent self-catered accommodation can be allowed in the countryside where it involves conversion of rural buildings subject to a set of criteria. Were the Broads Authority to take forward a similar approach in the new Local Plan, consideration should be given to how best to ensure tourist accommodation arising from farm diversification can be protected from pressure to become residential over time.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	East Suffolk Council	The Broads Authority may also wish to note that the Waveney Local Plan includes other policies governing conversion of existing rural building, namely, policies WLP8.11 (to residential use) and WLP8.14 (to employment use).	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	RSPB	New build if construction is shown to have a low or long-term neutral Carbon footprint, and will sit well within the landscape, should be considered. However, conversion of more permanent new build (bricks and mortar) would suggest the developer hasn't fully thought through construction and should be avoided and discouraged. Conversion of existing buildings if done sympathetically, following guidance and design principles should be encouraged.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	Sequence UK LTD/Brundall Riverside Estate Association	2.70We would broadly support a policy that allowed for conversion of farm and indeed other buildings to both holiday let and permanent residential. Current policies within the Broads Local Plan do make it more challenging to secure residential and holiday let conversion with a preference for buildings to be first retained in their current use. This is out of step with other Local Plan policies and indeed paragraph 80, part c of the Framework and therefore we would welcome policies allowing more straightforward residential and holiday let conversion.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
30	Bradwell Parish Council	The continued focus on diversification is not consistent with the country having self sufficiency in food production.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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30	Broads Society	The Society feels that farm diversification should remain a subsidiary element to the overall agricultural function of the business and should not exceed more than 50% of the total business operation.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
30	East Suffolk Council	As noted above, East Suffolk Council's view is that proposals for farm diversification should support the viability of the farm which will remain the main, primary use. A continuous loss of farmland to more diverse uses could, on a planning balance, change the primary use and the planning use class meaning it could fail its original objective.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
30	Luke Paterson	4.there is discussion around the nature and scale of farm diversification, farm diversification is very important with BPS being REMOVED and the energy crisis effecting farm profitability. Old buildings are not always efficient to heat and may not be as suitable as a new build. I have diversified into tourism and see that this is the direction of travel for my business to maintain its sustainability.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
30	Luke Paterson	6.Farmers PD rights should not be curtailed.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
30	RSPB	A complete business plan should define whether a particular diversification proposal is sound financially, will be acceptable in terms of design and will have no adverse impact on surrounding land, water, and other interests. It isn't so much a case of whether a single farm has been diversified enough as much as it is the in-combination impact of several adjacent farms diversifying and changing the landscape character. However, even this approach should be given due consideration if the proposed approach is deemed to be more beneficial given prevailing impacts of climate change. The land management activity known to produce the highest release of CO2 into the atmosphere is arable cropping.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
31	Bradwell Parish Council	Option b.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
31	Broads Society	The Society's preference is for 'Option a' to allow for a less constrained approach to any developing trends in the future. A specific policy might hamper an agricultural business from implementing speedier changes to the operation)	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
31	Designing Out Crime Officer, Norfolk Police	AS Q5 response - Consideration of condition of planning that the development and physical security meet Secured by Design standards.	Seems the suggestion is for agricultural development to address secured by design.	Consider adding the need for agricultural development to address secured by design principles.
31	East Suffolk Council	As the consultation document rightly sets out, agriculture is a key land use in the Broads and is important to the local economy. Within that context, there may be value in the Broads Authority giving further consideration to the feasibility of developing a new development management policy, specifically relating to agricultural buildings (option b).	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
31	Norfolk Wildlife Trust	Agricultural development – whilst we have no comments in principle on this question, we would recommend that any new development or renovation includes integral features of benefit for wildlife such as swift, bat and bee bricks, in order to help turn around the decline in these important species.	Seems the suggestion is for agricultural development to address biodiversity enhancements.	Consider adding the need for agricultural development to address biodiversity enhancements.
31	RSPB	Option b) should be chosen. A specific consideration relates to the creation of winter storage reservoirs to enable irrigation of arable crops and other forms of horticulture. Given the pressure on water resources and the Restoring Sustainable Abstraction decision made by Environment Agency facilitating the creation of new water storage reservoirs to capture winter rain and excess (perhaps reverse pumped storm flows) is paramount. This is especially attractive if farm clusters operate to create a shared structure as a single reservoir, which if sited appropriately is likely to have a lower impact on the landscape than several such structures if located on many individual farms. Obtaining planning permission for such structures is often a long-winded process and given these reservoirs protect both cropping and maintenance of groundwater sources, they should be applauded and supported.	Seems the suggestion is to consider reservoirs.	Consider adding the need for agricultural development to consider reservoirs.
32	Bradwell Parish Council	Maintain 12-month marketing period to allow time for full consideration of proposals.	Support for 12 month marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Broads Society	The Society feels that a period of 12 months can seriously restrict a business from implementing changes that may make a use viable. Given the need to quickly respond to changing economic trends, the Society suggests a period of 6 months would be more appropriate and reasonable.	Support for 6 month marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Brooms Boats	6 months would be more appropriate and reasonable.	Support for 6 month period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	East Suffolk Council	As set out in the consultation document the East Suffolk Council - Waveney Local Plan includes marketing requirements in relation to a number of policies (see appendix 4 of the Local Plan for details). For consistency, East Suffolk Council would strongly support the retention of a 12 month marketing requirement for the Broads Authority Local Plan.	Support for 12 month period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Sequence UK LTD/Brundall Riverside Estate Association	2.76We note that the proposed 12-month marketing period is largely consistent with other local planning authorities within Norfolk but Sequence also has concerns with those approaches. Requiring a marketing period for certain uses seems out-of-step with the Government's approach to change of use. In particular the amalgamation of a range of high street / town centre uses under Class E and the ability to vary the use of properties within those use classes to other uses without the need for any marketing, or indeed often a planning application as this can often be undertaken under permitted development. 2.77The marketing process adds significant time and cost to proposals for change of use and therefore Sequence would suggest this is reduced as far as possible	Support for shorter marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	South Norfolk Council	It is considered that the marketing period for a change of use needs to be relative to the existing use. Ultimately, it will be important to ensure a balanced and fair marketing period is required. This will ensure that viable uses are not lost prematurely without placing unduly restrictive burdens on business owners etc that might restrict their ability to flexibly adapt to changing market circumstances that would be necessary for them to remain financially viable.	Support for a flexible marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Wroxham Parish Council	WNP think the 12-month marketing period is too long. Cite the Windboats site as an example. The large site had been derelict for years and there was clearly no interest in rekindling boat building on this site. This could be in development by now, instead of caught up in the nutrient neutrality issue.	Support for shorter marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.

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32	Broadland Council	It is considered that the marketing period for a change of use needs to be relative to the existing use. Ultimately, it will be important to ensure a balanced and fair marketing period is required. This will ensure that viable uses are not lost prematurely without placing unduly restrictive burdens on business owners etc that might restrict their ability to flexibly adapt to changing market circumstances that would be necessary for them to remain financially viable.	Support for a flexible marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
33	Bradwell Parish Council	Where applicable re- allocation of property for different use is a better option than demolition and re-build.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
33	Broads Society	The Society agrees that this approach can be maintained but has one suggestion for other allocations:- Brundall Riverside area.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan. See comments on BRU section.
33	East Suffolk Council	East Suffolk Council would support the retention of this approach.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
33	RSPB	Support retention of this approach to maintain parity across the entirety of development.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
33	Sequence UK LTD/Brundall Riverside Estate Association	2.79There is no objection to the broad approach of identifying sites with the potential for change and redevelopment, and there are no particular sites within the Brundall Riverside Estate that we would wish to see allocated for change. However in broader terms, it is difficult to predict what sites may be available for redevelopment and things can change very quickly, certainly over the timescale of a Local Plan as we have seen with COVID-19 and the current inflationary and economic pressures. Accordingly we would suggest that the Broads Authority takes a flexible and positive approach to sites that may become available for redevelopment over the plan period and are not necessarily allocated for change. This relates to the response to question 32 above in terms of a potential reduction in the current 12-month marketing period, and also question 40 below.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
33	South Norfolk Council	It is reasonable for the authority to set out land-use policies setting out alternative uses that would be acceptable on specific sites, including specific requirements for types of development. It will be important to ensure that any specific requirements set out for redevelopment are realistic, can be viably achieved and incentivise the redevelopment of the site for the proposed use.	Agreed and advice noted.	Consider this advice as the approach to such sites is worked up.
33	Broadland Council	It is reasonable for the authority to set out land-use policies setting out alternative uses that would be acceptable on specific sites, including specific requirements for types of development. It will be important to ensure that any specific requirements set out for redevelopment are realistic, can be viably achieved and incentivise the redevelopment of the site for the proposed use.	Agreed and advice noted.	Consider this advice as the approach to such sites is worked up.
34	Anglian Water	3.33.Anglian Water supports a biodiversity net gain requirement, which can, in part, be achieved by requiring Sustainable Drainage Systems (SuDS) built in new developments to deliver water quality and biodiversity benefits as well as reductions in flood risk. We consider the introduction of higher BNG targets is a matter for the Authority in evidencing the policy requirements for new development. 3.34.Anglian Water has a voluntary biodiversity net gain (BNG) business plan commitment to deliver 10% BNG against the measured losses of habitats measured by area on all Anglian Water-owned land. It is also important to recognise that Anglian Water through landholdings and projects, as well as working with other bodies such as Wildlife Trusts can support the development of landscape scale BNG and linked habitats which support climate change adaptation and species resilience. We suggest that delivery of offsite BNG should align with Local Nature Recovery Strategies to deliver improvements at a landscape scale to support nature recovery and resilience.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Bradwell Parish Council	Option b to Introduce a standard of greater than 10% Biodiversity Net Gain seems sensible.	Support for greater than 10% noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Broads Society	The Society considers that the current policy set by the Government should be followed until more stringent standards are put into legislation.	Not supporting greater than 10% noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Brooms Boats	Current policy set by the Government should be followed.	Not supporting greater than 10% noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	East Suffolk Council	The adopted Local Plans for East Suffolk support the implementation of Biodiversity Net Gain whilst not specifying that 10% is required. Suffolk Local Planning Authorities are currently developing an interim position that also supports the 10% requirement, whilst stating that this should be seen as a minimum and that higher values will be supported. If gains of greater than 10% can be robustly justified to be included in policy this would be supported.	Support for greater than 10% noted if justified.	Consider this comment as produce Preferred Options version of the Local Plan.
34	East Suffolk Council	East Suffolk would also support the implementation of 'Environmental Net Gain', however this has similar issues as requiring more than 10% Biodiversity Net Gain as it would need to be robustly justified in policy.	Support for Environmental Net Gain noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Norfolk Wildlife Trust	Biodiversity Net Gain – whilst we support the mandatory 10% biodiversity net gain required by the 2021 Environment Act, given the scale of the global biodiversity crisis, and the need to make clear and tangible progress on nature's recovery, Norfolk Wildlife Trust recommends that wherever possible, a requirement for 20% should be set instead. We therefore support option b, and would also support option c.	Support for greater than 10% noted if justified.	Consider this comment as produce Preferred Options version of the Local Plan.
34	RSPB	Adopting a 20% BNG requirement will provide a more powerful and better targeted impact to restore biodiversity and encourage reconnection of fragmented habitats. The importance of this approach should not be under-estimated in the ability to restore wildlife, mitigate for the impacts of climate change and contribute to the wellbeing of residents and visitors alike. Extending the network of sites well managed for nature will also enhance the attractiveness of the landscape and reinforce the beauty and desirability as a tourist destination and create that 'breathing space for the cure of souls' you mention.	Support for greater than 10% noted if justified.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Sequence UK LTD/Brundall Riverside Estate Association	2.82IIIIWe would suggest the Broads Authority follows option a, which is the Government's 10% figure. As set out in previous answers, the majority of development within the Broads Authority area is small scale and therefore 10% on site provision can be challenging. Similarly the purchasing of credits for off-site mitigation as proposed by the Government could be also be challenging for small sites on viability grounds.	Not supporting greater than 10% noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	South Norfolk Council	The aim of creating biodiversity is in accordance with the NSPF (Agreement 3, 27, 28). As identified, the 10% requirement will also now be covered by other legislation (Environment Act 2021). If there is local evidence to suggest a need to go beyond this requirement either in percentage terms or in terms of an alternative approach then a separate policy may be justified. However, such interventions would need to be carefully balanced against the impact on the viability and deliverability of appropriate development.	Noted and agreed. If a greater % is desired, it will need to be justified and indeed, tested in terms of viability.	No further action other than justifying and assessing impact of a greater % than 10% for BNG.

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34	Suffolk County Council	At this time, Suffolk County Council supports setting the biodiversity net gain standard at 10% as required by Government from November 2023. However, we are aware other Suffolk Local Authorities, including West Suffolk in their preferred options local plan, have an aspiration of 20% and Suffolk County Council would support investigation as to whether this would be achievable.	Support for greater than 10% noted if justified.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Suffolk County Council	It is important to note that although we are still awaiting secondary legislation for biodiversity net gain and further guidance for LNRS, it is Suffolk County Council's understanding that the two will work closely together. Therefore, any policies on biodiversity net gain should also refer to the LNRS.	Noted - will consider links with LNRS.	Consider links with LNRS.
34	Broadland Council	The aim of creating biodiversity is in accordance with the NSPF (Agreement 3, 27, 28). As identified, the 10% requirement will also now be covered by other legislation (Environment Act 2021). If there is local evidence to suggest a need to go beyond this requirement either in percentage terms or in terms of an alternative approach then a separate policy may be justified. However, such interventions would need to be carefully balanced against the impact on the viability and deliverability of appropriate development.	Noted and agreed. If a greater % is desired, it will need to be justified and indeed, tested in terms of viability.	No further action other than justifying and assessing impact of a greater % than 10% for BNG.
35	Bradwell Parish Council	Option c they should consider introducing the M4(3) standard for a percentage of the homes.	Support for a M4(3) standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	Broads Society	The Society feels that Option 'a' is appropriate at this time.	Support for waiting for a national standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	East Suffolk Council	East Suffolk Council would support option c) (to consider introducing a M4(3) standard, subject to viability). However, Broads Authority will also want to consider the implications of planned changes to the Building Regulations in this regard and may supersede Local Plan policy requirements.	Support for a M4(3) standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	RSPB	Option b) seems appropriate.	Support for an amended M4(2) threshold noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	Sequence UK LTD/Brundall Riverside Estate Association	2.84It would seem reasonable to continue with the current Local Plan approach and then amendments can come forward with any updated Government guidance.	Support for waiting for a national standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	Suffolk County Council	Suffolk County Council supports the delivery of accessible homes. The Local Plan has identified that the Broads has an age profile of more older people and although only 9.6% report a long-term health problem or disability that limits their day-to-day activities 'a lot', an aging population means that the prevalence of health conditions associated with old age, such as dementia and frailty are likely to increase. This has implications for the types of housing which need to be planned for within the Broads. Accessible homes create living environments that are designed with the mobility and wellbeing needs of older residents in mind and can enable residents to live independently in the community and among their social support systems for longer. Suffolk County Council would support an approach to amend the M4(2) threshold so it applies to more schemes in the Broads, subject to viability and would also support consideration of introducing M4(3) standards.	Support for an amended M4(2) threshold noted. Support for a M4(3) standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
36	Bradwell Parish Council	Design of properties should focus on energy efficiency maximising heat gain and retention. Incorporating high levels of insulation and environmentally friendly materials.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Broads Society	Generally, the Society supports the current Policy DM43.	Support for DM43 noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Brooms Boats	Collaborative design and planning approach between all authorities, including cross border, businesses and residents to achieve environmental (current and future), economic viability, economic growth, well-being and job creation opportunities.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Designing Out Crime Officer, Norfolk Police	Consideration of making SBD condition of planning and to support partnership working for any new developments to ensure that the Broads towns and villages remain safe and do not see an increase of crime and disorder due to poor design.	Suggestions noted.	Ensure design policy adequately addresses crime and safety.
36	East Suffolk Council	What constitutes good design in the Broads Authority area is unlikely to have changed since the Government's amendments to the National Planning Policy Framework, and the introduction of the National Design Guide and National Model Design Code. East Suffolk Council therefore agree that the Broads Authority Local Plan policy relating to design may not need to change significantly. Comments on the Design Guide for the Broads have been submitted to you separately.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Great Yarmouth Borough Council	The emerging Broads Design Guide is noted, chiefly the chapters concerning the design of potential developments within the 'Historic Clusters', 'Rural Homes' and 'Farmstead & Enclosures' as these will be of particular relevance to those settlements and areas which straddle both the Great Yarmouth and Broads Authority planning boundaries.	Noted.	No further action.
36	Great Yarmouth Borough Council	The Borough Council is also currently preparing its own borough-wide design code which will include (amongst others) a focus on developments within the borough's rural hinterland. There is potential, therefore, for a degree of overlap between the respective design guides/codes. The Borough Council would welcome further engagement with the Broads Authority during the on-going preparation of its own borough-wide design code to ensure there is an appropriate alignment between the two documents.	Noted and agreed.	Pass on to officer leading on design at the Broads Authority.
36	RSPB	Integration of the principles which stand behind each element of design is complex. As we become more aware of the impacts of climate change and the need to change the way we do things, we need to integrate choice of materials, to be Carbon neutral both in source and construction. Equally being in a drought stressed part of the UK, we ought to consider how for example water storage reservoirs sit within the national character assessment and the landscape. We may need to adjust our thinking and approach to enable creation of such structures to be streamlined so that mitigation for abstraction is viewed as being a positive move, even though some may consider the impact on the landscape to be negative. Trying to balance the needs of different user groups and industries will become ever-more difficult and we need to change perceptions starting now so quality of structures is maintained alongside the need to be progressive and future proofed.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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36	Sequence UK LTD/Brundall Riverside Estate Association	Design policy should not be too prescriptive and repeating previous comments, each site will be considered on its merits. In addition, Broads Planning Officers place a considerable emphasis on good design already in our experience, commensurate with the National Park Status. Therefore we would not consider that any specific policy approach is required, noting the emphasis within Section 12 of the Framework and the associated national design guidance on high quality development and beautiful design. We also note the introduction of the Draft Design Guide and have made further comments with respect to this draft document in Section 3 of this response.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Suffolk County Council	Suffolk County Council would draw attention to the Suffolk Design: Streets Guide which has been recently released and is now being used by County Council Highways and Transport officers to assess the design of streets in new developments across the county.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Question 37, 38, 39	Great Yarmouth Borough Council	The Borough Council offers no comment in relation to the existing development boundaries as these lie outside of our planning administrative area. The Borough Council has noted the most recent Broads' Settlement Study (2022) evidence base, including scorings for settlements based upon their access to services and facilities and potential suitability for development boundaries as commented in Table 7 of the current consultation document.	Noted.	No further action.
Question 37, 38, 39	Great Yarmouth Borough Council	The Borough Council is also in the process of preparing an update to its Settlement Study to inform the potential hierarchy of settlements and approach to development limits for its own Local Plan review. The Borough Council would therefore be keen to liaise with the Broads Authority to ensure that approaches taken to identify and justify development boundaries in settlements which straddle the shared planning boundary are complementary to the aims of both emerging development plans.	Noted. We would be happy to be involved.	Contact GYBC re their work.
37	Bradwell Parish Council	No comment	Noted.	No further action.
37	Broads Society	The Society has no objections to the current development boundaries relating to the areas currently identified.	Noted.	No further action.
37	East Suffolk Council	The Waveney Local Plan defines Settlement Boundaries around the built up area of a number of settlements, including for the Waveney Local Plan part of settlements which also straddle the border with the Broads. Land outside of Settlement Boundaries (and allocations) is considered as the countryside where new residential, employment and town centre development will not be permitted except where in accordance with other policies in the Local Plan. The Settlement Boundaries can be viewed in the Waveney Local Plan policies maps here - www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/policies-map/ . Below are some settlement-specific comments:	Background information noted.	No further action.
37	East Suffolk Council	Oulton Broad The only development boundary in the current Broads Local Plan within the East Suffolk part of the Broads is Oulton Broad. It is noticeable that the area in the development boundary is partly located within flood zones 2 and 3. The area contained within the development boundary that is covered by flood zones 2 and 3 could increase in the future due to the impact of climate change. The Settlement Boundary as defined by Waveney Local Plan policy WLP1.2 follows the Broads Authority boundary through Oulton Broad itself. The two only deviate from each other further north near Camps Heath and Oulton in the south approaching Carlton Colville. The Oulton Broad Development Boundary extends southwards from Broadview Road and westwards from Commodore Road towards the water and includes housing that is not included within the Waveney Local Plan Settlement Boundary. It is not considered necessary for the Development Boundary to be redrawn in the Broads Local Plan.	Comments noted and will be considered as the development boundaries for the new Local Plan are produced.	Consider this comment as produce Preferred Options version of the Local Plan.
37	East Suffolk Council	Beccles The Settlement Boundary in the Waveney Local Plan closely follows the Broads Authority Boundary along the northern and western edges of the town. The Settlement Boundary runs close to, but does not touch the Broads Authority Boundary in all places. It is noticeable that there are several waterside properties next to the River Waveney which are situated within the Broads Authority area but are clearly part of Beccles. The Council previously highlighted, in relation to the preparation of the current Broads Local Plan, that introducing a Settlement Boundary for Beccles would not be supported due to issues of character and flood risk. These matters are reflected in Table 7 of the Issues and Options consultation documents and should be given careful consideration.	Comments noted and will be considered as the development boundaries for the new Local Plan are produced.	Consider this comment as produce Preferred Options version of the Local Plan.
37	East Suffolk Council	Bungay The Settlement Boundary in the Waveney Local Plan closely follows the Broads Authority Boundary, except around the Olland's Plantation. The Bungay Conservation area also extends eastwards into the Broads Authority area. Parts of the built-up area are within the Broads and therefore not within the Settlement Boundary. However, the Council previously highlighted, in relation to the preparation of the current Broads Local Plan, that introducing a Settlement Boundary for Bungay would not be supported due to issues of character and flood risk. These matters are reflected in Table 7 of the Issues and Options consultation documents and should be given careful consideration.	Comments noted and will be considered as the development boundaries for the new Local Plan are produced.	Consider this comment as produce Preferred Options version of the Local Plan.
37	East Suffolk Council	Somerleyton Somerleyton Settlement Boundary, as designated by policy WLP1.2 (Settlement Boundaries) is drawn very tightly around the existing built up areas of the settlement. Somerleyton Conservation Area borders the Broads Authority area along its western edge and encompasses both Brickfields and Staithe Lane. There do not appear to be reasonable opportunities to introduce a Development Boundary into the Broads part of Somerleyton.	Agreed.	No further action.
37	South Norfolk Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
37	Suffolk County Council	The only settlements within the Broads with potential for development boundaries, of relevance to Suffolk County Council, are Beccles, Oulton Broad, Bungay and Ditchingham Dam. The only one of these settlements that currently has a development boundary is Oulton Broad. Suffolk County Council provided comments on the proposed development boundary in February/March 2022, as set out at Appendix 1 of the Development Boundaries Topic Paper. These comments from the County Council as LLFA and from the SCCAS remain valid and we have no further comments to make on this development boundary.	Noted.	No further action.
37	Wroxham Parish Council	map incorrectly labelled "Hoveton" - map shows Hoveton & Wroxham.	Noted. Will ensure correct title.	Ensure title says 'Hoveton and Wroxham'.
37	Broadland Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
38	Bradwell Parish Council	No comment	Noted.	No further action.

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38	Broads Society	The study solely assesses 'walking distance and public transport against bus routes and not train routes. The example of Brundall is such that Authorities have failed to provide adequate provision for public access to Brundall Station and hence the scoring within the Study is inaccurate.	The study includes access to a train station and therefore it is not clear how the scoring is inaccurate.	No further action.
38	Broads Society	Improved links and access for pedestrians and cyclists to Brundall Station is embodied within the vision and policies of the Brundall Neighbourhood Plan 2016-2026 and is impacted further by approved housing developments and the inevitable population increase of Brundall and surrounding areas.	In general, we would support the access to the train station being improved, however it seems the comments implies this is about access from the side of the rail lines that is in Broadland Council's area.	No further action.
38	Brooms Boats	The study solely assesses 'walking distance and public transport against bus routes and not train routes. The example of Brundall is such that Authorities have failed to provide adequate provision for public access to Brundall Station and hence the scoring within the Study is inaccurate.	The study includes access to a train station and therefore it is not clear how the scoring is inaccurate.	No further action.
38	Brooms Boats	Improved links and access for pedestrians and cyclists to Brundall Station is embodied within the vision and policies of the Brundall Neighbourhood Plan 2016-2026 and is impacted further by approved housing developments and the inevitable population increase of Brundall and surrounding areas.	In general, we would support the access to the train station being improved, however it seems the comments implies this is about access from the side of the rail lines that is in Broadland Council's area.	No further action.
38	East Suffolk Council	East Suffolk Council broadly welcomes the Settlement Study, however, there are some additional elements that the Broads Authority may wish to consider for inclusion in the Settlement Study.	Noted.	See actions for each comment.
38	East Suffolk Council	Allotments are a valuable community resource, providing residents with the opportunity to grow their own food. This in turn enables allotment holders to exercise and socialise. Therefore there may be value in including them in appendix D of the Settlement Study. The East Suffolk Council: Suffolk Coastal Local Plan Settlement Hierarchy Topic Paper provides an example of where this has been done, see https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/Final-Settlement-Hierarchy-Topic-Paper.pdf	Noted and will add this as another consideration.	Amend study to assess provision of allotments.
38	East Suffolk Council	Appendix D of the Settlement Study does also not include proximity to major towns as a consideration. The close proximity of a smaller settlement to larger settlement/market town provides access to a wider range of shops, employment opportunities, public services and other facilities and can therefore increase the sustainability of the smaller settlement and increases the feasibility of sustainable modes of transport. Again, the Suffolk Coastal Local Plan Settlement Hierarchy considered this. See https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/Final-Settlement-Hierarchy-Topic-Paper.pdf	This is considered. The facility or service considered might be in another settlement.	No change to study.
38	East Suffolk Council	In addition to the comments above, please note that appendix D of the Settlement Study still refers to Beccles, Oulton Broad and Bungay as being located in Waveney. This should be updated to refer to East Suffolk.	Noted and will amend.	Amend study to say ESC rather than Waveney.
38	Sequence UK LTD/Brundall Riverside Estate Association	2.90No specific comments on the findings of the Settlement Study, which reflect our views on Brundall as a Key Service Centre with a good range of services and facilities.	Noted.	No further action.
38	South Norfolk Council	The approach appears to be generally consistent with Agreement 3 of the NSPF. In respect of question 38, it is important to recognise how services and facilities are distributed across the broads authority area. Careful consideration needs to be given to ensuring that important services and facilities are maintained, and it may be the case that some of these may not be in the best served villages. In this regard, when determining the location of new development consideration should be given to paragraph 79 of the NPPF which sets out that where there are groups of smaller settlements, development in one village may support services in a nearby village.	Noted.	Consider these sections of the NPPF when producing housing sections of the Preferred Options.
38	Broadland Council	The approach appears to be generally consistent with Agreement 3 of the NSPF. In respect of question 38, it is important to recognise how services and facilities are distributed across the broads authority area. Careful consideration needs to be given to ensuring that important services and facilities are maintained, and it may be the case that some of these may not be in the best served villages. In this regard, when determining the location of new development consideration should be given to paragraph 79 of the NPPF which sets out that where there are groups of smaller settlements, development in one village may support services in a nearby village.	Noted.	Consider these sections of the NPPF when producing housing sections of the Preferred Options.
39	Anglian Water	3.35.The Settlement Study sets a direction for sustainable growth, but this needs to be informed by constraints to delivering the housing needs of The Broads particularly in relation to the availability of suitable and deliverable sites that can access, and be supported by, resilient infrastructure and facilities. This should factor in embedded (capital) carbon. The Development Boundaries Topic Paper is helpful in this regard, but we recognise that this will be consolidated with other evidence as it emerges, to provide a comprehensive evidence base on appropriate and sustainable locations for long term growth through the Sustainability Appraisal. It is noted that many of the locations identified in the Development Boundaries Topic Paper have areas of flood risk, which will have implications for future growth.	Yes, the settlements study and the development boundaries proposed are a starting point, and each application may have other constraints that need addressing if they can. AWS have been asked to comment on the sites put forward as part of the Call for Sites.	Await AWS comments on sites put forward as part of the Call for Sites.
39	Bradwell Parish Council	No Comment	Noted.	No further action.
39	East Suffolk Council	It is important to take account of the settlement boundaries defined by other local authorities. Development boundaries defined by the Broads Authority should therefore be defined having regard to the criteria used by neighbouring local authorities. Settlement boundaries defined by the Waveney Local Plan closely follow the built- up area of a settlement, as well as landscape features such as hedgerows. Therefore, it is important for any development boundaries defined by the Broads Local Plan to take a similar approach, along with considerations of the statutory purposes and special qualities of the Broads. For information, a link to the Waveney Local Plan Settlement Boundaries Topic Paper can be found below. https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/C38-Topic-Paper-Definition-of-Settlement-Boundaries.pdf	This seems to be about the actual form of the development boundary and the idea is logical and we will look into that.	Liaise with districts about how they draw development boundaries to see if the BA ones should be changes to fit with their approach.
39	RSPB	The impact of either maintaining or extending the area of hard standing with obvious rapid run-off doesn't seem to be considered. This will be important given the trend for extreme, heavy rain events and the need for water to flow off by gravity.	The settlements study and the development boundaries proposed are a starting point, and each application may have other constraints that need addressing if they can. Indeed, the Local Plan has a policy relating to flood risk and SuDS.	No further action.

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39	Sequence UK LTD/Brundall Riverside Estate Association	2.92We note that the Development Boundary Topic Paper is currently a guide for the Issues and Options consultation and will be developed further in response to the consultation responses. Therefore we trust that our comments below for question 40 with regard to the suitability of the Riverside Estate being included within an extended development boundary for Brundall will be considered within that update. 2.93In response to the topic paper itself, we note the summary in the table in section 3 referencing Brundall Riverside comprising boatyards and residential (holiday let) to the south of the railway. The reference to the estate being 'over the railway from the main settlement' is unhelpful as it would suggest a degree of separation when as set out below, the Riverside Estate abuts the current settlement limit with the crossing on Station Road which does not act as a barrier. There are also ongoing discussions with regard to enhancements to Station Road and those linkages. 2.94We recognise the majority of the Riverside Estate lies within the higher risk flood zones but this should not preclude its inclusion within the development boundary / settlement limit. It is not clear what is meant by 'entire areas subject to policies in the Local Plan already' but again this would be not be a basis for not including the estate within a development boundary.	Noted, but the Brundall Riverside area is over the railway. See also response to question 40.	No further action.
39	South Norfolk Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
39	Broadland Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
40	Bradwell Parish Council	With ongoing rising sea levels building on possible flood plans seems highly questionable.	National policy is clear in relation to building in such areas and the Broads Authority has a history of upholding flood risk policy.	No further action.
40	East Suffolk Council	The Definition of Settlement Boundaries Topic Paper sets out how settlement boundaries are defined in the East Suffolk Council: Waveney Local Plan https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/C38-Topic-Paper-Definition-of-Settlement-Boundaries.pdf Settlement boundaries are drawn close to the built-up area of a settlement and tend to follow features in the landscape such as hedges and trees. Comments on individual settlements have been provided in response to question 37 above.	This seems to be about the actual form of the development boundary and the idea is logical and we will look into that.	Liaise with districts about how they draw development boundaries to see if the BA ones should be changed to fit with their approach.
40	RSPB	None	Noted.	No further action.
40	Sequence UK LTD/Brundall Riverside Estate Association	We would suggest the Brundall Riverside Estate is incorporated within the development boundary for Brundall. The image below shows the current settlement limit for Brundall within the Broadland Site Allocations DPD 2016. (image shows BDC site allocations map). 2.96The above image shows that the settlement limit runs essentially to the railway line to the south of Brundall which marks the boundary between the respective local authority area of Broadland District Council and the Broads Authority. However we are of the view that the extension of the boundary south to incorporate the Brundall Riverside Estate would be a logical extension, as shown on the image below. 2.97The extension of the development boundary to the south would include land that is contiguous with the current boundary and contains a significant concentration of residential properties, holiday accommodation and business uses including boatyards, in a sustainable location with excellent access to Brundall train station. It would therefore seem wholly appropriate for it to be included within an extended settlement boundary for Brundall to reflect that this is a developed area, which will see further (re)development and diversification, and is demonstrably not countryside.	One of the justifications for including a development boundary is potential for development; there seems limited development potential at the Brundall Riverside Estate. The Local Plan already allows for replacement dwellings.	No change to approach for the Brundall Riverside Estate area is terms of development boundary.
41	Bradwell Parish Council	There absolutely needs to be development boundaries.	Support for development boundaries noted.	Consider this advice as the approach to development boundaries is worked up.
41	Broads Society	The Society feels that, given that there are currently only four areas deemed to require a formal development boundary, the removal of those boundaries and a criteria-based approach may be possible. However, this would depend on what the criteria were and whether or not this could realistically be applied across the whole of the Broads area.	Support to investigate criteria based approach noted.	Consider this advice as the approach to development boundaries is worked up.
41	Brooms Boats	This would depend on the criteria were and if it were possible to realistically apply across the whole of the Broads area using a economic viability, environmental impact and economic growth assessment model.	Noted.	Consider this advice as the approach to development boundaries is worked up.
41	East Suffolk Council	Removing development boundaries in the Broads Authority area will have the effect of treating the whole area of The Broads as being in the open countryside. This will make it easier to resist development and protect the rural character of The Broads area. However, it also means that it will no longer be possible to focus the development that does come forward within existing centres. This could mean the development of isolated dwellings. While there could potentially be fewer developments in the Broad Authority area, those that did come forwards could be more likely to take place in isolated locations, creating a dispersed settlement pattern, which would undermine the delivery of sustainable development.	Thoughts on this matter welcomed and will be considered as we produce the housing section of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
41	Sequence UK LTD/Brundall Riverside Estate Association	2.99Sequence acknowledge that there are other Local Plans that do not have specific development boundaries drawn on proposals maps and more generally look to guide development to certain locations (for example a consideration of a built-up area or cluster of properties). These can work well as an alternative to development boundaries and the Riverside Estate Brundall should be recognised as a built-up location for the reasons set out in the response to question 40 in particular above. We would, however, reserve the right to comment further on the specific wording of such a policy.	Support to investigate criteria based approach noted.	Consider this advice as the approach to development boundaries is worked up.
41	South Norfolk Council	As previously stated elsewhere in the plan, the definition of development boundaries, supported by appropriate exception policies, is a tried and tested approach and acts as a useful policy tool to help direct development/growth into sustainable locations. However, in most cases, the development boundary will only be the starting point with regard needing to be had to the development plan taken as a whole and to specific exception policies.	Noted. We do currently have exceptions policies that are likely to be checked, updated and rolled forward.	No further action other than checking the exceptions policies and updating them for the Preferred Options consultation.
41	South Norfolk Council	If the authority were to pursue a criteria-based approach careful consideration would need to be given to ensuring that the policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. This will ensure that the plans overall outcomes are still achieved, that there are predictable outcomes for applicants and that the authority can efficiently process applications.	Agreed and advice noted.	Consider this advice as the approach to development boundaries is worked up.
41	Broadland Council	As previously stated elsewhere in the plan, the definition of development boundaries, supported by appropriate exception policies, is a tried and tested approach and acts as a useful policy tool to help direct development/growth into sustainable locations. However, in most cases, the development boundary will only be the starting point with regard needing to be had to the development plan taken as a whole and to specific exception policies.	Noted. We do currently have exceptions policies that are likely to be checked, updated and rolled forward.	No further action other than checking the exceptions policies and updating them for the Preferred Options consultation.

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41	Broadland Council	If the authority were to pursue a criteria-based approach careful consideration would need to be given to ensuring that the policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. This will ensure that the plans overall outcomes are still achieved, that there are predictable outcomes for applicants and that the authority can efficiently process applications.	Agreed and advice noted.	Consider this advice as the approach to development boundaries is worked up.
42	Bradwell Parish Council	No. of dwellings being developed seems extremely low compared to other areas.	Noted. The Broads is a very constrained area.	No further action.
42	East Suffolk Council	East Suffolk Council has welcomed, under the Duty to Co-operate, the previous discussion with the Broads Authority and their consultants as part of the production of the Local Housing Needs Assessment, and the further opportunity to review a draft of the report. We understand that a final version of the report was to be produced following our previous comments.	This has been produced and is here: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0026/432476/Great-Yarmouth-and-The-Broads-Authority-LHNA_Final-Version-2.pdf	No further action.
42	East Suffolk Council	The current Broads Local Plan identifies a housing need of 57 dwellings over the current plan period (2015-2036) in the Waveney (now East Suffolk) part of the Broads. As set out on page 2 of the Waveney Local Plan the 57 dwellings forms a part of the 'objectively assessed need' for the Waveney area and housing development within the Broads will meet this part of the need. This position is established through a Statement of Common Ground between the former Waveney District Council and the Broads Authority dated January 2018.	Noted.	No further action.
42	East Suffolk Council	The May 2022 Local Housing Needs Assessment identifies a need for 23 dwellings in the East Suffolk part of the Broads over the period 2021 – 2041. Whilst this is lower than the previous need of 57, it is understood that this is partly due to the methodology now considering the Broads as part of the larger East Suffolk area rather than the smaller former Waveney district, as well as the part of the Broads in East Suffolk having a relatively small population compared to other parts of the Broads.	Noted.	No further action.
42	East Suffolk Council	Completions of dwellings in the Broads are generally low, with a net gain of 5 dwellings recorded since the start of the current Local Plan period (1/4/2015). The current Broads Local Plan allocates a site at Pegasus Marine in Oulton Broad (Policy OUL2). This has planning consent for 76 dwellings, granted in 2014, and is coming forward with East Suffolk Council's 2022 Housing Land Supply Statement reporting that the developer has stated that the quay heading work is nearly complete and that the construction of the reed bed is to recommence. It is considered prudent to maintain the site allocation given that the development of the site addresses the housing needs identified for the Broads over the plan period and will also importantly bring about an enhancement to this area through the redevelopment of this previously developed site which is with Oulton Broad Conservation Area. As substantial construction of the uses forming the permission has not begun the continued allocation of this site will guide any future applications should they be submitted.	Noted and we intend to keep the allocation in the Local Plan.	Keep the Pegasus allocation in the Local Plan.
42	East Suffolk Council	East Suffolk Council would support a review and updating of the January 2018 Statement of Common Ground as part of the review of the Broads Local Plan to ensure that the approach of housing completions within the Broads contributing to meeting the objectively assessed need in the Waveney area / East Suffolk remains in place going forward	Noted and we will do this later in the local plan production period.	No further action for now, but SOCGs needed in future.
42	East Suffolk Council	In relation to the May 2022 Local Housing Needs Assessment we have previously made comments which we would like to be considered if the evidence document is to be revised further: a: Paragraph 2.19 – it would be helpful to explain what the 'backlog of need' is. It is understood that this relates to any existing historic need before considering future projections. b: Figure 49 (page 54) - the first row refers to Figure 35 but should be 36? And row 5 refers to Figure 46 which should be 47? c: Paragraph 6.32 (page 74) – clarity could be provided to explain that figure 61 shows households whilst figure 74 shows dwellings, to explain the difference between the figures of 151 (figure 61) and 153 (para 6.32 and figure 74). d: Figure 76 (page 76) – paragraph 6.19 explains that the needs for C2 accommodation are presented in the form of the C3 dwellings that could be released based upon the provision of C2 bed spaces at a ratio of 1.8 to 1 (i.e. equivalent of 1 dwelling for every 1.8 bed spaces). It could be misleading however to set out the need for 'C2 dwellings' in the Broads as zero in figure 76. This implies that there is no need for any C2 accommodation however it is understood that the approach is based on the anticipation that any needs for C2 accommodation would be met outside of the Broads Authority area. e: Figure 76 (page 76) – some additional clarification of the figures in figure 76 would be helpful, for example paragraph 6.34 states that there is a need for 78 social rented dwellings in the Broads however figure 76 suggests a need for 78 dwellings for those unable to afford social rent. It is understood that it is the contribution from Housing Benefit that makes these properties achievable and this could be explained.	The response from the consultant who produced the study was passed on to ESC. Here is their response. a: footnote added b: amended c: Figure 61 shows households. Para 6.32 and Figure 74 show dwellings. Footnotes added to both, e.g.: "153 dwellings, which is the result of converting the need for 151 households identified in Figure 61 to the need for dwellings." d: Again, it's because of small numbers making the results inaccurate, but also in this case it would be infeasible to provide the C2 dwellings as the costs wouldn't stack up. Any need for C2 dwellings would have to be outside of the Broads Authority area in the individual council areas, each of which will have an estimated C2 need including those people who live in the intersection of their council area and the Broads. e: Para 6.34 amended to read: Overleaf Figure 76 shows the components of housing need with a breakdown of affordable rented between social rent and Affordable rent in the Broads Authority and shows a need for 78 social rented dwellings (with the households involved requiring some Housing Benefit contribution to pay their rent) and 21 Affordable rented dwellings (with the households involved requiring some Housing Benefit contribution to pay their rent).	No further action.
42	Great Yarmouth Borough Council	The Borough Council is fully supportive of the approach and method undertaken by the Broads Authority in deriving their housing need, which forms part of the wider housing need for the whole borough of Great Yarmouth.	Support noted.	No further action.
42	Great Yarmouth Borough Council	The Borough Council considers that the constraints and special qualities of the Broads mean that it is unlikely to be desirable to provide significant housing within the Broads. Due to these exceptional circumstances, the Borough Council accepts that some, or perhaps all of the need arising from within that part of the Broads within the borough of Great Yarmouth will likely need to be met in those parts of the Borough outside of the Broads. This reflects the commitment of the Borough Council (alongside South Norfolk, Norwich City, Broadland and North Norfolk Councils) in the current Norfolk Strategic Planning Framework to address the housing needs arising from the part of the Broads which overlaps in its administrative area, if the housing need cannot be met within the Broads Local Plan.	Support noted. We have undertaken a call for sites and will assess the suitability of the sites put forward. If needed, we will liaise with out councils in relation to meeting housing need.	Assess call for sites nominations and liaise with constituent districts as required as the Preferred Options is produced.
42	Great Yarmouth Borough Council	Notwithstanding this above, there may be opportunities where housing development in the Broads could strengthen the sustainability of settlements, for example by helping to support the operation of key local facilities. The Borough Council is therefore keen to continue collaborating with the Broads Authority to investigate whether such benefits may be secured in settlements that straddle the shared planning boundary, and will welcome the opportunity to comment upon any such sites put forward for consideration through the Broads' call for sites consultation.	Support noted. We have undertaken a call for sites and will assess the suitability of the sites put forward. If needed, we will liaise with out councils in relation to meeting housing need.	Assess call for sites nominations and liaise with constituent districts as required as the Preferred Options is produced. Sites shared with our councils for comment.
42	RSPB	It is unclear how this 'total number' is derived. This is especially important given the disconnect between houses and services, be it power, water, sewerage. When will we reach the limit where new construction becomes unfeasible given the rising impacts of climate change which are getting more severe?	The study has been completed by experts in their field. As you will see in other responses to this question, it is acknowledged that the Broads Authority may not be able to meet this need and as such will work with our councils if required. We also ask key stakeholders to comment on sites, including AWS who will provide comments on water and sewerage.	No further action.

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42	South Norfolk Council	The Council notes the use of Option Research Services (ORS) in producing the housing needs study for the Broads. ORS have also been engaged to prepare a housing needs assessment for the Greater Norwich area and this work is considered to be robust and credible. The Council supports the authority in identifying is objectively assessed need for homes. Through the Greater Norwich Local Plan (GNLP) the Council has planned to fully meets its objectively assessed needs for housing. Agreement 13 of the NSPF states that, amongst others, South Norfolk, Norwich City and Broadland will include appropriate provision within their local plans to address housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local plan. The Council therefore considers that there needs to be an assessment of the extent to which the Broads Local Plan is able to meet the needs within its area, with that need being met within the Broads area wherever possible. It is somewhat unclear from the current consultation what the Broads Authority intends to do in this regard.	The Local Plan Issues and Options consultation clearly refers to and includes a call for sites. We will assess the sites put forward and allocate appropriate sites and then take things from there.	Assess call for sites nominations and liaise with constituent districts as required as the Preferred Options is produced.
42	Broadland Council	The Council notes the use of Option Research Services (ORS) in producing the housing needs study for the Broads. ORS have also been engaged to prepare a housing needs assessment for the Greater Norwich area and this work is considered to be robust and credible. The Council supports the authority in identifying is objectively assessed need for homes. Through the Greater Norwich Local Plan (GNLP) the Council has planned to fully meets its objectively assessed needs for housing. Agreement 13 of the NSPF states that, amongst others, South Norfolk, Norwich City and Broadland will include appropriate provision within their local plans to address housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local plan. The Council therefore considers that there needs to be an assessment of the extent to which the Broads Local Plan is able to meet the needs within its area, with that need being met within the Broads area wherever possible. It is somewhat unclear from the current consultation what the Broads Authority intends to do in this regard.	The Local Plan Issues and Options consultation clearly refers to and includes a call for sites. We will assess the sites put forward and allocate appropriate sites and then take things from there.	Assess call for sites nominations and liaise with constituent districts as required as the Preferred Options is produced.
42	Wroxham Parish Council	WNP section on housing refers.	Noted.	No further action.
43	Bradwell Parish Council	No comment	Noted.	No further action.
43	Broads Society	Firstly the Society considers that there is a clear difference between 'residential moorings' and 'liveaboards'. With regard to Residential Moorings, the Society would support a clear, criteria based policy which allowed for designated residential moorings throughout the Broads area. These designated areas, however, should be providing modern, on-shore facilities for users to promote a more environmentally acceptable approach that leads to a less detrimental impact on the visual quality and amenity of the Broads.	DM37 is in place and will be checked and amended and updated if required as the Preferred Options is produced.	Amend and update DM37 as required.
43	Brooms Boats	Planning should support a modern approach to both using agile means to help answer the vital questions of environmental impacts and economic viability	Noted.	No further action.
43	East Suffolk Council	The production of updated evidence by the Broads Authority in relation to new residential moorings is supported. In the preparation of the current Broads Local Plan the former Waveney District Council commented that Somerleyton should be considered as a suitable area for a modest number of residential moorings, and the site subsequently allocated under Policy SOM1 is acknowledged as providing a contribution to meeting the identified needs.	Noted.	No further action.
43	East Suffolk Council	Suffolk Coastal District Council and Waveney District Council (now East Suffolk Council), alongside Ipswich Borough Council, Babergh District Council, and Mid Suffolk District Council commissioned RRR Consultancy Ltd to prepare the Gypsy, Traveller, Travelling Showpeople, and Boat Dweller Accommodation Needs Assessments (2017) (available here: https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Gypsy-Traveller-Travelling-Showpeople-Boat-Dwellers-Accommodation-Needs-Assessment-May-2017.pdf). The needs assessment concluded that 28 permanent residential moorings were required over the period 2016-2036, of which 10 arose from need in Babergh, 17 in the former Suffolk Coastal area, and 1 in the former Waveney area. Our monitoring data shows the Local Plan policy relating to houseboats has not been used and no residential moorings/houseboat applications have been received.	Noted. We have policies and guidance relating to residential moorings that seek to enable successful schemes.	No further action.
43	RSPB	If moorings can be constructed and maintained in a sustainable manner, then the approach is acceptable.	Noted.	No further action.
43	South Norfolk Council	The Council welcomes the Authority identifying an objectively assessed need for residential moorings. In respect of the identified allocation, it will be important not only that allocations exist but also that there is proportionate evidence that those moorings are deliverable/developable in accordance with paragraph 68 of the NPPF.	Noted and agreed and that is why the call for sites refers to deliverability and seeks information from site promoters on that very issue.	No further action
43	Woodbastwick Parish Council	Residential moorings: The plan does not make clear what residential moorings would consist of, nor does it explain why there has been little or no progress in developing designated sites.	More detail is in the current Local Plan, much of which will be rolled forward. We allocate the sites and it is down to the site owner to put in an application and develop the site. For this Local Plan, our Call for Sites asks more questions about deliverability.	Ensure Local Plan is clear about residential moorings.
43	Woodbastwick Parish Council	Residential moorings: The people who live on boats should be consulted as a priority and their views should influence future development	Noted. We advertise the consultation far and wide and also consult the Residential Boat Owners Association.	None.
43	Broadland Council	The Council welcomes the Authority identifying an objectively assessed need for residential moorings. In respect of the identified allocation, it will be important not only that allocations exist but also that there is proportionate evidence that those moorings are deliverable/developable in accordance with paragraph 68 of the NPPF.	Noted and agreed and that is why the call for sites refers to deliverability and seeks information from site promoters on that very issue.	No further action
44	Bradwell Parish Council	In the interests of fairness other areas of the Broads should be considered for Traveller and Gypsy pitches, it should not just be limited to the Great Yarmouth Area.	As is clearly set out in the Issues and Options consultation document, we worked with GYBC to understand the need for sites in the Broads part of that Council area. The document goes on to say that we will work with the other five districts to understand need elsewhere in the Broads.	No further action other than working with other districts to understand need.

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44	Broads Society	The Society strongly feels that occupants of 'liveaboards' which, by their nature, often tend to be transient users of the waterways, should be regarded in the same way as Gypsies and Travellers. It should be incumbent upon the Authority to regulate their use effectively through planning law and its navigation responsibilities; and, should also, provide similar designated provision to that of residential moorings. We followed this comment up and the Broads Society said: As you are aware, the Authority recognises that there are a number of boat dwellers that do not have permanent moorings and do not wish to moor in the same location on anything but a temporary basis. This was recognised in the 'Broads Authority Boat Dwellers Accommodation Assessment Final Report August 2022'. All the Society is suggesting is that it may be helpful for a small number of temporary moorings to be allocated around the system with basic facilities (pump out, water, electricity) so that this lifestyle choice could be accommodated and more effectively regulated.	Suggestion noted and will be passed on to colleagues for consideration.	Pass comment to colleagues at BA.
44	East Suffolk Council	The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017) covered the former Waveney and Suffolk Coastal districts (as well as Babergh, Mid Suffolk and Ipswich) (www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Gypsy-Traveller-Travelling-Showpeople-and-Boat-Dwellers-Accommodation-Needs-Assessment-May-2017.pdf). The assessment has informed the needs and policies for Gypsy and Traveller accommodation set out in both the Waveney and Suffolk Coastal Local Plans. The assessment did not cover the Broads Authority and recognises in paragraph 2.30 that "The Broads Authority, the Greater Norwich local authorities, Great Yarmouth, and North Norfolk are working in partnership and are updating their GTAA. This is being undertaken by RRR Consultancy using a similar method and approach as adopted for this accommodation needs assessment, but also includes the assessment of accommodation needs of residential caravan dwellers."	Noted.	No further action.
44	East Suffolk Council	East Suffolk Council is aware of unauthorised encampments having taken place in Nicholas Everitt Park, Oulton Broad, which is in the Broads part of East Suffolk. An assessment has been undertaken for Great Yarmouth Borough however it is not clear whether the Broads Authority intend to undertake further work to cover the other five district Council areas in the Broads and/or will be looking to engage as part of any future updates undertaken by those authorities. The 2021 Greater Norwich Accommodation Need and Supply Changes since the Accommodation Needs Assessment only appears to provide updates in relation to the Greater Norwich authorities. Whilst the Council has no reason to consider the overall need situation has changed for the Broads since the 2017 Assessment covering the Broads was undertaken, the Council supports the reference in the Issues and Options consultation document to working with the other five district councils, in particular given that unauthorised encampments have taken place.	Noted. We intend to revisit Gypsy and Traveller approach/evidence over the coming months.	Consider this comment as look into gypsy and traveller work.
44	Great Yarmouth Borough Council	In similar to the response to Question 42, the Borough Council is fully supportive of the derived need figure for gypsy and travellers and, in recognition of the special qualities and constraints of the Broads (not least the risk of flooding), accepts the likelihood of having to meet this need within the borough which lies outside of the Broads. The Borough Council is therefore keen to continue collaborating with the Broads Authority in order to help meet this need and will welcome the opportunity to comment upon any such sites put forward for consideration for gypsies and travellers through the Broads' call for sites consultation.	Support noted.	Work with GYBC to address need for Gypsy and Travellers.
44	South Norfolk Council	Agreement 15 of the NSPF sets out that all Norfolk Planning Authorities need to quantify the need for and plan to provide for gypsy and travelling show people. The Council welcomes the Authorities commitment to updating their assessment of the need for Gypsy and Traveller sites through the production of a further addendum to their existing work.	Noted, but this is only in relation to Great Yarmouth as is clearly stated in the Issues and Options document.	Ensure any need in the GNLP area is understood as the Local Plan progresses.
44	South Norfolk Council	The Council notes that the Authority refers to a 2021 Greater Norwich addendum to their needs assessment. Since the publication of this addendum a further draft update of the Greater Norwich GTAA has been produced. This was published in June 2022. It should be noted that this assessment excluded land within the Broads area, which would need to be considered separately through the Authorities addendum.	The Broads Authority were only aware of the Addendum and not aware of the study dates June 2022. I have found the study and it says it excludes the Broads as we were doing our own update. That is incorrect; we worked with GYBC to work out the Gypsy and Traveller need for the Broads part of GYBC. Indeed, if we had known about this study, we would have worked with Greater Norwich Authorities to be part of this study.	Ensure any need in the GNLP area is understood as the Local Plan progresses.
44	Broadland Council	Agreement 15 of the NSPF sets out that all Norfolk Planning Authorities need to quantify the need for and plan to provide for gypsy and travelling show people. The Council welcomes the Authorities commitment to updating their assessment of the need for Gypsy and Traveller sites through the production of a further addendum to their existing work.	Noted, but this is only in relation to Great Yarmouth as is clearly stated in the Issues and Options document.	Ensure any need in the GNLP area is understood as the Local Plan progresses.
44	Broadland Council	The Council notes that the Authority refers to a 2021 Greater Norwich addendum to their needs assessment. Since the publication of this addendum a further draft update of the Greater Norwich GTAA has been produced. This was published in June 2022. It should be noted that this assessment excluded land within the Broads area, which would need to be considered separately through the Authorities addendum.	The Broads Authority were only aware of the Addendum and not aware of the study dates June 2022. I have found the study and it says it excludes the Broads as we were doing our own update. That is incorrect; we worked with GYBC to work out the Gypsy and Traveller need for the Broads part of GYBC. Indeed, if we had known about this study, we would have worked with Greater Norwich Authorities to be part of this study.	Ensure any need in the GNLP area is understood as the Local Plan progresses.
45	Bradwell Parish Council	In the interests of fairness of areas of the Broads should be considered for Residential Caravans.	Noted.	No further action.
45	Broads Society	The Society has no comment to make apart from any form of development should obviously fully comply with other relevant policies in the local plan.	Noted.	No further action.
45	East Suffolk Council	The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017) that assessed needs for both the Waveney Local Plan area and the Suffolk Coastal Local Plan area did not include an assessment of the needs for residential caravans. The Strategic Housing Market Assessment part 2 (2017) (www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Ipswich-and-Waveney-Housing-Market-Areas-Strategic-Housing-Market-Assessment-Part-2.pdf) considered the needs for mobile homes / park homes and concluded that the price of these meant they did not provide a cheaper alternative to standard market housing. East Suffolk Council would support liaising with the Broads Authority under the Duty to Co-operate in relation to understanding any needs for residential caravans in the Broads.	Noted.	No further action.

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46	Designing Out Crime Officer, Norfolk Police	DM43 Design policy the local plan currently states under subsection 25 Design g) Crime Prevention currently states 'The design and layout of development should be safe and secure, with natural surveillance. Measures to reduce the risk of crime and antisocial behaviour should be considered at an early stage so as not to be at the expense of overall design quality.' Norfolk Constabulary requests that in line with the aforementioned NPPF guidance and Design policies and to support the Broads Authority in its visions and commitments that this is amended to specifically include building to Secured by Design standards / in line with Crime Prevention Through Environmental Design (CTPED) Principles. This amendment will promote a significant step towards protecting the wonder and heritage of the Broads for future generations to use and enjoy safely. This could be further embedded into policy is consideration was given to making Secured by Design Awards a condition of planning for all commercial and residential applications within this area.	Noted.	Consider these amendments as work up the Design policy for the Preferred Options.
46	East Suffolk Council	Comments in relation to existing policies have been picked up in our response to the other questions as appropriate. The Council is aware that the Broads Authority may be considering the applicability of other designations close to the Broads, and therefore offers the comments below:	Noted.	No further action.
46	East Suffolk Council	Oulton Broad District Shopping Centre Oulton Broad District Shopping Centre, as defined by Local Plan policy WLP2.11, extends into the Broads Authority area where it is allocated under the current Broads Local Plan policy OUL3. The Broads Local Plan designation extends the District Shopping Centre westwards along the southern shore of Lake Lothing. It is considered appropriate area for the Broads Local Plan allocation to continue in its current form, unless further work indicates that change is necessary. The policies in each plan that relate to Oulton Broad should be aligned as closely as possible.	Support for current approach noted.	Working with ESC, consider continuing the current policy approach for the District Centre.
46	East Suffolk Council	Common Lane North Employment Area Common Lane North Employment Area is designated in Waveney Local Plan Policy WLP8.12. The northeast section of Common Lane North Employment area is situated close to the Broads Authority area boundary. Both the employment area boundary and settlement boundary are tightly drawn around existing buildings. There would be no justification to extend the Employment area boundary further north into the Broads authority area.	Thanks for considering nearby sites and contemplating the appropriateness for the Broads Authority to continue the policy approach. Reasons for not doing this are agreed.	No further action.
46	East Suffolk Council	Town Centre Boundary Beccles Town Centre Boundary as defined by Waveney Local Plan policy WLP8.18, meets the Broads Authority Boundary in the northwest corner of the town centre (adjacent to Saltgate) and also runs close to the Broads Authority Boundary along its western flank. The Waveney Retail and Leisure Needs Assessment (2016), which provides the evidence base for the current Waveney Local Plan, does not advocate moving the town centre boundary further to the west. Westward expansion of the town centre would mean incorporating parts of the town centre which only have a minimal retail presence. However, there may be scope to include the Waveney House Hotel within the town centre boundary.	Noted. We will liaise with ESC on this matter.	Liaise with ESC on how to address the issue of Waveney House Hotel and Beccles Town Centre.
46	East Suffolk Council	Gasworks Allotments The Gasworks allotments, Beccles, are designated as open space by Local Plan policy WLP8.23. The Gasworks allotments are separated from the Broads Authority area by a small stream, which itself is bounded by vegetation on each side. To the north is an area of vacant open land in the Broads. The vacant open land and allotments are separate and the allotments do not extend into the Broads, and there is therefore no reason to extend this designation into the Broads.	Thanks for considering nearby sites and contemplating the appropriateness for the Broads Authority to continue the policy approach. Reasons for not doing this are agreed.	No further action.
46	East Suffolk Council	Holy Trinity Church Open Space, Bungay Holy Trinity Church in Bungay is designated as open space under Local Plan policy WLP8.23 and is located on the eastern edge of Bungay. It directly borders the Broads Authority area. However, the churchyard is separated from the Broads Authority area by a wall or fence. Land on the other side of the boundary appears to be developed. Therefore, there is unlikely to be any justification in identifying open space into the Broads Local Plan.	Thanks for considering nearby sites and contemplating the appropriateness for the Broads Authority to continue the policy approach. Reasons for not doing this are agreed.	No further action.
46	East Suffolk Council	Holy Trinity Churchyard, Barsham Holy Trinity Churchyard in Barsham is designated as open space under Local Plan policy WLP8.23 and directly borders the Broads Authority area. However, the churchyard is separated from the Broads Authority area itself by a line of trees and the two do not appear to be connected in any way and so it is not considered advisable to extend the churchyard into The Broads Authority area.	Thanks for considering nearby sites and contemplating the appropriateness for the Broads Authority to continue the policy approach. Reasons for not doing this are agreed.	No further action.
46	Great Yarmouth Borough Council	The Borough Council considers it fundamental that a positive and proactive policy is retained within the Broads Local Plan which helps to enable the delivery of full dualling of the A47 'Acle Straight'. Realising the full dualling of the Acle Straight continues to be a key ambition of the Borough Council, and is critical to the long term health of industries and job growth in the borough, which are of importance to the wider and national economy.	The Acle Straight policy, like all others, will be taken before members in due course for their consideration.	When take Acle Straight policy to Members, report back this representation.
46	Historic England	Historic England considers the current policies to be robust and that they provide a good strategic policy basis for the conservation and enhancement of the historic environment. In particular Policies SP5, DM11 and DM12 comprehensively address The Broads' varied heritage assets.	Support noted.	No further action.
Agriculture	Mr K Lowes	The area needs farming industry. Farmers need fresh water. Winter rainfall needs to be collected as the climate is changing and we get drier summers.	Noted.	Consider how to include this in the Local Plan.
Archaeology	Suffolk County Council	Suffolk County Council would encourage policies which set out a clear approach to addressing the historic environment and archaeology. Policies should include reference to Suffolk County Council managing the Historic Environment Record for the county. A separate policy addressing undesignated heritage assets and whether they relate to built heritage or archaeological remains would be helpful. Including requirements for archaeological investigations in site specific policies can be helpful in setting expectations for developers and guiding decision makers.	Suggestion noted. We will consider this as we produce the heritage policies for the Preferred Options.	Consider this suggestion for heritage policies.
Archaeology	Suffolk County Council	The Local Plan should also make clear that Suffolk County Council advises early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the NPPF, Suffolk Coastal Core Strategy are met. SCCAS is happy to advise on the level of assessment and appropriate stages to be undertaken. They should be consulted for advice as early as possible in the planning application process.	Suggestion noted. We will consider this as we produce the heritage policies for the Preferred Options.	Consider this suggestion for heritage policies.

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Archaeology	Suffolk County Council	Suffolk County Council would also welcome the encouragement of public engagement as part of a development project to improve public understanding of the area's archaeology.	Suggestion noted. We will consider this as we produce the heritage policies for the Preferred Options.	Consider this suggestion for heritage policies.
Archaeology	Suffolk County Council	Use of Historic England's Historic Environment Good Practice Advice in Planning is encouraged throughout the plan making process and it may be beneficial for both Historic England and the County Councils to be involved jointly with the Broads Authority to create joined up holistic policy on the historic environment.	Noted.	We will send heritage policies to SCC, NCC and HE.
BRU policies	Broads Society	This is an area accommodating several important businesses supporting the marine industry, boatyards and tourism. There are a number of ageing and unused buildings which are falling into disrepair and have little or no industrial use. Access is poor hindering local plan objectives of sustainable travel, local economic development, local jobs and community well-being. Businesses and dwellings are threatened by environmental impacts. Valuable prime riverside locations could be enhanced through collaborative planning approaches that enable bio diversity, increased green sustainable tourism, net zero approaches, economic growth for the area and region, local jobs for local people, increased skills and job opportunities. This seems to be an ideal area to be targeted for positive change.	The Brundall Riverside area has its own series of policies.	Consider comment in relation to BRU policies.
BRU policies	Brooms Boats	Brundall Riverside area. An area accommodating several important businesses supporting the marine industry, boatyards and tourism. Ageing and unused buildings are eroding and have no industrial use. Access is poor hindering local plan objectives of sustainable travel, local economic development, local jobs and community well-being. Businesses and dwellings are threatened by environmental impacts. Valuable prime riverside locations could be enhanced through collaborative planning approaches that enable biodiversity, increased green sustainable tourism, net zero approaches, economic growth for the area and region, local jobs for local people, increased skills and job opportunities.	The Brundall Riverside area has its own series of policies.	Consider comment in relation to BRU policies.
BRU policies.	Sequence UK LTD/Brundall Riverside Estate Association	2.80Whilst not proposing any particular sites for allocation, the inclusion of the Brundall Riverside Estate within the development boundary as set out below, would recognise its built-up and previously developed nature and make it more straightforward in planning terms for sites to be redeveloped. In particular, the nature of boatyards is changing, for example Broom Boats is diversifying and policies should be flexible to the changing requirements for such sites.	The Brundall Riverside area has its own series of policies.	Consider comment in relation to BRU policies.
CAN1	British Sugar/Rapleys	British Sugar is fully supportive of the existing allocation for Cantley Sugar Factory (Policy CAN1) which, in principle, supports development within the defined area that secures and enhances the sugar factory's contribution to the economy of the Broads and wider area. We request that the policy allocation is carried forward in the Local Plan Review in order to ensure that there continues to be support for British Sugar's ongoing operation, diversification and associated development needs.	General support of the policy noted.	No change to general policy approach, although see other comments.
CAN1	British Sugar/Rapleys	As we raised in the previous representations to the adopted Broads Plan, there is an intrinsic area of the Cantley Sugar Factory site that is not contained within the Cantley Sugar Factory policy area, as identified on the enclosed Site Location Plan. The area currently excluded from Policy CAN1 is in the ownership of British Sugar and contains the car and truck park/service yard for British Sugar's operations and the entrance to the factory. The area therefore forms a fundamental component of the operation of British Sugar. As such, we request that the policy boundary is amended to include this area.	Noted. We will look into amending the boundary.	Look into amending the boundary of CAN1. Meet operators.
CAN1	British Sugar/Rapleys	As explained above, British Sugar's future development needs include potential on-site renewable energy development to reduce carbon emissions from the operation. British Sugar is considering opportunities for solar and wind energy development in order to ensure that its operations become more efficient and sustainable and contribute towards the net zero carbon target. We consider that the Local Plan should support such development needs in line with the Broads Authority's vision for the net zero carbon reduction targets in the long term.	Support for renewable energy noted. Note that the Government are indicating changing the approach for wind turbines, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced as well as policy CAN1 is checked and produced (see comments from British Sugar on CAN1), being aware of any Government policy change.
CAN1	British Sugar/Rapleys	Therefore, we request that Policy CAN1 is updated to support the principle of renewable energy development, including identifying the site as suitable for wind energy development to support the operation of Cantley Sugar Factory, as follows: This site is defined as an employment site for the purposes of Broads Local Plan Policies on general employment (DM26). Development on this site which secures and enhances the sugar works' contribution to the economy of the Broads and wider area will be supported where this also: a) Protects or enhances wildlife and habitats (including the nearby Ramsar site, SPA and SAC); b) Protects or enhances the amenity of nearby residents; c) Avoids severe residual impacts on highway capacity or safety; d) Improves the appearance of the works, particularly in views from the river and other receptors in the locality, through design, materials and landscaping and have regard to the setting of the nearby designated heritage assets; e) Reduces light pollution; f) Uses the disposition, bulk and location of buildings and structures to avoid extending the built up part of the site into the open areas around or more prominent in the skyline; g) Can be demonstrated to be in conformity with national policy on flood risk; and h) Appropriately manages any risk of water pollution. Renewed use of the railway or river for freight associated with the plant would be particularly encouraged, as would measures reducing carbon dioxide emissions, including solar and wind powered energy development. The site is identified as being suitable for wind turbine development in association with the sugar works, subject to satisfying the above criteria. Employment uses other than that associated with the sugar works will be supported only where they do not prejudice the future of that use (and associated waste operations) and also meet the above criteria.	Proposed amendment to enable renewable energy at Cantley Sugar Beet Factory noted. It is not clear if there are particular sites suggested within the boundary of the Factory in mind.	Meet with operator on site to discuss their ideas for renewable energy at the site.
CAN1	British Sugar/Rapleys	In recognition of the Cantley Sugar Factory's national significance and British Sugar's commitment to the factory's ongoing and long-term operation and diversification, we request that the Local Plan Review will carry forward the Cantley Sugar Factory policy allocation with an amended policy boundary and amended wording to support renewable energy development.	Noted. We will consider the changes as we prepare the Local Plan for the Broads Preferred Options version.	Consider changes put forward to CAN1. Potential to meet operator on site to talk through and understand the area.

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Climate change	Anglian Water	<p>3.20. Our long-term strategic ambitions are shaped to deliver on our purpose and drive us to achieve more, for everyone, this includes becoming a net zero carbon business by 2030 and reducing the carbon in building and maintaining our assets by 70%. We are therefore, committed to reducing our carbon footprint in both operational and capital carbon</p> <p>3.21. We support the climate checklist and suggest that surface water flooding and drought could have joined up solutions regarding rainwater harvesting and greywater recycling opportunities to minimise surface water run-off and potable water demand through implementing these climate resilient measures. Plus, more ambitious water efficiency measures in new development helps to reduce future water demand.</p> <p>3.22. We suggest the spatial strategy should ensure that new development is directed to locations which avoid areas at risk of flooding (from all sources) and sea level rise - taking climate change allowances into account. Further consideration could be given to whether this section also specifically mentions sea level rise implications.</p>	noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Design	Designing Out Crime Officer, Norfolk Police	<p>Secured by Design</p> <p>Secured by Design aims to achieve a good standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable Natural Surveillance and create a sense of ownership and responsibility for every part of the development. These features include secure vehicle parking, adequate lighting of common areas, defensible space and a landscaping and lighting scheme which when combined, enhances Natural Surveillance and safety. Experience shows that incorporating security measures during a new build or refurbishment reduces crime, fear of crime and disorder. The aim of the Police Service is to assist in the Design process to achieve a safe and secure environment for residents and visitors without creating a "fortress environment".</p> <p>All new developments should provide a venue that makes the most from the proven crime reduction methodologies of Secured by Design gained from over thirty years policing experience and supported by independent academic research. There are Residential, Commercial, Hospital and Educational Developments Design Guides available from www.securedbydesign.com which explain all of the crime reduction elements of these schemes. They are separated into sections; Section 1: Deals with the development layout and design and all external features and Section 2: Provides the detailed technical standards for various elements of the buildings.</p> <p>The interactive design guide https://www.securedbydesign.com/guidance/interactive-design-guide is also a very good and self-explanatory tool that can walk you through the various elements of designing out crime in a visual manner.</p>	Noted. Consider this comment as produce the design policy of the Local Plan.	Consider this comments as produce design policy of the Local Plan.
Design	National Grid/Avison Young	<p>Utilities Design Guidance</p> <p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.</p> <p>National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.</p> <p>Therefore, to ensure that future Design Policies remain consistent with national policy we would request the inclusion of a policy strand such as:</p> <p>"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."</p>	Noted and we will weave this into the Design policy.	Weave this wording into the Design policy.
DM11	Historic England	We support the current policy which seeks to protect, preserve or enhance the significance and setting of the heritage assets and that of the wider historic environment. We welcome the reference within the policy, to non-designated heritage assets, archaeology and undiscovered heritage assets. The supporting text provides good justification for the policy provisions and explains the reasoning clearly which should help direct decision makers and prospective applicants.	Support noted.	No further action
DM12	Historic England	We support the current policy.	Support noted.	No further action
DM30	Lanpro Services	Development proposals constrained by unenforceable restrictions requiring the use of holiday accommodation to be only for short stay occupancy on a rented basis, as currently exists in Broads Policy DM30 only serves to make continued investment in the provision and upgrading of specifically designed tourism accommodation and facilities on the Broads unviable and will result in investment taking place in nearby Local Authority areas where such restrictions do not apply.	Thoughts noted. We will consider this as we review and check DM30.	Consider comments as check DM30.
DM37 - residential moorings	Norwich City Council	With regards to residential moorings, we would like to see the criteria-based policy for residential moorings in Norwich that is contained within the current plan be retained in the new plan.	Noted and we don't anticipate removing that criterion from the current policy.	Maintain the Norwich City locational criterion of DM37.
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	<p>Environmental</p> <p>The proposal provides a number of key environmental benefits by:</p> <ul style="list-style-type: none"> • Making more efficient use of land thereby reducing the need to use limited land resources for housing. • Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions. • Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources. 	Noted.	See responses to other comments from McCarthy Stone.

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DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Given all these factors, evidence and the guidance of the PPG, the council should initially ensure that the Housing Needs for older persons' housing is identified in the plan. We then consider that the best approach is for the plan to identify the level of housing needed to meet the requirement of older people in the Broads Authority area and to allocate specific sites to meet the that are in the most sustainable locations close to key services. The plan should also continue to include a standalone policy actively supporting the delivery of specialist older people's housing, however some more flexibility should be applied to this compared to the existing policy.	All Norfolk LPAs worked with Norfolk County Council Independent Living and Supported Living Teams to look into the need for such housing. Whilst the Broads Authority is part of this work, no specific need is identified for the Broads Authority. This is because data is not available for the Broads. The boundary is such, that, for example, not one entire postcode area is within the Broads. The same is similar for other typical areas like Lower Super Output areas. That is why, taking market housing need as an example, the Standard Methodology does not apply to areas like the Broads – indeed, we have to commission bespoke evidence. It is also important to understand our area is part of 6 districts. Our need is part of their need, not additional to their need. The Broads Authority is open to development of the right type, in the right place, of the right design. Indeed, that is what policy DM41 allows. So, it is not clear how a need can be identified for the Broads. Further, we held a call for sites as part of the Issues and Options consultation and no sites have been put forward for elderly or specialist need housing. If MS have sites, please feel free to contact us to discuss them. Also, if MS have any comments on the policy DM41 then please do let us know.	Liaise with Norfolk County Council Officers in the first instance regarding this comment. Ask McCarthy Stone if they wish to put any sites forward and if they wish to propose changes to DM41.
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Developers should not be required to demonstrate need for older persons housing, given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments "help reduce costs to the social care and health systems" (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.	Suggested amendments to the existing policy noted and we will consider these as we draft the Preferred Options version.	Consider this comment as produce Preferred Options version of the Local Plan.
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council: "The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."	Suggested amendments to the existing policy noted and we will consider these as we draft the Preferred Options version.	Consider this comment as produce Preferred Options version of the Local Plan.
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Older peoples' housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.	Background information noted.	See responses to other comments
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Economic A report 'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that: •III'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. •IIIBuilding 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. •IIIOn a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.' A further report entitled Silver Saviours for the High Street : How new retirement properties create more local economic value and more local jobs than any other type of residential housing (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme built in a sustainable location, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open and high streets vibrant.	Background information noted.	See responses to other comments
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first- time buyers (Aug 2020)" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.	Background information noted.	See responses to other comments

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DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	<p>Social</p> <p>Retirement housing gives rise to many social benefits:</p> <ul style="list-style-type: none"> • Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder. • Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns. • The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living. 	Background information noted.	See responses to other comments
DM41 - general	McCarthy Stone/The Planning Bureau Limited	<p>We note that the existing local plan contains policy DM41 Elderly and Specialist Needs Housing that deals specifically with older persons housing and states 'Proposals for the development of or change to elderly or specialist needs housing will be supported if they are located within a development boundary and they have regard to: i) The local need for the accommodation proposed; ii) Whether the proposal would result in an undue concentration of such provision in the area; and iii) Impact upon amenity, landscape character, the historic environment and protected species or habitats.'</p> <p>The existing Local Plan was adopted just before the government updated the PPG with a new section on Housing for Older and Disabled People now recognising the need to provide housing for older people. Page 14 of the Issues and Options document identifies the PPG as relevant. Of relevance paragraph 001 Reference ID: 63- 001- 20190626 of the PPG states:</p> <p>"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid- 2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking" (emphasis added).</p>	Background information noted.	See responses to other comments
DM41 - general	McCarthy Stone/The Planning Bureau Limited	<p>Paragraph 003 Reference ID: 63-003-20190626 recognises that "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support."</p> <p>Thus, a range of provision needs to be planned for and recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing or adaptable housing is important. Paragraph 006 Reference ID: 63-006-20190626 sets out "plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require."</p>	Background information noted.	See responses to other comments
DM41 - Need for older persons' housing	McCarthy Stone/The Planning Bureau Limited	<p>It is well documented that the UK faces an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates). Between 2014 and 2039, the ONS project that over 70 per cent of projected household growth will be made up of households with someone aged 60 or older.</p> <p>It is generally recognised (for example The Homes for Later Living Report September 2019). That there is a need to deliver 30,000 retirement and extra care houses a year in the UK to keep pace with demand. The Mayhew Review Future-proofing retirement living' recommends 'an accelerated programme of retirement housing construction with up to 50,000 new units a year'.</p> <p>Although there are no apparent specific statistics for older people for the Broads Authority area both the 'Study of Demand for Specialist Retirement housing and Accessible housing for Older People in Norfolk' and the 'Great Yarmouth Borough Council and The Broads Authority Local housing Needs Assessment 2022, version 2' imply that the authority is anticipating an increase in the older persons population. This can be supported by looking at the age profile of Norfolk as a whole that can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 219,260 persons aged 65 and over in 2018, accounting for 24.3% of the total population of the County. This age range is projected to increase by 92,196 individuals, or 42%, to 311,456 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 30.2% of the total population of the County by 2043.</p>	Background information noted.	See responses to other comments
DM41 - Need for older persons' housing	McCarthy Stone/The Planning Bureau Limited	<p>In 2018 there were 60,914 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 48,822 individuals, or 80.2%, to 109,736 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Norfolk's residents, accounting for 6.7% of the total population in 2018 and increasing to 10.7% by 2043.</p> <p>It is therefore clear there will be a significant increase in older people over the Plan Period in Norfolk which will include the Broads Authority area and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan. The Plan should ensure that the policy approach to meet the housing needs of older people is up to date and addresses the need.</p>	Background information noted.	See responses to other comments
DM43	McCarthy Stone/The Planning Bureau Limited	<p>Point h of policy DM43 considers 'Accessibility and adaptability. This states that 'Developments shall be capable of adapting to changing circumstances, in terms of occupiers, use and climate change (including changes in water level). In particular, dwelling houses should be able to adapt to changing family circumstances or ageing of the occupier(s) and commercial premises should be able to respond to changes in industry or the economic base.</p> <p>Applicants are required to consider if it is appropriate for their proposed dwelling/ some of the dwellings to be built so they are accessible and adaptable and meet Building Regulation standard M4(2) and M4(3). If applicants do not consider it appropriate, they need to justify this. For developments of five dwellings or more, 20% will be built to meet Building Regulation Standard M4(2)'. </p>	Noted.	Review standard - could it apply to more dwellings? Also, keep an eye on Building Regulation changes and delete or amend the policy if they come into force during the production of the Local Plan.

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DM43	McCarthy Stone/The Planning Bureau Limited	The council should initially recognise that the proposed changes in building regulations will require all homes to be built to part M4(2) of the Building Regulations. This will remove the need to reference this in the local plan and should be removed.	As and when the requirement becomes part of Building Regulations, we can delete (if still producing the Local Plan). Until then we will review the standard and are likely to keep it.	Review standard - could it apply to more dwellings? Also, keep an eye on Building Regulation changes and delete or amend the policy if they come into force during the production of the Local Plan.
DM43	McCarthy Stone/The Planning Bureau Limited	Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support", the council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.	Noted. Agree that adaptable housing as well as housing for older persons are both appropriate approaches.	Carry forward DM41 and DM43 approach (although noting that accessibility may be addressed through Building Regulations).
DM43	McCarthy Stone/The Planning Bureau Limited	Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons scheme reducing independence contrary to the ethos of older persons and particularly extra care housing and this should be recognised within the plan.	Noted. Agree that adaptable housing as well as housing for older persons are both appropriate approaches.	Carry forward DM41 and DM43 approach (although noting that accessibility may be addressed through Building Regulations).
DM43	McCarthy Stone/The Planning Bureau Limited	Recommendation: Delete DM43 point h from the plan.	Suggestion noted. As and when the requirement becomes part of Building Regulations, we can delete (if still producing the Local Plan). Until then we will review the standard and are likely to keep it.	Review standard - could it apply to more dwellings? Also, keep an eye on Building Regulation changes and delete or amend the policy if they come into force during the production of the Local Plan.
Economy and Tourism	Lanpro Services	The Local Plan Review covers a wide range of topic areas and although at Section 7.6 The economy of the Broads the review acknowledges that tourism is the significant contributor to the economy and employment of the Broads, as it states: "Tourism is the mainstay of the Broads' economy. In 2019, the Broads and surrounding area (including the area of influence) received around 8.1 million visitors, bringing in an estimated £490 million and directly supporting more than 7,435 FTE jobs." and at Section 7.9 Navigation: "Navigation is fundamental to the local economy and provides varied health and wellbeing benefits. The Local Plan will need to ensure that navigation is protected and appropriately enhanced" the review does not contain any specific references as to how the Broads Authority aim at encouraging future investment into these important sectors in order to not only maintain but enhance the existing quality and provision in these sectors so they continue to be significant contributors to the economy.	It is intended that our current tourism policies will continue. No comments on those were provided however. It is worth noting that the Authority has a Tourism Strategy and the Broads Plan, which is the Management Plan for the Broads, has been adopted and is in place.	Assess economy and tourism policies and update and amend as required.
Economy and Tourism	Lanpro Services	Whilst, separate sections have been devoted to many other aspect and issues impacting on the Broads, the Tourism and Navigation sectors which are the main drivers of the Broads Economy, have failed to be addressed. This represents a significant and fundamental omission from the Local Plan review. The Broads Authority should be actively engaging with its tourism and navigation sectors to understand their needs and how to improve the quality and range of facilities on offer to ensure that tourism and navigation continue to thrive over the period to be covered by the Local Plan Review.	It is intended that our current tourism policies will continue. No comments on those were provided however. It is worth noting that the Authority has a Tourism Strategy and the Broads Plan, which is the Management Plan for the Broads, has been adopted and is in place. We have consulted far and wide (as evidenced by the number of comments received) and some boat yards have come forward to us wishing to speak about future plans - we have therefore engaged with tourism and navigation sectors.	Assess economy and tourism policies and update and amend as required.
Economy and Tourism	Lanpro Services	Local Plan policies formulated as part of the review SHOULD whilst affording protection of the Broads environment, landscape and ecology, also actively encourage business investment in tourism accommodation, boat moorings, marinas and services without the imposition of unnecessary and unenforceable restrictions, to ensure facilities which actively support the diversification and adaptation of the Broads tourism economy are provided for the future. Visitors expect high quality accommodation in which to stay and facilities to moor boats and this can only be achieved through creating the right climate for businesses to invest in these facilities.	It is intended that our current tourism policies will continue. No comments on those were provided however so it is not clear if the comments are saying the existing policies do this or not. It is worth noting that the Authority has a Tourism Strategy and the Broads Plan, which is the Management Plan for the Broads, has been adopted and is in place.	Assess economy and tourism policies and update and amend as required.
Economy and Tourism	Lanpro Services	Tingdene companies are significant providers of a variety of types of high quality holiday accommodation and mooring berths, which directly contribute to the economy and job opportunities of the Broads. They have in recent years been significant investors in the Broads with circa £34 million invested in the upgrading of the Parks and Marinas they have purchased and operate. This high level of investment ensures continued improvement of the facilities and services which directly contribute to the quality of the visitor experience and the overall economy of the Broads. Investment in the Broads economy needs to be actively recognized and encouraged in addition to policies affording protection to the environment, landscape and ecology of the Broads.	Background information noted.	No further action.
Economy and Tourism	Lanpro Services	Tingdene's business model for the operation of its holiday parks throughout the country, including those in the Broads, is to sell the holiday lodges on their holiday parks on long term leases to individual purchasers who wish to own holiday accommodation, rather than, as is often the case on many holiday sites, offering annual or time limited licences. The leases are registered with HM Land Registry which provides long term certainty for people purchasing holiday accommodation in an area. This model enables many different people who wish to purchase a wide range of types of holiday accommodation, the opportunity to do so on a dedicated holiday park, rather than opting for the purchase of an unrestricted property from within the general housing stock, further depleting the housing stock available for primary residences.	Background information noted.	No further action.
Economy and Tourism	Lanpro Services	The individual owners of the holiday accommodation then frequently rent their properties out to visitors to the Broads. This cyclical investment enables Tingdene to recoup the initial investment it has made in upgrading and improving the often poor quality holiday accommodation and facilities on a site and then to continue to invest in the upgrading of further holiday sites which have often fallen into disrepair, through lack of investment. Owners of the holiday accommodation then not only have accommodation available for their own use but also to achieve a return on their investment in the holiday accommodation by letting it out ensuring that holiday accommodation is available for visiting holiday makers throughout the year. This year round availability of holiday accommodation and facilities then results in wider business opportunities being created in the local area to serve the visitors.	Background information noted.	No further action.

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Economy and Tourism	Lanpro Services	Broadlands at Oulton Broad is a prime example of a holiday park and marina within the Broads which Tingdene has invested significantly in over recent years. The increase in tourism accommodation and marina berths has benefitted the Broads economy. The Park is now providing a range of high quality year round holiday accommodation and Marina berths at Oulton Broad, encouraging visitors throughout the year. The lodges and chalets on this Park are not constrained by unenforceable limitations on the periods the accommodation can be occupied or requirement that they should only be used for short stay occupation on a rented basis as required under the current Local Plan policy DM30- Holiday accommodation – new provision and retention. They are simply limited to ‘holiday use only and not for use as a sole or main residences’. This ensures the accommodation is used for holiday purposes only.	Background information noted.	No further action.
Economy and Tourism	Lanpro Services	Tingdene is also making substantial investment in the provision of a range of types of tourism accommodation at a recently acquired site at Caldecott Hall Country Park, Fritton, which whilst just outside the Broads Authority’s Executive Boundary directly serves the Southern Broads Area. The tourism accommodation recently permitted at Caldecott Hall allows for year round use for holiday purposes only and not as a sole or main residence, providing maximum flexibility in its holiday use whilst ensuring it does not become a sole or main residence.	Background information noted.	No further action.
Economy and Tourism	Lanpro Services	Tingdene as a significant operator and employer within the Broads would urge the Broads Authority to address in the review of its Local Plan how it proposes to attract investment into the main stays of its economy and would welcome the opportunity to discuss its business operations with the Broads Authority.	Will contact the respondent to understand better the nature of the request to meet.	Contact respondent.
Electric charging points	Woodbastwick Parish Council	Most boats on the Broads are powered by diesel or petrol and consequently contribute to global warming and climate change. The plan fails to recognise this, nor does it offer any mitigating action. As a minimum, steps should be taken to develop an infrastructure to encourage hire boats and private boats to use electric power. Charging points on 24-hour moorings would be a good start	The BA have a programme of installing charging points in certain areas. We are looking at the feasibility and practicalities of installing such pillars in more remote areas where power source is an issue. The unintended consequence of the pillars we install is the impact of the light at the top of the pillars and that needs consideration. We are also aware of some private organisations like boatyards and pubs installing the pillars. Further, even if the plan does not have a specific policy or mention of a particular issue, the policies on other relevant issues are of relevance and proposals can still be addressed.	Consider electric charging points as produce the Local Plan.
Flood risk	Mr K Lowes	Believes a barrier has been installed at Ipswich to reduce surge effects – perhaps one at GY would protect tidal rivers.	Noted. We work closely with colleagues producing the Broadland Futures Initiative and these comments seem relevant for that work and so will be passed on.	Pass on comments to BFI.
Flood risk	Mrs S Lowes	Concerned re river flooding locally – dead fish.	Noted. We work closely with colleagues producing the Broadland Futures Initiative and these comments seem relevant for that work and so will be passed on.	Pass on comments to BFI.
Flood risk	Mrs S Lowes	PH is in a flood area and in 2008 we were told it was only protected for 50 years so any new building here should never be allowed despite several requests to place homes near the village hall.	Noted. We work closely with colleagues producing the Broadland Futures Initiative and these comments seem relevant for that work and so will be passed on. There is only a small part of Potter Heigham in the Broads and yes, flood risk in that part is a significant constraint to development in the area.	Pass on comments to BFI.
Flood risk	Mrs S Lowes	Flood wall needs raising along with quay heading raised and repaired to protect residents.	Noted. We work closely with colleagues producing the Broadland Futures Initiative and these comments seem relevant for that work and so will be passed on.	Pass on comments to BFI.
Flood risk	Woodbastwick Parish Council	We would encourage further dredging as it is our Councillors’ experience that this will help to reduce local flooding, particularly in our local parish of Panxworth.	The BA have just finished a dredging project in Malthouse Broad, where we removed about 6000 m3. If the comment about Panxworth is in relation to management of the small stream that comes through Panxworth, then this is either EA or IDB responsibility for drainage management. The Authority is only responsible for dredging in the publicly navigable areas.	No further action.
General comment	Anglian Water	Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, our region has the highest rate of housing in England. The initial 2021 census report identifies that population growth in the region was 8.3% in the past decade against a national average of 6.6%. However, we recognise that The Broads, in focussing on the delivery of development to address local needs, will have a markedly different population change compared to the region as a whole.	Background information noted.	No further action.
General comment	Anglian Water	5.1. Anglian Water utilises six capitals thinking to help us keep our responsibility to customers, communities, and the environment at the front of our minds when making business decisions. Using this approach to assess the priorities and principles of the emerging Local Plan, we find the following	Background information noted.	No further action.
General comment	Anglian Water	The Plan should consider the impact and resilience of new development and its spatial distribution, in terms of capital (embedded) carbon, and climate adaptation for new development and the infrastructure needed to support future growth over the longer-term.	Noted. Will consider this as we produce the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
General comment	Anglian Water	This reflects organisational culture and ways of working – we consider that this initial stage of the Plan illustrates that the process of plan development and supporting evidence increases skills and knowledge and develops new ways of working.	Noted.	No further action.
General comment	Anglian Water	Further evidence needed to support the preparation of the plan towards preferred options include an updated Water Cycle Study and Strategic Flood Risk Assessment, and consideration of producing a carbon assessment to inform the spatial strategy. We recognise that partnership working is valuable in realising this, and we will provide advice where necessary.	Noted. We will produce a proportionate water cycle study. We will await the BFI modelling before updating a SFRA and will work with other LPAs like we did last time.	Produce a proportionate water cycle study and SFRA once BFI modelling done.
General comment	Anglian Water	3.8. Anglian Water recognises the challenges in operating in a low-lying wetland environment such as The Broads, particularly in maintaining and managing our infrastructure networks to support local communities. We would support an approach that minimises the need for carbon intensive infrastructure, in terms of capital (embedded) carbon and operational carbon, which would steer development to locations where there is existing infrastructure with the capacity to accommodate future development.	Background information noted.	No further action.

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General comment	Anglian Water	3.9.Anglian Water is supportive of Local Nature Recovery Strategies, as the platform to provide a holistic approach to addressing environmental concerns including climate change, nature recovery, and opportunities for informed locations for offsite biodiversity net gain, to achieve meaningful landscape scale environmental benefits. Anglian Water is proactively working to embed nature-based solutions to provide a range of benefits including improved water quality, minimising surface water flood risk and biodiversity net gain.	Background information noted.	No further action.
General comment	Anglian Water	3.10.We also understand how important natural capital, like water, soil and biodiversity provide benefits to society. Our Natural Capital Asset Check report explores how these dependencies impact our environment, helping us to make better decisions and help to protect natural capital around our region.	Background information noted.	No further action.
General comment	Anglian Water	3.11.There are a range of stakeholders with an influence on water quality and we believe that working in collaboration and using new markets for the trading of ecosystem services it can help deliver positive environmental outcomes.	Background information noted.	No further action.
General comment	Anglian Water	3.12.Anglian Water recognises that a collaborative, partnership approach to addressing issues, particularly within environmentally vulnerable and sensitive areas, can provide multiple benefits, including: shared stakeholder ownership of the issues and solutions, more potential sources of funding that can make schemes more affordable for individual partners, increased pace of delivery, and a true focus on a clear outcome, not individual outputs. Examples of where we are part of a multi-sector approach in our region include: <ul style="list-style-type: none"> •IIIWendling Beck Exemplar Project: a pioneering habitat creation, nature restoration and regenerative farming project, spanning almost 2,000 acres of land in North Dereham, Norfolk. It is a collaboration between private landowners, local authorities, environmental NGOs, and Anglian Water. It aims to transform land use for environmental benefit, whilst also building community and environmental resilience. The priorities began as carbon, flood risk reduction, and biodiversity net gain, and we have included nutrient neutrality to that list. •IIIThe Norfolk Water Strategy Programme: a partnership to prepare a sustainable Norfolk Water Strategy in recognition of the growing pressures on water resources in a changing climate. The objectives of the programme are to secure good quality, long-term water resources for all water users, while protecting the environment and showcasing the county as an international exemplar for collaborative water management. This will test and implement a number of nature-based solutions to manage water. 	Background information noted.	No further action.
General comment	Anglian Water	3.13.In relation to the nutrient neutrality issue affecting The Broads SAC and River Wensum SAC, Anglian Water has been working proactively with the Norfolk local planning authorities to identify and take forward mitigation measures, including those that are focussed on nature-based solutions. In addition, an amendment to The Levelling Up and Regeneration Bill proposes a new duty to be placed on Water Companies to upgrade all WRCs situated in nutrient sensitive areas to the 'highest technically achievable limits', with the deadline for this to be achieved by 2030.	Background information noted.	No further action.
General comment	British Sugar/Rapleys	The Cantley Sugar Factory was the first sugar beet processing factory in the UK and has been in operation since its opening in 1920. The Cantley Sugar Factory is of national importance, producing home-grown sugar and other related produces. This, in turn, helps underpin food security in the UK, in line with the Government's recently published food strategy (June 2022). The factory is an important part of the local – and regional – economy. As well as directly employing 90 permanent staff and a further 25 seasonal employees during the Campaign period, the factory supports a further 80 off-site/indirect jobs within the catchment area and 350 local farmers (with sugar beet grown by local growers) and several haulage companies. The factory supports local schools and colleges through offering work experience and apprenticeship schemes every year. In addition to the production of sugar, the sustainable production of the site ensures that the output of each process becomes the input of the next, turning raw materials into products thus avoiding unnecessary waste. The result is the production of much more than sugar, with its co-products including: <ul style="list-style-type: none"> •IIIAnimal feed from residual sugar beet fibre which is supplied to the livestock industry; •III Topsoil from soil recovered from sugar beet which is used primarily by the landscaping industry; •III LimeX, a liming material supplied to agriculture; •III On-site power generation (Combined Heat and Power) and the export of electricity into the electrical grid, and •III Aggregates from stones recovered from sugar beet which is used by civil engineering, road building and construction industries. 	Background information noted.	No further action
General comment	British Sugar/Rapleys	British Sugar is fully committed to the ongoing and long-term operations at its factory in Cantley. For example, the business is currently investing in a new waste water treatment plant (£10m investment). British Sugar is continuously reviewing opportunities to diversify while at the same time reducing greenhouse gas emissions from the sugar beet processing operation through on-site renewable energy development. British Sugar's operations at Cantley are diverse and they will continue to invest in further opportunities for diversification, efficient operations and carbon emission reductions, which will strengthen its role in the agri-food sector in the region and the sustainable, low carbon future.	Background information noted.	No further action
General comment	Catfield Parish Council	The Local Plan for the Broads is an excellent document in terms of recognising the unique ecological value of the Broads and the challenges facing their preservation for future generations. It also highlights the problems arising from the split responsibility between Local Planning Authorities (LPA's) and the need to work closely with neighbouring LPA's.	Support noted.	No further action.
General comment	Catfield Parish Council	Catfield Parish Council welcomes the consultation and the opportunity to express its views. Put succinctly it considers that more emphasis should be given to the monitoring and implementation of existing policies for the preservation of the Broads rather than the development of new strategies and public relations initiatives.	Noted and we are doing that. We also need to review the local plan to bring it up to date and try to tackle challenges now and in the future.	No further action.
General comment	Catfield Parish Council	The practical implementation of existing policies to meet the known challenges is seen to be the main priority.	Noted and we are doing that. We also need to review the local plan to bring it up to date and try to tackle challenges now and in the future.	No further action.
General comment	Designing Out Crime Officer, Norfolk Police	Norfolk Constabulary are committed to ongoing partnership working with the Broads Authority and look forward to further consultation regarding the suggestions made with regards to designing out crime being feature within the future planning and protection of the Broads.	Noted.	No further action.
General comment	Great Yarmouth Borough Council	In general, the Borough Council welcomes the Issues and Options consultation and its focus on the key issues for consideration at this early stage in the review of the Broads Local Plan. The comments below have been necessarily focussed on the main strategic cross-boundary planning issues between the Borough Council and the Broads Authority.	Support noted.	No further action

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General comment	Historic England	Please note that absence of a comment on a policy, allocation or documents in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.	Noted.	No further action
General comment	Lanpro Services	Please see below comments made on behalf of Tingdene Holiday Parks Ltd and Tingdene Marinas Ltd operators of Broadlands Park and Marina at Oulton Broad, Waveney River Centre at Burgh St Peter, Brundall Bay Marina within the Broads Authorities Executive area and Caldecott Hall Country Park at Fritton whilst within Great Yarmouth Borough Council borders onto the Broads Authority's area	Background information noted.	No further action.
General comment	Loddon Parish Council	Loddon Parish Council discussed the Local Plan Issues and Options and the Draft Design Guide at it's meeting on 12 October 2022 and resolved that they broadly support the plans but reserve the right to challenge it when the Council receives the final details.	Noted.	No further action.
General comment	Luke Paterson	2.Making space for water and allowing passage of fish by re flooding Dilham broad	Idea noted and will be passed onto colleagues for consideration .	Pass on to colleagues at the BA for consideration
General comment	Marine Management Organisation	Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Applicants should be directed to the MMO's online portal to register for an application for marine licence. https://www.gov.uk/guidance/make-a-marine-licence-application	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	The MMO is a signatory to the coastal concordat and operates in accordance with its principles. Should the activities subject to planning permission meet the above criteria then the applicant should be directed to the follow pages: check if you need a marine licence and asked to quote the following information on any resultant marine licence application: •lllocal planning authority name, •llplanning officer name and contact details, •llplanning application reference.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations http://www.legislation.gov.uk/uksi/2017/571/contents/made may be applicable.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and decision-making processes. Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. A map showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans please visit our Explore Marine Plans service. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. If you wish to contact your local marine planning officer you can find their details on our gov.uk page.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Mr K Lowes	The area needs a logical plan for development – not only housing, but agriculture and water.	Noted. The plan covers agricultural development and water related planning issues. The Broads Plan is also relevant.	No further action.
General comment	Mrs S Lowes	We need no development in PH.	Noted. There is a specific policy for the Potter Heigham Bridge area that guides what can happen in the area.	No further action.
General comment	Mrs S Lowes	We love where we live, but seems it's being destroyed.	Noted. There is a specific policy for the Potter Heigham Bridge area that guides what can happen in the area. We hope this would result in appropriate development that would not ruin the area.	No further action.

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General comment	National Grid/Avison Young	National Grid assets within the Plan area Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the Plan area. Details of National Grid assets are provided below. Gas Transmission Asset Description Gas Transmission Pipeline, route: BACTON TO YELVERTON A plan showing details and locations of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to National Grid assets.	General route of pipeline noted and thanks. Information sent to GIS officer to check our records.	Send rough route of pipe to GIS Officer.
General comment	Sequence UK LTD/Brundall Riverside Estate Association	1.2The Brundall Riverside Estate Association is an elected committee to oversee the general interests of its members, comprising of companies and individuals who own land/property within the Riverside Estate area. Primarily boatyards, marinas and other businesses and a number of private residential and holiday homes.	Background information noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	1.1These representations on behalf of the Somerleyton Estate discuss the opportunity for the new Local Plan to support the improvement of the marina and boatyard in Somerleyton village. The Estate's long-term aim is to secure the viable future of the boatyard and marina, to support a range of different types of moorings in the marina and to bring the boatyard with its buildings up to date. The facilities are old and there is the potential for the facility to better support the local tourism industry. With a larger marina the boatyard, which is an important local business, can flourish supporting local businesses and crafts connected with the water. 1.2We would welcome the chance to discuss if this is something that the Local Plan could support in all or in part. We would like to understand how the Local Plan could support the proposals for example using a site allocation or by using non site-specific development management policies. It is likely that any applications or developments would be done over a period of time as funds allow so supportive Local Plan policies would be welcome. 1.3The background is that the marina came up for sale in 2012 and was bought by the Estate. The Estate has had a longstanding policy of supporting traditional local businesses in the area. The marina has long been an active part of Somerleyton village, providing a boatyard, serving local boats and moorings. For 10 years, the Estate has run a successful boatyard and around 120 moorings at the marina. The Estate has been paying off the borrowings needed to purchase the marina and is now able to invest in, and improve the marina, as long as the investment produces a sensible return. 1.4Improvements to the marina would support the boatyard. The boatyard is housed in a building which is nearing the end of its useful life. In order to replace the building with a similar sized structure, the marina and boatyard need to be able to fund the new building which will be a significant cost. Keeping the boatyard going will maintain an important local business. It is the aspiration of Hugh Somerleyton to expand the range of traditional local boat businesses and crafts carried out at the site. For example, early discussions have been held with a company working with local reed.	Background information noted. Aspirations for the boatyard noted.	Will meet operator on site.
General comment	Somerleyton Marina/Evolution Planning	1.5 The marina basin could be expanded into an area of adjacent reed bed to the south. Work is underway to carefully study the ecology of the reed bed and understand how to create new reed bed nearby if required, or to enhance other reed beds on the Estate. The Estate has some 32 hectares of reed bed already providing a good opportunity for mitigation. 1.6Elsewhere, the Somerleyton Estate is rewilding hundreds of hectares of farmland as part of a project started by Hugh Somerleyton and he is committed to ensuring there is no loss of biodiversity as a result of this project. Mill House Ecology are advising the Estate. 1.7The following sections set out more detail on the proposal. We would welcome the chance to discuss this in more detail with the Broads Authority.	Background information noted. Aspirations for the boatyard noted.	Will meet operator on site.
General comment	Somerleyton Marina/Evolution Planning	2.1The Somerleyton marina and boatyard are located between Somerleyton village and the River Waveney. The Lowestoft railway line runs to the south and west. The site is accessed via a roadway that leads from the village at the junction of Slugs Lane and The Street. 2.2The vehicular access leads down a slope to the edge of the marina and boatyard and enters the marina at a car parking area. To the south east of the car park are welfare facilities for the owners of the boats. To the south of the marina is a building of around 775 square metres, and a smaller building of around 90 square metres which are the base for the boatyard. Around these buildings are outside storage areas for boats. 2.3A channel containing moorings and a slipway runs from the buildings in a westerly direction to where it opens out to the north. At this point there is a basin that can accommodate around 105 boats to the north of the channel. Further west from this channel, is the entrance to the River Waveney. A vehicular access runs alongside the southern part of the channel, and along the northern part of the channel, before running around the north of the mooring basin.	Context of the Marina noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	2.4To the west of the marina is the River Waveney. The river is around 40 metres wide at the entrance to the marina. To the north along the river there are moorings alongside the river. To the south, the river goes under the swing bridge for the Lowestoft Railway Line. 2.5To the north and east of the marina is the village of Somerleyton with homes and the Dukes Head Pub. To the south, is a single house and woodland and to the west is woodland and farmland. 2.6To the south of the existing marina basin, is an area of reed bed which extends to the railway line. 2.7The only planning application at the marina in the last 5 years was for 5 floating pontoon moorings, and has the reference BA/2018/0220/FUL.	Context of the Marina noted.	No further action.

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General comment	Somerleyton Marina/Evolution Planning	Background to the Marina, Boatyard and the Somerleyton Estate 2.8There are a diverse range of activities on the Somerleyton Estate. The marina and boatyard were bought by the Estate in 2012 after it was put up for sale by its previous owners who were the holiday company TUI. The Estate bought the business because it wanted to ensure that it remained viable, and remained an important amenity for the local area. The Estate has a long history of investing in local businesses including the Dukes Head Pub in Somerleyton. The Pub has been run by the Estate to ensure that it continued as a village amenity. The Estate owns and runs the Fritton Lake Resort and Fritton Arms Pub which are a high-quality holiday resort. The Estate has a large farming business, and a portfolio of properties that are let to local people. The Grade II* Somerleyton Hall and Gardens are owned and maintained by the Estate and are open to visitors. 2.9The Estate has embarked on a significant rewilding project. Rewilding is a process which encourages landowners and occupiers to make changes to how they use the environment for the benefit of nature and ecosystems. It is an initiative which can be engaged in at a range of scales (from domestic gardens to large estates of land), but the aim is to use land in less intensive ways, so that nature can colonise and coexist with other uses, to enable the flourishing of wild nature on its own terms.	Context of the Marina noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	2.10Examples of rewilding include: •IIIProtecting, expanding and connecting ancient woodlands to enable a diverse range of wildlife to establish and disperse, and increasing carbon storage; •IIIReducing high populations of grazing animals to help trees and other vegetation grow; •IIIRemoving fishing pressure and creating proper marine protection to stop dredging and bottom trawling so that sea life can recover and flourish; •IIIRestoring wetlands and introducing beavers to boost biodiversity, store carbon and help flood prevention; •IIIBringing back missing species to plug crucial gaps in the ecosystem, and re-forge key relationships between species (for example, between predators and prey and scavengers); •IIIRemoving dams so that fish can move freely, and the forces of erosions and deposition are allowed to re-establish themselves; •IIIReconnecting rivers with floodplains, restoring their natural course to slow the flow, easing flooding and creating habitats for fish and other aquatic and wetland wildlife; •IIIConnecting up habitats and providing wildlife bridges so wildlife can move and disperse naturally, helping them adapt to climate change and build resilience.; •IIISetting aside large areas for nature so that nature can truly flourish on its own terms, maximising biodiversity, carbon storage and essential eco benefits; and •IIICreating a wildlife-friendly garden and helping wildlife move through it to help nature on a smaller scale.	Context of the Marina noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	2.11On the Somerleyton Estate, Hugh Somerleyton has been pioneering in raising awareness of this project and has been aiming to recover nature by rewilding the lowland habitats of Norfolk and Suffolk. The project includes 400 hectares of land and began in 2016. As such, it is a large-scale project, which aims to facilitate the rewilding of lowland, mixed woodland, lakes and ponds, grassland and meadow and heathlands and shrub habitats. Key species introduced have included Exmoor Ponies, Welsh Black Cattle, Large Black Pigs, Mouflon and Water Buffalo. A key part of the rewilding project is enabling extensive grazing for these animals and natural regeneration. As such, the Estate has taken the decision to move away from intensive sheep grazing and traditional management to a rewilding approach, enabling extensive low-density cattle grazing instead. A reduction in sheep grazing was essential to allow natural processes more of a free reign on the site. More diverse, functional grazing animals were introduced to the project area to create species diversity and wood pasture habitats. In addition, some manual removal of non-native invasive species and fences was required. 2.12This project is part of the wider Wild East project, aimed to promote nature recovery across the region and return 20% of land to nature.	Context of the Marina noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	2.13The various businesses on the Estate have been built up or created in order to provide an income that maintains Somerleyton Hall, to provide local employment and to keep local skills alive such as those needed in livestock farming and boat building. The businesses are run with a strong environmental focus. 2.14The ambition for the marina and boatyard is to support local boat building and local crafts and businesses. A larger marina would support the boatyard. 2.15The aim of the Estate is to improve the marina and boatyard so that it can: •IIIDeliver a wider range of moorings supporting the local tourism industry; •IIISecure the long-term future of the boatyard and marina; •IIISecure local jobs in traditional marine industries; •IIIBe a catalyst for local businesses and crafts connected with the water; and •IIIEnable the replacement of the existing boatyard building on a like for like basis.	Aspirations for the Marina noted.	No further action.
General comment	Water Management Alliance	I can confirm that we have no comments at this time.	Noted.	No further action.
General comment	Broads Society	Environmental impacts threaten the survival of businesses, including boatyards, dwellings and access by the public for recreational and well being activities. A high-level plan is required that supports the mitigation of the environmental effects with a collaborative effort between Authorities, Town and Parish Councils, Businesses and residents.	Noted. The Broads Plan is the key document for the Broads. There are also other plans and strategies that relate to the Broads Plan like the Local Plan and Sustainable Tourism Strategy for example.	No further action.
General comment	Brooms Boats	Environmental impacts threaten the survival of businesses, including boatyards, dwellings and access by the public for recreational and well being activities. A high-level plan is required that supports the mitigation of the environmental effects with a collaborative effort between Authorities, Town Councils, Businesses and residents.	Noted. The Broads Plan is the key document for the Broads. There are also other plans and strategies that relate to the Broads Plan like the Local Plan and Sustainable Tourism Strategy for example.	No further action.
Heritage	Luke Paterson	1. Restoring heritage – Dilham water mill as education centre/hostel.	Officers will contact the respondent to go and visit him.	Contact and meet respondent.
HRA	Historic England	Support.	Comment noted and will be passed on to HRA consultants.	Pass on to HRA consultants.

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HRA	Norfolk Wildlife Trust	With regard to the potential impacts of air pollution on designated sites, and the criteria for screening them in to further HRA work in the next draft of the HRA, we recommend that in addition to Natural England's AADT threshold criteria (quoted for example in HRA section 5.3.13) regarding levels of traffic, that further consideration is given to the potential for lower levels of traffic to result in a Likely Significant Effect (LSE) requiring progression to the Appropriate Assessment (AA) stage. We have recently been consulted on several cases elsewhere in the county where Natural England's AADT threshold wouldn't be met, but the data from APIS shows that the existing baseline emissions of nitrogen are either close to or already exceeding critical loads/levels. In such cases, the sensitivity of those designated sites are clearly far more susceptible to adverse effects from much smaller increases in emissions. Whilst we haven't had the opportunity to review the APIS data for any of the sites in the HRA prior to submitting our comments, we would recommend as a precaution, that any sites close to or already exceeding their critical loads/levels are automatically screened in for AA regardless of the vehicle number threshold.	Comment noted and will be passed on to HRA consultants.	Pass on to HRA consultants.
LOD1	Ray Hollocks	There is no logic in transferring 10 of the existing moorings to residential as the boatyard has always had residential moorings without any restrictions.	Permission is required for residential moorings. If you wish for residential moorings at your site, you need to apply for planning permission.	No further action.
LOD1	Ray Hollocks	The SSSI site is a distance up the river and any impact from the boatyard is unlikely to have any impact so a habitats regulations assessment should not be required.	It would be for a suitably qualified HRA consultant to undertake the assessment and come to that conclusion or not. Please note that since the original policy was put in place, if the site were to be allocated, a tariff of around £180 would need to be paid per boat due to recreational impacts on protected sites. So the HRA issue is still relevant.	Continue with reference to need for HRA if site continues to be allocated.
LOD1	Ray Hollocks	There is no restriction on boat lengths at the moment and the one third policy for using the navigable river will apply. The Vessel Dimension act 1995 restricts the beam to 3.8 meters on the Chet so this is relevant.	Under the Vessel Dimension Bylaws, 1995 vessels navigation on the Chet are restricted to 3.8m beam and 14m length (unless exempt, see byelaws for full details). Vessels larger than these dimensions may navigate on the Chet providing written permission is sought from the Authority up to 7 days in advance and on no more than 4 occasions in one year. With regards to mooring in the navigation area, the Navigation Byelaws, 1995 (part 5) sets out the full requirements. There is no reference to 'a third' in the Byelaws. Vessels mooring abreast must not extend into the channel more than 10m or a quarter of the channel, whichever is the less. Vessels must not be moored in a way which impedes the clear and free passage of any other vessel or otherwise obstruct the navigation of a waterway or channel. The byelaws do not apply outside of the Navigation area, for example in a marina.	No further action.
LOD1	Ray Hollocks	Despite much effort it has not been possible to engage Highways or Anglia Water so this should be excluded as a condition but recognize they will have an opportunity to respond upon an application.	As part of any pre-application enquiry (which is for free), we can provide contact details if you wish. AWS and Norfolk Highways are key stakeholders and their involvement in the application process is essential. If this site is to continue to be allocated, the requirement will remain. We recognise that some organisations may charge for application advice, but the policy requirements are still valid and the policy raises important considerations that need addressing.	None
LOD1	Ray Hollocks	The quay headings have been upgraded.	Noted. If the site is put forward through the call for sites, a site visit will be undertaken and it may be that such a requirement could be removed from the policy.	Check quality of quay heading if continue to allocate the site.
LOD1	Ray Hollocks	The BA does not have any authority or examples to insist on a management plan and cannot make this a condition.	There is a guide that has been adopted by the Broads Authority which will be of assistance. We consider a management plan important and so this requirement is likely to be continued. Indeed, other applicants for residential moorings have provided a management plan.	Continue with requirement for management plan.
LOD1	Ray Hollocks	Page 229 of the plan 2015 to 2036 advises that the Environment Agency would have the flood zone evaluated for the flood defence work by Summer 2021. Has this been done as part of the site that would be ideal for residential moorings is flood zone 3.	The new modelling has been delayed and could be ready in 2024 or 2025. That being said, residential moorings are in the body of water by their very nature and are deemed generally acceptable, but you will see at the end of the supporting text of the residential moorings policy, DM37, we talk about requirements for residential moorings in terms of flood risk.	Include findings of the flood risk work in later iterations of the Local Plan.
LOD1	Ray Hollocks	The Marina has just been served with enforcement notice on 2 static caravans and the justification for these are as follows together with a response. <i><note that the some other text in the representation responded to parts of the enforcement notice and these are not included as they are not relevant to the thrust of the representation which is about LOD1></i> .	Noted. This enforcement notice is with regards to two static caravans that do not have permission. This allocation (LOD1), if continued, is for residential moorings that, even though allocated, need planning permission.	None
LOD1	Ray Hollocks	Can you please clarify why any application will not receive the same objections from the planning department as the likelihood of any residential boats are likely to not comply with these policies.	LOD1 and the residential moorings policy DM37 set out what is required for a residential moorings scheme to be permitted. If a residential mooring scheme comes in and meets those criteria, it is likely it will be permitted.	None
LOD1	Ray Hollocks	This email is sent on behalf of the property owner and the tenants <<names removed>> may have a different approach and may wish to comply with the restrictions under policy LOD1. We will have no objections if they do proceed. They wish to keep the option for 10 residential moorings and we will decide upon receiving your response.	Noted.	No further action
Minerals and Waste	Norfolk County Council	Norfolk County Council in its capacity as the Mineral Planning Authority considers that in terms of mineral planning the Issues and Options document correctly address these issues in the context of the Broads Authority Executive Area.	Support noted.	No further action
Minerals and Waste	Norfolk County Council	The Mineral Planning Authority currently has the Publication version of the Norfolk Minerals and Waste Local Plan review undergoing the Pre-submission representations period, which is available at: Norfolk County Council - Minerals and Waste Local Plan: Pre-Submission Publication (oc2.uk). Following the conclusion of this it is intended to submit the Minerals and Waste Local Plan to the Secretary of State, for the Examination in Public to take place in 2023.	Noted.	No further action
Minerals and Waste	Norfolk County Council	Norfolk County Council in its capacity as the Mineral Planning Authority welcomes the inclusion of the references to mineral planning within the Issues and Options document. In particular the reference that Norfolk County Council is the county planning authority for the Norfolk part of the Broads and that the Council's responsibilities include minerals and waste planning, is welcomed.	Support noted.	No further action

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Moorings	Luke Paterson	3.The provision of extra moorings in Dilham, the Staite is quite busy and its hard to turn around when busy I would like to help address this.	Suggestion has been passed on to Waterways and Access Officer who will look into it as he works on the Integrated Access Strategy in 2023.	Pass on to Waterways and Access Officer.
Navigation	Mr K Lowes	To promote the Broads and income from tourism, more moorings need to be provided and perhaps an inquiry into the size of boats which dominate the existing ones which in effect has created a wild mooring habitat which is go good to the hospitality sector as people eat and drink supplies from supermarket.	Comment noted and will be passed on to officers who work with moorings and boats.	Pass on to colleagues at the BA for consideration
Nutrient Neutrality	Luke Paterson	5.I would like to put land forward for phosphate mitigation and Biodiversity net gain (BNG).	Offer noted. Natural England have indicated a call for sites as part of their mitigation scheme in the New Year. We will keep an eye out for that and will aim to tell the respondent about it. We have got in touch with the lead on mitigation work for the Norfolk mitigation scheme about this offer and have put them in touch with the respondent.	Tell respondent when Natural England call for Sites starts. Liaise with lead for the Norfolk mitigation scheme.
Planning obligations	Norfolk County Council	Norfolk County Council's Planning Obligation Standards should be referred to in the emerging local plan.	Noted. We will cross refer to Norfolk and Suffolk Planning Obligation Standards.	Cross refer to NCC and SCC Planning Obligation Standards.
Renewable energy - solar	Mrs S Lowes	Solar panels on roofs (not fields) but not in areas of natural beauty, where possible.	Noted. We will consider this comment as we work up the renewable energy policy for the Preferred Options version.	Consider position on solar.
Renewable energy - solar	Norfolk Wildlife Trust	whilst we are supportive of increased use of renewable energy given the benefits to climate change mitigation that it brings, we are also aware of the sensitive designated sites that cover much of the plan area and the need to ensure that any renewable energy allocations do not result in adverse impacts on protected habitats and species.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Residential dwellings	Ray Hollocks	We applied last time for the Berney and Beauchamp to be included for development. Can you clarify if you are just looking for sites for residential moorings or does it include land based occupation. In every discussion we have with planning they refuse any opportunity for residential on the following. 1. Flood zone 3. As mentioned in the other email both sites have had major flood defence work which has not been evaluated by EA. Will this stop any consideration of these sites. 2. All policies require development in sites that are within existing communities. Beauchamp is considered rural by planning but is in fact on a bus route and access to all amenities. The Berney is a specialised site attractive to a certain type of the community. Will these facts stop consideration at stage 1. 3. There is a policy being implemented in the Norwich Greater plan to allow 3 residential units in every village in Norfolk in order to assist rural regeneration. Beauchamp and Berney are both villages without the likelihood of other developments so would the BA apply this policy. Any development at the Beauchamp and Berney are supported by all the objectives of the 1988 Broads Act and the majority of the policies under the planning Policy 2015 to 2036. If you can give us answers that any application for inclusion in suitable sites will be considered despite the Planning Departments use of irrespective policies to deny a fair application.	If you wish to put these sites in for consideration then that is up to you. Their location has not changed, so they may not be supported. In terms of flood risk, the approach taken in planning is to consider the flood risk without flood defences. In terms of access to facilities, the call for sites asks questions about this, so if you wish to put the sites in for consideration, you can put your thoughts in to answer that question. And in terms of what GNLP does, they are a different local planning authority and may have the need and justification to take certain approaches although the two sites in question are not located in villages. We are not aware of the 3 dwelling approach by the GNLP - we are aware of the South Norfolk Council Village Clusters Local Plan.	No further action.
Residential Moorings	Ray Hollocks	Is it still he case that the BA have to have the 63 residential moorings to exclude it from any Government imposed housing demands.	We need to address the need for residential moorings. As per the Issues and Options document, the need is not for 63, it is for 48 residential moorings. Our Call for Sites was also for residential moorings.	No further action.
SA	East Suffolk Council	Overall, East Suffolk Council welcomes the Sustainability Appraisal and considers it to provide clear and comprehensive consideration of the key Sustainability issues affecting the Broads Authority area.	Support noted.	No further action.
SA	East Suffolk Council	The baseline chapter acts as a comprehensive overview of the existing environmental, economic and social characteristics of the area. We welcome acknowledgement of the emerging Census data and commitment to reflecting the latest data releases in future SA work. As per our comments on the SA Scoping report, there may be value in clarifying that where 2011 census data has been used this refers to 'Waveney' which no longer exists as a local authority. While overall the baseline is considered comprehensive, the Broads Authority may want to consider expanding the data in relation to health. Currently the health topic is only covered with self-reported health status which means this does not provide a sufficient evidence base for identifying key health challenges.	Comments and suggestions noted. We will consider these are we produce the Preferred Options SA.	Consider this comment as produce Preferred Options version of the Local Plan.
SA	East Suffolk Council	We have reviewed the Literature Review and consider that there may be value in reviewing the following additional documents in future iterations of the SA: •III East Suffolk Sustainable Construction SPD; •III East Suffolk Cycling and Walking Strategy; •III Building for a Healthy Life (https://www.designforhomes.org/project/building-for-life/) •III Suffolk Design: Streets Guide (https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/)	We will review these documents as we produce the Preferred Options SA.	Review these documents.
SA	East Suffolk Council	East Suffolk Council consider that the Sustainability Objectives reflect the identified characteristics, baseline data, and SWOT analysis set out in the Issues and Options document. We welcome the amendments made in response to our comments on the Scoping Report. Within the specific wording of the objectives, we have the following suggestions: •III ENV3- consider adding specific reference to habitat restoration and creation •III ENV11- consider adding specific reference Dark Skies as part of the objective, although we note and welcome that it forms part of the decision making criteria against a number of the objectives •III SOC1- as per comment above, this objective could benefit from more baseline data in relation to health	Comments and suggestions noted. We will consider these are we produce the Preferred Options SA.	Consider this comment as produce Preferred Options version of the Local Plan.

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SA	East Suffolk Council	Subject to the comments above, East Suffolk Council consider that the Sustainability Framework in Appendix 4 represents an appropriate mechanism for assessing the Plan against the identified SA objectives. Against the specific wording of the criteria, we have the following suggestions/ comments: <ul style="list-style-type: none"> •IIENV5 oconsider adding criteria/ question relating to solar shade/solar gain and mitigating/adapting to overheating oconsider adding adaptable and flexible design of buildings oConsider adding support for nature based solutions over hardscape (SuDS, attenuation, screening, etc.), where relevant <ul style="list-style-type: none"> •IIENV10 oENV10 is worded slightly differently in the appendix to the main body (p. 6) oConsider adding criteria in relation to the efficient use of land in sustainable locations for higher density development oConsider adding criteria in relation housing design that promotes good space standards	Comments and suggestions noted. We will consider these as we produce the Preferred Options SA.	Consider this comment as produce Preferred Options version of the Local Plan.
SA	Historic England	Support.	Support noted.	No further action
Saline incursion	Mr K Lowes	Rivers are being affected by saline incursions. We are losing fish and the tourist fisherman that support the local economy i.e. hotels. Pubs, restaurants, holiday lets. It needs sorting.	We are aware of the saline incursion as a result of salt surges and low river flows. In a way this has always happened in the Broads, however with climate change these effects are expected to worsen. Apart for the general actions to combat climate change, the Broadland Futures Initiative are now working to agree a framework for future flood risk management that better copes with our changing climate and rising sea level. The focus will be on what happens from the mid-2020s onwards, and we need to start planning now to secure support and make well-informed decisions. We are working with farmers and land managers to talk about land subsidence and the impact of excessive land drainage on the whole ecosystem of the Broads. We have in the past few weeks hosted two presentations and discussions at our partnership meetings the Broads Angling Services Group. We provide support to salinity monitoring network in the Broads by purchase of new monitoring equipment. The Broads Authority is also working with the Environment Agency to look at a salinity model to understand how different water and land management options may affect the salt levels in the Broads rivers system. The Broads Authority rangers support the Environment Agency with fish rescues as required.	No further action for Local Plan.
Site	Brooms Boats	Wish for site to be updated and improved. CALL FOR SITE FORM NOT FILLED OUT	Respondent's wishes for the sites noted. We will arrange to meet the site promoter and talk through their plans.	Meet site promoter
Site	Brundall Gardens	Wish for site to be updated and improved. CALL FOR SITE FORM FILLED OUT	Respondent's wishes for the sites noted. We will look into the proposals and arrange to meet the site promoter and talk through their plans.	Meet site promoter
Site	Principal Planning/Crown Point Estate	This submission promotes a location on Whitlingham Lane as a site that would benefit from an allocation under the Sites Allocated for Change approach for Class E. CALL FOR SITE FORM NOT FILLED OUT	Respondent's wishes for the sites noted. We will look into the proposals and arrange to meet the site promoter and talk through their plans.	Meet site promoter
Site	Somerleyton Marina/Evolution Planning	3.1A possible improvement to is to create a new marina basin to the south of the existing basin. The access point would be through the existing marina bank southwards into an area of reed bed to the south of the existing basin. An access into the new basin from the existing marina avoids the need to have a new access directly into the River Waveney, and disruption to boat traffic. 3.2Subject to the findings of an ecological appraisal which is underway the loss of reed bed could be compensated for with the creation of new reed bed or by the improvement of existing reed beds on the Estate. The Estate has 32 hectares of reed bed and has already been involved in the creation of reed bed elsewhere on its land. The new reed bed, and other biodiversity measures, could be designed to ensure that there is no loss of biodiversity. 3.3The existing boatyard building is nearing the end of its useful life and will require investment in order to sustain the yard for the long term. A new building would be sustained by a greater range of boats. The Estate would like to see the building supporting small local businesses connected with the water and local crafts. The key to achieving this is a thriving marina. The existing boatyard building would be replaced on a like for like basis and would be provided with better facilities. This way there would be no visual impact from the replacement. 3.4The expansion of the marina will help develop a more diverse range of moorings including short term moorings to meet the local demand identified in the Broads Local Plan. The Estate would like to develop the 10 residential moorings allocated in the current Local Plan in the next few years in order to generate income to support the improvement of the marina and boatyard. CALL FOR SITE FORM FILLED OUT FOR RESIDENTIAL MOORINGS. CALL FOR SITES FORM FOR THE REST OF THE SITE NOT FILLED OUT.	Respondent's wishes for the sites noted. We will look into the proposals and arrange to meet the site promoter and talk through their plans.	Meet site promoter
Site	Walsingham Planning/Greene King Brewing	We write with reference to their landholding on Station Road, Hoveton and to confirm Green King's support for identification of the site as a redevelopment plot/ site allocated for change within the emerging plan. CALL FOR SITE FORM FILLED OUT	Respondent's wishes for the sites noted. We will look into the proposals and arrange to meet the site promoter and talk through their plans.	Meet site promoter
SP5	Historic England	We support the current strategic level policy which seeks to protect and enhance the historic environment. We welcome the reference within the policy itself to setting, archaeology, waterlogged heritage, and heritage at risk. We are also welcome the term historic environment being used. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage, and both designated and non-designated heritage assets.	Noted	No further action.
Table 7, page 77	Wroxham Parish Council	Wroxham doesn't have any shops or pubs in the BA boundary. There is only a florist and a garage in Wroxham (BDC) and no pubs.	Noted, but there are shops over the river in Hoveton. This is about access to shops and facilities regardless of what town or village they are in.	No further action.
Transport	Mrs S Lowes	Due to increase in traffic on rural roads, many deer have been run over due to their habitat being lost.	Comments noted. Will be passed on to Norfolk County Council contact as they are the Highways Authority.	Pass on to Norfolk County Council

Part of document (numbers denote question number)	Organisation	Comment	Response	Action for next version of the Local plan
Transport	Mrs S Lowes	In PH, we have tourists who will not remain in Herbert Woods yard because of the traffic noise!	Comments noted. Will be passed on to Norfolk County Council contact as they are the Highways Authority.	Pass on to Norfolk County Council
Transport	Mrs S Lowes	PH was a quiet village but traffic has dramatically increased and speeding is a problem with through traffic. Traffic calming is a necessity.	Comments noted. Will be passed on to Norfolk County Council contact as they are the Highways Authority.	Pass on to Norfolk County Council
Transport	Norfolk County Council	The County Council will need to be consulted on the sites submitted through the call for sites process in due course.	Noted and yes, we will consult you.	Consult Norfolk and Suffolk Highways on sites.
Transport	Norfolk County Council	The Local Plan transport policy should reference the County Council's Local Transport Plan 4.	Noted and we will do.	Refer to Norfolk and Suffolk Local Transport Plans.
Water	Mrs S Lowes	Less homes – less water use!	Noted. Although we do need to provide homes for the communities. We currently require homes to be designed to 110l/h/d water use and are looking at a lower level than this.	No further action other than look into the potential for water use of less than 110l/h/d.
Your part	Mr K Lowes	In terms of 'your part of the Broads', I expect to see a gradual increase in house building. I expect villages to fill in the spaces between then and I expect the Broadlands villages will lose their appeal to tourists. I expect the whole of Norfolk to develop and eventually eat itself to its detriment. The more concrete you put down, the less the water has anywhere to go. See the marsh behind Herbert Woods.	Noted. The Local Plan will address surface water. Our Enforcement Officer was made aware of the marsh behind Herbert Woods. Generally, local plan policies seek to maintain the gaps between settlements. There is a need for housing, so yes, there will be more housing over the coming years and beyond.	No further action.