

Broads Authority

23 September 2022

Agenda item number 9

Broads Plan 2022-27: Adoption

Report by Strategy and Projects Officer

Purpose

The first draft Broads Plan 2022-27 was presented to the Broads Authority on 13 March 2022 and published for public consultation from 23 May to 15 July 2022. This report presents the revised draft Plan and accompanying SA and HRA, together with the schedule of consultation responses to the first draft plan. Members are asked to agree any final amendments to the Plan and endorse it for adoption.

Recommended decision

To adopt the revised draft Broads Plan 2022-27, subject to any non-substantive amendments agreed at today's meeting.

1. Introduction

- 1.1. The Broads Plan is the key strategic management plan for the Broads. It sets out a long-vision for the area and strategic objectives to benefit the area's natural and built environment, navigation, heritage, local communities and visitors.
- 1.2. Under the Broads Act 1988, the Broads Authority must review the Broads Plan at least every five years and update it as necessary. The current Plan was adopted in 2017 and is now under review.

2. Plan review process

- 2.1. The Authority held member and officer workshops in late 2021 and early 2022 to review the objectives in the current Plan and consider priorities for the next plan period. Officers have also discussed relevant sections of the emerging draft plan with key delivery partners. The review process has taken account of the themes in the Landscapes Review and 25-year Environment Plan and other key issues including climate change and flood risk, post-Brexit legislation, the state of the economy and the ongoing impacts of Covid-19.
- 2.2. At the Authority's meeting on 13 May 2022, members resolved unanimously to endorse the draft Broads Plan 2022-27 for public consultation. The first draft Broads Plan 2022-27 was published for public consultation from 23 May to 15 July. The schedule of consultation responses is at Appendix 1.

Amendments to first draft Plan

- 2.3. The consultation responses have been considered in preparing the revised draft Broads Plan (at Appendix 2). Most of the proposed amendments to the Plan (shown as track changes) are minor and intended to give clarity and additional detail.

3. Plan assessment (SA and HRA)

- 3.1. The strategic objectives in the Broads Plan are subject to Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment) and to Habitats Regulation Assessment (HRA).
- 3.2. As the revised draft Plan recommends only minor, non-substantive changes, the SA conclusion is the same as that for the first draft Plan: That the majority of the strategic objectives show either a positive or neutral impact on the Sustainability Objectives in the SA Framework; a small number show uncertain impacts, depending on the implementation of the objective, and none show a negative impact.
- 3.3. Likewise, the conclusion from the HRA of the revised draft Plan is the same as that for the first draft Plan, which is that the Plan would have no adverse impact on site integrity at any Habitats Sites either alone or in combination.
- 3.4. The SA and the HRA are at Appendices 3 and 4.
- 3.4. It should be noted that the Broads Plan is a high-level strategy and SA and HRA may be required for more detailed plans and projects that implement the Plan's objectives.

4. Adoption and monitoring

- 4.1. Subject to any further minor amendments agreed at today's meeting, members are invited to endorse the Broads Plan 2022-27 for adoption. Should members consider that more substantive changes are needed, it may be necessary to hold a further stage of public consultation.
- 4.2. Once adopted, the Broads Plan 2022-27 will be published on the Authority's website.
- 4.3. The Broads Plan is a partnership strategy. While Authority officers already work across organisations on a day-to-day basis, we are also making plans to host annual 'Broads Plan Partnership' meetings with our key delivery partners to monitor the Plan's progress and make the most of joint partnership working.
- 3.4. In the next few months, monitoring outcomes and indicators are due to be agreed by DEFRA for the role of protected landscapes in delivering on the Government's goals for nature recovery and climate mitigation and adaptation. We will use this and other relevant information to update the Broads 'State of the Park' report, which will be published in due course on our website.

Author: Maria Conti

Date of report: 05 September 2022

Appendix 1 – Schedule of consultation responses to first draft Broads Plan

Appendix 2 – Revised draft Broads Plan 2022-27

Appendix 3 – Revised draft Broads Plan - Sustainability Appraisal

Appendix 4 – Revised draft Broads Plan - Habitats Regulations Assessment

Appendix 1

Table 1

Draft Broads Plan 2022-27: Schedule of consultation responses

Respondent	Comments	BA response	Edits to plan
Section 1 – Introduction			
<p>Norfolk and Suffolk Boating Association</p>	<p>Page 4 Special qualities - Consider adding a new bullet: · Unique heritage fleets of broads yachts, wherries and leisure cruisers. Consider adding after the list of bullets: Whilst there is excellent access to many parts of the Broads on foot, and some bankside experiences can be enjoyed by road, the unique qualities of the Broads are most commonly appreciated from aboard the wide variety of sailing and motorised boats available throughout the navigation.</p> <p>Page 5. Para 3. The term “shaped and nurtured” is an exaggeration. The Broads are man-made and owe their existence in their present (poor) condition to human activity, most of which paid no attention to shaping or nurturing. At one time the area was purely agricultural and commercial. Marshmen cut the reeds, wherryman controlled bankside trees to keep the wind, and farmers and hunters decimated birds and other wildlife for food, decoration and sport. More recently, agricultural pollution, invasive species and poor waste management have caused eutrophication, biodiversity loss and severe damage to soils and waterways.</p> <p>Today the activity that keeps the Broads alive and the navigation open is recreational boating including sailing and racing. If this is to continue successfully, the role of the boating community in paying for the upkeep of the Broads and monitoring and improving its condition for all users needs to be recognised much more explicitly. This is touched upon in the penultimate paragraph of page 5 but the impression given is that “boating holidays” are what sustain the Broads. NSBA disputes this characterisation. Most boating on the Broads is for sport and leisure, and also relatively small but still significant commercial vessel usage, not for holidays. Much boating is conducted in sailing boats and small motorised craft, not in large hire boats, which are outnumbered ten to one by the private fleet. In addition to yachts and dinghies, the Broads are increasingly enjoyed on paddleboards, canoes and other self-propelled craft.</p> <p>The last sentence should say: “Private boat-owners, tourists, the marine industry, farming and land management all continue to play an important role in maintaining and enhancing this unique, much loved landscape.”</p> <p>“Boating” is defined by the RYA as the use of waterborne craft of all kinds, but the NSBA is concerned that the persistent use of this catch-all term tends to neglect and sometimes even sideline sailing boats (with or without auxiliary engines) and the traditional skills of managing them in the prevailing wind and tide. The term “sailing” appears only once, on p.34 para 2. The balance could usefully be reset, particularly in this era of carbon-neutral targets.</p>	<p>Comments noted – will edit/ strengthen some text & links in Plan.</p>	<p>Para 1.1 special qualities – add ref to boating, boat-building & heritage fleet.</p> <p>Profile & history: Amend 'boating holidays' to 'boating', add ref to 'boating and marine industry'.</p> <p>Challenges ahead - add cross-ref to BA purposes and integrated management.</p> <p>B1 - amend 'lakes' to 'broads'.</p> <p>Theme E – edits to 'Recreation and integrated access' section; add footnote link to annual tolls table.</p>

Respondent	Comments	BA response	Edits to plan
	<p>Accordingly, NSBA would like to see a table inserted under the section on Profile and History expanding on footnote 5 p.8 and showing the number of hire and private boats on the Broads, segmented between sailing boats and motor cruisers. This would help to balance the prevailing image of the Broads presented in the strategy. [Suggested table taken from BA 19/11/21 agenda item 11, report on annual tolls review.] The various segments in this table could usefully be further subdivided into heritage, traditional and modern craft. Full information is not easily to hand but a preliminary analysis by NSBA suggests that the heritage sailing fleet unique to the Broads amounts to about 900 private craft and 50 hire craft. This is nearly 8% of the 12, 297 craft in the Broads fleet in 2021 and relates importantly to Theme D, which we would like to see expanded specifically to include heritage craft (see below).</p> <p>The section on Challenges Ahead (pp.5-6) speaks at length about the environmental challenges, but it does so as if the Broads were once natural, having emphasised earlier in the document under Profile and History that they are not. In the chapeau to this section, it might be useful to emphasise the over-arching theme of “nature recovery” and how this term (mentioned on p.6 paras 2 and 4), which is central to the UK Environment Act, needs very careful interpretation in the Broads because the Broads differs from the rest of the family of national parks.</p> <p>Continuing in Challenges Ahead, why does this section speak of challenges other than the environmental ones only in a cursory catch-all single sentence on p.6 para 4? There is room for more useful discussion here because a key challenge, which is completely omitted, is keeping the navigation open and accessible for all forms of boating while at the same time promoting nature recovery.</p>		
Norwich Green Party	<p>Principle 1 - The precautionary principle is entirely appropriate when protecting biodiversity and climate, however its application is unclear, and references to cost-effective measures are somewhat confusing. We need to be clear that not all impacts can be mitigated and some developments, especially those on flood plains and protected areas may have to be refused.</p> <p>Principle 2 - We agree that ecosystems are complex, the best management is the most local appropriate. However, some issues require management at scale, for example legislation and management of water quality.</p> <p>There is a need to work with Environment Agency, Anglian Water and farmers’ organisations to improve monitoring and ending of raw sewage waste, farm nutrients and storm drain run off being discharged into rivers.</p> <p>Principle 3 - Involving communities and using scientific evidence are fundamental and supported by the Green Party. We hope that a wide definition of community will be used to include those work, visit, learn and care about the Broads, as well as those who own property there.</p>	We are recommending replacing principles 1&2 with the five environmental principles in the Environment Act.	2.2 - delete principles 1 and 2; replace with environmental principles in Environment Act 2021 Section 17(5)
RSPB	Having reviewed the plan, we have a serious concern about the fundamental principles that have been used to inform the plan, which could undermine the efforts to recover species and habitats within The Broads. The introductory paragraph of Section 2.2 (Fundamental Principles, p.11) states that: “The first principle is	We are recommending replacing principles 1&2 with the five environmental	1.3. update monitoring text

Respondent	Comments	BA response	Edits to plan
	<p>(2) Para 1.1, final para: Amend "rich in biodiversity" to "be richer in biodiversity", which would better fit with the need to restore and increase biodiversity.</p> <p>(3) Funding and resources: Whilst we accept that the Plan is high-level, there is still a need to ensure the right information is collated from stakeholders to demonstrate that the Plan is achieving its objectives. More clarity is needed on how this information will be collated. We appreciate that it can be difficult to obtain some of this information, but it is important that this information can be secured to inform progress. To help develop the evidence-base to report on progress:</p> <p>What evidence on partners work is collated through existing groups in The Broads such as the Broadland Catchment Partnership and Broads Biodiversity Partnership that could provide essential information? An annual forum to look at delivery challenges would be good, but this will in part depend on a suitable mechanism to secure stakeholder updates on work that is going well and where objectives are struggling to be met. Could an annual survey of partners to report on progress against criteria set out in the plan be a useful exercise? More work is needed to help with this collation exercise. We would be happy to discuss further to support the development of appropriate processes.</p> <p>Assessing the plan's impacts: (HRA): The high-level nature of the plan may mean this is appropriate but any conclusions will also be dependent on the evidence base to draw these conclusions.</p> <p>Monitoring: More clarity on the timeline for updating the 'State of The Broads' dataset would be helpful.</p> <p>Having reviewed Tables 3-8, the monitoring objectives are highly variable with respect to how SMART they are (e.g. action under Strategic Objective A3 mentions a minimum 2 projects by 2027, whilst many other objectives simply direct the reader to actions outlined in other plans). As a consequence, it is not always clear what good enough would be annually or at the end of the plan period to demonstrate that objectives have been achieved. Whilst high-level there is still a need to ensure objectives can be suitably reported against.</p> <p>The Broads Authority's role with respect to monitoring and reporting on actions that are solely or largely delivered by other stakeholders would also benefit from clarification. For example, how much will the Authority follow up with partners where it becomes clear that key actions are not being delivered. This relates to the accountability of the plan and the need to ensure that where stakeholders have been mentioned that they are fully bought into the plan to ensure they assist with necessary reporting etc.</p>		
Woodbastwick Parish Council	We note in 1.3 your wish for "strong partnership working to make the best use of shared knowledge, effort and resources" however, we cannot see how you will effectively measure the success and progress of this objective?	Many partners have a lead or support role in delivering the Plan, and work together on a day-to-day basis.	None.

Respondent	Comments	BA response	Edits to plan
		We previously 6-monthly updates for the Broads Plan, but are looking at how we can improve partnership monitoring & reporting for the new Plan; we will post updates on our website. We report annually (BA meeting, Nov) on our key partnerships in the Corporate Partnerships Register and to every BA meeting on progress against key strategic objectives.	
Section 2 – Vision and principles			
Norfolk Geodiversity Partnership	We think geodiversity should explicitly be part of the Vision for the Broads. (Suggested addition to para 3): "The area's environmental history is better appreciated through understanding its sediments, rocks and landforms."	Agreed.	Add text to Vision as suggested by NGP.
Norfolk and Suffolk Boating Association	<p>(Vision) Para 1. Line 3 National not Natural! Setting aside this typographical error, the sentence is too brief. Yes, of course the BA agrees with the Vision for the English National Parks and the Broads, but it needs to be interpreted for the local conditions. The English vision is a generalised framework, and the BA vision, while remaining consistent with this wider context, needs to give greater emphasis to the special qualities of the Broads and the protection of the interests of navigation as stated on p.7 para1.</p> <p>Table 1 is a Box, not a Table but, in any case, it would benefit from more work. It is too long and would have more impact if it was half the length. The opening phrase "Biodiversity is at the heart of nature recovery" is a statement, not a vision, and much of the rest of that paragraph might also be dropped. In the third paragraph of the vision box, "effectively to other ecological networks" is not explained and can be dropped. Paragraph 5 can be much reduced.</p>	Feedback will be shared with BA members (in this schedule of responses) for them to agree the final version. We will update the intro in 2.1 to reference Defra's vision for protected landscapes.	2.1 intro – add ref to Defra vision for protected landscapes (Landscapes Review)
RSPB	2010 vision for National Parks and the Broads now superseded by the Defra's vision in its response to the Landscapes Review (2022) (https://consult.defra.gov.uk/future-landscapes-strategy/government-response-to-the-landscapes-review/supporting_documents/Consultation%20on%20the%20Government%20response%20to%20the%20Landscapes%20Review.pdf) i.e. "A coherent national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy. Protected landscapes will support thriving local communities and economies, improve our public health and wellbeing, drive forward nature recovery, and build our resilience to climate change."	Will update intro in 2.1 to reference Defra's vision for protected landscapes.	2.1 intro - add ref to Defra vision for protected landscapes (Landscapes Review)

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Wroxham Parish Council	Vision statement - Sentence starting "People of all ages, abilities...." needs to include "as a place to live". Across the board the plan needs to be more inclusive to local communities and should be focusing on communication with the residents that live within the area.	Agreed.	Vision, para 5 - add 'a place to live and work' etc
Section 3 Theme A: Responding to climate change and flood risk			
East Suffolk Council	<p>The Council supports the significance given to responding to climate change and flood risk. As stated above, East Suffolk Council declared a climate emergency in 2019 and has set itself a target of becoming carbon neutral by 2030. However, we have some detailed comments on this Theme as set out below.</p> <p>Introduction:</p> <p>Given the, albeit relatively short, stretch of coastline between Winterton and Sea Palling it may be appropriate to also include reference to coastal change within this section. The Broads Authority is a signatory to the Norfolk and Suffolk Coastal Authorities Statement of Common Ground on Coastal Zone Planning (SoCG). Through the SoCG, the authorities have agreed to apply an Integrated Coastal Zone Management approach across Local Authority and land/sea boundaries in order to ensure the integration of the terrestrial and marine planning regimes.</p> <p>The Broads' coastline is subject to a Hold The Line policy (Policy Unit 6.13) in the current Shoreline Management Plan (SMP) across the short (up to 2025) and medium (2025-2055) time periods, with the long term (2055-2105) policy a conditional Hold The Line. Without this policy approach, sand dunes and associated habitats and species at and landward of the coastline, as well as buildings and infrastructure, could be further affected by coastal change. In addition, sea flooding in the Broads may not just be an issue of sea level rise and climate change, but also caused by coastal erosion impacts on sea defences and natural defences such as sand dunes. Coastal erosion and flood risk and their impacts on the Broads are therefore inherently interconnected.</p> <p>Building on the hydrological interconnectedness of the Broads with the coastal management and current / proposed flood risk management interventions in the Great Yarmouth area that is mentioned, the potential interaction with current / future projects in the Lowestoft area could also be given emphasis (especially in the case of future North Sea storm surges), in addition to the navigation linkages.</p> <p>A1: The Broads Authority is currently working with East Suffolk Council (as well as Great Yarmouth Borough Council and North Norfolk District Council and the Shared Coastal Partnership East team) on a Coastal Adaptation Supplementary Planning Document, to support a holistic approach to coastal planning along the coast. This could be referenced as an action.</p> <p>A2: It is noted that there is reference to zero/low emission options for vessels in the Broads Authority's operations. Reference to promoting and encouraging the use of electric boats (by both individuals and boat hire companies) could also be included under tourism initiatives.</p>	Comments noted; will add refs to text.	Theme A, intro - add para on coastal flood management regimes; A1 - add action on coastal adaptation SPD; A3 - add ref to neighbourhood plans.

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	A3: As well as the Broads Local Plan, Neighbourhood Plans could also include design policies to encourage more sustainable buildings, and could therefore also be referenced here.		
East Suffolk Council - Green, Lib Dem & Independent Group	The GLI Group is strongly in favour of the proposed development of a long-term integrated flood risk strategy. The GLI Group would suggest use of electric boats to reduce emissions, or possibly incentivising visitors to use electric rather than fossil fuel powered boats. There is also a possibility that the peatlands could be used to generate income by selling carbon offsets and using the proceeds to recreate more peatland. The GLI Group would also argue that in light of the climate crisis we are facing, an earlier date for carbon neutrality than 2040 is necessary.	The BA has a net-zero target date of 2030, and 2040 for zero emissions for its operations; this includes our Scope 3 footprint, which we cannot commit to reducing to zero by 2030 as items we will buy (such as equipment) will still have embodied emissions requiring offsetting. We also have heavy duty equipment with expected end of life mid-2030s – replacing these earlier would increase our footprint and we don't yet know when true zero-emission fuels such as methanol could be available for them. See promotion of electric boating and carbon offsetting actions under A3/ B3.	None.
Environment Agency	Introduction, para 1: Suggest adding 'more frequent flooding' as a key impact. A1. We strongly agree with the objective of supporting projects that restore natural flood management processes. The PSO Team welcomes the opportunity to assist the Broads Authority with their scoping and updating of these documents (Broads SFRA and Flood Risk SPD) and production of any local planning guidance linked to development and flood risk, taking into account our understanding of climate change and sea level rise.	Comments noted and PSO support welcomed. Edits made to text.	Theme A, intro para 1 - add ref to more frequent flooding
Lead Local Flood Authority Team, Norfolk County Council	In Theme A the LLFA observe that the interlinking nature of flood risk with other themes has not been included. The LLFA would expect some acknowledgement of the other themes in the flood risk management solutions especially in relation to land management practises and natural flood management approaches. This would need to be reciprocated in other themes acknowledging the links to flood risk too. In addition, the LLFA observes the plan focuses on the flood alleviation and has not started to consider discussions with communities regarding the potential future adaption, which is in accordance with the	Ref to the importance of responding to climate change and flood risk is made throughout the plan but we will check & strengthen references. Discussion with local communities on flood risk	Highlight relevance of theme A to whole Plan; add text on coastal defence policy and BFI work with local communities. Theme E: Intro - add text on climate

Respondent	Comments	BA response	Edits to plan
	<p>government’s current Policy Statement on Flood and Coastal Erosion Risk Management (July 2020). While it is appreciated the Broadland Future Initiative (BFI) is ongoing and is just to produce a strategy, conversations regarding adaption to flood risk are best started in advance due to the nature of community consultations.</p>	<p>adaptation is within BFI work – we will clarify this.</p>	<p>change & flood risk impacts for access & recreation.</p>
<p>Natural England (Freshwater Lead Adviser, Norfolk & Suffolk Local Delivery Team)</p>	<p>We welcome recognition by the Broads Management Plan of the wide range of invaluable services that ecosystems provide in the Broads National Park.</p> <p>We support the approach taken here for a long-term strategy towards flood risk management which integrates natural flood management processes and implements nature-based solutions to deliver multiple benefits, such as carbon storage and enhancing biodiversity, to the natural environment and local communities.</p> <p>We would strongly encourage the plan makes space for nature to ensure delivery of the flood risk management strategy, aligning itself with the EA’s National and Anglian Flood Risk Management Plans by discouraging inappropriate development which may impact natural processes and ecosystem functions.</p> <p>Natural England would like to encourage dialogue between our two organisations, and others, to deliver opportunities through stewardship agreements with landowners and potential Nature Recovery Network projects. Flood Management approaches may fruitfully coincide with aspirations for the restoration of priority habitats or degraded ecosystems. These present potential opportunities to reconnect natural processes and fragmented habitats to help support and enhance the natural function of the ecosystems within the Broads National Park. The restoration of habitats and more naturally functioning ecosystems can help make significant contributions to the management of flood risk along with other multi-sector benefits.</p>	<p>We welcome strong partnership working with Natural England and others to implement the Plan's objectives.</p>	<p>None.</p>
<p>Norfolk and Suffolk Boating Association</p>	<p>We suggest a slightly longer title “Responding to climate change and flood risk, and promoting sustainability in all aspects of boating”.</p> <p>On page 17, NSBA again sees an undue emphasis on hire boats and tourism in A3’s first bullet. Carbon reduction is for all Broads boaters to understand and implement, not only the hire fleet. Surely there is room to be reminded that the use of wind and tide for sailing represents the ultimate sustainable sport.</p> <p>Please consider adding new Objective A4. 'Encourage sustainable boating for all craft through BA communications; convene discussion and debate to explore and publicise technologies for mitigation of current impacts.' NSBA is willing to participate with BA in achieving this objective.</p> <p>Please consider adding new Objective A5. 'Work with Broads users to enhance their understanding of climate change and the imminent flood risk, encourage impact mitigation and strengthen resilience.' NSBA is willing to participate with BA in achieving this objective.</p>	<p>The heading encompasses multiple interests incl. boating. We agree promoting sustainable boating is a matter for the whole boating community and will check text to make this clearer; there are actions on sustainable boating in Themes A and E.</p> <p>Engaging all Broads' users in climate change and flood risk management issues is a core part of the Broadland Futures Initiative, carbon reduction work and other actions in the Plan.</p>	<p>Edit A3 bullet point to 'boating and tourism initiatives'; actions - add refs to NSBA and BHBF</p>

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Norwich Green Party	<p>We applaud the ambitious targets for Broads Authority operations and would like to see this extended to all activities within its sphere of influence, such as planning applications, site allocations, development management policies, not just the Authority's own activities. The distinction between carbon neutrality and zero carbon is all too rarely recognised, and we hope others will follow where the BA leads.</p> <p>We would look to see the BA working closely with other agencies to enact change, including councils, Environment Agency, Anglian Water. Civil society groups such as Wildlife Trusts, Woodland Trust, Friends of the Earth also have an important part to play, and the Broads Authority could encourage the growth of 'Friends of' groups to nurture parts of their own local areas.</p>	<p>We recognise the importance of partnership working to deliver the Broads Plan.</p> <p>We are reviewing the Local Plan for the Broads, and climate change & flood risk management are key topics in the 'Issues and Options' consultation (due to take place in late 2022).</p>	None
Rewilding Britain	<p>The plan recognises that the Broads, as a manmade ecosystem, are extremely vulnerable to climate change, primarily through sea level rise. This plan understands the need to improve local knowledge of climate change and how acting now can ensure the long-term viability of the park that remains rich in biodiversity and enjoyed by people.</p> <p>The Broads Authority is working with multiple agencies and local communities to better understand the impacts of climate change and sea level rise. We support the joined up approach to assess the management options to cope with climate change and how they affect natural ecosystems and the services they provide, as well as the options for local communities and businesses and visitors.</p> <p>Our report on rewilding and the climate breakdown outlines how we can support land use change to reduce carbon emissions, sequester carbon and reverse biodiversity loss. Rewilding and other natural climate solutions can draw millions of tonnes of carbon from the atmosphere by restoring and protecting our living systems. Nature-based climate solutions – trees, peat, soils – are currently the only tried and tested way we have of sequestering and storing carbon in a safe way. Rewilding Britain's analysis suggests that supporting native woodland re-establishment on rough grassland, and restoration and protection of peat bogs and heaths over 30% of Britain (7.2 million hectares) could sequester 52 million tonnes of CO2 per year equal to 12% of current UK greenhouse gas emissions. Salt Marshes and other coastal ecosystems can sequester very large amounts of carbon in sediments, as well as being important for fisheries, biodiversity and coastal protection. In addition, in order to adapt to rising sea levels, we need to incentivise managed coastal retreat and allow transformation of existing agricultural land that is no longer viable into saltmarsh. Recent estimates in the scientific literature yield a figure of 2.2 tonnes/ha/year. Lowland fens – of which only a fraction of the original area remains in eastern England – can be strong carbon sinks.</p>	Comments noted.	None.
Suffolk County Council	<p>SCC support theme A of the of the plan. It is welcome that SCC and its flood risks management plan are listed as delivery links and resources, that aid in achieving objectives related to flood risk and water management in table 3. Water Resources East are also potential partners that could be listed in table 3 in relation to water quality issues and in table 4 relating to water capture, usage and pollution objectives.</p>	<p>Support noted. Water quality issues are in Theme B, including ref to WRE work – we will check where additional refs are needed.</p>	Table 4 - check/add refs to WRE

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	The Broads carbon net zero by 2030 target aligns with Suffolk County Council's Climate Change Emergency Plan. In table 3 local authorities, including SCC could be listed as potential partners to achieve net zero by 2030.		
Suffolk Wildlife Trust	Whilst we will not comment further on Theme A: Responding to climate change and flood risk, we recognise and support the crucial role the Broads National Park and the National Parks can play in the climate emergency through leading the way in carbon reduction measures, natural flood management and green travel, and we fully support the Broads Authority's ambition to make all operations carbon zero by 2040. Considering the unique position of the Broads National Park as a low-lying wetland whose rare species and habitats are at risk from sea level rise, it is crucial that the Broads Authority is leading the way in tackling climate change.	Comments noted.	None.
Woodbastwick Parish Council	Strategic Objective A: We believe this objective is hugely important with the changing climate and affect locally, causing multiple flooding problems within our parish alone. We were reassured by the objective being followed up [Intro, para 2.2] with: "Principle 3: We plan and work in partnership to make the best use of shared knowledge and resources and to avoid duplication of effort. People are involved from an early stage, and throughout, in decisions that may interest or affect them. Decisions are supported with robust evidence, including scientific and local knowledge, innovation and best practice." Therefore, we are extremely disappointed to learn that from Appendix A you will not be officially working with Lord Dannatt and the Norfolk Flood Alliance. Prima facie it would seem that you will both be engaging with the same partners (Anglian Water, Environment Agency, Drainage Boards etc) and therefore it would benefit Principle 3 if you were to work together. Would the Authority consider working officially with Norfolk Flood Alliance?	Support noted. The BA is a member of the Norfolk Strategic Flood Alliance and is signed up to the NSFA Strategy (see Broads Authority agenda 24/9/21) - we will add refs to make this clearer.	Refs to NSFA added to Table 3 objective A1 and Appendices A & B.
Section 3 Theme B: Improving landscapes for biodiversity and agriculture			
Broads Reed & Sedge Cutters Association	Brasca welcomes Ref.B3 and in particular "Offer advice and practical support to local reed and sedge cutters, including extension of cutting areas, new commercial reed beds, equipment, contracts and training initiatives". Several existing cutters have benefited from Defra's Farming in Protected Landscape (FIPL) initiative in The Broads which has provided grant aid for harvesting machinery replacement and training. The draft plan rightly states in "Responding to climate change and flood risk" that "It is clear that we need to act now etc. etc. such as reducing our carbon emissions". We would therefore suggest that the references in B3 to "Develop and implement tailored habitat management for public benefits" should include the statement: "giving priority to low carbon methods of management which have a strong sustainable link i.e. that produce economically viable goods (products for which a demand exists and for which can be supplied without public subsidy).	Comments noted - we will strengthen refs in intro and B3.	Intro and B3 actions – add/edit refs on low carbon management and paludiculture.
East Suffolk Council	East Suffolk Council supports the aims of this theme. It is noted however that the title of the theme doesn't seem to portray the topics covered which are wider than improving landscapes in also covering water quantity and quality. It is noted, and welcomed, that the draft Plan refers to the current issues surrounding	We will add text/cross-refs. The term 'landscape' in the heading includes water bodies.	Theme B: Intro, water quantity & quality - add ref to Local Plan policy,

Respondent	Comments	BA response	Edits to plan
	<p>nutrient neutrality (under Theme C in relation to maintaining and enhancing navigation and under Theme F in relation to local development). Specific reference to nutrient neutrality under Theme B would, along with any related land and water management actions and working with relevant organisations, also be welcomed noting that addressing pollution from agriculture and restoring protected sites also form a part of the Defra guidance issued in March 2022. The Council has some detailed comments on Theme B as set out below.</p> <p>Intro, para 1: It would be helpful to reference the source of the definition of good water quality.</p> <p>Long-term aim: The Long-term aim clearly puts across the importance of the Broads not only locally but also nationally and internationally. The biodiversity and environmental elements of this importance are, and should be, the focus of this aim but could there be reference to how these support other aspects of the Broads such as tourism and business? While these do have their own aims, there is a clear relationship between them, which could be referenced here.</p> <p>It is stated in the Long-term aim that targets on water quality are being met, yet on page 19 it states that 90% of rivers in the Broads catchment are failing European Water Framework Directive targets. This therefore needs clarifying.</p> <p>B3: This could include reference to the Broads Local Plan (and also Neighbourhood Plans) as including policies in the future to ensure Biodiversity Net Gain.</p>	<p>We don't generally add the Local Plan as a delivery link against specific objectives in the Broads Plan but we note the important relationship between the two plans in Section 1.3.</p>	<p>add text on WFD; long-term aim - add ref to tourism; make other minor edits for clarity.</p>
<p>East Suffolk Council - Green, Lib Dem & Independent Group</p>	<p>The Broads plans to maintain and improve biodiversity in the Broads are commendable, and the GLI Group is of the view that traditional farming techniques like grazing marshland can provide useful ways to promote both biodiversity and agricultural use of the land.</p>	<p>Comment noted.</p>	<p>None.</p>
<p>Environment Agency</p>	<p>(1) P19: "The Broadland Catchment Partnership also works... to improve water capture and water efficiency." The Broadland Catchment Partnership also works to improve water quality as well as water capture and water efficiency.</p> <p>(2) We appreciate that this is a recent development but does Nutrient Neutrality need a section? The constraints and requirements and benefits etc. It is mentioned in the Sustainability assessment but may need to be within the main plan as well?</p> <p>(3) Since September last year we have appointed several new Agricultural Regulatory Officers who are checking compliance with the environmental legislation and giving advice on pollution prevention on many farms in the diffuse water pollution plan areas of the Broads. This will help to improve water quality over time.</p>	<p>Suggested edits noted.</p>	<p>Theme B table 4 - edits/additions as suggested</p>

Respondent	Comments	BA response	Edits to plan
	<p>(4) Table 2:</p> <ul style="list-style-type: none"> • There is no mention of rivers. We suggest something needs to be included about promoting healthy, wildlife rich and naturally functioning rivers in order to meet Water Framework Directive targets, amongst other reasons. • There is no mention of fish or fisheries. We suggest something needs to be included about working with partners and stakeholders to protect and improve fish populations within the Broads rivers and lakes. The health of fish populations within the broads directly affects the wider ecology of the area. <p>(5) Theme B introduction: We suggest that rivers are included in the list of important wetland features. The sentence currently reads as follows: “The Broads is one of Europe’s finest and most important wetlands, with a rich mosaic of habitats comprising, among other things, shallow lakes, fens, drained marshland, wet woodland, estuary saltmarshes, intertidal mudflats and coastal dunes”. Given that rivers are fundamental to the character of the Broads landscape, it seems odd to omit them from the list of habitats.</p> <p>(6) Water Quantity and Quality: Not sure what is meant by the following sentence: “Additional environmental needs are likely to arise from climate change and development growth”. Could you please elaborate?</p> <p>(7) Table 4: Suggest that strategic objectives are included for:</p> <p>(a) Rivers. Perhaps include something along the lines of improving the habitat quality in order to meet WFD objectives.</p> <p>(b) Fish. Something along the lines of taking action to conserve and improve native fish populations in the broads and rivers to deliver a balanced community structure as measured by WFD metrics. Several species of conservation concern are present in the broads (eel, lamprey, smelt) and efforts should be made to reduce impacts to these species. Fish are also an essential food source for piscivorous birds and otters. These could be monitored against WFD targets. Partners would include the EA and possibly angling representatives.</p>		
<p>Natural England (Freshwater Lead Adviser, Norfolk & Suffolk Local Delivery Team)</p>	<p>Natural England welcomes the inclusion and reference to the relevant legislation, plans, policies, and commitments outlined in this section. In particular, the commitment towards 75% of SSSI’s to be in favourable condition by 2042.</p> <p>We would encourage the inclusion of Water Level Management Plans as a delivery mechanism and driver to improve landscapes and support their resilience.</p> <p>Under Section B1, we would recommend the inclusion of the Hoveton Great Broad Restoration Project website within the delivery links [https://hovetongreatbroad.org.uk/]. Furthermore, we would recommend SSSI condition monitoring data to be included within the monitoring section and reference to Supplementary Advice on Conservation Objectives (SACOs) for designated sites within the resources section.</p>	<p>Comments noted.</p>	<p>Edit hyperlinks/ refs as above; check all hyperlinks in final plan.</p>

Respondent	Comments	BA response	Edits to plan
	<p>Under Section B2, we believe Catchment Sensitive Farming and their officers are central to the delivery of water infrastructure on farms, due to the services they provided when advising and approving capital grant applications for water infrastructure on farms. Furthermore, we would welcome collaboration with other key local stakeholders such as the Norfolk Rivers Trust and reference made to Water Company Drainage and Wastewater Management Plans (DWMPs).</p> <p>We believe Natural England should be included as a lead delivery partner for the Wendling Beck Exemplar Project as the Environment Project is a Net Gain Credit Scheme pilot project, and, a Natural England Nature Recovery Project (NRP). By including a delivery link to the Wendling Beck Exemplar Project this may attract and inspire new partners and future projects.</p> <p>Under Section B3, we found the Nature for Climate Peatland Grant Scheme - Discovery Grant (broad-authority.gov.uk) link within the draft document wasn't working.</p>		
Natural Environment Team, Norfolk County Council	Regarding Water Quantity & Quality), the second para appears to underplay the potential negative impacts of agriculture on water quality, therefore consideration should be given to including such impacts in the first sentence.	Comment noted.	Theme B – edits to intro
Navigation Committee	There is a lot of focus in the press about rewilding, specifically in relation to national parks, although this would not necessarily be appropriate to the man-made Broads.	While the focus for most of the Broads is on retaining and enhancing the existing biodiversity, some sites have been identified as potentially benefiting from rewilding.	Intro - Add text on natural regeneration of wild wet woodland in suitable low-quality habitats.
Norfolk and Suffolk Boating Association	B1. Use 'broads' rather than 'lakes' (x 2). B5. The phrase "linked to national biodiversity network" is unexplained and should probably be removed. If left in, it should say "the National Biodiversity Network". If you want to mention NBN, it should be included in the section on page 24 et seq.	Edits noted.	B1 -change ref to rivers and broads. B5 - edit NBN ref
Norwich City Council	Will the actions for B2 need updating to account for the Nutrient Neutrality situation/ongoing work?	The BA is working with neighbouring LPAs on how best to deal with Nutrient Neutrality requirements .	B2 - Add ref to Nutrient Neutrality
Norwich Green Party	We agree with B1-5 and would like to add a B6, which would assist and encourage restorative practices in agriculture, including but not limited to community supported agriculture, agroforestry, smallholdings to enable entry to agriculture, protecting hedges, meadows and trees. There may be a B7 or maybe a C5 needed to enhance water quality for people and wildlife. We will defer to the BA's expertise as to how this would best be done.	Several objectives (notably B1 & B2) aim to improve water quality and regenerative farming, but we can emphasise these more. The BA is working with neighbouring LPAs on how	Enhance actions/delivery measures in Theme B table

Respondent	Comments	BA response	Edits to plan
	<p>We think it's important to maintain nutrient neutrality requirements and improve the quality of our water as much as possible for people, for agriculture and for wildlife.</p>	<p>best to deal with Nutrient Neutrality requirements.</p>	
<p>Rewilding Britain</p>	<p>Rewilding Britain is the first and only country-wide organisation in Britain focusing on rewilding and the amazing benefits it can bring for people, nature and climate. At Rewilding Britain, we define rewilding as the large-scale restoration of ecosystems to the point where nature is allowed to take care of itself. Rewilding seeks to reinstate natural processes and, where appropriate, missing species – allowing them to shape the landscape and the habitats within.</p> <p>Rewilding encourages a balance between people and the rest of nature so that we thrive together. It can provide opportunities for communities to diversify and create nature-based economies; for living systems to provide the ecological functions on which we all depend; and for people to reconnect with wild nature.</p> <p>We know that there is strong support for rewilding across Britain. A recent YouGov poll commissioned by Rewilding Britain shows that 81% of Britons support rewilding and just 5% of people oppose it. This polling confirms rewilding is overwhelmingly popular with the British public and also shows that 83% of people support our national parks being made wilder, with areas in them set aside for rewilding.</p> <p>We can demonstrate that rewilding can play an essential role in tackling the extinction crisis and climate emergency and believe that creating wilder national parks is vital for addressing both. Our national parks comprise some of the most remote swathes of Britain and some of our most cherished landscapes. Yet whilst national parks have largely protected these landscapes from built development, they're not delivering for nature and biodiversity and could be much wilder.</p> <p>We feel that the UK government and devolved administrations pledges to protect 30% of Britain's land and sea for nature by 2030 are not credible without ensuring wilder national parks. In order to genuinely achieve nature's recovery across 30% of Britain by 2030 we need our national parks to lead the way by establishing:</p> <ul style="list-style-type: none"> ● Core rewilding areas across at least 10% by 2030 which focus on restoring and reinstating as wide a range of natural processes, habitats and missing species as possible to form mosaics of native forest, peatlands, heaths, species-rich grasslands and wetlands etc. There should be minimal or no human impact or extraction of resources. ● Regenerative areas/nature recovery areas across at least 50% by 2030 which support a diverse range of land uses and enterprises, generating value for the local economy while allowing nature to flourish, e.g. continuous cover forestry, nature-based tourism, recreational fishing and high-nature value/wild meats. <p>In order to do so we need to modernise legislation to empower national parks to upscale efforts for nature's recovery. So it is great for example that the UK Government's recent response to the Glover review confirmed support for including nature's recovery as a statutory purpose of national parks.</p> <p>We welcome the UK Government's commitment to provide funds for farmers to rewild and restore natural habitats under new Environmental Land Management schemes. These funds could be prioritised to enable increasing numbers of landowners to create rewilding areas within national parks. As the consultation</p>	<p>Comments noted.</p>	<p>minor edits to Theme B intro – section fen, wet woodland and grazing marsh</p>

Respondent	Comments	BA response	Edits to plan
	<p>recognises, the Broads is one of Europe's most important wetlands, with a rich mosaic of habitats comprising, among other things, shallow lakes, fens, wet woodland, estuary salt marshes, intertidal mudflats and coastal dunes. More than 7200 hectares are nationally designated as Sites of Special Scientific Interest (SSSIs), a third of which are also National Nature Reserves. Most of the SSSIs are of international importance for their habitats and wildlife as the Broads Special Area of Conservation (SAC) and the Broadland Special Protection Area (SPA), and an area of the wetland is also designated as a Wetland of International Importance under the Ramsar Convention. As this habitat is a vast mosaic we welcome the recognition that the ecosystem must be managed as a complex, dynamic whole, not as individual fragments. In the coming years the biggest challenge is going to be the impacts of sea level rise and adapting to climate change. It is vitally important to ensure that nature's resilience is central to the management plan in order to reverse biodiversity decline and to create resilient landscapes in the face of the climate emergency. We also welcome the inclusion of connecting and inspiring communities and the expansion of environmental education – people are very much at the centre of rewilding.</p> <p>We fully support the inclusion of the precautionary principle as one of three fundamental principles to guide the development and implementation of the Broads Plan.</p> <p>We would like to see the Plan make an explicit commitment to the creation of at least 10% core rewilding areas. These should build on the broads existing habitats, while ensuring they are either resilient to or adaptable to the inevitable impacts of climate change. We would like to see this linked to the establishment of a vibrant Nature-Based Economy across the Park which allows nature to heal and flourish whilst supporting prosperous communities.</p> <p>The plan recognises the range of habitats and biodiversity. The Biodiversity Audit shows the Broads is home to around 1,500 species of conservation concern, with 66 species relying almost entirely on the Broads for UK survival. This demonstrates the vitally important and unique place the Broads has as a home of nature. We would like to see the plan include reference to core rewilding areas, and the potential to build on and further restore the unique habitats to the area and restore more wildlife to the National Park.</p> <p>Rewilding is innovative, and it can restore unique natural landscapes and it can help build resilience. Through the use of native breeds, and allowing nature to lead the way, core rewilding and regenerative areas could truly restore and protect unique habitats, and support the adaptation of species and biodiversity to the impacts of climate change. This will not just be to the benefit of wildlife of the Broads but also for people and communities.</p>		
Rewilding Britain	<p>Landscape: The National Park is one of the finest and most important wetlands in Europe and a UK priority wetland. We agree these landscapes should continue to support local community development, economic activities and nature recovery. We recognise this is primarily a manmade landscape and there is a need to balance what is needed for a healthy, functioning ecosystem with the fair and sustainable use of the many benefits we get from it. We welcome the inclusion of a specific commitment to maintain, enhance and increase areas of priority fen, reed bed, grazing marsh and wet woodland, protecting peatland ecosystems as carbon sinks and</p>	Comments noted. Wet woodland without designation has been identified by Natural England and BA, although NE have confirmed that they do not wish to designate any further sites at present. The BA	Theme B, section on 'Fen, wet woodland & grazing marsh' – edits to text

Respondent	Comments	BA response	Edits to plan
	<p>seeking environmental net gain. These should be supported by a commitment to deliver biodiversity net gain.</p> <p>We support the plan to map potential areas for net gain and wildlife corridors, as well as developing and implementing integrated landscape-scale initiatives. These should be in line with and developed to deliver a commitment to rewilding a minimum 10% of the park. Maintaining and enhancing a mosaic of dynamic habitats and restored natural processes are central to restoring a diversity of landscapes across the Park, and will support wellbeing, community development and economic activities alongside nature recovery.</p> <p>Nature Recovery: We welcome the inclusion of reversing the decline in biodiversity and developing resilient ecological networks. However, our national parks should be leading the way in the delivery of 30% of land for nature by 2030. This is why we are calling for the creation of 10% core rewilding areas and 50% regenerative areas across Britain’s National Parks.</p> <p>We would like to see this objective extended to include 10% core rewilding areas, connected to and supporting a wider mosaic of 50% regenerating areas for nature. These should focus on restoring and reinstating as wide a range of natural processes, habitats and missing species as possible to form mosaics of naturally functioning fens, peatlands, wet-woodlands, species-rich grasslands and wetlands etc – building on the Broads existing diversity of habitats. We would also like to see the proposals be more explicit around how the resilient ecological networks will be developed. And we would like to see consideration given to low quality habitats where rewilding efforts could support and maximise nature’s recovery. Clear targets for nature’s recovery need to be set with a monitoring and reporting plan to track progress against these targets.</p> <p>We are working with the University of Leeds to identify rewilding potential across Britain and would be happy to share this modelling with you as part of your management planning. This could be utilised to further develop where core and regenerative rewilding areas could be supported, linking these areas up with protected sites and other important areas for wildlife. It would also identify where pinch points and barriers exist, and how these could be removed to allow wildlife to move throughout the landscapes. With 56% SAC designations in unfavourable condition and only 10% of SSSIs in appropriate management, this approach will also aim to restore biodiversity to these protected and important areas.</p> <p>[Map, Wildland Research Institute: This mapping shows the areas within - and adjacent to - the NP which have higher naturalness potential. Based on broad-scale landscape modelling the map highlights potential areas of interest for creating large scale intact natural areas. A necessary next step will be to use the mapping as a basis for local level participatory discussions with a wide range of local actors and stakeholders to identify restoration and rewilding opportunities]</p> <p>We would like to see the inclusion of plans to deliver targeted action for key species and habitats as part of a wider, integrated nature recovery action programme. This should include specific reference to the need for reintroductions and species recovery where appropriate. This would start with feasibility assessments to identify key species and establish baseline populations. This could lead to action plans being developed for</p>	<p>has offered CWS designation and surveyed all woodland resource in the Broads area.</p>	

Respondent	Comments	BA response	Edits to plan
	<p>the reintroduction/recovery of missing species where there is local support. Reinstating missing species will not only help to restore natural processes, but also boost locally adapted species assemblages. Species reintroductions can also support a range of ecosystem services. For example, beavers have a proven effect on wetland biodiversity, water purity and flood mitigation.</p> <p>Wet-woodland and peatland: The Broads peatlands provide considerable carbon sequestration, which should be protected and enhanced. We welcome the plan to continue to capture and store existing and additional carbon under appropriate water level and land management conditions. As referenced the peatlands policy statement issued by the Campaign for National Parks (Nov 2021) calls for much greater priority to be given to the restoration and rewetting of peatlands of all types within National Parks, with the aim of bringing all this peatland into good condition or restoration management by 2030 at the latest. We would like to see a specific target for this in the final plan.</p> <p>The Broads has the most extensive tract of wet woodland within Eastern England. As such the plan needs to make specific reference to how it will continue to conserve and enhance this habitat and, especially where it has no formal designation, protect from risks such as development and drainage.</p> <p>We would like the plan to reference the use of natural regeneration as a preferred option for peat and wet-woodland restoration where feasible, as this will create diverse, locally appropriate and natural woodland habitats with increased ecological resilience.</p> <p>We would like the plan to include objectives to restore and rewild wet-woodland.</p> <p>Aquatic management: We acknowledge the importance of the Broads waterways for navigation, recreation and biodiversity. We also recognise the important role of sustainable tourism for the economic viability of communities and local business. The role of water plants and trees is clearly understood, however there is emphasis in managing them in order to keep waterways free for navigation. This cannot happen at the expense of ecosystem functionality. It is important to manage water plants and trees in a way that supports and enhances them.</p> <p>The Waterways Management Strategy focuses on navigation and dredging. We recognise dredging is an important tool to ensure ease of navigation and we welcome the commitment to dispose of dredged material in cost effective and environmentally sustainable ways, taking account of its value for agriculture, habitat creation, land restoration and flood protection. However, it is important to consider the impact on natural processes and make sure dredging is not carried out at the expense of other systems.</p> <p>We strongly support the implementation of nature based solutions to catchment management, which should include restoring natural functionality within rivers and streams, as well as restoring a mosaic of habitats across the catchment to slow the flow. Rewilding areas could help to store and manage water across the catchment, as well as reduce the level of pollutants and provide resilience to climate change and flooding. We would also like these natural solutions to be extended to include the explicit inclusion of</p>		

Respondent	Comments	BA response	Edits to plan
	<p>beaver reintroductions across the park because of the important role they play in flood mitigation, water quality, rewetting the landscape and fire mitigation.</p>		
RSPB	<p>Thank you for giving the RSPB the chance to comment on the draft versions of the Broads Plan. We are pleased to see previous suggestions and recommendations have been incorporated within the consultation document.</p> <p>Overall, the plan recognises the importance of The Broads' biodiversity and wider environment, and helpfully keeps nature and the environment as a golden thread running through it. However, there is a need for the plan to have a greater focus on species and habitat recovery and to go beyond simply maintaining what The Broads currently supports in line with the (e.g. paragraph 3, p.6), with the aim of The Broads becoming richer in nature. this needs to be backed up by appropriate actions and monitoring.</p> <p>We are supportive of the Strategic Objectives of the plan, as set out in Table 2 (pp.12-13). However, we recommend greater clarity be provided (or signposted) to which priority species and invasive non-native species are a focus of the plan, as mentioned in Strategic Objective B4. This will help identify, for example, the management measures needed.</p> <p>Long-term aim: Important to mention that biodiversity is a public good as the plan does in the previous paragraph. People want to see abundant wildlife when they visit the Broads. Add in "abundant wildlife" between storage and landscape.</p> <p>"Opportunities are pursued..." This is not ambitious enough. The aim should be for the Broads to be a resilient ecological network, comprising better, bigger, more and joined up places for nature. Simply "pursuing opportunities" to achieve this lacks ambition and is not an end point to aim for (it's a means to an end). Amend "pursued" to "delivered".</p> <p>"halt biodiversity declines" should be amended to "halt and reverse biodiversity declines". The Government's targets under the Environment Act are to first halt and then reverse biodiversity loss, so this should be reflected here.</p> <p>Penultimate sentence: This should be expanded to read "...maintaining or restoring habitats to good ecological condition."</p> <p>B3: site-specific habitat improvement measures - This should have a monitoring target for numbers of schemes where advice has been implemented on the ground. This could include amount of footdrain created, scrub planted, ditches cleared, area over which water levels have been raised etc. This is fundamental to demonstrate success of the plan, rather than the plan recording that additional plans have been written.</p> <p>B4: The objective for priority species should be to achieve their favourable condition in the Broads which will either involve maintaining their abundance and range or restoring it. This approach is taken to the habitat objectives above, which refer to restoring / maintaining habitats, and the same approach should be used for</p>	Comments noted.	Edits made to text for clarity.

Respondent	Comments	BA response	Edits to plan
	<p>species. It is not clear that this list of priority species is suitably comprehensive. Priority species should be based on robust ecological criteria and some should be good indicators of a healthy environment. This list should be expanded to be more representative of the biodiversity importance of The Broads. Delivering and monitoring management regimes will be key actions to achieve that objective but are not the objectives themselves.</p> <p>Invasive non-native species management: This should include action to deliver management for INNSs. Ultimately, action taken to remove e.g. mink, Himalayan balsam, Crassula etc will be the fundamental information needed to assess progress. This action should then be followed up with monitoring with the aim of showing INNS distribution and abundance has been reduced.</p>		
Suffolk County Council	<p>The strategic objectives under Theme B relating to nature recovery, enhancement and management, are supported. The Environment Act could be listed as a delivery link for biodiversity net gain in table 4, as the requirement for all planning applications to deliver 10 net gain comes into force in November 2023. Additionally, the local plan could also be listed as a delivery link, as there is potential for local plans to set higher net gain targets. The environment act also places a responsibility on local authorities to put in place nature recovery strategies. Contributing to the development of these strategies in Suffolk and Norfolk could be a key action to achieve objectives in biodiversity enhancement.</p>	<p>In general, the Environment Act and Local Plan are drivers across the whole Broads Plan, but we will add specific refs to B3; will add new action on Biodiversity Net Gain in association with development.</p>	<p>Objective B3 reworded; additions/edits made to B3 actions – ref to BNG policy</p>
Suffolk Wildlife Trust	<p>(1) We fully support the long-term vision for the Broads National Park as a place where ‘Wildlife flourishes and habitats are maintained, restored, expanded and linked’. The Broads Plan has the potential to be a driving force for nature recovery in East Anglia, and as such we expect the plan to match the ambition required to achieve government targets such as protecting 30% of land for nature by 2030. We support the objective to maintain, enhance and increase areas of wetland habitats for wildlife and as carbon sinks. Furthermore, we support the monitoring mechanism proposed –Broads Biodiversity Partnership to annually review changes in species numbers and habitats. However, we would encourage the inclusion within the Broads Plan of clear targets for nature recovery within the Broads National Park, so that progress can be assessed against these targets. Species for which The Broads is a key stronghold, such as breeding waders whose populations continue to decline, should have clearly defined targets set out in the plan. The Broads Plan should also clearly set out habitat creation targets within the timeframe of the plan, with targets in line with those proposed in The Broads Nature Recovery Delivery Prospectus.</p> <p>(2) The Broads Authority, as a local planning authority set within a national park, should be setting higher standards for development, and ensuring that we do not exceed environmental limits. The Broads Authority is now required by Natural England to achieve nutrient neutrality for new development and within the context of freshwater habitats at risk from saline incursion and East Anglia being classified as seriously water stressed, The Broads Authority should also be leading the way in ensuring that new development aims to achieve water neutrality. We would strongly support the Broads Authority taking a stronger stance on reducing water usage to help conserve freshwater habitats for people and wildlife, with an aim of achieving water neutrality across new development.</p>	<p>(1) We await the Government's environmental targets for air quality, water, biodiversity, and resource efficiency and waste reduction. The Broads Biodiversity Partnership will meet in Oct/Nov to discuss and agree arrangements to review changes in species numbers and habitats, and SWT's input will be welcomed.</p> <p>(2) The BA is working with other Norfolk LPAs on how to address nutrient neutrality – see Planning permission (broads-authority.gov.uk). The Local Plan Issues and Options consultation will raise potential to go further than 10% biodiversity net gain and optional building regs water</p>	<p>None.</p>

Respondent	Comments	BA response	Edits to plan
	<p>(3) Furthermore, The Broads SAC has baseline air pollution concentrations (ammonia and nitrogen deposition) which exceed the critical levels for designated features, including calcareous fens, transition mires and quaking bogs, and fen orchid, some features of the SPA are also impacted by air pollutions levels. Air pollution levels above the critical level for sensitive habitats are likely to cause harmful effects to species diversity, vegetation structure and ecosystem function, with the potential to impact the integrity of designated sites. This is acknowledged within the HRA of the Broads Plan, however no strategic objectives, or delivery mechanisms address this issue within the plan document. The Broads SAC supplementary advice on conserving and restoring site features includes a target to maintain air pollution 'to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (APIS)'. We recommend that a strategic objective should be added to the Broads Plan to reduce the concentrations and deposition of air pollutants to at or below the site-relevant critical load/level for all designated features of The Broads SAC and the Broadland SPA.</p> <p>(4) Overall, we are supportive of the ambition of the Broads Plan, however we recommend that clear targets are set out for species recovery and habitat creation to enable assessment of progress throughout the plan period. Additionally, greater attention should be paid to how development and land use can be kept within environmental limits to ensure the protection of the integrity of designated sites across The Broads.</p>	<p>usage standard of 125l/h/d. (3) While we do not include an objective on reducing air pollution, we seek to address this through other objectives (e.g. carbon reduction measures in A2/A3). The Local Plan promotes sustainable transport, has policies on renewable energy and also seeks to direct development to areas with a development boundary where services and facilities are located with access modes other than the private car. Any sites that come forward as part of the call for sites (as part of the Local Plan Issues and Options consultation) will be assessed in terms of location and access. (4) Comments noted - also see response to (1)</p>	
Section 3 Theme C: Maintaining and enhancing the navigation			
Chris Balls	<p>Having lived on the Broads for my entire life my main concerns are that the document seems to imply that boatbuilding and commercial use of the broads is a heritage aspect. Please remember that there still is significant commercial activity relying on maintenance of the Navigation, with seagoing commercial vessels still built in the broads catchment and still some "pleasure steamers" operating which is one of the most environmentally friendly ways for newcomers to see the broads, but heavily reliant on a proper navigation being maintained. Also we should not forget that water transportation is very environmentally friendly and technological developments may soon make vessels that can operate on the Broads economically viable again, but again it is imperative to maintain and enhance navigational aspects of this mainly man made environment.</p> <p>It was only some 50 years ago that Potter Heigham had a shipyard building sea going vessels and of course much more recently there was significant boatbuilding for export activity on all the major rivers, many brown field sites still exist that could be suitably utilized in the future should economics dictate a revival. If the navigation is allowed to deteriorate such opportunities would be lost as it is generally more expensive to restore than maintain.</p>	We recognise the importance of boat building, chandlery and repair as significant local industries, and will emphasise this more strongly in the text.	Edits made to 'Recreation and access' section, paras 1-2

Respondent	Comments	BA response	Edits to plan
	It is unfortunate that such activities as reintroducing otters has seen the decimation of other much more visible wildlife.		
East Suffolk Council	The Council supports the overall approach to facilitating navigation in a manner which is consistent with nature conservation and water resource management objectives.	Comment noted.	None.
East Suffolk Council - Green, Lib Dem & Independent Group	The GLI Group would be against extending navigation water space for more craft at the expense of altering waterways that are valuable habitats for local species. Biodiversity impact assessments should be undertaken before any alterations.	Will add text to penultimate para, section on 'Managing navigation safety and access' to clarify that any planning proposals to extend navigation access would need to be consistent with nature conservation interests, flood risk management, and archaeological and geological status.	Add text as noted in BA reply
Environment Agency	<p>Could more perhaps be done with partners to help reduce sediment input from land into upland watercourses feeding in to Broadland? The Sustainable Farming Incentive Scheme (part of the Environmental Land Management Scheme) could prove to be a useful tool for helping to reduce sediment input from land and to help reduce the envisaged climate change impacts of increased soil erosion and mobilisation from more intense storm rainfall and higher peak river flows? https://www.gov.uk/guidance/a-summary-of-the-sfi-in-2022 https://www.gov.uk/guidance/complete-a-runoff-and-soil-erosion-risk-assessment</p> <p>C2: We suggest that this theme is further qualified to make clear that extending access for watercraft should only be considered where there is no adverse impact on river function or river ecology.</p>	Edits made to text. The BA will continue to work with partners and land managers on projects to reduce sediment input from higher up the catchment; e.g. use of silt traps, cover crops, different ploughing patterns, and funding agricultural equipment to reduce run-off and soil erosion.	Theme C intro, section on 'Managing navigation safety and access' - clarify that any planning proposals to extend navigation access would need to be consistent with nature conservation interests, flood risk management, and archaeological and geological status. B2 - add ref to SCI scheme.
Natural England (Freshwater Lead Adviser, Norfolk & Suffolk Local Delivery Team)	We welcome measures aimed at reducing sediment inputs into the water environment and promoting the sustainable use of dredged material.	Comment noted.	None.

Respondent	Comments	BA response	Edits to plan
<p>Norfolk and Suffolk Boating Association</p>	<p>C2. NSBA applauds this objective and would like to extend opportunities for boating, in particular sailing, and the use of personally propelled watercraft, particularly in less accessible areas.</p> <p>Bullet 1: NSBA would favour the introduction of a strategy to open up tidal broads connected to the river system that are currently closed to navigation. The prime example is Hoveton Great Broad, which was closed to navigation 130 years ago. Its restoration should be complete by 2027.</p> <p>Bullet 2: NSBA would like to see more analysis done on the modalities for raising the air draft of bridges, to maintain the navigation as water levels rise.</p> <p>C3. NSBA is concerned that the area for navigation is gradually in decline because of the increase in bankside vegetation in many areas and the proliferation of aquatic plants. NSBA fully understands the challenges of encouraging landowners to manage their banksides, the sometimes-conflicting needs of the conservation community, and the ecological reasons for this, but would urge BA to resist bankside overgrowth and obtain and maintain sufficient equipment to keep the navigation open, even as the waters of the Broads improve in quality (see also our arguments under nature recovery on pp 3-4 above).</p> <p>NSBA would like to see more detailed and thorough characterisation of the Broads navigation, including more maps precisely identifying the navigation and directly useful to navigators. NSBA suggests a redraft as follows:</p> <p>Map and maintain existing navigation water space, identify and map where the navigation is undergoing rapid change, identify important areas for sailing, especially for annual regattas, and identify potential areas for extension of opportunities for personal propulsion craft.</p> <p>In this section on the navigation, it would be useful to indicate that in the next five years a lot more needs to be known about the use of the Broads by different craft, and how this is changing, particularly considering environmental targets.</p> <p>Please consider adding new Objective C5.</p> <p>Maintain an overview of the use of the Broads by craft of all kinds, while monitoring and reporting on their environmental impact.</p>	<p>Bullet 1 - As reported to the Navigation Committee, opening access is a matter for private landowners as these sites are not part of the navigation area; the BA's role is one of open dialogue with such landowners to seek opportunities, although previously landowners did not want open navigable access.</p> <p>Bullet 2 - Air draft is a standard issue raised through the BA Works Licence process when considering plans submitted by bridge owners.</p> <p>C3 - The BA has an active management approach for bankside trees that pose a safety hazard (Riverside tree and scrub management (broads-authority.gov.uk)) and for water plant cutting.</p> <p>Maps - Many maps for navigators are available, e.g. water depths and navigation notes (broads-authority.gov.uk) and riverside tree and scrub management. Producing further maps to help strategic and spatial planning is likely to feature in the updated Broads Integrated Access Strategy (under review in 2022-23).</p> <p>The Broads Act defines the navigation area as “those stretches of the rivers Bure, Yare and Waveney, and their tributaries, branches and embayments (including Oulton</p>	<p>E1 - add new action to review and update boat census methodology.</p>

Respondent	Comments	BA response	Edits to plan
		<p>Broad) which, at the passing of this Act, were in use for navigation by virtue of any public right of navigation". However, a map precisely identifying the navigation area has never been produced; doing so would lead to multiple site-specific challenges, legal and otherwise, about the exact boundary and, in most cases, no-one has actual substantive evidence.</p> <p>Reviewing/Updating the boat census methodology is scheduled this year, incl. use of GIS mapping to assess the spatial relationships between waterways usage and pressures on protected sites – we will add ref to objective E1.</p>	
Norwich City Council	<ul style="list-style-type: none"> • Long term aim – would suggest additional of wording as follows to ensure consistency with the aims of the River Wensum Strategy: “The navigation, access and associated facilities and infrastructure are maintained and enhanced” and “Opportunities to extend and improve the navigable water space are pursued, consistent with nature conservation interests and water resource management.” • C2/C4 – doesn’t seem to include reference to the provision of additional/improvement of existing residential mooring facilities to both help meet local housing need but also to ensure there are appropriate managed/maintained spaces along the river. This is in line with what the River Wensum Strategy sets out in policies in section 5 of that document and is also referred to in the Broads Local Plan. 	<p>Maintaining and improving integrated access on land and between land and water is covered more extensively under Theme E.</p> <p>C2/C4 - there will be a Call for Sites for residential dwellings and residential moorings as part of the Local Plan Issues & Options consultation (planned in autumn 2022).</p>	Edit long-term aim to <i>‘improve and extend’</i>
Wroxham Parish Council	Theme C1 - disposing of dredged material in more sustainable ways needs to include consideration of, and consultation with, local communities. As the largest navigation cost these dredging projects should be planned as a start to finish project with full consultation and communication with ALL partners. This is currently NOT the case in Wroxham with the planning application for the dredging lagoon.	Comments noted and forwarded to BA Planning and Operations	None. CC to Head of Planning and Director of Operations

Respondent	Comments	BA response	Edits to plan
Section 3 Theme D: Protecting landscape character and the historic environment			
Broads Reed & Sedge Cutters Association	<p>Protecting landscape character and the historic environment, page 30/31 correctly and clearly states “Traditional craft industries such as reed and sedge cutting, thatching and millwrighting remain a small but important part of life and landscape management in the Broads but are struggling to survive etc. etc. Ref.D1 again includes “support local reed and sedge cutting industry”.</p> <p>Knowledge of protecting landscape character and the historic environment could be improved if those persons currently undertaking training schemes / apprenticeships in the Broads spent some time with reed and sedge cutters and millwrights and gained some experience and knowledge of these traditional industries.</p>	Comments noted.	None. CC comments to WMM Project Manager
East Suffolk Council	<p>The Council supports the overall approach to protecting landscape character and the historic environment. Detailed comments are set out below.</p> <p>Long-term aim: This section correctly places an emphasis on the preservation and improvement of landscape and heritage assets for the local community, but the value of historic and environmental protection to the visitor economy could also be referenced here in addition to the later sections.</p> <p>D1: Neighbourhood Plans can also be a useful source for identifying locally important heritage and cultural features. They can identify non-designated heritage assets and include local policies to aid their preservation so could be worth referencing here.</p> <p>D2: More could be said about the use and role of Landscape Character Assessment. As a key piece of evidence when considering potential impacts from development on the natural and built landscape it could be stated that this will also inform future Local Plans and decisions on planning applications.</p> <p>D3: The Council notes the intentions around implementing a 5 year programme of Conservation Area Appraisal reviews and will be pleased to work with the Broads Authority on the alignment of the approach of the two authorities in this respect.</p>	Comments noted.	Edit D2 actions re role of LCA
East Suffolk Council - Green, Lib Dem & Independent Group	The GLI Group is strongly in favour of these plans, particularly the proposed Dark Skies sites. These will increase the enjoyment and value of the Broads for residents and tourists alike.	Comments noted.	None.
Environment Agency	<p>These publications may prove to be useful guidance:- https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/heag017-flooding-and-historic-buildings/ https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/</p>	References forwarded to BA Historic Environment Manager	None. CC to HEM

Respondent	Comments	BA response	Edits to plan
Historic England	<p>The Broads are a unique landscape which exist through a combination of natural circumstance and human intervention. The area supports a unique water-focused environment with an historic environment that spans early human activity in the Mesolithic Period to contemporary use of village greens and staithe by local communities and visitors.</p> <p>The Broads benefits from a variety of historic features that reflect the way of life of local people for centuries from the Roman roads, village staithe and greens that originate in Saxon riverside settlements, the man-made broads themselves, ecclesiastical buildings including listed Medieval churches and scheduled ruins and buildings that reflect the agricultural and water-focused activities of the area with barns, mills and pumping stations.</p> <p>Many of these areas are designated as one of the Broads’ twenty-five conservation areas or one of the many structures are either nationally listed or included within the authority’s comprehensive list of local structures.</p> <p>We are pleased to note that the Draft Plan acknowledges the wide variety of elements that make up the historic environment. The Draft Plan is clear and contains a positive strategy for the conservation of the historic environment and the wider natural environment to which it is intrinsically linked within the Broads area.</p>	Comments noted.	None.
Natural Environment Team, Norfolk County Council	<p>I broadly support the policies which promote the protection and enhancement of the special landscapes of the Broads.</p> <p>It is encouraging to see objectives in place to protect and enhance dark skies areas, but also that acknowledgement of requiring flexible approaches towards different areas. For example, acknowledging that areas around places such as Wroxham and Potter Heigham have a very different character to the more rural tranquil areas of the Broads.</p>	Comments noted.	None.
Norfolk and Suffolk Boating Association	<p>Please note our comment on the heritage fleet on page 3 of this document [under 'Introduction' comments].</p> <p>We suggest a longer title “Protecting landscape character, the historic environment and the heritage of navigation”</p> <p>Please consider adding add new Objective D5.</p> <p>Initiate research and documentation of the Broads heritage in navigation, including the stock of heritage boats (both sailing and motor) and historic sites, as well as those organisations working to protect this legacy. NSBA is willing to partner with BA in achieving this objective.</p>	<p>The heading encompasses our navigation heritage and other specific areas of heritage.</p> <p>We agree that researching and documenting the heritage of navigation (potential action under D1) would be an interesting project – while we are unlikely to have resources to do this in-house, we would support the NSBA in any funding bids to have the work done externally.</p>	None.

Respondent	Comments	BA response	Edits to plan
Norfolk Gardens Trust	<p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee. The Norfolk Gardens Trust (NGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of consultations that may impact such sites, as well as having an interest in sites of heritage significance but not registered.</p> <p>We have reviewed the Broads Plan for 2022-27 with particular attention to the section which deals with protecting the landscape character and the historic environment. There is no mention of heritage parks and gardens in the context of the cultural heritage of the Broads, and ask that you will consider a specific recognition that the cultural heritage includes significant parks and gardens, both registered and unregistered.</p>	There are no Registered Parks and Gardens in the Broads but we will reference their cultural heritage significance.	Theme D intro para on built & cultural heritage - add "Although undesignated within the Broads Authority area, historic parks and gardens also contribute to our cultural heritage."
Norfolk Geodiversity Partnership	<p>We note that D1 is described here as Record, protect and enhance local built and cultural features, archaeology and potential hidden heritage, including 'at risk' assets. However on p.32 it is described as D1. Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including 'at risk' assets. Why is geodiversity not mentioned in the D1 heading on page 12? Is this a textual error? Protecting and enhancing geological sites should be among the strategic objectives, as per NPPF section 170a and Sustainability Objective ENV3.</p> <p>Thank you for recognising that there are many geological sites lacking designation and protection. Please add a sentence recognising that built development may have an impact on geodiversity assets. (Suggested addition to Introduction, paragraph on Geodiversity: Built development can adversely affect access to geological assets by obscuring or obliterating them.)</p> <p>Long-term aim, sentence starting 'Earth heritage features...'): Enhancement of Earth Heritage features is possible and desirable, as per NPPF section 170a. (Suggested edit: Earth heritage features are protected and enhanced where possible...)</p> <p>Key action: Implement measures to document, protect and enhance local geodiversity sites and assets across identified work areas in county Geodiversity Action Plans [NGP, GeoSuffolk] - thank you for including this.</p>	Suggested edits noted and amendments made to text.	Amend omission in Table 2/D1. Add suggested text in intro and long-term aim.
Section 3 Theme E: Promoting understanding and enjoyment			
East Suffolk Council	<p>The Council supports the aim of supporting a range of recreation and tourism activities, in particular those which link with activity and health such as active travel. The emerging East Suffolk Cycling and Walking Strategy identifies opportunities for enhancing cycling and walking infrastructure, and further enhancements and support for cycling and walking within the Broads will bolster the ambitions of the Strategy. The Council also wishes to make the specific comments below.</p> <p>E1: East Suffolk Council strongly welcomes the reference to implementing projects in the East Suffolk Cycling and Walking Strategy. The draft Strategy underwent public consultation between November 2021 and January 2022 and is anticipated to be adopted over the coming months. It is considered however that the</p>	Comments noted.	E1 - add ref to neighbourhood plans

Respondent	Comments	BA response	Edits to plan
	<p>Broads Plan could go further, in terms of its remit for promoting understanding and enjoyment, by promoting and encouraging cycling and walking not just within the Broads but as a means of accessing the Broads from areas in the vicinity.</p> <p>Neighbourhood Plans can also be a useful source for identifying locally important transport improvements (particularly for sustainable travel). Furthermore, they can include local policies to support their preservation and improvement so could be worth referencing here.</p>		
East Suffolk Council - Green, Lib Dem & Independent Group	The GLI Group supports any efforts to educate tourists about the local biomes, and the plans to create jobs and training opportunities are very good – though care should be taken that these opportunities go to local people wherever possible, rather than bringing in new talent and possibly pushing residents out.	Comments noted.	None.
Environment Agency	<p>There may be an opportunity to include some summary statistics on angling in the introductory text.</p> <p>Section E1 ‘Implement agreed initiatives to support local fisheries and provision of Broads’ angling facilities [EA, angling bodies/community groups]’ - This should be expanded and include that angling is estimated to bring in over £100 million to the local economy each year from more than 1.4 million angling tourists to the broads.</p>	Introductory text amended	Intro, para 2 -add ref to value of angling to local economy
Navigation Committee	There could be more in the Plan on increasing access for people with disability or mobility issues.	We know many organisations do an excellent job in supporting easier access in the Broads; we can also discuss this with the Broads Hire Boat Federation to see what more can be done.	None.
Norfolk and Suffolk Boating Association	E1. Bullet 4. NSBA suggests “Maintain and, where possible, enhance the BA 24-hour free mooring network, informed by boat census and strategic priority sites data”	Comment noted, will include additional wording	Wording added to E1, bullet point 4 as suggested
Norwich City Council	<p>Key actions for E3 relating to tourism initiatives – what would this mean for mooring stations? Have things such as electric charge points or green waste facilities been considered?</p> <p>Theme E actions – Although reference is made to improving facilities at mooring areas and creating new launch points, can’t see reference to creation of new residential moorings. This is referenced in the Broads Integrated Access Strategy as well as the Broads Local Plan and River Wensum Strategy so should this also be mentioned in the Broads plan?</p>	Objectives E1 and A1/A2 identify actions to provide electric/ solar charging points and refuse/ recycling facilities and to reduce carbon emissions, e.g. the 'Electrifying the Broads' initiative. The need for new residential moorings is identified in the	None.

Respondent	Comments	BA response	Edits to plan
		upcoming Local Plan Issues and Options consultation .	
Norwich Green Party	We note the lack of residential moorings and would like to see this rectified.	There will be a Call for Sites for residential dwellings and residential moorings in the upcoming Local Plan Issues & Options consultation .	None. CC comments to Planning Policy Officer.
Rewilding Britain	<p>The Park already supports a high number of visitors and tourism. Rewilding areas often support thriving tourism opportunities, from safaris and walks through to camping, glamping and B&Bs. By increasing the Park's ambition to include core and regenerative rewilding areas within its management plan, this will provide additional tourism destinations for visitors, reducing the pressure on existing busy areas and provide alternative destinations with high quality landscape and nature offerings. In particular, rewilding projects across Britain are showing us how we can promote our countryside as a premier destination for visitors, supporting a range of jobs and opportunities for people to explore nature.</p> <p>Wellbeing is central to our national parks, and we have seen higher levels of visitors and local communities accessing our countryside. This has put huge pressure on the Park, which is already under stress from the ecological and climate emergencies. Rewilding can provide high quality opportunities for interaction with nature, improving the wellbeing of not just visitors but also local communities.</p>	Comments noted.	None
Suffolk County Council	<p>Reference to the Public Rights of Way network and SCC as a responsible authority for maintaining this network in Suffolk is welcome. Reference to the County Access Improvement Plans is also welcome as a key action in table 7 (E1), however it is more correct to refer to these as "Rights of Way Improvement Plans". The current Rights of Way Improvement Plan for Suffolk is the Suffolk Green Access Strategy2. which covers the period of 2020 – 2030.</p> <p>Reference to the Cycling and Walking Strategy for East Suffolk is welcome under E2 of table 7. This incorporates a number of routes in the Suffolk Local Cycling and Walking Infrastructure Plan, which for completeness should also be referenced.</p> <p>For information, Suffolk County Council is currently in the process of updating the Local Transport Plan. The focus of the revised Local Transport Plan will be decarbonisation of transport, achieving shift in transport modes and demand management.</p>	Comments noted.	Minor edits as noted.
Suffolk County Council Archaeological Service	We have no comments on the Draft Broads Plan 2022-27 other than to note our support for the aims and objectives of Theme D "Protecting landscape character and the historic environment".	Comments noted.	None.

Respondent	Comments	BA response	Edits to plan
Upton with Fishley PC	<p>Upton with Fishley Parish Council would like to take this opportunity to bring up again the lack of refuse collection points in the Broads area. Here in Upton we get people visiting the village by boat and many boat users carefully put a bag or two of rubbish by the little litter bin at the staithe, meaning that the Broadland District Council's contractor has to collect far more than one binbag on their weekly visit; sometimes three or four.</p> <p>I appreciate that the BA has set up refuse collection points in the Broads, but they are too few and too far apart. Obviously people on a boat want to get rid of their rubbish as soon as possible, especially in warmer weather.</p> <p>If there are 8 million tourists visiting the Broads Area, and the BA is planning to attract another 1 million over the next few years, then it is only fair to our communities that the BA negotiates with the district council to part-fund the provision of bins and the collection of rubbish that is nearly entirely from boat users.</p> <p>If the local authority chooses not to pay for rubbish collection in these areas, then the village residents will be paying for this through their precept, which seems very unfair.</p>	<p>Waste is a responsibility of the relevant District Councils and County Councils who are funded through council tax to operate a collection and disposal system; waste collection and removal is also supplemented by other businesses and organisations. Waste from hire craft is the responsibility of the hire company, and waste from private boats the responsibility of the individual creating the waste. The change in 2015 by Government that classed waste from boats as commercial waste (not domestic) saw local and district councils remove many waste facilities due to the increased costs. The Broads Authority continues to work with local partners to address waste issues, and all sites the BA operates have waste disposal available.</p>	None
Woodbastwick Parish Council	<p>table 7: Strategic objectives and key actions make reference to Implement working agreements and other measures to improve strategic network of toilet facilities (incl. Changing Places accessible toilets) and refuse & recycling facilities [BA, LAs, local businesses]. Given that Broadland District Council (BDC) plans to refurbish the toilet block at Ranworth Staithe this year, but beyond that, is looking for bodies to take over the running of the block, will the Authority be working directly with the Community Assets Management Team at BDC to ensure this vital facility remains in use?</p> <p>Theme E also notes “Other popular activities on land and by the water include angling, walking, cycling, horse riding and visiting local sites of interest. The strong appeal of the local wildlife, notably birds, boosts visitor numbers throughout the year.” In order to achieve these activities, we would welcome improved partnership working with local landowners and partners to increase the network of footpaths for walkers and, if possible, bridleways and cycle routes.</p>	<p>Comments noted. The BA works in partnership with a range of organisations looking at improve access (see Broads Integrated Access Strategy). With regard to increasing the provision of Changing Places toilets, managing public facilities is a specialist area requiring specific resources and budgets better suited to District Councils, and the BA will</p>	None

Respondent	Comments	BA response	Edits to plan
		continue to support this development.	
Wroxham Parish Council	Theme E1 - the Parish Council wish to emphasise the need for provision of litter bins and public toilets at Staithe and that these need to be suitably managed to reduce the impact on local communities.	Public waste facilities are a statutory duty of District and County Councils, who receive funding for this purpose through council tax, and the BA liaises with them on these issues. The BA does not receive funding to deal with public waste, but provides waste facilities at the sites it manages.	None.
Section 3 Theme F: Connecting and inspiring communities			
East Suffolk Council	<p>The Council supports the approach to inclusivity and reaching harder to reach communities. In relation to planning and development, the reference to ongoing cooperation with adjoining authorities, of which East Suffolk Council is one, is also supported and reflects the way in which the authorities continue to work together on strategic cross-boundary planning matters.</p> <p>Intro: Under the Landscapes for Everyone paragraph in addition to Covid-19 could reference also be made to the current cost of living crisis and the value of the access to the natural environment for free leisure opportunities?</p> <p>F2: Reference is made to social prescribing, which is supported, however given the nature of the Broads, could reference also be made specifically to green and blue prescribing? The provision of allotment sites and the setting up of community gardens could also be considered as a means of meeting environmental and social sustainability objectives.</p> <p>F4: Whilst the 'Delivery links' column identifies "County RAMS/GIRAMS" as the mechanism for delivery of the key action "Implement Green Infrastructure and Recreational Disturbance Avoidance Mitigation Strategies to extend and protect biodiversity value of sites [NSNRP, NCP, NSPG]", it would be clearer if it was recognised that there are separate RAMS for Norfolk and the Suffolk Coast (as the HRA of the document highlights). It would also clarify that the Suffolk Coast RAMS is not a countywide strategy (unlike the Norfolk version).</p>	Comments noted and edits made to text. We recognise the importance of offering free/affordable and supported opportunities so everyone can access and enjoy the Broads.	<p>1.1. Intro – add ref to cost of living crisis</p> <p>F2 - add ref to free opportunities and green & blue social prescribing.</p> <p>F4 - amend text on RAMS.</p>
East Suffolk Council - Green, Lib Dem & Independent Group	The GLI Group supports the efforts on education and outreach, but caution must be used when seeking to increase income that any income generation schemes are friendly to the residents, biodiversity and character of the Broads.	Initiatives like the 'Love the Broads' visitor giving scheme recognise the importance of working alongside local groups and businesses to improve	None.

Respondent	Comments	BA response	Edits to plan
		sustainable practices and make sure funds go to projects that support the area's special qualities and its communities.	
Hoveton Parish Council	<p>Hoveton Parish Council broadly supports the Draft Broads Plan 2022-27. The plan itself appears to be well laid out and covers all the areas which the Council would expect.</p> <p>Hoveton Parish Council wishes to make it clear that there are concerns from the viewpoint of Hoveton which will need to be addressed and which must form part of the next level of operational planning. Securing improvements to Riverside and Pocket Parks in Hoveton are a key concern. Flood mitigation is also a concern.</p> <p>Hoveton needs to be confident that the Broads Authority will ensure that the community and the tourists who are attracted to our village are catered for appropriately. The Council and Broads Authority have worked together over many years to ensure that areas such as Riverside Park and Pocket Park are fit for purpose. This must continue – especially as there is now a need for a period of renewal at the parks.</p> <p>The ongoing concerns about quay headings and flooding in the parks must be addressed. This is a project which has been discussed for many years and is now in need of urgent action. It seems that, whilst the Council has been working recently with officers, there is still no formal acceptance that these works will be completed soon and these works do not currently appear to be part of the piling strategy. The condition of other quay headings along the Hoveton waterfront is poor and will need attention in the near future.</p> <p>Hoveton has always been, and will remain, a key area of recreational activity in the national park. Despite that, and the proximity of the Broads Authority's own tourist centre, we are still blighted by the ground conditions and appearance of the area between Station Road and the river including both the former Waterside Rooms and the Kings Head Cottage - which have been derelict for nearly 30 years. This is a critical project and needs inclusion within operational plans.</p> <p>Additionally, the Council seeks more clarity about the works to be undertaken to protect Hoveton, and other communities nearby, from future flooding. Whilst the overarching theme is included within the report, we seek clarity over the specific works that will be undertaken to mitigate the issue in our parish, and others along the river.</p> <p>To conclude, the Plan appears to cover areas that concern us. However, the Plan does not provide enough detail which leaves the Council uncomfortable and unclear about how Hoveton's issues as outlined will be addressed.</p>	As a high-level strategy, the Broads Plan doesn't contain operational level detail; however, this will be in the project plans sitting under the Plan, incl. the development plans for Hoveton Riverside Park. (Council's comments cc'd to BA Waterways & Recreation Officer).	None. CC comments to WRO
Lead Local Flood Authority	The LLFA notes the draft plan mentions Nutrient Neutrality in relation new development in Theme F but does not define the watercourses affected by the current guidance. In addition, no further information on how the future Nutrient Neutrality guidance will be relate to this plan and who is intended to own the	The BA is working with its neighbouring authorities to better understand the	Theme F section on 'Local development' - add ref to

Respondent	Comments	BA response	Edits to plan
Team, Norfolk County Council	application of the Nutrient Neutrality management in this plan area. The LLFA would suggest that further sign-posting information is included in the plan.	implications of nutrient neutrality and identify mitigation options to ensure sustainable development can proceed – see www.broads-authority.gov.uk/planning/planning-permission and upcoming Local Plan Issues & Options consultation.	Nutrient Neutrality updates on BA website
Norfolk County Council, Natural Environment Team	<p>Reference to GIRAMS is welcomed, however consideration should be given (in Local Development, 2nd para) to including specific reference to the recently published Norfolk GIRAMS and providing a broad indication as to how the Broads Authority intends to formally adopt this document and implement its recommendations.</p> <p>Details set out in the supporting Sustainability Appraisal and Habitats Regulations Assessment appear acceptable, noting that reference to both Nutrient Neutrality and GIRAMS have been incorporated into the Broads Plan, as indicated in Box 4 (Overview of Recommendations) of the HRA.</p> <p>Subject to timescales, it may also be appropriate to include a more detailed update in relation to nutrient neutrality in the Broads Plan (prior to its planned adoption in autumn 2022), with a NN Strategy currently being developed by consultants on behalf of all the Norfolk local authorities.</p>	Updates on how the BA is dealing with GIRAMS and nutrient neutrality requirements are posted on our website at www.broads-authority.gov.uk/planning/planning-permission . These issues will be addressed in the Local Plan Issues & Options consultation.	Intro, section on 'Local development' - add text and footnotes
Norfolk and Suffolk Boating Association	Whilst themes F2 to F5 appear to be appropriate, it is not clear what F1 is about. What exactly is planned by the BA? NSBA would certainly agree that there should be more opportunities for young and disadvantaged people to learn to sail. There are many organisations and centres, including the NSBA and those affiliated with it, capable of implementing this objective and, no doubt, some help from the BA would be welcome.	Objective F1 responds to the Landscapes Review call to encourage more first-time visitors to our protected landscapes, particularly those from disadvantaged or under-represented groups. The BA is already involved in a number of activities under this objective, in liaison with local providers and would be happy to discuss ideas with the NSBA on how more people can try sailing.	None
Rewilding Britain	<p>We strongly support the outcomes relating to communities, especially the commitment to welcome people from all walks of life. We also welcome the aim to use the park's nature to inspire and educate people, and to have them actively involved in the future of the park.</p> <p>Schools based and outreach environmental education opportunities, using the Broads as a learning resource, are a great way to teach people about the role nature has in our lives, wellbeing and the importance of</p>	Comments noted. We are impressed by the comprehensive approach of Rewilding Britain's Nature-Based Economies (NBEs) across	

Respondent	Comments	BA response	Edits to plan
	<p>protecting and enhancing this. A core element will be recognising the importance of rewilding, to leave the national park in better shape than when we found it.</p> <p>We support the commitment to strong planning frameworks and cross-boundary cooperation between local authorities to provide opportunities for socio-economic and environmental sustainability, regeneration and diversification in ways that continue to protect and enhance the distinctive character and assets of the Broads and support thriving local communities. This objective can be strengthened through the establishment of Nature-Based Economies (NBE) - i.e. those which allow nature to heal and flourish while supporting prosperous communities. We make recommendations about how this can be done in our recent report (Rewilding and the rural economy Rewilding Britain). Many of these resonate with your objectives, in particular in relation to involving local communities, maintaining a strong land management community, and upskilling local workforces in green jobs. In particular we recommend that the UK and devolved governments support:</p> <ol style="list-style-type: none"> 1. Transition towards Nature-Based Economies (NBEs) across all our national parks <ul style="list-style-type: none"> ● Mandate all National Park Authorities (NPAs) to lead on their creation of NBEs including 10% core rewilding and 50% regenerative areas. 2. Embed NBEs within locally led land use plans <ul style="list-style-type: none"> ● Support the creation of integrated Local Land Use Plans linked to the development of NBEs that are shaped by local communities and led by trusted anchor institutions such as the National Park Authority ● Enhance localised decision-making through diversifying public, private and community ownership models within NBEs. 3. Incentivise NBEs through coordinated financing and regulation <ul style="list-style-type: none"> ● Re-orientate a significant amount of public funding towards the establishment of Nature-Based Economies, especially for core rewilding areas ● Encourage equivalent increases in private capital investment focussed on integrated business models which deliver nature’s recovery alongside thriving local communities. ● Empower local anchor institutions to attract and coordinate significant inward investment and ensure that benefits accrue to the local economy. ● Establish integrated regulatory processes and practices which support the development and implementation of NBEs in alignment with local land use plans. 4. Unleash a wave of nature-based business innovation <ul style="list-style-type: none"> ● Re-orientate public innovation funding towards the establishment of NBEs to support nature’s restoration and place rural communities at the forefront of a just economic transition. ● Establish Nature-Based Enterprise Zones with associated packages of support for nature-based businesses aligned to locally determine land/marine use plans. ● Integrate other innovation support mechanisms within NBEs such as ensuring adequate investment in internet connectivity and local infrastructure <p>We would like the strategy of the park to be based on community co-design, where core and regenerative</p>	<p>all our national parks and will continue to work in partnership on projects and funding opportunities to benefit the Broads and its catchment.</p>	

Respondent	Comments	BA response	Edits to plan
	rewilding areas are developed whilst working with the community to ensure that it is appropriate for wildlife as well as people.		
RSPB	Long-term aim re educational and outreach opportunities - There is a need to build links with appropriate organisations who are able to deliver work that can realise such opportunities e.g. the work of the Greenlight Trust at Strumpshaw Fen.	Comments noted.	None
Woodbastwick Parish Council	<p>On pages 43-44, F4 it is stated that you will “Engage with local communities, stakeholders and prescribed local ‘duty to cooperate’ bodies on strategic planning matters [BA, LPAs]” and that this will be monitored by “NPA planning targets, duty to cooperate principles met”. Given that the NPA (National Park Authority) is, presumably, yourselves, does this refer to your duty to cooperate with others being monitored by your own planning department? How will you ensure transparency and fair governance of your monitoring and how will this be reported to local communities? Where is the duty to cooperate principles published, please?</p> <p>We see that your aim also refers to “cross-boundary cooperation between local authorities” but we are disappointed to learn that this does not extend beyond County and District Councils (Appendix A). Given that there are in excess of 20 parish councils with Broads access and interests, will the Authority reconsider this and begin to engage locally?</p> <p>We note on page 41 your long-term aim. However, there is no direct and clear route of communication for people to be involved or question the Authority or its decision making. We have been advised that there is 1 public meeting per annum, which, quite rightly, hasn’t happened during Covid, but does the Authority consider 1 meeting effective for “people to feel actively involved”? When will the next meeting be and how will this be communicated? Will this only be communicated to those on your Partner List (Appendix A)?</p>	<p>The BA consults the public when producing/reviewing the Broads Plan, Local Plan and other key strategic plans (e.g. the upcoming Tourism Strategy).</p> <p>Duty to cooperate: See www.broads-authority.gov.uk/planning/planning-policies). At the Local Plan examination stage, the Planning Inspector will assess how the BA has met its duty to cooperate requirements.</p> <p>Appendix A refers to key delivery partners, and we know a much wider range of stakeholders will be interested/involved in particular part of the Plan.</p> <p>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. Our committee meetings are open to the public.</p>	
General comments on topics across the Plan			

Respondent	Comments	BA response	Edits to plan
Acle Parish Council	<p>Acle Parish Council would like to take this opportunity to bring up again the lack of refuse collection points in the Broads area. Here in Acle we get people visiting the village by boat and many boat users walk up to the village along Boat Dyke Lane and carefully put a bag or two of rubbish by the little litter bin at the allotments, meaning that the Broadland District Council's contractor has to collect far more than one binbag on their weekly visit; sometimes three or four.</p> <p>We have already reported this to you but nothing has been done to help. I appreciate that the BA has set up refuse collection points in the Broads, but they are too few and too far apart. Obviously people on a boat want to get rid of their rubbish as soon as possible, especially in warmer weather.</p> <p>If there are 8 million tourists visiting the Broads Area, and the BA is planning to attract another 1 million over the next few years, then it is only fair to our communities that the BA negotiates with the district council to part-fund the provision of bins and the collection of rubbish that is nearly entirely from boat users.</p> <p>If the local authority chooses not to pay for rubbish collection in these areas, then the village residents will be paying for this through their precept, which seems very unfair.</p>	<p>Waste is a responsibility of the relevant District Council and County Council, who are funded through council tax to operate a collection and disposal system; waste collection and removal is also supplemented by other businesses and organisations. Waste from hire craft is the responsibility of the hire company, and waste from private boats the responsibility of the individual creating the waste. The change in 2015 by Government that classed waste from boats as commercial waste (not domestic) saw local and district councils remove many waste facilities due to the increased costs. The BA continues to work with local partners to address waste issues, and all sites the BA operates have waste disposal available.</p>	None.
Bradwell Parish Council	Our Councillors have no comments, but thank you for consulting with us.	Comment noted.	None.
British Sugar plc (Cantley Sugar Factory)	<p>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 emerging Local Plan in order to ensure that there continues to be support for British Sugar's ongoing operation, diversification and associated development needs.</p> <p>As we raised in the previous representations to the now 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. Please see the Site Location Plan attached, which illustrates the Cantley Sugar Factory policy and the omitted area in question. The area currently excluded from the Cantley policy 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.</p>	<p>Comments noted and cc'd to BA Planning Policy Officer to inform current Broads Local Plan review.</p>	None. CC to PPO

Respondent	Comments	BA response	Edits to plan
	<p>The area therefore forms a fundamental component of the operation of British Sugar and is within the same land ownership as the Sugar Factory. As such, we request that the policy boundary is amended to include this area, in order to ensure that it is recognised by the policy and to secure its protection and support.</p> <p>More generally, British Sugar wishes to express support for the vision and Theme A of the consultation document on the response to climate change. As British Sugar continually seeks opportunities to reduce carbon emissions, we believe that the emerging Local Plan should encourage and support renewal energy development, including encouraging wind and solar powered energy sources.</p> <p>Conclusion: 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 emerging Broads Plan will carry forward the Cantley Sugar Factory policy allocation with an amended policy boundary.</p>		
Broads Reed & Sedge Cutters Association	<p>Whilst welcoming the draft plan in general, it is disappointing that other important issues currently impacting reed and sedge cutting in The Broads are not included.</p> <p>Local and sustainable reed and sedge management can only take place if cutters and in particular younger persons interested in becoming cutters, are able to live near their place of work. This would require positive affordable housing provision in The Broads.</p> <p>Access problems remain on many sites and in particular with the network of dykes which provided boat access and important water flow on and off the reed and sedge beds. Rising water levels and prolonged periods of high water levels impact the harvesting of reed and sedge. Hopefully, new reed beds can be created which are designed to be managed more easily and actually produce thatching quality reed.</p>	<p>Please let the BA know of any fen site access problems the reed cutters are unable to resolve directly with the landowner; we can investigate to see where we can provide support, particularly when we have FiPL grants available. We note the issue with prolonged high water and shorter reed cutting season. While awaiting further details on long-term incentives to allow land owners to create new reedbeds, if there are machinery or site efficiencies that can be made, the cutters can consider applying to FiPL – our Catchment & Farming Officer can support these applications. Comments relating to affordable housing provision cc'd to Planning Policy Officer - this issue is identified in the Issues and Options stage of the Broads Local Plan review (public</p>	<p>None. CC comments to PPO and CFO</p>

Respondent	Comments	BA response	Edits to plan
		consultation due in the autumn).	
East Suffolk Council	<p>Thank you for consulting with East Suffolk Council on the Draft Broads Plan, we welcome the opportunity to comment on the Plan.</p> <p>As a part of the Broads falls within East Suffolk, East Suffolk Council has an important role in supporting and assisting with the delivery of the aims of the Broads Plan. The Council recognises the importance of the Broads, not only in terms of the intrinsic qualities of its landscape and natural environment but also the role it plays as a place for recreation and enjoyment, as well as being home to a number of East Suffolk residents and communities.</p> <p>The East Suffolk Council Strategic Plan covers the period 2020 – 2024 and guides many of the activities of the Council and the way in which it operates (Strategic Plan 2020 - 2024 - Report - Page 1 (paperturn-view.com)). The Strategic Plan has five interconnected themes: Growing our economy; Enabling our communities; Remaining financially sustainable; Delivering digital transformation; and Caring for our environment. A number of other more detailed plans and strategies also guide the work of the Council, such as in relation to housing and the economy. The Council also, in 2019, declared a climate emergency (Our climate commitment » East Suffolk Council).</p> <p>The Council supports the vision for the Broads National Park to 2042, as set out on page 10 of the draft Broads Plan. In relation to each of the Themes of the draft Plan, the Council has set out comments below.</p> <p>Intro: in the paragraph on the Local Plan, reference should also be made to Neighbourhood Plans which, when ‘made’, also form a part of the development plan and are used in determining planning applications.</p> <p>It is recommended that the use of acronyms such as GHG (Greenhouse Gas) is either avoided or a list of acronyms included at the start. A brief explanation of carbon neutral and net zero carbon would also be useful.</p>	Comments noted and edits made to plan.	Theme A intro (under 'Reducing our carbon emissions') - add footnote: "In this context, 'carbon neutral' means the offsetting carried out by the Broads Authority balances the emissions from its activities, and 'carbon zero' means there are no emissions from the Authority's activities." Add ref to neighbourhood plans in intro (under 'Local Plan' section). Check/explain acronyms.
Katie Howe and Ellie Meneses	As two conscientious A-level students, we find the Broads Authority draft local plan to be overall good in principle and covers the basics. However, we note that there is nothing about second homes, holiday homes, the rise in living costs in the area especially. We believe this topic in particular needs attention and addressing for the benefit of the locals, their businesses and wellbeing. On the topic of second homes, we have noticed they are not mentioned in the draft plan alongside holiday homes. This is an issue as it does not discuss the impacts it causes on the local economy and housing prices. We believe this to be incredibly important as the nature of second homes is likely to affect the stability of the local economy. This unpredictable aspect that is caused as a result of second homes not being occupied consistently undoubtedly effects the amount of footfall and customers local business receive. Most devastatingly, this could result in the loss of jobs or prices rising so high that it drives current residents away. This is evidently not aided by the current cost of living crisis. Although this could be expected due to The Broads National Park being “unique and special”, we believe that the security of the local residents should also be a priority.	<p>A number of points in your response relate to planning policy and will be issues for discussion in the Local Plan Issues and Options consultation.</p> <p>We agree the Broads has large areas of high nature value farming and more could be done for sustainable and regenerative agriculture; while</p>	B2 - add ref to Regenerative Farming

Respondent	Comments	BA response	Edits to plan
	<p>In a similar vein, holiday homes are not mentioned in the draft plan leaving us to suspect that, perhaps, there hasn't been much consideration on how seasonal work and the flexibility of tourism effects the local culture. From first-hand experience, we are aware of how Covid has affected the hospitality and tourism industry as well as local businesses, therefore we believe that more could be done to address this issue, especially in relation to the Broads.</p> <p>Interestingly, we have also noticed that the 1st principle seemingly places cost analysis over the protection of "environmental degradation". Though it may be understandable to have cost effectiveness measure in mind, they should not supersede the importance of "likely threats of serious or irreversible damage to the environment". This should change if the Broads Plan really does have "biodiversity at the heart" or "recognising climate change". We recognise that throughout the draft agriculture and the well-being of farmers is mentioned, but we feel as though this attention and progression should be more targeted to restorative agriculture as is it not included in the draft. This is crucial is agriculture has the ability to impact the environment in many ways depending on how it is carried out. We think if this plan prioritises restorative agriculture the positive impact on land and water would be sizeable. One suggestion we have is to work with water authorities when appropriate to further improve The Broads.</p> <p>Thank you for considering our suggestions and notes. We hope our ideas can be implemented in some sort of way to improve your draft on The Broads.</p>	<p>this is intended under Theme B, we will check additional refs.</p>	
J Cressey	<p>Commitment to those who work live and have businesses on the broads that they will be supported financially and their properties respected by visitors who assume that they have a right to enter on or through land & properties without care and consideration. For the property owners as soon as national park is mentioned it gives people the idea that they can roam & let their dogs off and not keep them under control. And to be more forward thinking with planning permission for some premises to carry on economically they need to change how they manage their business in to the future. People change, so must a business to keep up.</p>	<p>Comments noted. The Broads Integrated Access Strategy (Objective 7) emphasises the importance of good visitor information and interpretation to promote responsible tourism.</p> <p>Comments relating to planning policy will be shared with our Planning team – also see the Local Plan Issues and Options consultation later this year.</p>	<p>None. CC comments to Planning.</p>
Keswick & Intwood Parish Council	<p>Keswick & Intwood Parish Council reviewed your draft plans at its last parish council meeting and would like to commend you on the plans and the work that has gone into producing them. It is fully supportive of the plans that you have put forward.</p>	<p>Comments noted.</p>	<p>None.</p>
Loddon Parish Council	<p>Loddon Parish Council supports the BA's Draft Broads Plan 2022-2027, but reserves its ongoing right to strongly challenge and resist any BA activity (resulting from the document's ultimate acceptance as policy)</p>	<p>Comments noted.</p>	<p>None.</p>

Respondent	Comments	BA response	Edits to plan
	that LPC considers, at that time, to be inappropriate or potentially damaging to the status of our Parish and/or Parishioners.		
Mark Collins	<p>Here are some very minor editorial observations on the draft Broads plan:</p> <p>p 25 line 6 Country not County</p> <p>p 31 second heading dark not darks</p> <p>p 31 suggest Dark Skies Partnership be given an acronym if BA is a member, and include the acronym on p 47</p> <p>p 41 line 3 are there really only 6,500 people in the BA Executive Area? this seems surprisingly low!</p> <p>p 48 suggest adding LPS (ref page 30) and STEAM (ref page 35)</p> <p>It's a very good plan in my personal opinion, but I will reserve wider comment for other interventions.</p>	Comments noted. The BA executive area is drawn tightly to the river valleys and only parts of settlements lie within the boundary, hence the fairly low population!	Minor edits made to Plan.
National Highways (Operations East)	National Highways have reviewed the information contained within the Draft Broads Plan 22-27 and wish to make no comment on the document. This is due to the document having no impact on the Strategic Road Network.	Response noted.	None.
Natural England (Freshwater Lead Adviser, Norfolk & Suffolk Local Delivery Team)	<p>We have considered the draft plan against Natural England's interests on freshwater within the natural environment.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>It is important to note that Natural England has not commented specifically on every strategic theme outlined in the Broads Plan but has provided an indication of schemes we are in support of, or where we have concerns regarding the potential impact on SSSI SAC/SPA and therefore need to be involved in its development. There may be schemes that we have not commented on at this stage which we may raise with you in the future if we have any concerns.</p> <p>We would ask if the Plan has considered the connections and implications between measures and their objectives in a holistic and strategic manner? For example, whether future maintenance activities, visitor numbers and recreation will support Diffuse Water Pollution Plans and its objectives?</p>	Comments noted. While the Plan is split into themes, we recognise the importance of assessing how all the objectives relate to and affect each other (and relevant plans and policies).	None.
Norfolk and Suffolk Boating Association	<p>NSBA's objectives include serving, protecting and promoting the interests of private users of pleasure craft of all kinds on the Broads. Its members look to NSBA as a competent and dependable interlocutor with the BA, the RYA and other large regulatory, governmental and NGO bodies. It aims to strengthen and reinforce its relationship with the Broads Authority (BA) and play a full and appropriate role in supporting the execution of the Partnership Strategy, 2022-27.</p> <p>The NSBA is an independent, voluntary, not-for-profit organisation. Its membership includes 49 affiliated clubs and organisations plus 857 personal members of whom two-thirds live in the NR and IP postcode</p>	Comments noted.	None.

Respondent	Comments	BA response	Edits to plan
	<p>areas. NSBA’s constituency represents the majority of those who pay Broads tolls to use private sailing boats, motor cruisers, and traditional and heritage vessels.</p> <p>NSBA publishes the annual NSBA Handbook for Navigating the Broads (the “Green Book”), which contains information for boaters and is an essential tool for coordinating the hundreds of races and other events taking place every year in the BA’s Executive Area. NSBA also convenes discussions and debates on matters that affect the navigation of the Broads.</p> <p>Certainly, the navigation of the Broads area is the top priority for NSBA. This is as it should be when our members, as BA toll-payers, provide 50% of the BA’s annual budget, underpinning the annual programme of dredging, water plant management, bank clearance and other necessities that keep the Broads navigable and accessible. NSBA is very concerned that the Broads navigation is, for a variety of reasons, in a slow decline.</p> <p>However, NSBA’s mission should not be narrowly interpreted. NSBA members also want to conserve and enhance the natural beauty, wildlife and cultural heritage that are integral to the balance of the Broads experience. To all private boat users, this is fundamental, and they want to see continuing improvements. They also appreciate the need to promote opportunities for enjoyment of the Broads by the wider public, and they want to see this being achieved equitably, sensitively and sustainably.</p> <p>The contemporary concept of “wellbeing” is one that NSBA members understand and value, indeed they have done so for over 125 years since the conversion of the navigation from commercial to recreational use began. It is worth remembering that many NSBA members have been boating through the generations and have an in-depth appreciation of the Broads, past, present and future.</p> <p>NSBA members want to navigate safely and experience the Broads with its full complement of landscapes. They have been loyal to this cause during many changes over the years, not least during the COVID pandemic. They will continue in this vein, with the expectation that the BA is not only safeguarding navigational access, natural diversity, environmental quality, and public understanding but that it is proactively accelerating improvements towards these goals in partnership with the NSBA and others.</p>		
Norwich Green Party	<p>Norwich Green Party commends the Broads Authority for having declared a climate emergency and for the high priority given to climate and biodiversity in its principles and strategies.</p> <p>(1) We support the Vision and Principles and would like to see more practical measures to bring about the aims. For climate and biodiversity aspirations to make a real difference, they need to both legally binding and smart – specific, measurable, achievable, relevant and time-bound.</p> <p>(2) The BA intention to make its operations carbon neutral by 2030 and zero carbon by 2040 are small slow steps in the right direction. The immediacy of climate change and species loss already underway mean that leading by example is simply not enough. To be effective in meeting its own aims, a planning authority must take its climate and biodiversity emergency planning measures into its entire sphere of influence, requiring the necessary actions to be taken in all developments and activities, not just those of the local authority.</p>	<p>Comments noted. Many of the issues you raise relate to planning policy, and will be highlighted in the Local Plan Issues and Options consultation.</p> <p>Working in and beyond our sphere of influence on carbon reduction is part of objective A3</p>	

Respondent	Comments	BA response	Edits to plan
	<p>Some positive measures are planned or underway, (Table 3, page 17). The area’s energy descent, water management and nature restoration need to be conducted in an urgent systematic way and cannot wait for good examples and best practices to be voluntarily and haphazardly normalised over decades.</p> <p>We note some positive impacts cited in the Sustainability Appraisal, but the majority are neutral and could be improved.</p> <p>Tourism and agriculture are recognised as vital to the economy. We would like to see ecotourism and regenerative agriculture encouraged through management policies and site allocations, with co-benefits for the economy, environment, and human well-being.</p> <p>The Plan could include seeking funding, sites and hubs for active travel, where train, cycling / E-bike hire connects destinations in the Broads to encourage people from their cars. This would reduce traffic and improve the experience of all road-users. E/V charging points could be made available where there is already shore power provision for boats, this will be a small part of the mix, in which active travel options should be the priority.</p> <p>While there may be limits to what a Local Plan can achieve, the need should be acknowledged and a strategy developed, particularly with regard to land use.</p> <p>Housing tenure also receives little attention but is vital to communities of people who work and live near the Broads, or who have strong local connections and aspire to do so, while house prices make the area unaffordable for many. The impact of second homes (and holiday lets) on local communities needs to be assessed in order to maximise any benefits and make manageable any downsides.</p>	<p>and other objectives in the Plan.</p> <p>More detailed sustainable travel measures will be a focus of the Sustainable Tourism Strategy being updated soon - this will also be subject to consultation.</p>	
Paul Mathews	<p>I live within The National Park and have worked within it since 1988. I strongly support the proposed Broads Plan but think it needs to be strengthened in some areas and be more proactive and comprehensible to most people to make sure it relates particularly to those most effected by it ie those who live and work within it.</p> <p>Areas proposed to be strengthened:-</p> <ol style="list-style-type: none"> 1. Local people. Economic resilience of existing communities and support for local businesses, initiatives particularly those based on sustainable principles including visitors and renewable energy. Community cooperatives should be supported. 2. Sustainable living. Housing particularly social/truly affordable - a strategy for managed retreat to /rebuilding in less flood risk areas for those with properties/ housing needs. Particularly small local schemes proportionate to local hamlets, needs and landscapes. This should be incentivised by enabling development. 3. Cooperative land schemes. A strategy supporting landowners, farmers and local businesses/groups to cooperate to gain funding for renewable energy projects, sustainable land management/produce growing/housing and tourism from sources such as ELMS and housing associations even if the schemes are small as these may be better related to landscape/ communities. 	<p>Some of these points will be addressed through implementing the Plan's strategic objectives.</p> <p>Some issues relate to spatial planning policy and the Local Plan for the Broads is also under review - see https://www.broads-authority.gov.uk/planning/planning-policies/development.</p> <p>The Plan covers complex subjects; we try to make it easy to understand, but will see where further edits may help!</p>	Simplify text where possible. CC comments to Planning.

Respondent	Comments	BA response	Edits to plan
	<p>4. Improvement strategy for existing housing/businesses to facilitate Czero objectives via levelling up funds or similar.</p> <p>5. Make all the Plan easy to understand - either rewrite in plain English or produce a 'Non-technical Statement' that is brief and targeted eg to:-</p> <ul style="list-style-type: none"> - local / prospective residents - local / prospective businesses - prospective developers - potential Park users - etc <p>I am aware there are already various BA initiatives but these could be made more deliverable/proactive. I have set this out briefly to make a series of points but would welcome questions/discussion on any of the points.</p>		
Rewilding Britain	<p>Rewilding Britain is the first and only country-wide organisation in Britain focusing on rewilding and the amazing benefits it can bring for people, nature and climate. At Rewilding Britain, we define rewilding as the large-scale restoration of ecosystems to the point where nature is allowed to take care of itself. Rewilding seeks to reinstate natural processes and, where appropriate, missing species – allowing them to shape the landscape and the habitats within.</p> <p>Rewilding encourages a balance between people and the rest of nature so that we thrive together. It can provide opportunities for communities to diversify and create nature-based economies; for living systems to provide the ecological functions on which we all depend; and for people to reconnect with wild nature.</p> <p>We know that there is strong support for rewilding across Britain. A recent YouGov poll commissioned by Rewilding Britain shows that 81% of Britons support rewilding and just 5% of people oppose it. This polling confirms rewilding is overwhelmingly popular with the British public and also shows that 83% of people support our national parks being made wilder, with areas in them set aside for rewilding.</p> <p>We can demonstrate that rewilding can play an essential role in tackling the extinction crisis and climate emergency and believe that creating wilder national parks is vital for addressing both. Our national parks comprise some of the most remote swathes of Britain and some of our most cherished landscapes. Yet whilst national parks have largely protected these landscapes from built development, they're not delivering for nature and biodiversity and could be much wilder.</p> <p>We feel that the UK government and devolved administrations pledges to protect 30% of Britain's land and sea for nature by 2030 are not credible without ensuring wilder national parks. In order to genuinely achieve nature's recovery across 30% of Britain by 2030 we need our national parks to lead the way by establishing:</p> <ul style="list-style-type: none"> ● Core rewilding areas across at least 10% by 2030 which focus on restoring and reinstating as wide a range of natural processes, habitats and missing species as possible to form mosaics of native forest, peatlands, heaths, species-rich grasslands and wetlands etc. There should be minimal or no human impact or extraction of resources. 	While the focus for most of the Broads is on retaining and enhancing the existing biodiversity, some sites have been identified as potentially benefiting from rewilding; we will add refs in text and strategic objectives	Theme B intro - Add text "Natural regeneration of wet woodland in suitable low-quality habitats could support and maximise nature's recovery." B3 - Add ref to core rewilding areas and nature-based economy

Respondent	Comments	BA response	Edits to plan
	<ul style="list-style-type: none"> ● Regenerative areas/nature recovery areas across at least 50% by 2030 which support a diverse range of land uses and enterprises, generating value for the local economy while allowing nature to flourish, e.g. continuous cover forestry, nature-based tourism, recreational fishing and high-nature value/wild meats. <p>In order to do so we need to modernise legislation to empower national parks to upscale efforts for nature’s recovery. So it is great for example that the UK Government's recent response to the Glover review confirmed support for including nature’s recovery as a statutory purpose of national parks.</p> <p>We welcome the UK Government’s commitment to provide funds for farmers to rewild and restore natural habitats under new Environmental Land Management schemes. These funds could be prioritised to enable increasing numbers of landowners to create rewilding areas within national parks.</p>		
River Waveney Trust	<p>The Waveney area makes up a small percentage of the Broads, but my comments are not restricted to this geographical area.</p> <p>(1) My first comment is that to achieve true joined up and effective flood risk management alongside management for biodiversity and water quality then the different authorities and organisations need to work together more effectively.</p> <p>I give the following example: Recently we have been working on a project to leave trees in the River Waveney when they fall for biodiversity and WQ, but ensuring we clear a pathway for canoe access. This is done in partnership with the EA to ensure that the location is suitable due to flood risk management. A really important part of this project was to work with the EA so they could change their strong wording on removing trees from rivers. The LAs have similar wording relating to obstructions in rivers and liability. I strongly believe until this changes and the different partners work together to present a true united message then it will be very hard to put into practice measures such as NFM and river restoration projects. I would ideally like to see this reflected in the plan. A desire to communicate a coherent and joined up message to riparian owners that reflects the current science on river and catchment management to prevent (and mitigate for and accept) flooding. It would be good to see somewhere in the plan an acceptance of wood in rivers and a commitment to retain it where possible for its many benefits. It would also be good to see the words ‘river restoration’ somewhere in Theme B.</p> <p>(2) My second small comment is that the River Waveney Trust (RWT) is not in the list of possible partners for relevant key actions, eg B3.</p> <p>(3) My third comment is that I would like to see an access agreement officially granted for the stretch of river from the Locks Inn, Geldeston, to Ellingham. I am sure this comes under C2, but want to ensure it is on your radar.</p>	Comments noted. We agree on the benefits of strong partnership working and appreciate your example.	
Suffolk County Council	<p>SCC has four main objectives informing this response which are:</p> <ul style="list-style-type: none"> • Promoting and supporting the health and wellbeing of Suffolk people • Strengthening our local economy 	Comments noted.	None.

Respondent	Comments	BA response	Edits to plan
	<ul style="list-style-type: none"> • Protecting and enhancing our environment • Providing value for money <p>Reference to the local plan review within the document is noted and it is appropriate that planning is included amongst the delivery links for the strategic objectives and key actions. Where relevant to its responsibilities, SCC will continue to support the Broads Authority in making its Local Plan.</p>		
Thorpe St Andrew Town Council	<p>The Town Council welcomes the opportunity to comment as consultee on the Draft Broads Plan 2022-2027. Having reviewed the document, the Council welcomes many of the projects outlined within each of the strategic objective categories.</p> <p>The Council has some concerns that although the document uses phrases such as ‘connecting and inspiring communities’ and references the more than 90 parishes partly within the executive area, there is no mention of how partnership working with these parishes will be improved. There is a national drive to devolve powers to the first tier of local government, which will give communities substantial new powers. Against this backdrop, it was felt that the plan should give a vision for what tangible and measurable ways the Broads Authority will seek to partner these communities and improve the relationship it has with Councils in the area. The Broads Authority response to the Glover Review was not well received by local Councils who felt it was used to diminish the role of elected representatives serving on the Broads Authority, thereby reducing accountability. The lack of detail on how these relationships will be rebuilt is disappointing given the strategic objectives would seem to make this a priority. It is felt this lack of detail relating to the democratic elements of partnerships shows a lack of awareness and/or care for those relationships.</p>	<p>The BA awaits Defra’s decisions on the issues raised in the Landscapes Review, and has been working with the Town Council on issues of concern.</p> <p>We send regular briefings to all parish councils with part of their area in the Broads, and officers will engage with individual parish councils on specific issues of concern.</p>	
Water Management Alliance	Having reviewed the draft plan, from a planning and regulation standpoint we would only like to request that we are contacted for comment as part of any future SFRA proposal or update consultation.	Comments noted.	None.
Appendices			
East Suffolk Council	The reference to the Council providing the planning service (second paragraph in the right hand column) should be reworded to clarify that the Broads Authority is the planning authority for the Broads, but that the Councils provide the planning service for the rest of the Council area.	Noted.	Appx A entry amended.
Norfolk and Suffolk Boating Association	NSBA sees itself as a partner with the BA, helping to achieve shared, often challenging, objectives. For this reason, perhaps we might also be listed in Appendix A.	While the list of partners is not exhaustive, we are happy to add the NSBA	NSBA added to Appendix A list
HRA of draft Broads Plan			
East Suffolk Council	We welcome reference to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) of which East Suffolk is a partner, and the recognition of the Benacre and Easton Bavants SPA throughout the HRA.	Comments noted.	Send comments to HRA consultant.

Respondent	Comments	BA response	Edits to plan
	<p>Para 6.5.5. Where this paragraph refers to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy, it should be clarified that the strategy does not consider the whole of Suffolk, only the authority areas listed at the start of the paragraph.</p> <p>Para 11.3.2. Same comment as against para 6.5.5. Reference to Suffolk RAMS should be amended to reflect the fact the RAMS only applies to East Suffolk Council, Ipswich Borough Council, Babergh District Council and Mid Suffolk District Council.</p> <p>Para 11.4.4. and box 4, p74: Amend reference to ‘Suffolk RAMS’ to ‘Suffolk Coast RAMS’</p> <p>Page A10: Replace references to East Suffolk District with East Suffolk Council. The correct title of the relevant East Suffolk Local Plan is ‘East Suffolk Council - Waveney Local Plan’</p>		
<p>Natural Environment Team, Norfolk County Council</p>	<p>Reference to GIRAMS is welcomed, however consideration should be given (in Local Development, 2nd para) to including specific reference to the recently published Norfolk GIRAMS and providing a broad indication as to how the Broads Authority intends to formally adopt this document and implement its recommendations.</p> <p>Details set out in the supporting Sustainability Appraisal and Habitats Regulations Assessment appear acceptable, noting that reference to both Nutrient Neutrality and GIRAMS have been incorporated into the Broads Plan, as indicated in Box 4 (Overview of Recommendations) of the HRA.</p> <p>Subject to timescales, it may also be appropriate to include a more detailed update in relation to nutrient neutrality in the Broads Plan (prior to its planned adoption in autumn 2022), with a NN Strategy currently being developed by consultants on behalf of all the Norfolk local authorities.</p>	<p>Updates on how the BA is dealing with GIRAMS and nutrient neutrality requirements are posted on our website at www.broads-authority.gov.uk/planning/planning-permission. These issues will be addressed in the Local Plan Issues & Options consultation.</p>	<p>Intro, section on 'Local development' - add text and footnotes</p>
<p>SA of draft Broads Plan</p>			
<p>East Suffolk Council</p>	<p>It is noted that the Sustainability Appraisal of the Draft Broads Plan does not cover the consideration of reasonable alternatives. Whilst we recognise that use of the Sustainability Appraisal process framework has been a useful exercise to assess the strategic objectives against sustainability objectives, it is not clear why reasonable alternatives have not been considered and assessed.</p> <p>Paragraph 2.2 of the Sustainability Appraisal would benefit from further explanation on this point. It would also be beneficial to clarify here that any forthcoming Broads Local Plan will assess reasonable alternatives, in accordance with the requirements of the Planning and Compulsory Purchase Act 2004, which makes Sustainability Appraisal a mandatory process for the production of sound Local Plan documents (in England).</p>	<p>Reasonable alternatives are limited given the Plan’s high-level strategic nature and expectation to conform with the BA’s statutory purposes and other environmental protection legislation. However, we assess the objectives against the sustainability objectives in the SA Framework. We will clarify the Local Plan SA requirement.</p>	<p>2.2. – edit text re SA scoping and requirements for Local Plan under Planning and Compulsory Purchase Act 2004.</p>
<p>Environment Agency</p>	<p>Within the accompanying Sustainability Appraisal, it states: “As part of the BFI the Environment Agency is reviewing and updating the hydraulic modelling for fluvial, tidal and coastal flooding relevant to the Broads area. This work is underway, but due to the size of the project it is not due to be completed for some time (around the end of 2023). As well as informing the BFI this modelling will update our understanding of flood</p>	<p>Comments noted.</p>	<p>Modelling delivery date amended.</p>

Respondent	Comments	BA response	Edits to plan
	<p>risk to communities in the Broads and help us identify locations where flood risk management could be improved.”</p> <p>The current estimated delivery for the Broadland hydraulic modelling is now spring 2024. This completion date is a guide. Due to the complexity and scale of the modelling this date may change. We can only supply the modelling and its outputs to inform the Local Plan and SFRA when it is fully finalised and signed off by the Environment Agency. We welcome the opportunity to assist you in updating the SFRA and will continue to keep you updated on the progress of the modelling via the Broadland Future Initiatives project team.</p>		
Historic England	<p>We have carefully reviewed the Sustainability Report which we understand will also be used to test the Broads Local Plan review, and we are satisfied that the methodology within it allows a full and proper consideration of any impact to the historic environment.</p> <p>Historic England strongly advises that the conservation and archaeological team of your authority are closely involved throughout the preparation of the SA of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER; how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.</p> <p>As a statutory body tasked with conservation of the historic environment we must stress that this opinion is based on the information provided by you in the document dated May 2022 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA, have adverse effects on the environment.</p>	Comments noted. We welcome Historic England's ongoing input on matters relating to the local historic environment.	None.
Norfolk Geodiversity Partnership	<p>Appendix 2 SA Framework/Table 4: "Reason for SO - One of the statutory purposes of the Broads Authority is to conserve and enhance the natural beauty and wildlife of the Broads... Soils in the Broads contain and continue to store large amounts of carbon and archaeological remains." Suggested addition: "There are geological features which provide evidence for the area's unique environmental history." As it stands, the text does not explain the contribution of geodiversity among the reasons for SO.</p> <p>Appendix 2 Sustainability Baseline/Page 32/A2.1: "The Broads contains a mosaic of habitats... as well as 8 National Nature Reserves, one Local Nature Reserve". Suggested addition: "and 29 candidate County Geodiversity Sites."</p> <p>Needs information from the Norfolk Geodiversity Audit about sites of geological interest. NB, County Geodiversity Sites have the same status in planning as County Wildlife Sites.</p>	Comments noted.	Add suggested text to SA Appx 2

Respondent	Comments	BA response	Edits to plan



Broads Plan *(Revised draft Plan – 23 Sept 2022)*

Partnership strategy for the Norfolk and Suffolk Broads 2022-27

Broads Authority
Yare House
62-64 Thorpe Road
Norwich NR1 1RY

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1. Introduction

1.1. About the Broads

Status

The Norfolk and Suffolk Broads ('the Broads') is a special member of the UK family of 15 National Parks¹. These protected landscapes are known collectively as 'Britain's Breathing Spaces' – echoing the words of the late Norfolk naturalist Ted Ellis, who called the Broads a "breathing space for the cure of souls".

The Broads has an equivalent status to a National Park under the National Parks and Access to the Countryside Act 1949, and the Broads Authority shares the same two purposes as the English, Welsh and Scottish National Parks. It also has a unique third purpose relating to the interests of navigation, and as such is defined under its own Act of Parliament known as the Broads Act².

In 2015, the Broads Authority agreed to brand the area as the 'Broads National Park' to promote more clearly its credentials and special qualities. The Authority's three purposes (*section 1.2*) remain unchanged.

Special qualities

Over the years, the Authority has asked people to identify the special qualities or features of the Broads they value most. Common responses include:

- The winding rivers and open water bodies – the 'broads'
- The variety of habitats
- The abundance and rich diversity of wildlife
- Navigable, lock-free, waterways to explore and enjoy
- The variety of patterns and textures in the landscape
- Countryside access to both land and water
- 'Big sky' views, dark skies and a sense of remoteness, tranquillity and wildness
- The people, the visitors, the activities
- The history and historic environment: Earth heritage, heritage assets, archaeology
- Boating, boatbuilding and heritage fleets
- Cultural assets, skills and traditions such as ~~boat building~~thatching and millwrighting
- People's interactions with the landscape
- Waterside settlements and quiet villages

Profile and history

"On the evidence now available, they (the broads) are, beyond reasonable doubt, the flooded sites of former great peat pits, made in the natural fenland in medieval times".³

The Broads is a distinctive and globally important wetland landscape and an important inland waterway. Home to around 6,500 people⁴, the Broads executive area (*Map 1, Appendix C*) covers

¹ [National Parks UK // British National Parks](#)

² [Norfolk and Suffolk Broads Act 1988](#)

³ JM Lambert, JN Jennings and CT Smith in 'The Broads', EA Ellis, 1965

⁴ Mid-2020 census (experimental statistics)

around 303km in Norfolk and North Suffolk between the city of Norwich to the west and the coastal resorts of Great Yarmouth and Lowestoft to the east, with a short coastal strip at Winterton and a tidal estuary at Breydon Water. Its boundaries are drawn tightly around the floodplains and lower reaches of three main rivers – the Bure, Yare and Waveney – and their tributaries, the Thurne, Ant, Wensum and Chet. The Broads is the basin at the bottom end of the much larger Broadland Rivers Catchment (*Maps 2 and 3, Appendix C*), with water flowing through it and out into the North Sea.

Water, not surprisingly, is the vital element linking everything in the Broads. The low-lying, mainly open and undeveloped landscape is a rich mosaic of interconnected habitats including rivers, shallow lakes ('broads'), fen, reed bed, drained marshland, wet woodland, saltmarsh, intertidal mudflats and sand dunes. Each habitat has its own special characteristics and is home to a wealth of species, many rare and some unique to the Broads within the UK.

The importance of the area is borne out by a range of international, national and local designations in recognition of its landscape, nature conservation and cultural features. These features have been shaped and nurtured over centuries by the way peat diggers, traders and merchants, reed and sedge cutters, thatchers, farmers and fishermen have lived and worked. The story of the Broads began in the Middle Ages. By the 12th century, much of east Norfolk had been cleared of its woodland for fuel and building materials. Over the next 350 years, peat digging (or turf cutting) was a major industry. As sea levels rose, the diggings were eventually abandoned and left to flood, creating the shallow stretches of water known as 'broads'.

There are now around 63 broads, varying in size from tiny, isolated lakes to large expanses of open water. The connected broads and rivers were once part of an extensive network for communication and commerce, transporting goods such as fuel, building materials (including reed) and livestock and their products, especially wool. Villages and settlements commonly grew up around a parish staithe (landing stage), riverside common, ferry or bridge, making the most of the water environment.

The advent of the railways in the mid-19th century and motor vehicles in the 20th century brought most river-borne commerce to an end. In its place, the Broads waterways became increasingly popular for recreation, particularly boating ~~holidays~~, with more than 200km of navigable, lock-free rivers and open water bodies to be explored and enjoyed. Today, around eight million people a year visit the area, supporting thousands of jobs and having an impact of around £660m on the local economy⁵. Tourism, recreational boating and the marine industry, and farming and land management all continue to play an important role in maintaining and enhancing this unique, much loved landscape.

Challenges ahead

The Earth's natural resources - water, air, soil, geology and all living things - provide us with a huge range of benefits: goods such as food, fresh water and energy; services such as clean air regulation and carbon storage; and many cultural values from health and wellbeing to jobs, community development and a sense of place. These public benefits are supported by other natural functions

⁵ STEAM data 2019, Broads including influence area ~~—see monitoring data, Appendix C~~

such as photosynthesis, soil formation, vegetation growth and water cycling, underpinned by biodiversity.

The UK [Environment Act](#) became law in November 2021 to address environmental protection and the delivery of the [25-year Environment Plan](#) following Brexit. The Plan sets out the Government's goals for nature recovery including clean air, clean and plentiful water, thriving plants and wildlife, a reduced risk of harm from environmental hazards such as flooding and drought, using resources from nature more sustainably and efficiently, and enhanced beauty, heritage and engagement with the natural environment. The Plan also sets goals to manage environmental pressures by mitigating and adapting to climate change, minimising waste, managing exposure to chemicals and enhancing biosecurity. It emphasises the need to get better at including environmental and social costs, benefits and trade-offs in policy, investment and planning decisions.

The [Landscapes Review \(2019\)](#) highlights that national protected landscapes like the Broads are fragile, that nature in them is in crisis as elsewhere, that communities are changing and that many people do not know about these places. The report emphasises that the way we protect and improve these landscapes needs urgent and radical change ~~“needs to change radically...”~~ “if their natural beauty is to be in a better condition 70 years from today, even better to look at, far more biodiverse, and alive with people from all backgrounds and parts of the country”.

During this Broads Plan period, the biggest challenge for our easterly, low-lying wetland landscape is adapting to climate change and sea level rise, especially in terms of managing water. Other significant issues are the state of the UK economy and the cost of living crisis; the rollout of post-Brexit legislation, particularly for [agricultural transition](#) and the management of farmland, habitats and species; the growth in demand for housing and infrastructure in the East of England; and the potential ongoing impacts of the Covid-19 pandemic on our local communities, tourism and other businesses and recreational trends.

The Broads is like a vast mosaic; lose one fragment and its overall integrity is flawed. This means that rather than focusing on single or favourable interests (such as food production, flood protection or economic benefit) possibly at the expense of others, we must manage this precious ecosystem as a dynamic, complex and interdependent whole.

We ~~cannot~~ predict exactly what the Broads will look like in 50 to 100 years' time, but we must accept that it is likely to change. By improving our knowledge and acting now, we can help to make sure it will always remain a special and distinctive place, richer in biodiversity and enjoyed by all.

1.2. Broads Authority

The Broads Authority is a statutory body with very similar responsibilities to those of the English, Welsh and Scottish National Park Authorities. The Authority was established under the [Norfolk and Suffolk Broads Act 1988](#). Further provisions for the management of the navigation area were made through the [Broads Authority Act 2009](#). It is the local planning authority, and a harbour and navigation authority. The distinctive shape of the Broads executive area (*Map 1*) comes from its boundary being drawn tightly around the flood plains and lower reaches of the main rivers (Bure, Yare and Waveney) and their tributaries (Thurne, Ant, Wensum and Chet).

The Authority has a duty to manage the Broads for the following three purposes:

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

In practice, how much weight is given by the Authority to any of these purposes will depend upon the particular circumstances under consideration. In its commitment to integrated management, the Authority and its Broads Plan partners always look for potential win-win solutions, rather than setting the different purposes at odds with each other.

In managing the area, the Authority must also have regard to:

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

The Authority also has the duty to maintain the navigation area for the purposes of navigation to such standard as appears to it to be reasonably required, and take such steps to improve and develop it as it thinks fit. It may carry out works, and do other things in relation to any adjacent waters in or over which it has sufficient rights or interest, for the improvement of navigation on those waters.

1.3. Broads Plan

Working in partnership

The Broads Plan is the single most important strategy for the Broads National Park, setting out a long-term vision and strategic objectives to benefit its landscape, environment, local communities and visitors. As a high-level overarching plan, it draws together and guides a wide range of plans, programmes and policies relevant to the area. The Broads Plan is reviewed and updated on a regular basis, and this Plan covers the period 2022 to 2027.

While the Broads Authority is responsible for producing the Broads Plan, its success depends on strong partnership working to make the best use of shared knowledge, effort and resources. Key delivery partners are highlighted in Section 3 and in Appendix A.

Funding and resources

As the body responsible for managing the Broads, the Broads Authority receives a Government funded National Park Grant (NPG), which was £3.4m in 2021/22, and navigation income funded by boat toll payers (£3.4m in 2020/21).

In the three years to 2022 this income has come under pressure from rising costs, the impacts of Covid-19 and a static NPG (and in real terms, the Authority's 2021/22 NPG is a reduction of 42% compared with its 2010/11 grant). In terms of navigation income, a comparison of boat toll data in 2017 (when the last Broads Plan was adopted) and 2021 shows the number of private boats remaining fairly steady; however, despite continuing investment in new boats, there has been a decrease in the hire boat fleet and more losses are predicted⁶. Future navigation income is uncertain, due largely to the ongoing effects of the UK economy and Covid-19 on boat ownership and on the domestic holiday market.

The [Landscapes Review](#) says the Government's approach to funding national protected landscapes like the Broads is not as diverse and sustainable as it should be. The Government's response⁷ is that there is limited scope to increase the core grant by the scale suggested, or to provide funding settlements that extend beyond a spending review period. However, it supports the recommendation for protected landscapes to source more investment from private and blended financing models for nature recovery and nature-based solutions, and to pursue commercial and sponsorship opportunities provided by each landscape's unique brand identity.

Along with its Broads Plan partners, the Broads Authority works hard to increase its financial resources (most significantly in recent years from EU grants and the National Heritage Lottery Fund). The Authority is a member of the [National Parks Partnerships](#), which supports closer links between businesses and protected landscapes for commercial and practical benefits, while other initiatives such as '[Love the Broads](#)' help to fund local community projects. Resources are about people too, and the dedicated volunteers who give their time and practical support to many organisations in the Broads are an invaluable asset.

As a high-level strategy, the Broads Plan does not contain detailed costings; this information will be within the [lower level](#) business plans and operational work programmes delivering the Broads Plan's strategic objectives.

Assessing the plan's impacts (SA and HRA)

The Broads Plan review is subject to [Sustainability Appraisal](#) (SA) to assess any significant environmental, economic and social impacts of implementing the updated plan. The outcome of the SA on the Broads Plan 2022-27 was that most of its strategic objectives (Section 3) show either a positive or neutral impact on the Sustainability Objectives in the Sustainability Appraisal

⁶ Private boats: 10,646 in Nov 2017 and 11,179 in Nov 2021; Hire boats: 1158 in Nov 2017 and 1118 in Nov 2021; a fall of c.40 hire boats in 2022 is predicted. [Check latest figures in final version of plan and add online link](#)

⁷ [Landscapes review \(National Parks and AONBs\): government response - GOV.UK \(www.gov.uk\)](#)

framework. A small number show uncertain impacts, depending on the implementation of the objective, and none show a negative impact.

A [Habitats Regulations Assessment](#) (HRA) was also carried out to assess the impacts of this Broads Plan on local sites protected by the Habitats Regulations, including [Ramsar Sites](#), Special Areas of Conservation and Special Protection Areas. The HRA concluded that the Plan would have no adverse impact on site integrity at any Habitats Site, either alone or in-combination.

It is important to note that plans, programmes and works to implement the strategic objectives in the Broads Plan will need to be undertaken in a manner that is sensitive to the environment. Works will also need to comply with relevant permits and controls to ensure environmental protection on Habitats Sites. Where relevant such plans, programmes and works will be subject to SA and HRA⁸.

Monitoring and reporting

Monitoring indicators are shown against specific objectives in Tables 3-8 (Section C). We also use a 'State of the Broads' dataset to help assess change over time. This is usually updated as part of the Broads Plan review, but we are awaiting the publication of new national indicators for protected landscapes in delivering on the Government's goals for nature recovery and for climate mitigation and adaptation. When we have this information, we will publish the updated 'State of the Broads' dataset on our website.

[At the time of adopting this Plan, the Authority is working with key delivery partners to improve how we monitor and report on progress. We will post information on our website at Strategy \(broads-authority.gov.uk\).](#)

Local Plan for the Broads

As the local planning authority, the Broads Authority is responsible for setting spatial planning policies for the Broads executive area. The [Local Plan for the Broads](#) supports the strategic ~~direction-aims~~ of the Broads Plan, ~~with-through~~ policies that are used in determining planning applications, and ~~providing~~ guidance on development and land use. The ~~current~~ next Local Plan ~~(adopted in 2019) is under review, with an expected adoption date of~~ is due to be adopted in 2024. A number of town and parish councils partly within the Broads executive area have adopted, or are developing, Neighbourhood Plans.

The special qualities and features of the Broads are also influenced by development in adjoining areas, particularly given its narrow executive boundary and low-lying, open landscape. Under the [Localism Act](#) the Authority and its neighbouring planning authorities, county councils and public bodies have a 'duty to cooperate' to make the most of cross-boundary strategic planning matters such as housing, transport, open space and demands on water and other resources.

⁸ [The same SA scoping exercise was used for this Broads Plan and the emerging Local Plan for the Broads. The Local Plan SA will assess reasonable alternatives in accordance with the Planning and Compulsory Purchase Act 2004.](#)

2. Vision and principles

2.1. Long-term vision

The Vision for the Broads National Park (Table 1) is based on Defra’s [vision for protected landscapes: ‘A coherent national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy. Protected landscapes will support thriving local communities and economies, improve our public health and wellbeing, drive forward nature recovery, and build our resilience to climate change.’](#)⁹ Our vision has [2010 Vision for the English Natural Parks and the Broads](#), with a timeframe in line with the [25-year Environment Plan](#).

Table 1

Vision for the Broads National Park to 2042

Our vision for the Broads National Park is that:

Biodiversity is at the heart of nature recovery. Our natural environment and the beneficial goods, services and cultural values it provides from food and energy to landscape character and recreation are in good condition, used fairly and sustainably, and valued by society. In particular, the precious nature of plentiful, clean, fresh water as a fundamental resource is understood and respected by all.

We are meeting the challenges of climate change and sea level rise, and the carbon reduction targets of ‘net zero’ by 2040, with well-maintained soils that retain and increase stored carbon.

Wildlife is flourishing and habitats are maintained, restored [and](#), expanded ~~and linked~~ [effectively to other ecological networks](#). Land and water are managed in an integrated way, with local and landscape-scale management that creates resilience and space for nature and agriculture, enabling us to adapt to changing environmental, economic and social needs. [The area’s environmental history is better appreciated through understanding its sediments, rocks and landforms](#).

The past and present importance of the waterways for navigation, biodiversity and recreation is recognised and cherished, and the asset is protected, maintained and enhanced.

This living, working, ‘big skies’ landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances enjoy it as a place [to live and work, as a place](#) of escape, adventure, ~~work~~, learning and tranquillity, and as a source of national pride and identity. Local communities are active in decisions about their future and sustainable living is seen in action. There is a buoyant rural economy and a viable, well-used public transport network, and local housing need is being met.

The Broads National Park is forever recognised as fundamental to our prosperity and our mental and physical health and wellbeing, and is forever treasured as a unique and special place that provides a breathing space for the cure of souls.

⁹ [Landscapes Review \(National Parks and AONBs\): Government response - GOV.UK \(www.gov.uk\)](#)

2.2. Fundamental principles

In implementing and reviewing the Broads Plan, we support the five environmental principles set out under Section 17(5) of the Environment Act 2021:

- The **integration principle** states that policy-makers should look for opportunities to embed environmental protection in other fields of policy that have impacts on the environment;
- The **prevention principle** means that government policy should aim to prevent environmental harm;
- The **rectification at source principle** means that any environmental damage should, as a priority, be addressed at its origin to avoid the need to remedy its effects later;
- The **polluter pays principle** makes clear that those who cause environmental damage should be responsible for mitigation or compensation; and
- The **precautionary principle** states that where there are threats of serious or irreversible environmental damage, a lack of scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

We also support the following principles:

- To plan and work in partnership to make the best use of shared knowledge and resources, and to avoid duplication of effort;
- To involve people from an early stage, and throughout, in decisions that may interest or affect them; and
- To support decisions with robust evidence, including scientific and local knowledge, innovation and best practice.

We use three fundamental principles to help guide the development and implementation of the Broads Plan. The first is based on the definition of the Precautionary Approach in the Rio Declaration on Environment and Development, 1992. The second recognises the need for integrated, long term management, and the third underlines the importance of informed, partnership working.

Principle 1: Where there are likely threats of serious or irreversible damage to the environment, as a precaution, cost-effective measures are taken to prevent environmental degradation in the absence of full scientific certainty of the outcome of such threats.

Such precautionary action is based on assessment of the costs and benefits of action, taking into account both the proportionality between the costs and benefits and the degree of certainty in their calculation, and transparency in decision-making. Gaps in knowledge are addressed by research and, where feasible, precautionary measures taken while such knowledge is outstanding.

Principle 2: We seek to understand and respect the complexity and biological limits of our ecosystems, and conserve their structures to maintain their health and productivity. Management is at a local scale, while recognizing the direct or indirect effects on wider,

interconnected ecosystems and the public goods and services they provide. We manage for long-term, multiple benefits, not just for short-term or single interest gains.

Principle 3: We plan and work in partnership to make the best use of shared knowledge and resources and to avoid duplication of effort. People are involved from an early stage, and throughout, in decisions that may interest or affect them. Decisions are supported with robust evidence, including scientific and local knowledge, innovation and best practice.

3. Our strategic objectives

This section sets out our strategic objectives for 2022-27, under six key themes. It is not a list of all work carried out in the Broads, including many routine operations, and further actions are likely to be developed through the plan period. While we aim to deliver an ambitious plan, the Broads Authority and its partners have finite resources, and will need to set clear priorities for action.

Appendices A and B give details about partners and abbreviations used in this section.

Table 2

Summary of strategic objectives 2022-27

Theme A: Responding to climate change and flood risk

- A1.** Prepare a long-term integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area
- A2.** Work towards making all Broads Authority operations carbon neutral by 2030 and carbon zero by 2040
- A3.** Agree carbon reduction targets for the Broads National Park and promote action to reduce emissions

Theme B: Improving landscapes for biodiversity and agriculture

- B1.** Restore, maintain and enhance [rivers and broads lakes](#) and use monitoring evidence to trial and implement further innovative ~~lake~~-restoration techniques
- B2.** Promote best practice water capture and usage across the Broadland rivers catchment and reduce point and diffuse pollution into the floodplain and water courses
- B3.** [Seek biodiversity net gain and Maintain, enhance, adapt and increase](#) areas of [priority](#) fen, reed bed, grazing marsh and wet woodland, [to protecting](#) peatlands ~~ecosystems~~ as carbon sinks ~~and seeking environmental biodiversity net gain~~
- B4.** Define, implement and monitor management regimes for priority species and invasive non-native species
- B5.** Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to the National Biodiversity Network

Theme C: Maintaining and enhancing the navigation

- 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 and 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

Theme D: Protecting landscape character and the historic environment

- D1.** Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including 'at risk' assets
- D2.** Maintain an up-to-date Broads Landscape Character Assessment ~~and use to inform conservation action plans~~
- D3.** Maintain up-to-date Conservation Area designations, appraisals and management proposals
- D4.** Reduce the impacts on the Broads of visual intrusion and noise and light pollution, and promote Dark Sky Discovery Sites

Theme E: Promoting understanding and enjoyment

- E1.** Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities
- E2.** Offer a coordinated and year-round programme of visitor activities that promote a 'Broads' experience', taking measures to prevent any adverse environmental impacts
- E3.** Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities of the Broads National Park, and 'point of need' information for visitors
- E4.** Strengthen the quality and distinctiveness of the local tourism offer, including careers and skills training

Theme F: Connecting and inspiring communities

- F1.** Increase and promote accessible and 'taster' activities that foster physical and mental health and wellbeing for all, including under-represented groups
- F2.** Offer varied, flexible and sustainable volunteering opportunities and skills training to suit diverse audiences
- F3.** Provide and expand schools-based and outreach environmental education opportunities for young people, using the Broads as a learning resource
- F4.** Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits
- F5.** Increase income generation to support Broads-themed projects

Theme A: Responding to climate change and flood risk

Introduction

Sea level rise, [coastal change](#) and the predicted more rapid changes to the climate, [including more frequent flooding](#), pose enormous challenges to the special qualities of this easterly, low-lying wetland. [Responding to these challenges is central to all themes in this Broads Plan.](#) It is clear that we need to act now, both to mitigate the scale of change - such as reducing our carbon emissions - and to adapt to the changes that are inevitable. We are likely to see key impacts for the distribution of habitats and species, visual landscape character, demands for water resources, and agricultural patterns and production.

The [Protected and Conserved Areas Joint Statement on Climate Change and Biodiversity Crises statement¹⁰](#), which was signed by National Parks UK among others, highlights that the global family of protected and conserved areas are well placed to take rapid and far-reaching action to tackle climate change and biodiversity loss. They are also areas where billions of people connect with nature and can become inspired to play an active part in combatting these dual crises.

Adaptation and mitigation decisions need to be informed by strong evidence and widespread debate with all interests to determine what is desirable and possible, and what will make us more resilient to change. The Broads Authority is working with multiple [stakeholders agencies and local communities](#) to better understand the impacts of climate change and sea level rise on the Broads and surrounding areas, and to develop the best management options for the longer term. In doing so, we are considering how the options may affect our local communities, businesses and visitors as well as our natural ecosystems and the services they provide such as thriving wildlife, fresh water, food, carbon capture, recreation and employment.

Managing flood risk

Water is obviously a dominant feature in the Broads, and its interconnecting characteristics present continual challenges in dealing with changes in quality, availability and levels. This section looks at flood risk management; other issues related to water quantity and quality are addressed in Theme B.

Flooding is a natural and sometimes beneficial process within a floodplain like the Broads, and the control of water has been a major influence on the form of this landscape for hundreds of years. In living with our water environment, we have to accept the associated risks and, where necessary, be adaptive to change. Flood risks include damage to property, infrastructure, habitats and farmland, causing distress to people and wildlife. Around 85% of the Broads executive area is at some risk of flooding, including thousands of properties and around 25,000 hectares of farmland and mainly freshwater habitats. Higher sea levels along the north-east Norfolk and north Suffolk coast bring an increased risk of sea defences being overtopped or breached. This can also hold back water trying to drain from the rivers,

¹⁰ Statement presented to the UN Framework Convention on Climate Change (COP26) and the Convention on Biological Diversity (COP15) in November 2021

causing flooding to natural and built capital. A combination of particular weather conditions and high tides causing a surge in the North Sea can also push salt water higher up the system, damaging the area's freshwater biodiversity and agriculture.

The main types of flooding we face in the Broads are tidal and coastal, river (fluvial) and flooding from ordinary watercourses, surface water and groundwater. Multiple agencies called Risk Management Authorities are involved in managing flood risk, including the Environment Agency (which has a strategic overview of all sources of flooding and coastal change), Norfolk and Suffolk County Councils (as the Lead Local Flood Authorities for their respective areas), District and Borough Councils, Internal Drainage Boards and Highways Authorities.

The Broads executive area includes a short stretch of coastline between Winterton and Sea Palling, and coastal erosion can affect the area. The Broads Authority has signed up to the Norfolk and Suffolk Coastal Authorities Statement of Common Ground on Coastal Zone Planning, which has an agreed approach to make sure that land and marine planning regimes are integrated. In the current Shoreline Management Plan, the Broads' coastline is subject to a 'hold the line' policy in the short to medium term (up to 2055), and a conditional 'hold the line' policy for the longer term (2055-2105). Without this policy approach, sand dunes and associated coastline habitats and species, as well as buildings and infrastructure, could be further affected by coastal change.

Strategic flood and coastal risk management in and around the Broads used to incorporate three separate major flood defence systems: The Broads (tidal and fluvial); Eccles to Winterton (coastal); and Great Yarmouth (tidal). The [Broadland Futures Initiative](#) (BFI) is a multi-agency partnership set up to integrate flood risk management for the whole area and produce a strategy covering the next 100 years. Work is underway to secure support ~~and~~ publish evidence, ~~and the BFI will and be engaging engage~~ with ~~local communities and other~~ widely with stakeholders to identify the way forward, including conversations with local communities about flood risk adaptation. The Environment Agency has the lead technical responsibility and is working with the Risk Management Authorities and others, and the Broads Authority is leading on governance and communications activities.

The Broads Authority's ambition to retain the area's predominantly freshwater conditions for as long as practicable is being assessed as part of the BFI approach. It will be linked to climate change scenarios, and a shared vision that takes account of environmental, technical, socio-economic and political considerations, with planned action to help us prepare for long-term resilience and adaptation in the Broads.

Reducing our carbon emissions

Reducing carbon emissions across the Broads is a priority. In 2019 the Broads Authority adopted a [climate emergency statement](#) pledging to work towards making its operations carbon neutral by 2030 and reducing all carbon emissions to zero by 2040¹¹. It also aims to work with local communities to set a carbon reduction target and measures for the Broads National Park. A carbon footprint [GHG-greenhouse gases \(GHG\)](#) emissions assessment of the Broads was produced in 2022.

More widely across protected landscapes, National Parks UK hopes to become a hub for the '[Count Us In](#)' initiative, which sets 16 steps to reduce carbon emissions based on three criteria: Impact on personal carbon pollution, power to influence leaders, and ability to involve everyone. Locally, the Broads Authority has the potential to influence its own staff and volunteers as well as 6,500 residents, millions of visitors and numerous partner organisations and local businesses.

Long-term aim

The Broads National Park and its communities are responding to the challenges of climate change and sea level rise, and the Broads Authority is on track to meet its carbon reduction target of zero emissions by 2040. Adaptive approaches and resilience standards are informed by robust evidence and wide debate on the most appropriate management options. Our decisions define the scale and expenditure of human intervention needed to protect important assets to changing regimes, and identify the actions and resources needed to implement agreed interventions. Importantly, while the Broads continues to evolve, it remains a unique and special area that retains its rich biodiversity and heritage importance and offers extensive recreation, health and wellbeing, employment and other socio-economic opportunities.

Table 3

Theme A: Strategic objectives and key actions

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
A1	Prepare a long-term integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal	<ul style="list-style-type: none"> Commission, carry out and publish updated and more extensive flood risk research and modelling (incl. saline incursion, risk and impact assessments of natural floodplain restoration); identify and appraise potential management actions to form adaptive strategy; engage with stakeholders [EA, BFI partners] 	BFI Broads Flood Risk SPD Broads SFRA	EA and BFI partners	BFI reporting indicators

¹¹ [In this context, 'carbon neutral' means that the offsetting carried out by the Broads Authority balances the emissions from its activities, and 'carbon zero' means there are no emissions from the Authority's activities.](#)

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
	frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area	<ul style="list-style-type: none"> Update Broads Strategic Flood Risk Assessment and Broads Flood Risk Supplementary Planning Document as required [BA, EA, LAs] 			
		<ul style="list-style-type: none"> Develop flood risk management mapping, feasibility studies and project proposals in Broadland catchment, and implement on-site site projects to restore natural flood management processes [EA, IDBs, BCP partners, NSFA, landowners] 	BFI BRCP Anglian CFMP	Funded schemes (EA Grant in Aid, CS, CFMP)	BFI reporting indicators
		<ul style="list-style-type: none"> Implement and promote flood risk mitigation measures and advice, e.g. through Anglian Flood Risk Management Plan 2021-27, county Flood Risk Management Strategies, Surface Water Management Plans, LPA planning policy/guidance [EA, LLFAs, IDBs, LPAs] 	Anglian FRMP Norfolk FRMS Suffolk FRMS SWMPs LPA Local Plans	NCC, SCC	FRMS targets
		<ul style="list-style-type: none"> Complete planned schedule of Broadland Flood Alleviation Project infrastructure maintenance works (to May 2023) and transition period from BFAP to EA direct management of assets [EA] 		EA	EA schedule targets
		<ul style="list-style-type: none"> Through Local Plan for the Broads review (to 2024), consider revised/new development and land use policies and guidance to respond to climate change and sea level rise [BA] 	Local Plan for the Broads	Partners	# planning apps approved by BA contrary to EA flood risk advice
		<ul style="list-style-type: none"> Produce Coastal Adaptation Supplementary Planning Document [CPE, ESC, GYBC, NNDC, BA] 	CPE	Partners	CPE schedule targets
A2	Work towards making all Broads Authority operations carbon neutral by 2030 and carbon zero by 2040	<ul style="list-style-type: none"> Research and implement carbon reduction measures for BA operations, incl.: all road vehicles replaced with electric versions; zero/low-emission options for heavy equipment/vessels; renewable energy generation for premises; carbon-related assessments in procurement processes; green travel to work schemes [BA] Identify and implement opportunities to offset emissions from BA operations, with target of c.1,500 tonnes of offset by 2030 [BA] 	Count Us In Broads CCAP	BA, grants	BA carbon emissions annual estimate BA carbon offset targets

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
A3	Agree carbon reduction targets for the Broads National Park and promote action to reduce emissions	<ul style="list-style-type: none"> Work with National Park Authorities in England to establish common standards for determining joint ambition towards net-zero, incl. offsetting schemes, and apply to the Broads [BA, Norfolk CCP, Suffolk CCP] Commission further research on sector CO2 emissions in the Broads and promote information to raise public awareness and action [BA] 	Count Us In Broads CCAP	BA, NPE, grants, private investment	NPA family indicator data Level of carbon emission reductions by spatial boundary
		<ul style="list-style-type: none"> Agree, promote and implement measures to reduce carbon emissions from local domestic, business, recreational, travel and other sources, incl.: <ul style="list-style-type: none"> Boating and tourism initiatives, e.g. ‘Electrifying the Broads’ and promotion of tourism hotspots within Electric Vehicle and Alternative Fuels strategies (<i>see strategic objective E1</i>), visitor green travel (incl. multi-modal transport hubs) and local food sourcing [LAs, BA, BT partners, NSBA, BHBF, local businesses, other partners] Local Plan policy and Neighbourhood Plans, e.g. building energy design and energy sourcing, use of materials and embodied carbon <i>Habitat management, incl. peatland water and carbon storage and offsetting-financing - see strategic objective B3</i> 	Broads IAS Broads STS Broads WMS EtB initiative & EVS/AFS Local Plan for the Broads	Partners, regenerative tourism schemes & grants, private investment	# new funded projects in place (min. 2 by 2027) AMR data

Theme B: Improving landscapes for biodiversity and agriculture

Introduction

The Broads is one of Europe's finest and most important wetlands, with a rich mosaic of habitats comprising, among other things, shallow lakes, rivers, fens, drained marshland, wet woodland, estuary saltmarshes, intertidal mudflats and coastal dunes. 28 sites covering a total of more than 7200 hectares are nationally designated as Sites of Special Scientific Interest (SSSIs), a third of which are also National Nature Reserves, and there are numerous County Wildlife Sites within and near the Broads boundary. Most of the SSSIs are of international importance for their habitats and wildlife as the Broads Special Area of Conservation (SAC) and the Broadland Special Protection Area (SPA), and an area of the wetland is also designated as a Wetland of International Importance under the Ramsar Convention. The local agriculture is primarily a mix of livestock grazing and some arable cropping, with grassland the dominant feature in the floodplain. Reed and sedge cutting remains a traditional and important local industry.

We must remember that the Broads is essentially a man-made landscape, shaped over centuries. As highlighted in Theme A, while we will always seek to retain the Broads as a special and protected landscape it is likely to alter as a result of climate change and sea level rise, leading to more saline habitats and changes in land use, agricultural practices and cropping. Post-Brexit environmental and land management legislation, the economy, food and energy policy, leisure and tourism patterns and development growth in the East of England also bring both challenges and opportunities for the Broads landscape, wildlife and people.

Set within this context, we must seek to balance what is needed for a healthy, functioning ecosystem with the fair and sustainable use of the many benefits we get from it. This ambition is central to the [Environment Act 2021](#), which sets goals to improve the natural environment and achieve biodiversity net gain, and to the [Landscapes Review](#). Underpinning environmental policy is the [Government's 25-Year Environment Plan](#), and protected landscapes like the Broads are critical for the ambitious target of protecting 30% of UK land [and halting the decline in species abundance](#) by 2030. The commitment in relation to Nature Recovery grants for [England and the UK](#) includes creating or restoring 500,000 hectares of wildlife rich habitat and [restoring](#) 75% of Sites of Special Scientific Interest into favourable condition by 2042. Species [recovery and](#) reintroduction will also be expanded. Local Nature Recovery Strategies are putting spatial planning for nature on a statutory basis, with Nature Recovery Network mapping prioritising local action to reduce pressures and enhance assets and benefits.

Water quantity and quality

The groundwater, rivers and broads in the Broadland Rivers Catchment (*Map 2*) are primary to the healthy condition and functioning of the Broads' habitats, waterways and land and water dependent businesses. To put the best management regimes in place, we need to better understand the ecological and hydrological functioning of our water and water-related habitats, and address water demands across all sectors.

Good quality water is ~~defined as~~ clear, low in nutrients ~~and~~, free of harmful substances. ~~It has, having~~ a rich diversity of aquatic plants and supporting healthy populations of fish, invertebrates and water birds. The Broads restoration programme has been active for ~~over more than~~ 35 years, and leads the UK in developing and studying lake restoration projects. However, despite significant improvements in water quality in recent decades, monitoring shows that all Broads' water bodies and river reaches, and more than 90% of rivers in the Broads catchment, are failing European Water Framework Directive (WFD) targets¹².

Water quality continues to be affected by a combination of point source and diffuse pollution from waste water, urban areas, transport and ~~agriculture, land erosion as well as from~~ physical modification of water courses, changes to ~~the water~~ flow, ~~and level of water, dissolved oxygen~~, salinity and ~~demand for water use~~ abstraction. As the driest region in the UK, Eastern England is extremely vulnerable to water shortages. During droughts and other periods of water stress, rivers and wetlands can suffer damage that is then exacerbated by abstraction and other land and water management activity. ~~Additional environmental needs are likely to arise from climate change and development growth.~~

[Water Resources East](#) (WRE) was established in 2019 to bring together water, agriculture, power and environmental interests (including the Broads Authority) to look at the water needs and potential trade-offs across the sectors, balancing considerations of customers, agriculture, the environment and the economy. ~~The Broads has a key role in contributing to the delivery of Government targets to improve water quality and quantity under the Environment Act 2021. The~~ WRE is working with stakeholders to develop an integrated Water Resources Management Plan for the region. The [Broadland Catchment Partnership](#) also works with local land managers, farmers, businesses and others to take practical action to improve ~~water quality, water~~ capture and ~~water~~ efficient use. ~~The next Local Plan for the Broads¹³ will include updated planning policies on water use and efficiency, as well as nutrient neutrality and other water quality measures.~~

Fen, wet woodland and grazing marsh

The Broads is a UK priority wetland area, with the largest expanse of species-rich peat fen in lowland Britain. Most of its fen sites are designated for nature conservation, with around 40% owned or managed by conservation organisations. The Fen Ecological Survey (2010) showed clear evidence of loss, fragmentation and decline in some areas, but also showed how other areas have been improved by focused agri-environmental support.

~~An estimated 13 million tonnes of carbon are stored in the Broads' peat soils. Crucially, we can expect fewer greenhouse gas emissions from peatlands in good health with water at or close to the soil surface are more than 90% saturated. The science shows that where peatlands and carbon rich alluvial soils are well irrigated or under higher water table management regimes, we can expect fewer greenhouse gas emissions than for from~~ intensively drained peatlands. ~~Rewetting Good water level management grazing marsh~~ can also bring landscape ~~character, flood control, water cleaning~~ and ~~wider~~ biodiversity benefits. ~~13 million tonnes of~~

¹² ~~Figure incorporates both chemical and ecological status~~

¹³ ~~See Theme F 'Local development'~~

~~carbon are estimated to be stored in the Broads' peat soils, which will continue to capture and store existing and additional carbon under appropriate water level and land management conditions. tonnes CO2 have been lost as a result of land drainage in the peat areas the past 40 years.~~

The [England Peat Action Plan](#) (2021) sets out the Government's long-term vision for managing, protecting and restoring our peatlands so they provide a wide range of benefits to wildlife and people. The [peatlands policy statement issued by the Campaign for National Parks](#) (Nov 2021) calls for greater priority to be given to restoring and rewetting peatland of all types within National Parks, with the aim of bringing it all into good condition or restoration management by 2030 at the latest. [The Lowland Agricultural Peatland Task Force will publish a 'road map' for sustainable lowland agriculture, including paludiculture \(wet agriculture on peatlands\), in late 2022.](#)

The Broads has the most extensive tract of [wild](#) wet woodland within Eastern England. It is of international significance and where not designated may, like other habitats located on peat soils, be at risk from drainage and from loss due to development. [Natural regeneration of wet woodland in suitable low-quality habitats can support nature recovery.](#)

Grazing marsh covers around half of the Broads. Some areas attract large and internationally important numbers of breeding and non-breeding birds, and there is a substantial area of internationally important dyke communities. The marshes provide a third of East Anglia's cattle grazing land, and local farmers and graziers rely on environmental land management support to optimise profit and protect the habitats. Threats to these habitats include loss to arable reversion and land drainage, development, water level regimes, flooding, drought, salt tides and invasive species.

Species

There are more than 11,000 recorded species in the Broads, including 26% of all UK BAP¹⁴ priority species and 17% of all nationally notable or scarce species. 66 species are either restricted entirely to the Broads or rarely seen elsewhere in Britain. Iconic species include the Bittern, Marsh Harrier, Otter, Fen Orchid, Norfolk Hawker Dragonfly and the entire UK populations of the Swallowtail Butterfly, Dotted Footman Moth and Holly-Leaved Naiad. However, some species are in decline or on the brink of survival. The challenges faced by many species, including Broads' specialists, include increases in seasonal variability in river levels and depleted water resources, salinity from land drainage and tidal flooding, nutrient enrichment and pollution of the waterways, habitat loss and fragmentation, and increasing threats from invasive non-native species. Species recovery and translocation programmes can take substantial time and resources, as can managing invasive species. Gains in recent years include wintering water birds around Breydon, Fen Raft Spider, Otter, Bittern, Crane and Marsh Harrier, and the control of invasive species such as Floating Pennywort and American Mink, but much more needs to be done.

¹⁴ [UK Biodiversity Action Plan](#)

Agriculture, land use and development

Adapting land use to work more sustainably with nature [and environmental change](#) requires coordinated investment. This plan period will see the greatest changes in UK agricultural policy for half a century, with three new land management payments schemes ([Sustainable Farming Incentive](#), [Local Nature Recovery](#) and [Landscape Recovery](#)) introduced during the [Agricultural Transition Plan 2021 to 2024](#). The schemes focus on paying farmers for public goods such as water quality, biodiversity and climate change mitigation, alongside food production. Some income streams may be through private revenue, such as from large corporations for carbon credits, housing developers for [nutrient, water and](#) biodiversity credits, and water companies for water quality improvements. Other action, such as for major flood risk management, air quality control and land subsidies, is likely to rely mostly on public funding.

Long-term aim

Biodiversity is thriving in the Broads, which remains a globally important wetland adapting to climate change. Sustainable land and water management practices support well-functioning ecosystems to provide multiple public goods including food, clean and plentiful water, carbon storage, [abundant wildlife](#), landscape character, and recreation [and tourism](#). The challenging targets to improve water quality, water supply and flood protection are being met. Opportunities are [pursued-taken](#) to establish more, bigger, better and more joined up ecological networks, and priority species and their habitat needs are well understood and well managed to halt [and reverse](#) biodiversity decline and loss, increase resilience and adaptive ability, and pursue environmental net gain. Invasive non-native species are under control and eradicated where possible. A profitable agriculture sector provides good food while maintaining [or restoring](#) habitats [to good ecological condition](#). Robust evidence and monitoring guide good decision making in all aspects of natural resource management.

Table 4

Theme B: Strategic objectives and key actions

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
B1	Restore, maintain and enhance lakes-rivers and broads and use monitoring evidence to trial and implement further innovative lake restoration techniques	<ul style="list-style-type: none"> Seek funding to develop and implement river and broad-in-lake restoration, maintenance and enhancement works for aquatic communities (incl. fish) (incl. biomanipulation) at priority sites to meet WFD and SSSI objectives as funding opportunities arise at priority sites [BA, BBP partners, BASG] Complete Hoveton Great Broad Restoration Project, carry out pre- and post-works monitoring of Hoveton, Trinity and Hickling lake Broads' condition status, and use evidence to trial and implement further innovative restoration techniques [NE, EA, BA] 	Broads BWS Broads WMS DWPPs Hoveton Great Broad Restoration Project BASG Strategy	Partners	WFD & SSSI site condition targets, EA statutory monitoring data; WMS and DWPP targets

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
B2	Promote best practice water capture and usage across the Broadland rivers catchment and reduce point and diffuse pollution into the floodplain and water courses	<ul style="list-style-type: none"> Implement water efficiency measures and planning policy to reduce water usage in new development, and promote to domestic and business water users¹⁵ [AW/ESW, non-domestic water retail companies, LPAs] 	BRCP Water resource management plans LPA Local Plans	Partners	Water company business plan targets
		<ul style="list-style-type: none"> Promote and install 'whole farm' (and where feasible, low cost) water capital infrastructure and water retention and infiltration measures [BCP, AW/ESW, county FWAGs] 	Water resource management plans	Funded schemes, water capital grants	WSF targets, CSF data, RDPE reporting
		<ul style="list-style-type: none"> Develop cross-sector, integrated water resources management plan [WRE, AW/ESW, NFU] Adopt and implement abstraction licensing strategy, Water Resource Management Plans, Drought Plans and Implement Water Industry National Environment Programme (WINEP) action plans in Broadland catchment (incl. Wendling Beck Exemplar Project, Water for Tomorrow, Norfolk Water Strategy Programme) [NE, EA, AW/ESW, other project partners] 	Water resource management plans (incl. Norfolk Water Strategy Programme) WINEP AMP8 Wendling Beck Exemplar project	Funded schemes Water company funds	CAMS resource availability, WFD hydrology status AW/ESW targets, EA action plan targets
		<ul style="list-style-type: none"> Work with farmers and land managers and organisations to implementcreate tailored environmental land and water management measures to reduce air pollution and water pollution through Farming in Protected Landscapes, Countryside Stewardship, Catchment Sensitive Farming, Campaign for Farmed Environment, Water Sensitive Farming, water company schemes, [BCP coordination, HA] 	Broads BWS BRCP NSNRP	BCP partners ELMs, FiPL, other funded grant schemes Private finance HA	CS/WSF targets, CSF water capital grant targets, WFD/ SSSI/ SAC/ Nature 2000 targets

¹⁵ [Also see theme F](#)

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
		<ul style="list-style-type: none"> Work with businesses and local communities to raise community awareness about pollution condition and sources, and implement pollution reduction measures (e.g. investigating saline water incursion and installing new pumps and management systems; trialling and installing constructed wetlands and other CSF measures) [BBP partners, IDBs] 	Water resource management plans Broads BWS BRCP	Partners	# first time rural sewerage schemes in catchment (AW); # CSO pollution events in catchment (EA/AW)
B3	Seek biodiversity net gain and Maintain, enhance, adapt and increase areas of priority fen, reed bed, grazing marsh and wet woodland to protecting peatlands ecosystems as carbon sinks and seeking environmental biodiversity net gain	<ul style="list-style-type: none"> Identify areas to support carbon take up and reduction of land use emissions; support development and use of IUCN peatland code carbon offset projects, linked to biodiversity gain and integrated water management; develop projects to transition from net source to net sink for GHG from land use [BA, BCP & BBP partners, land managers] Identify areas suitable for rewetting for reedbed/fen creation and for commercially viable paludiculture [BA, BCP & BBP partners, farmers & land managers, IDBs, RSPB, NRT, water companies] Investigate and implement local nature enhancement, water management and soil carbon management projects [IDBs, NE, BA, RSPB, NRT, Norfolk FWAG, Wildlife Trusts, water companies, land managers] Develop and implement tailored habitat management measures for public benefits with focus on low carbon methods and nature-based solutions; facilitate support farmers and land managers in transition to LNR and ELMs payment schemes [BA, BBP partners, BLMB, BRASCA, RSPB, farmers & land managers] Offer advice and practical support to local reed and sedge cutters, incl. extension of cutting areas, new commercial reedbeds, equipment, contracts and training initiatives [BA, BRASCA] 	Broads BWS CANAPE, NCPGS Broads CCAP England Peat Action Plan BRASCA action plan LAPTF Revere	CANAPE, NCPGS & successor grant schemes ELMs FiPL Peatland Code Partners	Total area peatland, area restored peatland (ha) Total area under BA management agreement (ha) % priority habitat in CS; SSSI condition status Carbon reduction targets BBP annual review of changes in species numbers and habitat quality BBP monitoring

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
		<ul style="list-style-type: none"> Complete nature conservation activities under Broads LPS 'Water, Mills & Marshes' Programme 5: Natural Landscapes by Dec 2023, and develop and implement legacy activities based on evaluation and outcomes of LPS [Broads LPS delivery partners] 	WMM and legacy schemes	NLHF LPS, partners	Broads LPS target data for NLHF
		<ul style="list-style-type: none"> Develop and apply biodiversity net gain requirement for development in the Broads [BA] Develop Norfolk and Suffolk Nature Recovery Strategy and identify and map potential areas of new net-gain-priority habitat, wildlife corridors, extended/new field buffer strips and pollinator networks through Local Nature Recovery Plan [NCC, SCC, NSNRP, partners] Provide advice and support to land managers on tailored site-specific measures, particularly in identified high value areas Update and adopt Broadland Rivers Catchment Plan [BBP partners, BCP partners, NCP, farmers & land managers] 	Local Plan for the Broads NSNRP Broads BWS BRCP	ELMs , partners	# investment plans completed (e.g. econet mapping) Reviewed Broadland Catchment Plan
		<ul style="list-style-type: none"> Develop and implement integrated landscape-scale initiatives, incl. Landscape Recovery Schemes, NWT/SWT Living Landscapes, RSPB Priority Landscapes [NBP partners, BCP partners, other partners] Develop demonstration connection projects through river valley projects and highways network [NCC, SCC, NSNRP] 	NSNRP	Partners, secured external funding	Individual project delivery targets BBP annual review of changes in species numbers and habitat quality
		<ul style="list-style-type: none"> <i>Green Infrastructure and Recreational Disturbance Avoidance Mitigation Strategies – see strategic objective F4</i> 	n/a	n/a	n/a
B4	Define, implement and monitor management regimes for priority species and invasive non-native species	<ul style="list-style-type: none"> Implement priority species recovery and support programmes, incl. targeted management, spatial mapping, monitoring, research and species translocation action where appropriate [BBP partners, Highways England] 	Broads BWS	Partners, grants	Distribution of breeding wader pop., # new sites for bittern/ swallowtail, priority INNS data

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
		<ul style="list-style-type: none"> Carry out invasive non-native species monitoring regimes and awareness campaigns; and make data publicly available on present/potential threats and biosecurity plans/control programmes where threats are highest (e.g. mink, Floating Pennywort) [NNNSI] Implement new biosecurity standards to minimise risks of field workers accidentally introducing/spreading biosecurity threats [BA] 	NNNSI Broads BWS Defra Group Personal Biosecurity Project	Partners, grants	NNNSI data
B5	Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to the National Biodiversity Network	<ul style="list-style-type: none"> Carry out research/monitoring to determine impacts of habitat management and manipulation techniques, and coordinate/share findings [BBP partners, BA, EA, NBN] <i>(Priority research areas 2022-27: Extension of Broads Biodiversity Audit to include assessment of guilds; Carbon emissions related to land uses; Fen ecology and water levels and quality; Prynnesium ecology and mitigation of impact on fish; Pollutant inputs; Impacts of drought, flooding and salinity; Creating markets for fen materials; Impacts of connectivity, stressors and interaction on freshwater habitats)</i> 	Broads BWS NBN	Research grants	# published papers/ research reports BBP partners annual monitoring and review of changes in species numbers and habitat quality BBP monitoring
		<ul style="list-style-type: none"> Complete community-based research and monitoring activities under Broads LPS 'Water, Mills & Marshes' Programme 1: Interpreting the Landscape and Programme 3: Learning and Future Skills by Dec 2023; develop and implement legacy research and monitoring projects based on evaluation and outcomes of Broads LPS [Broads LPS delivery partners] 	WMM and legacy schemes	NLHF LPS, partners	Broads LPS target data for NLHF

Theme C: Maintaining and enhancing the navigation

Introduction

The Broads is an extensive and varied inland waterway system, offering 200 km of boating on lock-free, meandering tidal rivers. The Broads executive area comprises approximately 3113 ha of water space, including 63 permanently open water bodies covering 843 ha (*maps, Appendix C*). Many of these water bodies are traditional ‘broads’ formed from medieval peat diggings, while others are of more recent or different origin, such as the former gravel quarry at Whitlingham Country Park. Some broads have public navigation rights, others more limited access (generally for environmental or land ownership reasons), and some are landlocked and inaccessible to craft. The navigation reaches from the quiet headwaters of the rivers Bure, Ant and Waveney to the centre of Norwich and coastal resorts of Great Yarmouth and Lowestoft.

As the harbour and navigation authority, the Broads Authority is responsible for maintaining the navigation area. The Waterways Management Strategy (2022-27) provides the framework for the Authority’s practical operations including the management of sediment, aquatic plants, and riverside trees and scrub to benefit the navigation while also ensuring the protection of important water plant communities and refuges and food for wildlife. The maintenance of moorings, slipways and other waterside infrastructure is addressed in Theme E, as part of managing integrated access to and between land and water.

Managing sediment and plants

Dredging is carried out to provide reasonable depths for safe navigation, and to help restore degraded or shallowing water bodies. It also helps improve water quality by providing greater capacity for water storage, and by removing excess nutrients in the mud, reducing turbidity and creating depth for aquatic plants to flourish and stabilise the bed. Dredging the waterways and disposing of dredged material is the largest navigation maintenance cost to the Authority. River bank erosion is a key sediment source, caused by wind, tidal action, boat induced waves and feral geese. Land use and soil and vegetation type on riverbanks and uplands are also contributory factors, with headwaters contributing around 50% of sediment inputs.

A whole catchment approach to sediment management is helping to manage sediment coming into the Broads system. The Waterways Management Strategy guides the Authority’s operational priorities to maintain water depth specifications and to dispose of dredged material in cost effective and environmentally sustainable ways, taking account of its value for agriculture, habitat creation, land restoration and flood protection. A carbon budget produced for the Authority’s internal operations showed that over 50% of its carbon emissions are being generated by the vehicles, plant and vessels involved in waterways management, providing a focus to reduce emissions (see Theme A) while keeping up with waterways maintenance priorities.

Thriving aquatic plants are part of a healthy ecosystem, and certain species are protected under legislation¹⁶. Recent years have seen increasing plant abundance in the rivers and broads, particularly in the upper reaches and smaller isolated broads; plants further downstream in the more tidally influenced

¹⁶ [Conservation of Habitats and Species Regulations 2010](#) and [Wildlife and Countryside Act 1981 \(as amended\)](#)

areas are typically slower to respond to improving water quality. In a connected waterways network like the Broads, tackling the spread of some aquatic invasive non-native species is a huge and ongoing challenge. Practical work tends to focus on preventing the arrival of new species, and on controlling established species that significantly impact navigation or the conservation interest of key sites.

While the activities under this theme can enhance biodiversity, such as improving water quality by restoring depth and flow, it is acknowledged that some works have the potential to cause mainly short-term negative environmental or ecological effects; for example, dredging can increase turbidity and release contaminants, soil and nutrients¹⁷ into the water. To mitigate such impacts, the Broads Authority applies Environmental Standard Operating Procedures to all its practical and engineering works, and this guidance is generic across all operators in the Broads.

Managing navigation safety and access

The Broads Authority manages the use of the Broads navigation to maintain safety, reduce potential conflicts between different user groups and ease pressure on busy areas. Safety on the waterways is managed through Ranger patrolling, supported by byelaws, codes of conduct and public guidance such as Super Safety Days and the 'Wear It' lifejacket campaign. Safety standards are generally high, although speeding and people falling while getting on and off boats are common problems. In 2020-21, an increase in waterways users (including many first-time domestic visitors) as a consequence of global Covid-19 restrictions saw a surge in safety-related incidents, including sadly a number of fatalities.

The Authority, emergency services and Coastguard work closely together to respond to incidents on the water. In 2021, the Authority increased its complement of Rangers to have a greater daily presence on the system, and produced new safety videos with local hire boat operators to give pre-visit advice to hirers. The Authority also worked with inland waterways bodies to update the Hire Boat Code¹⁸, which contains new safety aspects including stability requirements and more emphasis on the handover procedure given to hirers. Local policing partnerships including 'Broads Beat' work with the Authority and local businesses to promote a proactive approach to maintaining safety and reducing marine-related crime such as the theft of boats and outboard motors.

A number of initiatives help to avoid overcrowding and visitor pressures in certain areas. The Broads Integrated Access Strategy (see Theme E) focuses on distributing access points and visitor facilities across the Broads system, and a regular boat census monitors boat movements and distribution to help identify stress points at sensitive sites. County GI-RAMS¹⁹ will also aim to mitigate negative impacts from visitor pressure on SAC/SPA²⁰ conservation sites. The potential to open up new areas of navigable water space are very limited, tempered by voluntary restrictions to certain areas of water space that provide key refuges for wildlife, by other environmental or land ownership issues, and by a lack of resources. However, there are quiet access opportunities for smaller, non-powered

¹⁷ In March 2022, Natural England released '[nutrient neutrality](#)' guidance to local planning authorities (including the Broads Authority) in areas where protected habitats sites are in unfavourable condition due to excess nutrients (also see Theme F).

¹⁸ Code for the Design, Construction and Operation of Hire Boats (the 'Hire Boat Code'), Jan 2022

¹⁹ Green Infrastructure and Recreational Disturbance Avoidance Mitigation Strategies

²⁰ Special Areas of Conservation/Special Protection Areas

craft such as canoes and paddleboards above the heads of the navigation. Any planning proposal to extend navigation access will need to be consistent with nature conservation interests, flood risk management, and archaeological and geological status.

The Broads Authority works with Network Rail and other operators to make sure road and rail bridges are maintained to allow access to navigators. The work of the Broadland Futures Initiative (see Theme A) includes assessing the potential impacts of climate change and sea level rise on the tidal Broads waterways and the implications for navigators, such as the available air draft and timing of when vessels can pass under bridges, to make sure these and other interests are all considered in determining future management approaches.

Long-term aim

The historic and present importance of the Broads' waterways for navigation, biodiversity and recreation is recognised and valued. The navigation and associated facilities and infrastructure are maintained and enhanced. Waterborne activity across the system is managed carefully to maximise safe enjoyment by all, minimise conflict between users and ease pressure on busy or vulnerable areas. Opportunities to improve and extend the navigable water space are pursued, consistent with nature conservation interests and water resource management. Sediment management provides necessary depths for boating, and dredged material is reused or disposed of in environmentally and economically sustainable ways. Sediment loss from agricultural land and bank erosion is minimal, with sustainable natural and constructed solutions used to protect vulnerable stretches of waterways. Bankside vegetation and water plants are managed in ways that keep waterways open to navigation, do not impact on the ecological or archaeological integrity of sites, and provide for appropriate recreation. Restrictions on navigation due to bridges is minimised and mitigated wherever possible.

Table 5

Theme C: Strategic objectives and key actions

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
C1	Maintain navigation water depths to defined specifications, reduce sediment input and dispose of dredged material in sustainable and beneficial ways	<ul style="list-style-type: none"> Carry out annual dredging programme in priority locations to maximise compliance with defined waterways specifications (based on annual programme of hydrographic surveying, mapping and quantification), and provide water depth data to navigators [BA] Seek additional resources to improve sustainable sediment management [BA and partners] Develop and share inland waterways legislation and good practice for dredging and sediment re-use [AINA, MMO, BA] 	Broads WMS	BA and partners	% annual compliance with waterways specs, up-to-date sediment management legislation & guidance
		<ul style="list-style-type: none"> Identify and prioritise stretches of lost or eroded river bank/island for restoration and implement land management protection, creation and restoration strategies, using innovative sediment re-use techniques where possible [BA, BCP] Promote good practice guidance on minimising bank erosion to recreational users and land owners/managers [BA] 	Broads WMS BRCP	Funded schemes, partners	SSSI and WFD condition status, CFE records
C2	Maintain existing navigation water space and develop appropriate opportunities to extend access for various types of craft	<ul style="list-style-type: none"> Develop schemes and agreements to extend navigation access for appropriate craft, consistent with nature conservation interests, flood risk management, and geological and archaeological status [BA, partners] 	Broads WMS Broads IAS	BA and partners	Broads WMS and IAS action plan targets
		<ul style="list-style-type: none"> Maintain navigation access through bridges and provide clearance information to navigators, incl.: <ul style="list-style-type: none"> Negotiate refurbishment/replacement of Somerleyton and Reedham swing bridges, incl. secured funding and agreed design and mitigation measures, and provide clearance information to navigators [NR, BA] 	Network Rail CP6 Delivery Plan NCC Transport Asset Mgt. Plan Broads WMS	Bridge operators	NR CP6 Delivery Plan schedule NR/BA liaison meetings

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
		<ul style="list-style-type: none"> ○ Maintain low bridges, incl. Carrow Bridge, to allow opening/closing for navigators, and provide clearance information to navigators [Bridge operators, BA] 			
		<ul style="list-style-type: none"> • Develop understanding of long-term trends in water levels and impacts on navigation, and refresh mean water level data using standardised methodology [BA, BFI] 	BFI	Partners	BFI reporting indicators
		<ul style="list-style-type: none"> • <i>Management of moorings, slipways and other waterside infrastructure - see strategic objective E1</i> 	n/a	n/a	n/a
C3	Manage water plants and riverside trees and scrub, and seek resources to increase operational targets	<ul style="list-style-type: none"> • 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 [BA] 	Broads WMS	BA	BA annual monitoring of managed river bank, navigation channels, water plants
		<ul style="list-style-type: none"> • Carry out annual tree and scrub management regimes in accordance with agreed criteria and Area Ranger strategies for managing hazards to navigation from trees on private land [BA, landowners, community groups] 	Broads WMS	BA	Routine BA Ranger checks; 5-yearly survey of riverside trees
C4	Maintain and improve safety and security standards and user behaviour on the waterways	<ul style="list-style-type: none"> • Manage adherence to boat safety measures, incl. up-to-date Safety Management System and Boat Safety Scheme [BA] • <i>Provision of user safety information - see strategic objective E3</i> • Incorporate Hire Boat Code through local licence conditions [BA] • Manage navigation aids and up-to-date reference on GIS mapping; carry out navigation infrastructure inspection and maintenance regimes to agreed annual schedules, incl. full review of navigational posts [BA] 	PMSC Hire Boat Code Broads WMS	BA	BSS compliance/PMSC external audit Boat census, boat user/HBO surveys
		<ul style="list-style-type: none"> • Use zoning agreements/protocols and pilot schemes as required for organised water sport activities and events (incl. water skiing, wakeboarding, power boat racing, wild swimming and competitive 	PMSC Broads WMS	BA	BSS compliance/PMSC external audit

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
		rowing) and provide up-to-date guidance and signage for participants and other waterways users [BA]			
		<ul style="list-style-type: none"> Through ranger patrolling, events, guidance, training and guidance, promote and improve waterways recreational user safety and security [BA, NC, SC, NWSF, hire boat operators] 	Broads WMS	Partners	NPA (BA) indicators and targets

Theme D: Protecting landscape character and the historic environment

Introduction

The low-lying, interconnected wetland habitats of the Broads follow the edges of level, open marshland and valleys drained by three principal rivers and their tributaries. This is a living and working landscape, created and influenced over thousands of years by patterns of human existence. The [Broads Landscape Character Assessment](#) (2017) summarises the physical processes that have shaped the landscape we see today. It identifies 13 distinct landscape types from coastal dunes and tidal estuary to peat fen, carr woodland and settlement fringe. Within these are 31 individual character areas, each with a unique combination of landscape features and elements.

The shallow lakes we know as ‘broads’ are actually manmade, mostly originating as medieval peat diggings. Arguably this makes the Broads itself one of England’s most extensive industrial monuments. A long history of controlled drainage is evident from the drainage mills, raised and embanked rivers, and dykes. The location and pattern of villages and settlements have been dictated largely by historic social and economic need, with groupings often round a parish staithe, riverside common, ferry or bridge, with isolated churches on the surrounding uplands.

Built and cultural heritage

The significant built heritage value of the Broads is recognised in the designation of 25 Conservation Areas and the scheduling of 15 Ancient Monuments and more than 270 Listed Buildings. [Although undesignated within the Broads Authority area, historic parks and gardens also contribute to our cultural heritage.](#) Much has been done to protect, conserve and enhance key historic and cultural assets, and seven Listed Buildings at risk were removed from the Register between 2017 and 2021. However, there is still gradual erosion in the condition, quality and distinctiveness of the built environment. Among the most vulnerable assets are more than 70 drainage mills, an iconic and visible feature in this flat landscape. Many of these structures are isolated, inaccessible and in a deteriorating condition. Five-yearly surveys of these buildings and other listed structures is providing important evidence for action.

In line with good practice, we have a programme of Conservation Area reviews (with three new Conservation Area Appraisals adopted between 2017 and 2020), helping to acknowledge and preserve the special character of these important places. In many areas, unlisted buildings such as waterside chalets contribute greatly to the local character and are of special significance to local communities, and we maintain a Local List to make sure these buildings are recognised. New schemes to follow on from the Landscape Partnership Scheme (LPS) ‘Water, Mills and Marshes’ project will continue to support local heritage projects, including the repair of drainage mills that are so integral to this landscape. Ongoing support is also needed to preserve, restore and use historic Broads’ craft, including the trading wherries and other small craft, and the LPS legacy will add to the hard work by local groups and trusts to maintain our heritage fleet.

Other important aspects of the area's heritage are also in danger of being lost if not recognised, protected and supported. Historic England has identified the Broads as a site of Exceptional Waterlogged Heritage, but many of its archaeological features remain hidden and vulnerable to changes in water levels, development and other land use pressures. Traditional craft industries such as reed and sedge cutting, thatching and millwrighting remain a small but important part of life and landscape management in the Broads but are struggling to survive, as are other local traditions, crafts and cultures.

Geodiversity

The geodiversity of the Broads is an understated aspect of its natural heritage, with many identified sites of interest lacking designation and protection. Risks include the impacts of climate change, including coastal protection work altering the dynamics of marine erosion and sediment transport, and drying out of wetland and oxidation of peat leading to the loss of finite environmental and archaeological archives. Agricultural activity can also adversely impact the historic environment and landscape, such as by removing historic patterns of drainage and water management and separating former water mills from their functional context. [Built development can also hide or obliterate access to geological assets.](#) County geodiversity action plans for Norfolk and Suffolk help to provide a comprehensive approach to documenting, protecting and enhancing our local geodiversity resources and understanding.

Tranquillity, darks skies and wildness

A sense of tranquillity, dark skies and wildness gives the Broads much of its character and appeal, and visual disturbance and noise and light pollution in or near the area can have an undesirable impact. Tranquillity mapping by the Campaign to Protect Rural England puts most of the Broads at the 'most tranquil' end of the spectrum, and most parts of the Broads have 'intrinsic dark skies' with the potential for some Dark Sky Discovery Sites. The Broads Authority is a member of the UK Dark Skies Partnership, which aims to tackle light pollution in protected landscapes. Within the Broads, measures to protect and enhance tranquillity, dark skies and wildness are encouraged through planning policy and design guidance, and through action such as reducing boat engine noise, zoning water skiing and power boat racing, and undergrounding overhead electricity distribution cables. Having said that, it is the bustling activity in some areas of concentrated leisure development, such as Wroxham and Potter Heigham, that gives those areas their particular character and supports the local economy and communities.

Long-term aim

The Broads remains a dynamic and special landscape with its own sense of place and historic significance. The key physical, historic and cultural elements of landscape character are recognised, retained and actively managed while allowing the landscape to evolve and reflect the interactions between people and nature. Traditional and heritage industries such as boat building, agriculture, thatching and millwrighting thrive and wider local traditions, crafts and oral cultures are maintained and celebrated. Archaeological sites and historic built and cultural assets are recorded, protected and enhanced, halting further degradation and loss and contributing to landscape integrity. The built environment continues to reflect the activities of people living and working here, embracing traditional and innovative design that ensures new and historic structures are compatible with the landscape, energy efficiency is improved, and environmental benefits and

socio-economic stability and growth are promoted. Earth heritage features are protected and enhanced where possible, and people understand the evolution of our environment over deep time. People enjoy the sense of tranquillity, wildness and dark skies; at the same time, the bustling nature of some areas is supported in keeping with the overall character of the Broads and the needs of its communities.

Table 6

Theme D: Strategic objectives and key actions

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
D1	Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including ‘at risk’ assets	<ul style="list-style-type: none"> Maintain comprehensive Heritage at Risk (HAR) Register and work with building owners to remove sites from register [BA] Maintain Broads Local List of heritage assets and carry out 5-yearly, thematic and conservation area-based surveys of assets for inclusion on list [BA, parish councils] Produce planning guidance for ‘at risk’ heritage assets as appropriate, including those at risk from flooding [BA, HE, NCC] 	HAR Register Broads Local List Neighbourhood plans	Parish Councils, building owners, partners	# buildings removed from HAR Register # new heritage assets added to Local List £ funding and # new projects
		<ul style="list-style-type: none"> Complete Broads LPS ‘Water, Mills & Marshes’ Programmes 1: Interpreting the Landscape, 3: Learning and Future Skills, 4: Historic Landscapes, and 5B: Natural Landscapes (by Dec 2023); develop and implement legacy interpretation activities based on evaluation and outcomes of LPS [Broads LPS delivery partners] 	WMM and legacy schemes	NLHF LPS, partners	Broads LPS target data for NLHF
		<ul style="list-style-type: none"> Develop evidence base and policy to improve awareness, understanding and protection of the Broads’ exceptional waterlogged archaeology, and develop management plan [NAT, BA, NCC, SCC, HE] Implement measures to document, protect and enhance local geodiversity sites and assets across identified work areas in county Geodiversity Action Plans [NGP, GeoSuffolk] 	Norfolk and Suffolk County Geodiversity Action Plans	Partners	Evidence base and management plan
		<ul style="list-style-type: none"> Complete Broads LPS ‘Water, Mills & Marshes’ Programmes 3A: Heritage Construction Skills Training and 4E: Land of the Windmills 	WMM and legacy schemes	NLHF LPS, BEEN & FE providers, BIS/BEIS	Broads LPS target data for NLHF # trainees/ work experience

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
		<p>(by Dec 2023); develop legacy opportunities for skills training and apprenticeships [Broads LPS delivery partners];</p> <ul style="list-style-type: none"> • Provide vocational heritage skills training and work experience opportunities [FE providers, BEEN, BA, Broads LPS legacy] • <i>Support local reed and sedge cutting industry – see objective B4</i> 			participants in target schemes
D2	Maintain an up-to-date Broads Landscape Character Assessment and use to inform conservation action plans	<ul style="list-style-type: none"> • Refresh Broads Landscape Character Assessment to inform Local Plan review, planning decisions and Conservation Action Plans [BA] • Use Broads Landscape Conservation Action Plan to inform completion of Broads LPS 'Water, Mills & Marshes' programmes and development of legacy opportunities [Broads LPS partners, BA] 	Broads LCAP CAA schedule WMM and legacy schemes	NLHF LPS, partners	Broads LPS target data for NLHF
D3	Maintain up-to-date Conservation Area designations, appraisals and management proposals	<ul style="list-style-type: none"> • Implement 5-year programme of Conservation Area Appraisal reviews to provide up-to-date Conservation Area designations, appraisals and management proposals; designate new Conservation Areas as appropriate [BA, LAs, parish councils] 	CAA schedule	Partners	CAA 5-year schedule (BA)
D4	Reduce the impacts on the Broads of visual intrusion and noise and light pollution, and promote Dark Sky Discovery Sites	<ul style="list-style-type: none"> • Implement funded schemes in scheduled Broads undergrounding wires programme and bid for further schemes [Ofgem/UK Power Networks, BA] 	UKPN Schedule 9 Statement	Ofgem/UK Power Networks	Ofgem/UKPN programme schedule
		<ul style="list-style-type: none"> • Refresh Broads dark sky mapping assessment and monitoring, and apply for status of Dark Sky Discovery Sites in the Broads [BA] 	Dark Sky Discovery Sites	BA	Dark sky mapping

Theme E: Promoting understanding and enjoyment

Recreation and integrated access

More than eight million people a year²¹ visit the Broads National Park to enjoy outdoor activities on land and water. ~~With more than 200km of inland navigable lock-free waterways, the~~ The area ~~is best known for leisure boating, contains more than 200km of inland navigable lock-free waterways, but it also contains,~~ part of National Cycle Route 1, and 303km of public rights of way including three county long distance trails and part of the national England Coast Path trail. The coast and urban centres such as Norwich and Great Yarmouth also provide opportunities for open access and recreation.

There are currently more than 12,000 craft licenced to use the Broads²², ~~and the boating community plays an important role in contributing towards the upkeep of the navigation. While~~ The majority of ~~most boats~~ are privately owned, ~~but~~ the hire boat industry remains a ~~significant major~~ part of the Broads economy, and diversification and improvements in environmental and quality standards have been crucial to its ongoing survival. ~~Boat building, chandlery and repair are also significant local industries. While t~~ There has been a trend in recent years towards bigger boats, ~~but most boating is still in~~ small ~~motorised craft and sailing boats, the latter having been integral to the Broads landscape since the 19th century. craft such as~~ Small craft such as canoes and stand up paddle boards are also becoming increasingly popular, particularly with young people. ~~Sailing has been part of the Broads way of life since the 19th century and remains integral to the landscape.~~ Managing user safety on the water has become a growing focus, as highlighted in Theme C (Maintaining and enhancing the navigation). Other popular activities on land and by the water include angling (~~estimated to bring in more than £100 million a year to the local economy~~), walking, cycling, horse riding and visiting local sites of interest. The strong appeal of the local wildlife, notably birds, boosts visitor numbers throughout the year.

All these activities rely on good public access on land and between land and water, along with appropriate visitor ~~services and facilities. The need to plan for the impacts of climate change, particularly changing water levels and flood risk impacts on these, in particular the future changes in water levels and flood management, is acknowledged.~~ It is also important to provide access in ways that will not damage fragile wetland habitats or disturb wildlife. Due to its geography and waterways network, much of the area is also relatively difficult to access and the best (and sometimes only) way to reach certain parts of the system is by water. In common with other National Parks, most visitors come to the Broads by private car. In some areas, particularly popular sites, this contributes to carbon emissions, increases seasonal traffic congestion and demand for parking, and creates a contradictory impression to visitors who expect the area to be tranquil. There are, however, three railway lines serving many of the smaller settlements between Norwich, Great Yarmouth and Lowestoft, good bus services in some areas, and a number of community transport schemes based in and around Broads villages.

²¹ STEAM data for Broads and area of influence

²² [\(Annual toll figures showing boats by type to be added as link to online Plan\)](#)

Proposals to improve access to and around the Broads, linked to destination points, services and sustainable transport are identified in the [Broads Integrated Access Strategy](#). However, action often depends on gaining realistic landowner agreements, and on having sufficient resources both to carry out works and to maintain the overall network in the longer term. Other access, travel and local plans, including the emerging 30-year Transport Strategy for the East and county-led plans, all identify the need for more investment in public transport, walking and cycling facilities, and links between visitor hubs such as rail stations, town centres, tourist attractions and moorings.

Regenerative tourism

Tourism is a major contributor to the Broads' economy, and the area's attractions also recognise the significant appeal of the surrounding area including the historic city of Norwich, seaside resorts like Great Yarmouth and Lowestoft, and the North Norfolk coast, part of which is designated as an Area of Outstanding Natural Beauty.

[The Tourism Strategy for the Broads \(2016\)](#) focuses on high quality, year-round sustainable activity, with connected benefits for local communities and conservation. Its main aims are to raise awareness of this unique wetland, strengthen the tourism offer and manage the flow of visitors around the Broads, encouraging exploration and environmental awareness. The emphasis for the UK National Parks family is now moving from sustainable tourism to 'regenerative tourism' – activity that goes one step further and contributes tangibly toward the regeneration of the places and communities in which it operates. This will be reflected in our updated Tourism Strategy, due to be adopted in 2023.

The Broads ~~has~~ offers unique offer-experiences to a wide range of audiences, although its place within the UK National Parks family is still not widely recognised. Public sector cuts continue to affect support for tourism marketing, management and infrastructure, and stronger working between local authorities and the private sector is vital in supporting the industry. Recognised issues include a lack of visitor facilities in some areas, inconsistent quality in accommodation and catering, and a shortage of labour, skills and volunteers. Opportunities include private sector interest in sponsorship, and the growing trend for 'experiential' activities that bring the area's nature, landscape and cultural heritage to life. The primary markets for the Broads include domestic visitors on short breaks, couples and families on longer holidays, and day visits by local residents and coastal holidaymakers. There is also forecast growth in other markets such as young independent travellers, groups, and people with special needs.

As in many other sectors, tourism has been impacted by the Covid-19 pandemic. In 2020, tourism in the Broads and area of influence brought in around £382m and 4.76m visitors, compared with £665m and 8.2m visitors in 2019²³. Periods of lockdown, especially at high points of the holiday season, required new ways of working for local businesses, often at reduced capacity and increased cost, and sustainable tourism slipped down the priority list as survival and adaptation

²³ STEAM annual data 2020 and 2019

became paramount. Conversely, easing of Covid-19 restrictions created a surge in domestic holidays in 2020 and 2021, with a huge increase in new and younger waterways users to the Broads during a condensed season. While this was positive for local businesses, coping with such high visitor numbers also brought significant safety and environmental problems. It is too early to say how the trends caused by Covid-19 might influence tourism in the longer term.

Visitor information

Clear, consistent and coordinated information about the area help to strengthen visitor understanding and enjoyment, both before and during their visit. In 2015 the Broads Authority agreed to brand the area as the 'Broads National Park', to promote more clearly its National Parks UK membership credentials and special qualities. While the Broads may mean different things to different people, branding and key messages aim to capture the area's essence and value, and encourage people to value and care for it.

Long-term aim

The value of the Broads National Park as a place for escape, adventure, enjoyment, inspiration and reflection is recognised and treasured. The area offers a wide range of high quality, distinctive and memorable activities on water and on land, in suitable locations and in harmony with the special status and qualities of the area and its communities. Boating remains integral to local recreation, alongside other popular pursuits of angling, walking, cycling and experiencing the rich natural and cultural assets of this wetland landscape. Year-round regenerative tourism actively supports the natural environment and a thriving local economy. Physical access on and between land and water is managed sensitively to maximise the health and wellbeing benefits of open space to all, while ensuring the resource itself is not degraded. Where possible, improvements are made to the access network, linked to visitor destination points and sustainable transport. Clear, consistent and high-quality information helps people to understand, respect and enjoy the area's special qualities. The natural, built and cultural heritage and local traditions that reflect the character of the Broads are understood, documented and promoted.

Table 7

Theme E: Strategic objectives and key actions

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
E1	Improve the integrated network of access routes	<ul style="list-style-type: none"> Create and maintain web-based map of Broads visitor infrastructure and facilities incl. moorings, hook up points, etc. [BA] 	Broads IAS	BA	IAS targets

<p>and points (with easier access for people with mobility and sensory needs), linked to visitor facilities</p>	<ul style="list-style-type: none"> Implement working agreements and other measures to improve strategic network of toilet facilities (incl. Changing Places accessible toilets) and refuse & recycling facilities [BA, LAs, local businesses] Develop and implement 5-year maintenance delivery plan for network of solar/electric hook up points [BA] 	Broads IAS EtB initiative EV and AFS strategies	BA, LAs, local businesses	IAS targets
	<ul style="list-style-type: none"> Maintain <u>and where possible enhance</u> BA 24-hour free mooring network, informed by boat census and strategic priority sites data [BA] Install new small craft launch facilities linked to parking, craft hire points and published trails [BA, BC, BLAF, HBOs, RWSP] <u>Review and update boat census methodology, incl. GIS mapping to monitor/assess spatial relationships between waterways usage and pressures on protected sites [BA]</u> Implement projects in county <u>Rights of Way Access</u> Improvement Plans/Green Infrastructure Plans and River Wensum Strategy to improve provision of access points between land and water and mooring/stopping points [NCC, SCC, BLAF, RWSP, BA] 	Broads IAS RWS County AIPs/GIPs Neighbourhood plans	BA, BLAF, partners	Broads IAS targets BA boat census BA maintenance & repair schedule and 10-year repiling targets
	<ul style="list-style-type: none"> Implement Norfolk Local Cycling and Walking Infrastructure Plan and East Suffolk Walking & Cycling Strategy; Develop new cycleways and cycle hire provision schemes, incl. Active travel routes and Norfolk Trails) [NCC, SCC, BA, BLAF, RSPB]; Implement projects in county <u>Rights of Way Access</u> Improvement Plans (AIPs) and Broads Integrated Access Strategy to promote circular horse-riding routes [NCC, SCC, BA, BLAF] Promote action through local transport improvement plans to improve transport to and within the Broads, e.g. Bus Back Better Strategy [NCC, SCC, BA] 	Broads IAS Broads STS County cycling and walking strategies Transport Strategy for the East and county transport improvement plans County AIPs/ GIPs Neighbourhood plans	Partners	Strategic plan targets
	<ul style="list-style-type: none"> Implement agreed initiatives to support local fisheries and provision of Broads' angling facilities [EA, angling bodies/community groups] 	Community angling plans	Partners	Plan targets

			Broads STS		
E2	Offer a coordinated and year-round programme of visitor activities that promote a 'Broads' experience', taking measures to prevent any adverse environmental impacts	<ul style="list-style-type: none"> Provide and promote annual, year-round visitor events programme, incl. Outdoors in the Broads, Walkability, Royal Norfolk Show, Dark Skies Festival [BT, BA, DMOs, NGOs, AONBs] 	Broads STS	Partners	# and spread of events, visitor attendance
		<ul style="list-style-type: none"> Create and promote year-round, high quality/low environmental impact 'experiential' itineraries, events and packages, linked into coastal and urban visitor offers [BT, BA, LPS partners, HBOs, TBs, WCOs, LAs, NGOs] 	Broads STS	NA LEP, EXPERIENCE project (NCC). partners	Visitor/event surveys, BA boat census
		<ul style="list-style-type: none"> Complete activities under Broads LPS 'Water, Mills & Marshes' Programmes 1: Interpreting the Landscape and 2: Exploring the Landscape and access improvements to Angles Way; Develop and implement legacy interpretation projects based on evaluation and outcomes of LPS [Broads LPS Board delivery partners] 	WMM and legacy schemes	NLHF LPS, partners	Broads LPS target data for NLHF
E3	Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities of the Broads National Park, and 'point of need' information for visitors	<ul style="list-style-type: none"> Promote the Broads National Park identity, incl.: <ul style="list-style-type: none"> Maintain up-to-date Broads National Park and Visit the Broads social media channels and Visit the Broads website, linked to destination websites at local to international level [BA and partners] Deliver multimedia destination marketing campaigns featuring Norfolk & Suffolk, East of England, UK waterways and UK National Parks [BA and partners] Promote Broads National Park brand at local sites and events, provide brand assets and guidelines to local businesses, and install brand signage, promotional art and interpretation at appropriate locations [BA and partners] 	Broads STS	Partners	BA social media metrics, survey data
		<ul style="list-style-type: none"> Provide comprehensive on-site information to visitors, incl.: 	Broads STS	Partners	BA visitor centre usage, print distribution numbers, social media metrics

		<ul style="list-style-type: none"> ○ Maintain Broads information presence at strategic hubs incl. yacht stations, visitor centres, gateways and key sites; provide Wi-Fi access at yacht stations and visitor centres [BA] ○ Produce and promote Broads visitor newspaper, Broadsheet, trail/location maps, interactive tools and creative projects (e.g. visual arts, drama) [BA] ○ Improve availability and range of information on easier access within the Broads [BA and partners] 			
		<ul style="list-style-type: none"> • Provide information and other resources to encourage environmentally aware and responsible visitor behaviour (e.g. litter disposal, use of barbecues, recognising invasive species, accessing protected habitats) [BA and partners] • Provide safety information and support to recreational users and tourism businesses - <i>also see strategic objective C4</i> 	Broads STS	Partners	Visitor survey data, boat handover surveys
E4	Strengthen the quality and distinctiveness of the local tourism offer, including careers and skills training	<ul style="list-style-type: none"> • Implement measures to assess and guide quality and environmental sustainability standards and local distinctiveness in local tourism provision, incl. quality assurance certification/ award schemes and visitor feedback sites [BT partners, TBs, NA LEP, BA] 	Broads STS	BT Marketing Plan grants, partners, NA LEP	Visitor feedback survey data, # quality/ certification schemes in place
		<ul style="list-style-type: none"> • Provide tailored tourism staff recruitment and training programmes and events through hire boat operators and tourism businesses; develop and offer initiatives to young people wishing to pursue tourism-related careers [BT partners, DMOs, TBs, BHBF, NA LEP, BA] 	Broads STS	Partners, NA LEP	Visitor surveys, # training courses/ young people entering industry

Theme F: Connecting and inspiring communities

Landscapes for everyone

The [Landscapes Review](#) recognises that our National Parks and other protected landscapes are sometimes seen as an exclusive, mainly white and middle-class club, with rules only members understand and too little done to encourage first time visitors. Those who miss out tend to be older people, the young, those from lower socio-economic groups, people with disabilities and black, Asian and minority ethnic communities. The Review sets out proposals to help people from all walks of life, ages and abilities to experience and enjoy these special landscapes. The Covid-19 pandemic has also given many of us a new perspective on the personal appeal and value of getting out into nature for our physical and mental health and wellbeing. At a local level, experience shows that a first-time visit is often enough to show someone that the Broads is not an exclusive club, but it is also important to provide practical and longer-term support for those who need it.

People can feel disconnected from the natural environment for various reasons, such as a lack of physical or cultural access, mobility, information or simply motivation. Offering accessible, [inspiring, and free or affordable](#) ~~and inspiring~~ opportunities can encourage people to 'go the extra mile' and reconnect - or perhaps connect for the first time - with all that nature has to offer. A recent success is the 'Water, Mills and Marshes' programme, which has delivered outreach projects enabling under-represented groups, including local migrant communities and young people, to experience the Broads at first hand. Another positive initiative is social prescribing, which recognises the benefits of the outdoors for all-round health and wellbeing. Environmental education, outreach and volunteering are highlighted below, while other access issues such as integrated travel routes and transport are discussed in Theme E.

Environmental education

The Broads is a wonderful outdoor resource for environmental education as a 'classroom without walls', and for wider outreach. Our long-term aim is that the Broads is a source of enjoyment, learning and personal development for every child in Norfolk and Suffolk during their school career, echoing the 'night under the stars' ambition of the Landscapes Review. However, providers often have to focus limited resources where they are likely to have most impact, particularly for young people who might otherwise not have a chance to experience an outdoor landscape like the Broads. The [Education Strategy for the Broads](#) identifies the need to increase these resources to build upon existing school-based and outreach activities, including legacy projects following the end of the 'Water, Mills & Marshes' scheme in 2023, and initiatives and partnerships established by Generation Green.

Volunteering

Volunteering is a long-established way to involve people in their local landscape, from practical conservation and survey work to supporting education and recreation events. An important focus for the future is to retain and build our volunteer resources by offering more varied and flexible volunteering opportunities to suit everyone, whatever their personal circumstances. [The BA Volunteer Strategy has been updated, with an action plan for 2023-28.](#)

Local development

The Broads executive area straddles parts of six district authority areas (Broadland, East Suffolk, Great Yarmouth, North Norfolk, Norwich and South Norfolk) and is home to around 6,500 people. The Broads Authority is the local planning authority, while the district councils retain all other local authority powers and responsibilities. County planning responsibilities, including minerals and waste planning, sit with Norfolk and Suffolk County Councils. The [Local Plan for the Broads](#) helps to achieve the aims of the Broads Plan through development management policies that seek to preserve and improve the area's built environment and economy while protecting and enhancing its biodiversity, waterways, landscape character and historic environment.

The National Planning Policy Framework identifies the Broads as an area where development may be restricted because of its landscape and scenic beauty. However, it is bordered by areas identified as urban growth locations including Norwich, Great Yarmouth and Lowestoft (all 'gateways to the Broads') and the Local Needs Housing Assessment²⁴ calculates that 358 new dwellings are needed for the Broads by 2041.

While development and regeneration attracts business investment, contributes towards local services and infrastructure improvements and supports a higher quality of life, growth at the scale being planned is not without environmental impact. Robust, [up-to-date](#) planning policies and co-operation between the relevant local planning authorities will continue to be essential. [The Local Plan for the Broads is under review, with an expected adoption date of 2024.](#)

Green Infrastructure and Recreational ~~impact Disturbance~~-Avoidance [and](#) Mitigation Strategies ([GIRAMS](#)) for Norfolk and Suffolk²⁵ will be used to help prevent additional recreational pressure on European designated sites, in part due to the proposed housing growth in the wider local area. In March 2022, Natural England released guidance to local planning authorities (including the Broads Authority) in areas where protected habitats sites are in unfavourable condition due to excess nutrients, with a requirement for new development to achieve [nutrient neutrality](#). [At the time of writing this plan, the Authority is working with neighbouring Local Planning Authorities on how to address this issue](#)²⁶.

²⁴ Great Yarmouth Borough Council and the Broads Authority: Local Needs Housing Assessment 2022: ORS draft report, April 2022

²⁵ [Implementing Norfolk and Suffolk Coast RAMS – see Habitat mitigation \(broads-authority.gov.uk\)](#)

²⁶ [Updates on nutrient neutrality – see Planning permission \(broads-authority.gov.uk\)](#)

Income generation

Section 1.3 highlights the pressures on the Broads Authority's income, and the need for those managing England's protected landscapes to seek increased and more diverse sources of funding. The Authority will continue to work with its Broads Plan partners and the National Parks family to improve income generation to support local projects and services.

Long-term aim

People from all walks of life and all ages and abilities are able to connect with the Broads for their health and wellbeing. Educational and outreach opportunities make use of the area's natural and cultural assets to inspire and motivate everyone, especially young people, as part of lifelong learning. People feel actively involved in decisions about the future of the Broads. Volunteering provides beneficial opportunities for enjoyment, wellbeing and enhanced life skills, and is recognised as a valuable resource in looking after the Broads. Strong planning frameworks and cross-boundary cooperation between local authorities provide vibrant opportunities for socio-economic and environmental sustainability, regeneration and diversification in ways that continue to protect and enhance the distinctive character and assets of the Broads and support thriving local communities.

Table 8

Theme F: Strategic objectives and key actions

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
F1	Increase and promote accessible and 'taster' activities that foster physical and mental health and wellbeing for all, including under-represented groups	<ul style="list-style-type: none"> Build on legacy of Generation Green initiative and Broads LPS 'Water, Mills & Marshes' programmes & mental health research to develop new partnership projects via Norwich Integration Partnership, Restoration Trust, social housing providers, etc [BA, GG, WMM, other partners] Provide accessible, affordable 'try it out' activities for new and under-represented audiences [community/ amenity groups, local businesses, BA, other partners] Provide nature-based health & wellbeing activities, e.g. Active Outdoors, Wellbeing Walks, Green Gym, green & blue social prescribing schemes and /community connectors schemes [LAs, health & social care sector, volunteer sector, BA, other partners] 	WMM and legacy schemes Partnership schemes	NLHF LPS, local businesses, other partners	Broads LPS target data for NLHF NHS wellness statistics (to be determined)

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
F2	Offer varied, flexible and sustainable volunteering opportunities and skills training to suit diverse audiences	<ul style="list-style-type: none"> Update-Implement BA Volunteer Strategy 5-year action plan <u>2023-28</u> [BA] Provide varied, flexible volunteering opportunities (incl. ‘casual volunteering’ events) and associated skills training through multiple sources and sites [BA, TCV, VN, WCO, other partners] 	Broads VS Partner volunteer programmes	Partners	NPA (BA) annual indicator data
		<ul style="list-style-type: none"> Implement opportunities through Broads LPS ‘Water, Mills & Marshes’ Programme 3D: Broads Young Rangers and 3E: People Engagement; Develop legacy volunteering opportunities and projects based on evaluation and outcomes of LPS [Broads LPS delivery partners] 	WMM and legacy schemes	NLHF LPS, partners	Broads LPS target data for NLHF
F3	Provide and expand schools-based and outreach environmental education opportunities for young people, using the Broads as a learning resource	<ul style="list-style-type: none"> Update-Implement BA Education Strategy 5-year action plan <u>2023-28</u> [BA] Produce enhanced range of environmental education schemes, activities and resource tools (incl. Broads Curriculum materials and teacher training support) and promote/deliver to local schools [BA, BEEN partners] 	Broads ES Broads Curriculum	BEEN, other education providers	# participants in target schemes
		<ul style="list-style-type: none"> Complete schools-based educational opportunities under Broads LPS ‘Water, Mills & Marshes’ programmes; develop and implement legacy youth learning and future skills opportunities based on evaluation and outcomes of LPS [Broads LPS delivery partners] 	Broads ES	NLHF funding, partners	Broads LPS target data for NLHF
		<ul style="list-style-type: none"> Build resource capacity to deliver more outreach educational activities for school-aged children by sourcing external funding and sponsorship, training volunteer supervisors and other means [BA, BEEN] 	Broads ES	Partners	Additional new resources in place

Ref	Strategic objectives	Key actions 2022-27 [lead delivery partners]	Delivery links	Resources	Monitoring
		<p>Implement projects for young people focused on skills training, practical experience and progression, incl.:</p> <ul style="list-style-type: none"> • Build capacity to continue objectives of Generation Green initiative, incl. employing project officers to maintain links with YHA residential experiences, and develop successor projects [GG partners, others] • Provide and expand range of life skills outreach programmes, award and apprenticeship schemes (incl. John Muir Award, Forest Schools, BA Youth Rangers, Broads Discovery Days), and progression routes for participants [BEEN, Broads LPS delivery partners] 	Broads ES	Partners, award schemes, apprenticeship schemes Access Unlimited Coalition	# participants in target schemes, participant feedback
F4	Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits	<ul style="list-style-type: none"> • Review and update Local Plan for the Broads and provide planning advice, incl. pre-application service [BA] • Produce, adopt and promote new Design Guide for the Broads in line with NPPF requirements [BA, parish councils] • Engage with local communities, stakeholders and prescribed local 'duty to cooperate' bodies on strategic planning matters [BA, LPAs] • Implement Green Infrastructure and Recreational Disturbance Avoidance Mitigation Strategies to extend and protect biodiversity value of sites [NSNRP, NCP, NSPG] 	Local Plan for the Broads, other LPA Local Plans County RAMS/ GIRAMS	BA, LPAs	NPA planning targets, duty to cooperate principles met
		<ul style="list-style-type: none"> • Develop site masterplans and funding bids to support proposals for strategic sites with significant built, cultural, natural heritage, recreation or green infrastructure value, incl. Hoveton Riverside Park, How Hill, Whitlingham Country Park [BA, LPAs, HHT, WCT] 	Site management plans	Partners	Site management plan targets
F5	Increase income generation to support Broads-themed projects	<ul style="list-style-type: none"> • Support and develop partnership income generation, e.g. private and blended financing models for nature recovery, carbon credits, corporate sponsorship, National Parks Partnerships initiatives, visitor giving schemes, retail sales at visitor centres, etc. [BA, BT, NPE, NA LEP, charities/trusts] 	NPP Love the Broads	Broads Trust, businesses, other partners	Love the Broads data NPP data New income generation streams

Appendices

Appendix A: Broads Plan partners

Many organisations, groups, partnerships and individuals will help the Broads Authority to deliver this plan's strategic objectives. While we cannot list them all here, key partners and partnerships are shown below (see Appendix B for a list of abbreviations).

Partners

[Anglian Water](#) provides a water supply to much of the Broadland catchment and sewerage services throughout the catchment. [Essex & Suffolk Water](#) supplies water to parts of the south and east of the catchment.

[British Marine and its regional association the Broads Hire Boat Federation](#) represent operators of holiday hire cruisers, yachts and day boats.

The Broads executive area straddles six **District Council** areas: [Broadland](#), [East Suffolk](#), [Great Yarmouth](#), [North Norfolk](#), [Norwich](#) and [South Norfolk](#). The councils provide a range of community services including housing, planning ([outside the Broads executive area](#)), and waste collection and recycling. The coastal councils are also coastal erosion risk management authorities.

Within the Broads area, the [Environment Agency](#) is responsible for water quality and resources, fisheries, conservation and ecology, the regulation of major industry including waste and the treatment of contaminated land, and for managing flood risk from main rivers, reservoirs, estuaries and the sea.

[Historic England](#) is a public body offering expert advice on heritage issues and promoting the wider conservation of the historic environment. English Heritage, as an independent charity, oversees the National Heritage Collection of historic properties.

[Internal Drainage Boards](#) are independent public bodies responsible for managing water levels in low-lying areas. As the district land drainage authorities, IDBs supervise land drainage and flood defence works on ordinary watercourses.

The [National Farmers Union](#) (NFU) champions British agriculture and horticulture, campaigns for a sustainable future for British farmers and provides

professional representation and services to its farmer and grower members.

The [National Trust](#) is a charity working to preserve and protect historic places and spaces. It is one of the UK's largest landowners and owner of a large number of heritage properties, including historic houses and gardens, industrial monuments, and social history sites.

[Natural England](#) aims to enhance England's wildlife and landscapes and maximise the benefits they bring to the public. It focuses on agri-environment land management, habitat and landscape conservation, coastal public access and National Trails, and conservation designation.

[Norfolk County Council](#) and [Suffolk County Council](#) are responsible for a wide range of public services within their respective counties including social care, public safety, roads and transport, education, environment and waste management. As highway authorities, their responsibilities include public rights of way for the Broads. The councils are also the Lead Local Flood Authorities, responsible for managing the risk of flooding from surface water, groundwater and ordinary watercourses and leading on community recovery.

The [Norfolk Rivers Trust](#) works to restore, protect and enhance the water environments of Norfolk for wildlife and people through conservation, education and advice.

The [Norfolk & Suffolk Broads Charitable Trust](#) (Broads Trust) manages the 'Love the Broads' fundraising initiative and promotes improvements for people who work in, live in and visit the Broads.

[Norfolk Wildlife Trust](#) and [Suffolk Wildlife Trust](#) are charities working to protect and enhance county wildlife and wild places including reserves, and promote environmental education. Norfolk

Wildlife Trust is the oldest Wildlife Trust in the country.

More than 90 **parish council** areas sit partly within the Broads executive area. The level of government closest to the community, the councils represent local interests, deliver services to meet local needs and support community life and wellbeing.

[The Royal Yachting Association and the regional Norfolk and Suffolk Boating Association represent the interests of private users of pleasure craft.](#)

The **RSPB** is a nature conservation charity that protects and manages special places for wildlife, save species from extinction and encourages people to experience and help protect wildlife and nature.

Partnerships

The **Broadland Catchment Partnership** aims to improve the water environment and provide wider benefits for people and nature through a coordinated catchment-based approach. The partnership is co-hosted by the BA and the Norfolk Rivers Trust.

The goal of the **Broadland Futures Initiative** (BFI) is to agree a framework for future flood risk management that copes more effectively with our changing climate and rising sea level. [The BFI is represented on the Norfolk Strategic Flood Alliance.](#)

The **Broads Biodiversity Partnership** seeks to improve biodiversity through a coordinated approach at a landscape scale. The group is hosted by the Broads Authority.

The **Broads Environmental Education Network** involves education bodies, charities, businesses and others in improving people's understanding of the Broads, including through the 'Broads Curriculum' online resources for schools.

The **Broads and Norfolk Coast Land Managers Board** manages the local [Farming in Protected Landscapes](#) grant scheme, supporting farmers and land managers to carry out projects that benefit the natural environment, mitigate climate change impacts, provide public access and support nature-friendly, sustainable farm businesses.

The **Broads Local Access Forum** is a semi-independent body established under the Countryside and Rights of Way Act. It advises the Broads Authority on improving and promoting access to land within the Broads and adjacent parts of Norfolk and Suffolk.

Broads Tourism is a forum for local tourism businesses through the [Visit the Broads DMO](#). It aims to promote the Broads as a high quality, 'green' visitor destination through quality standards, staff training and clear, coordinated messages that define the area's status and special qualities.

The **Greater Norwich Development Partnership** involves Broadland, Norwich and South Norfolk councils working on a Joint Core Strategy that sets a long-term vision and development objectives for the area. The Broads executive area must be regarded in the Joint Core Strategy.

National Parks England promotes the needs of the country's 10 National Parks. More widely, **National Parks UK** looks after the interests of the 15 National Parks in England, Scotland and Wales.

The **New Anglia Local Enterprise Partnership** works with businesses and public sector partners to drive enterprise in Norfolk and Suffolk.

The **Norfolk Biodiversity Partnership** has a shared vision for the conservation, enhancement and restoration of the county's biological diversity.

The **Norfolk Coast Partnership** and **Suffolk Coast & Heaths AONB Partnership** are designated as outstanding landscapes whose distinctive character and natural beauty are so precious that it is in the nation's interest to safeguard them. Part of the Norfolk Coast AONB overlaps with the Broads Authority executive area.

The **Norfolk Geodiversity Partnership** and **GeoSuffolk** record, conserve and promote appreciation of the local geological and geomorphological diversity.

The **Norfolk & Suffolk Nature Recovery Partnership** was set up to help deliver the 25-year Environment Plan commitment to create a national Nature Recovery Network of biodiversity-rich places.

The [River Wensum Strategy Partnership](#) delivers projects to enhance the river corridor through Norwich and increase its access and use by the public.

Appendix B: Abbreviations

Table 9

Abbreviations used in Broads Plan

Abbreviation	Meaning
AINA	Association of Inland Navigation Authorities
AIP / GIP	Access Improvement Plan/ Green Infrastructure Plan
AONB	Area of Outstanding Natural Beauty
AW / ESW	Anglian Water / Essex & Suffolk Water
BA	Broads Authority
BASG	Broads Angling Services Group
BAWAG	Broadland Agricultural Water Abstractors Group
BBP	Broads Biodiversity Partnership
BC	British Canoeing
BCP	Broadland Catchment Partnership
BEEN	Broads Environmental Education Network
BEIS / BIS	Dept. for Business, Energy & Industrial Strategy / Dept for Business, Innovation & Skills
BFI	Broadland Futures Initiative
BHBF	Broads Hire Boat Federation
BLAF	Broads Local Access Forum
BLMB	Broads Land Management Board
BMF	British Marine Federation
BRASCA	Broads Reed and Sedge Cutters Association
BRCP	Broadland Rivers Catchment Plan
Broads BWS	Broads Biodiversity and Water Strategy
Broads CCAP	Broads Climate Change Action Plan
Broads ES	Broads Education Strategy
Broads IAS	Broads Integrated Access Strategy
Broads LCAP	Broads Landscape Character Assessment Plan
Broads LPS	Broads Landscape Partnership Scheme
Broads STS	Broads Sustainable Tourism Strategy
Broads VS	Broads Volunteer Strategy
Broads WMS	Broads Water Management Strategy
BSS	Boat Safety Scheme
BT	Broads Tourism
CAA	Conservation Area Appraisal
CAMS	Catchment Abstraction Management Strategy
CANAPE	Creating a New Approach to Peatland Ecosystems
CCP	Climate Change Partnership
CFE	Campaign for the Farmed Environment
CFMP	Catchment Flood Management Plan
CPE	Coastal Partnership East
CS	Countryside Stewardship
CSF	Catchment Sensitive Farming
DMO	Destination Management Organisation
DWWP	Diffuse Water Pollution Plans
EA	Environment Agency
ELMS	Environmental Land Management Schemes
ESC	East Suffolk Council
EtB	Electrifying the Broads
EVS/AFS	Electric Vehicle and Alternative Fuels Strategies
FE	Further Education

Abbreviation	Meaning
FiPL	Farming in Protected Landscapes
FRMP / FRMS	Flood Risk Management Plan / Flood Risk Management Strategy
FWAG	Farming & Wildlife Advisory Group
GG	Generation Green
GI-RAMS	Green Infrastructure / Recreational Disturbance Avoidance Mitigation Strategies
GYBC	Great Yarmouth Borough Council
HA	Highways Authorities
HBO	Hire Boat Operators
HE	Historic England
HHT	How Hill Trust
HLF	Heritage Lottery Fund
IDB	Internal Drainage Board
LA/ LPA	Local Authority / Local Planning Authority
LAPTF	Lowland Agricultural Peat Task Force
LLFA	Lead Local Flood Authorities
LNR	Local Nature Recovery
MMO	Marine Management Organisation
N&SNRP	Norfolk and Suffolk Nature Recovery Partnership
NA LEP	New Anglia Local Enterprise Partnership
NAT	Norfolk Archaeological Trust
NBIS	Norfolk Biodiversity Information Service
NBP	Norfolk Biodiversity Partnership
NC / SC	Norfolk Constabulary / Suffolk Constabulary
NCC / SCC	Norfolk County Council / Suffolk County Council
NCPGS	Nature for Climate Peatland Grant Scheme
NE	Natural England
NGO	Non-Governmental Organisation
NGP	Norfolk Geodiversity Partnership
NLHF LPS	National Lottery Heritage Fund Landscape Partnership Scheme
NNDC	North Norfolk District Council
NNNSI / INNS	Norfolk Non-Native Species Initiative / Invasive non-native species
NP / NPA	National Park / National Park Authority
NPE	National Parks England
NPP	National Parks Partnership
NR	Network Rail
NRT	Norfolk Rivers Trust
NSBA	Norfolk & Suffolk Boating Association
NSFA	Norfolk Strategic Flooding Alliance
NSNRP	Norfolk & Suffolk Nature Recovery Partnership
NSPG	Norfolk Strategic Planners Group
NWSF	Norfolk Water Safety Forum
NWT	Norfolk Wildlife Trust
PMSC	Port Marine Safety Code
RSPB	Royal Society for the Protection of Birds
RWSP	River Wensum Strategy Partnership
RWT	River Waveney Trust
RYA	Royal Yachting Association
SAC	Special Area of Conservation
SFRA	Strategic Flood Risk Assessment
SMP	Shoreline Management Plan
SSSI	Site of Special Scientific Interest
SWMP	Surface Water Management Plan
SWT	Suffolk Wildlife Trust

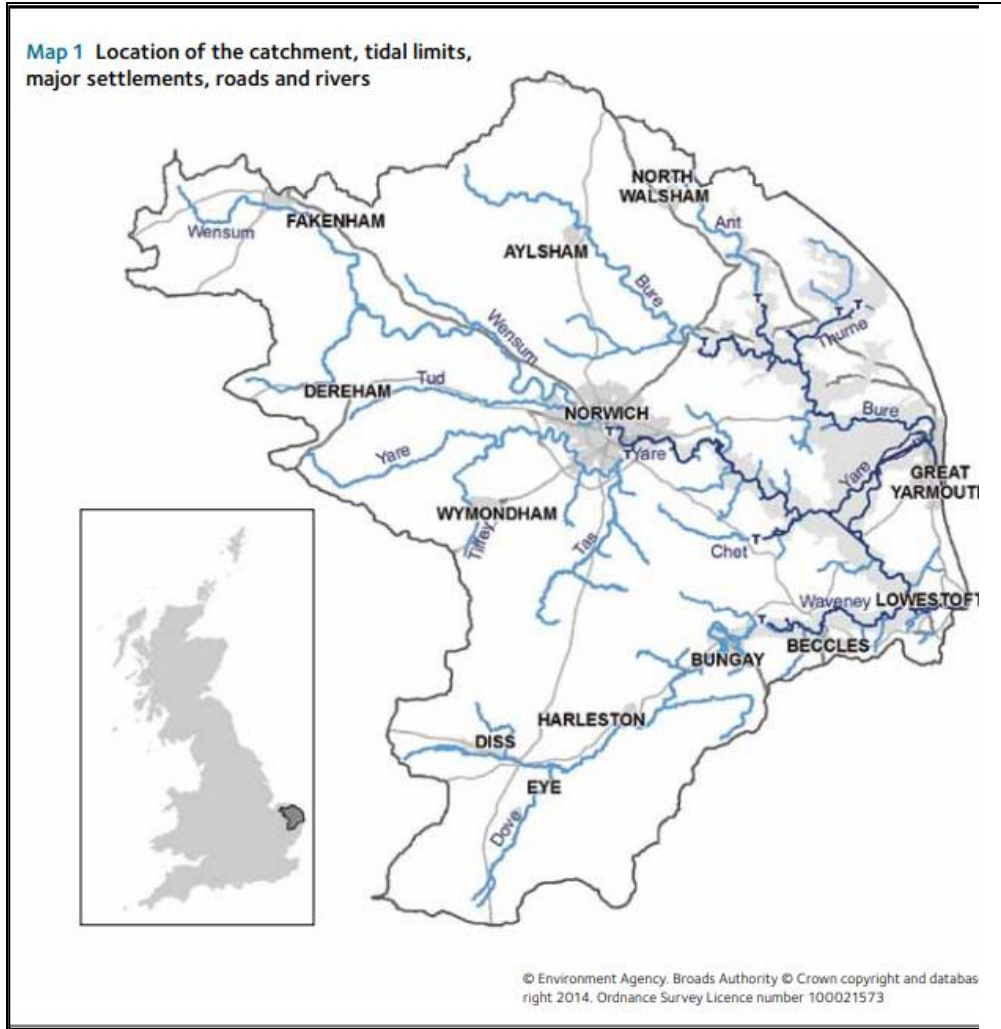
Abbreviation	Meaning
TBs	Tourism businesses
TCV	The Conservation Volunteers
UKPN	UK Power Networks
VN	Voluntary Norfolk
WCO	Wildlife, heritage and conservation bodies
WCT	Whitlingham Charitable Trust
WFD	Water Framework Directive
WMM	Water, Mills & Marshes project
WSF	Water Sensitive Farming

Appendix C: Maps

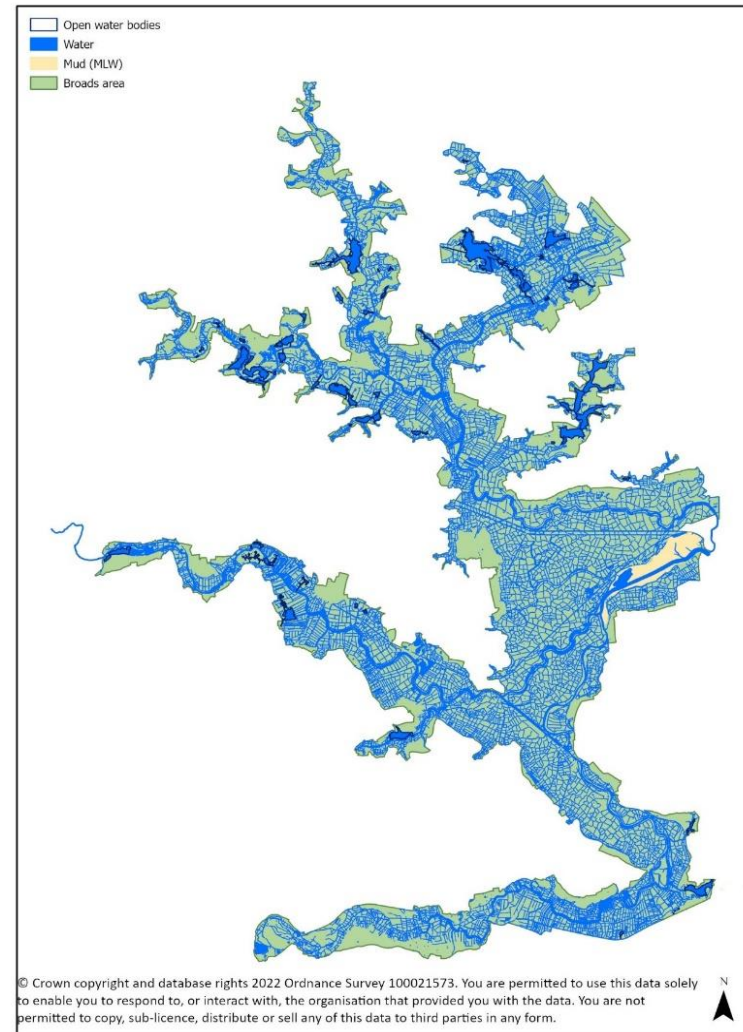
Map 1 Broads executive area



Map 2 Broadland Rivers Catchment



Map 3 Water space, Broads Authority executive area





Sustainability Appraisal Report

to accompany the revised draft Broads Plan 2022-27

Version: 23 September 2022

Broads Authority
Yare House, 62-64 Thorpe Road
Norwich NR1 1RY
Tel: 01603 610734
Fax: 01603 756069
Email: [broadsplan@broads-authority.gov.uk](mailto:broadspan@broads-authority.gov.uk)
www.broads-authority.gov.uk

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1. Introduction

1.1. Broads Authority

The Broads Authority is a Special Statutory Authority, established under the Norfolk and Suffolk Broads Act 1988 to manage the Broads for the purposes of:

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

None of these three purposes takes precedence. Under the Act, in discharging its functions, the Authority must also have regard to:

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

Further provisions for the regulation and management of the navigation area were made through the Broads Authority Act 2009.

1.2. Broads Plan

The Broads Authority is required to produce a management plan for the Broads, known as the Broads Plan, and review it at least once every five years¹. The first draft Broads Plan 2022-27 was published for consultation from 23 May to 15 July 2022.

It is important to note that the Broads Plan is a plan for the Broads, not just for the Broads Authority. While the Authority is responsible for its production, a wide range of organisations, interest groups and communities are involved in caring for the area. As such, the Plan's successful delivery depends on a shared vision and commitment and on partnership working to make the best use of knowledge, efforts and resources.

1.3. Sustainability Appraisal Report

This is the Sustainability Appraisal (SA) Report for the revised draft Broads Plan 2022-27. It incorporates the requirements of the SEA Directive (2001/42/EC). Strategic Environmental Assessment (SEA) is mandatory for plans and programmes that are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste and water management, telecommunications, tourism, town and country planning or land use, and that set the framework for future development consent of projects listed in the EIA Directive; or that have been determined to require an

¹ [Norfolk and Suffolk Broads Act 1988](#), part 1 section 3

assessment under the [Habitats Directive](#). Undertaking a broader SA offers a more comprehensive process that considers social and economic factors as well as environmental impacts, and is the best practice approach taken by most National Park Authorities in assessing national park management plans.

This SA Report identifies the likely significant effects on the environment of the [revised](#) draft Broads Plan. The public and the environmental authorities ~~are~~ were informed and consulted on the [first](#) draft Plan and ~~on the accompanying~~ SA Report. The SA Report and the consultation responses on the [first](#) draft Plan ~~were~~ are considered before a [revised draft final](#) Plan ~~was~~ is prepared for adoption. Once the Plan is adopted, the environmental authorities and the public are informed and relevant information is made available. To identify unforeseen adverse effects at an early stage, significant environmental effects of the Plan are to be monitored.

1.4. Habitats Regulation Assessment

The [revised](#) draft Broads Plan 2022-27 is also subject to a **Habitats Regulation Assessment (HRA)**, which considers the impacts of the plan on conservation sites designated under the European Habitats Directive. The HRA will be published [on the Broads Authority's website](#). ~~for consultation alongside the draft Broads Plan and this SA.~~

2. Scope of the SA

2.1. Stages of SA process

Table 1 outlines how the requirements for sustainability appraisal at various stages of plan production are being addressed.

Table 1

Stages of SA process for Broads Plan 2022-27

Stage	Developing and refining alternatives and assessing effects
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	Broads Authority purposes and long-term Vision for the Broads set context for Broads Plan. Sustainability baseline at Appendix 2 of this draft SA Report. SA Scoping Report published at Local Plan for the Broads (broads-authority.gov.uk) .
Stage B: Developing and refining options	Broads Plan sets high-level strategic direction for managing the Broads; strategic objectives in plan implemented through more detailed plans, programmes and operational procedures that will be subject to their own SA where appropriate.
Stage C: Appraising the effects of the plan	Strategic objectives in draft Broads Plan 2022-27 assessed against Sustainability Objectives set out in SA Scoping Report.
Stage D: Consulting on the draft plan and SA Report	CURRENT STAGE – consultation on first draft Plan 23 May-15 July 2022; revised draft Plan to Broads Authority 23 Sept 2022
Stage E: Monitoring the	Broads Plan monitored through State of the Park indicators, additional monitoring measures at project/operational level, and

implementation of the plan	reporting to Broads Authority's full board.
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2.2. Assessing alternatives

The SA process requires alternatives to be assessed. ~~However, reasonable alternatives to the strategic objectives in the draft Broads Plan would be very limited given their high-level guiding nature and the expectation of the Plan to be in conformity with the Broads Authority's statutory purposes and duties (section 1.1), as well as other legislation for the environmental protection of the Broads. The review process enables us to develop and refine the objectives in consultation with delivery partners and wider stakeholders, and The core purpose of the Broads Plan is to set the overarching high-level strategic direction for the management of the Broads. It sets out partnership intentions to secure a sustainable future for the Broads environment and communities, with strategic objectives that reflect both the Broads Authority's three statutory purposes (see section 1.1) and the Sustainability Objectives of the SA Framework. As such, alternative options are not formally considered in this SA and the proposed objectives are~~ evaluated them in light of their potential impacts on the Sustainability Objectives and the indicators that comprise the sustainability baseline.

~~The same SA scoping exercise, including data collation for the sustainability baseline and literature review, was undertaken for this Broads Plan and for the emerging Local Plan for the Broads (due to be adopted in 2024). The Local Plan will assess reasonable alternatives to the proposed policies, in accordance with the requirements of the Planning and Compulsory Purchase Act 2004.~~

2.3. Scoping Report

The **Scoping Report** forms the starting point (Stage A) for sustainability appraisal. Its purpose is to:

- a) Identify other relevant policies, plans and programmes and sustainability objectives;
- b) Collect baseline information;
- c) Identify sustainability issues and problems;
- d) Develop the sustainability appraisal framework; and
- e) Consult the consultation bodies on the scope of the sustainability report.

~~Alongside this Broads Plan review, the Broads Authority is reviewing the Broads Local Plan, which sets the spatial planning policies for the Broads Authority Executive Area. The same SA scoping exercise, including data collation for the sustainability baseline and literature review, has been undertaken for both plans.~~The Authority consulted on the [SA Scoping Report](#) with the statutory Environmental Bodies (Natural England, English Heritage and Environment Agency) and other organisations from 23 July to 27 August 2021. The Report and consultation responses may be viewed at [Local Plan for the Broads \(broads-authority.gov.uk\)](#).

2.4. Sustainability Objectives and sustainability baseline

The SA process is designed to inform the content of a developing plan by assessing it against a set of **Sustainability Objectives**. The Sustainability Objectives used to assess the draft Broads Plan are in Table 2, with a key to the colours and symbols used in Table 3. The **SA Framework** at Appendix 1

shows the decision-making criteria for each Sustainability Objective, together with relevant SEA² themes.

The Sustainability Objectives relate to different aspects of sustainability. They are broken down into environmental (ENV), social (SOC) and economic (ECO) factors, although there are close interrelationships between them. ENV factors include climate change, air pollution, flood risk, landscape and townscape, wildlife and habitats, water and soil quality; SOC factors include effects on the population such as human health, deprivation, education and housing; and ECO factors include rural economies and economic wellbeing.

Data for the Sustainability Objectives were collected to establish the ‘state of the environment’, known as the **sustainability baseline** (Appendix 2). An analysis of trends and targets was used to help predict how the sustainability baseline might change in light of each of the strategic objectives in the draft [versions of the](#) Broads Plan. This SA Report also includes a **literature review** of relevant plans, programmes and environmental objectives (Appendix 3).

Table 2
SA Sustainability Objectives

Sustainability Objectives
ENV1: To reduce the adverse effects of traffic (on roads and water)
ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently
ENV3: To protect and enhance biodiversity and geodiversity
ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages
ENV5: To adapt, become resilient and mitigate against the impacts of climate change
ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change
ENV7: To manage resources sustainably through the effective use of land, energy and materials.
ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left
ENV9: To conserve and where appropriate enhance the cultural heritage, historic environment, heritage assets and their settings
ENV10: To achieve the highest quality of design that is innovative, imaginative, sustainable and reflects local distinctiveness
ENV11: To improve air quality and minimise noise, vibration and light pollution

² Strategic Environment Assessment

Sustainability Objectives
ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle
SCO2: To reduce poverty, inequality and social exclusion
SOC3: To improve education and skills, including those related to local traditional industries
SOC4: To enable suitable stock of housing meeting local needs, including affordability
SOC5: To maximise opportunities for new/additional employment
SOC6: To improve the quality, range and accessibility of community services and facilities, and to ensure new development is sustainably located with good access by means other than a private car to a range of community services and facilities
SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity
ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas
ECO2: To ensure the economy actively contributes to social and environmental wellbeing
ECO3: To offer opportunities for tourism and recreation in a way that helps the economy, society and the environment

2.5. Summary of assessment

The outcome of the appraisal (Appendix 1) is that the majority of the strategic objectives in the revised draft Broads Plan show either a positive or neutral impact on the Sustainability Objectives. A small number show uncertain impacts, depending on the implementation of the objective, and none show a negative impact.

2.6. Next steps

The Broads Authority ~~assessed will assess~~ the consultation responses to the draft Broads Plan 2022-27 and accompanying SA Report (~~this document~~) and prepared a revised draft Broads Plan and SA Report. The revised draft Plan will be presented to the Broads Authority board meeting on 23 September 2022 with a recommendation for its adoption. Pending any final amendments agreed by members at a full Broads Authority meeting in September 2022, the Broads Plan will be adopted and implemented.

Appendix 1: Assessment of strategic objectives in draft Broads Plan 2022-27

Table 3

Key to assessment of Sustainability Objectives

Symbol	Impact on Sustainability Objectives
+	Positive impact
o	No/neutral impact or not relevant
-	Negative impact
?	Uncertain impact / depends on implementation

Theme A: Responding to climate change and flood risk

Strategic objectives 2022-27	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3
A1. Prepare a long-term integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area	o	+	+	o	+	+	o	o	o	o	o	+	o	o	o	o	o	o	o	+	o	o
A2. Work towards making all Broads Authority operations carbon neutral by 2030 and carbon zero by 2040	+	o	+	?	+	o	+	o	o	o	o	+	o	o	o	o	o	o	o	o	o	o
A3. Agree carbon reduction targets for the Broads National Park and promote action to reduce emissions	+	o	+	?	+	+	+	o	o	o	?	+	+	o	o	o	o	o	o	+	o	+

Objective A1 should work directly to manage flood risk for the benefit of people, nature and the economy in the Broads and wider area, but the emerging strategy will also be subject to its own SA process. Objectives A2 and A3 should have a positive impact for the environment, and reduce vulnerability of local communities and businesses to the impacts of climate change. The areas of uncertainty acknowledge that the means to reduce carbon emissions may have the potential for either positive or negative effects, depending on the type and scale of development. For example, electric boating may reduce noise and air pollution, but siting electric

charging points in rural areas away from power sources may require more visually intrusive charging structures. Objective A3 should work directly to manage flood risk for the benefit of people, nature and the economy in the Broads and wider area, but the emerging strategy will also be subject to its own SA process.

Theme B: Improving landscapes for biodiversity and agriculture

Strategic objectives 2022-27	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3
B1. Restore, maintain and enhance rivers and broads lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques	0	+	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B2. Promote best practice water capture and usage across the Broadland rivers catchment and reduce point and diffuse pollution into the floodplain and water courses	0	+	+	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B3. Seek biodiversity net gain and Maintain, enhance and increase areas of priority fen, reed bed, grazing marsh and wet woodland to , protecting peatlands ecosystems as carbon sinks and seeking environmental net gain	0	+	+	0	+	+	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0
B4. Define, implement and monitor management regimes for priority species and invasive non-native species	0	+	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B5. Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to National Biodiversity Network	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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All objectives in this section should have a significant beneficial effect on protecting and enhancing local biodiversity and geodiversity and managing resources sustainably. The objectives should also increase the resilience of Broads' habitats, wildlife and agriculture to the impacts of climate change, for example through protecting and restoring peatlands to capture and store carbon. A healthy natural environment should also have a secondary beneficial effect in terms of supporting the local tourism economy and promoting social health and wellbeing.

Theme C: Maintaining and enhancing the navigation

Strategic objectives 2022-27	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
C1. Maintain navigation water depths to defined specifications, reduce sediment input and dispose of dredged material in sustainable and beneficial ways	o	?	?	o	o	o	+	+	o	o	o	o	o	o	o	o	o	o	o	o	o	o	+
C2. Maintain existing navigation water space and develop appropriate opportunities to extend access for various types of craft	o	o	?	o	o	o	o	o	o	o	o	o	+	o	o	o	o	o	o	o	o	o	+
C3. Manage water plants and riverside trees and scrub, and seek resources to increase operational targets	o	?	?	o	o	o	+	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
C4. Maintain and improve safety and security standards and user behaviour on the waterways	o	o	o	o	o	o	o	o	o	o	o	o	+	o	o	o	o	o	+	o	o	o	+

Protecting the interests of navigation is one of the Broads Authority’s statutory purposes. The areas of uncertainty acknowledge that some activities under this theme have the potential to cause mainly short-term negative environmental or ecological effects, such as dredging increasing turbidity and releasing pollutants into the water. To mitigate such impacts, the Broads Authority applies [Environmental Standard Operating Procedures](#) to all its practical and engineering works, including dredging and water plant management, and this guidance is generic across all operators in the Broads. However, these activities can also enhance biodiversity, such as improving water quality by restoring depth and flow and by removing polluted sediment. In terms of managing flood risk, various modelling studies have shown that increasing the depth in tidal rivers such as in the Broads does not influence the water levels during flood events.

To minimise the potential for waterborne recreational activities within the navigation area to have negative environmental impacts, such as disturbing wildlife and increasing sedimentation from bank erosion, the Authority applies measures such as zoning agreements and permits (e.g. for water-skiing) and speed limit byelaws. It also works with local tourism operators and other partners to promote safe and environmentally friendly boating guidance to waterways users. Maintaining and improving the navigation should have a beneficial secondary effect on supporting the local economy and on promoting peoples’ health and wellbeing.

Theme D: Protecting landscape character and the historic environment

Strategic objectives 2022-27	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3	
D1. Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including 'at risk' assets	0	0	+	+	0	0	0	0	+	+	0	0	0	0	+	0	+	0	0	0	0	?	+
D2. Maintain an up-to-date Broads Landscape Character Assessment and use to inform conservation action plans	0	0	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	?	+
D3. Maintain up-to-date Conservation Area designations, appraisals and management proposals	0	0	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	?	+	?	?	+
D4. Reduce the impacts on the Broads of visual intrusion and noise and light pollution, and promote Dark Sky Discovery Sites	0	0	+	+	0	0	0	0	+	+	+	0	+	0	0	0	0	0	0	0	0	0	+

The objectives to monitor, protect and enhance the Broads' landscape character and heritage assets, including 'at risk' assets, should have a positive effect on the area's distinctiveness and quality, on improving local community services and facilities, and on supporting local traditional industries such as thatching and millwrighting. Action to deliver the objectives may have a negative impact on the natural and cultural environment if not appropriately planned for, but the potential for this to happen should be mitigated through local landscape and conservation area assessments where relevant, asset management plans, the provision of advice to owners and developers, and the application of Local Plan development policies (that are subject to their own SA process to limit the potential for negative impacts, using the same SA Sustainability Objectives as used for the Broads Plan). The objectives are also likely to have a beneficial secondary effect on the tourism economy, and may help to foster community identity and a sense of place.

Theme E: Promoting understanding and enjoyment

Strategic objectives 2022-27	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3
E1. Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities	+	o	?	o	+	o	o	o	o	o	o	o	+	+	o	o	o	+	o	+	o	+
E2. Offer a coordinated and year-round programme of visitor activities that promote a ‘Broads’ experience’, taking measures to prevent any adverse environmental impacts	o	o	?	o	o	o	o	o	o	o	o	o	+	o	+	o	o	o	o	+	o	+
E3. Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities of the Broads National Park, and ‘point of need’ information for visitors	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	+
E4. Strengthen the quality and distinctiveness of the local tourism offer, including careers and skills training	o	o	o	o	o	o	o	o	o	o	o	o	o	+	+	o	+	o	o	+	o	+

The objectives in this section support the Broads Authority’s second purpose to promote understanding and enjoyment of the Broads National Park. They should have beneficial impacts on the local tourism economy and employment and on the social health and wellbeing, environmental awareness and social inclusion of local communities and visitors. The areas of uncertainty acknowledge that an increase in infrastructure to support recreational access and activity could have negative environmental impacts, as could a significant increase in visitor numbers. These potential outcomes are mitigated through good communication about the area’s protected status and special qualities, and through the application of Broads Local Plan policies that are subject to their own SA process to limit the potential for negative impacts (using the same SA Sustainability Objectives as used for the Broads Plan). Projects identified in county access and travel improvement plans will also be subject to SA.

Theme F: Connecting and inspiring communities

Strategic objectives 2022-27	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV8	ENV9	ENV10	ENV11	ENV12	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	ECO1	ECO2	ECO3
F1. Increase and promote accessible and ‘taster’ activities that foster physical and mental health and wellbeing for all, including under-represented groups	o	o	o	o	o	o	o	o	o	o	o	o	+	+	+	o	?	o	o	o	+	+
F2. Offer varied, flexible and sustainable volunteering opportunities and skills training to suit diverse audiences	o	o	?	?	o	o	o	o	?	o	o	o	+	+	+	o	?	o	o	o	+	+
F3. Provide and expand schools-based and outreach environmental education opportunities for young people, using the Broads as a learning resource	o	o	?	o	o	o	o	o	o	o	o	o	+	+	+	o	?	o	o	o	+	+
F4. Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits	? The Local Plan for the Broads will be reviewed during this Broads Plan period and will be subject to its own SA process to limit the potential for negative impacts in the spatial delivery of Broads Plan objectives.																					
F5. Increase income generation to support Broads-themed projects	? Any activity supported through increased income would be subject to its own SA process to limit the potential for negative sustainability impacts.																					

The objectives in this section to provide opportunities for all, including young people and those from under-represented or disadvantaged groups, to experience the Broads should have positive social and economic impacts, including promoting health and wellbeing and reducing social exclusion. Offering volunteering and skills training opportunities and providing environmental education and outreach should foster greater engagement with young people and local communities, raising awareness of and respect for the Broads’ environment and special qualities, and may also help to build community identity. Depending on their implementation, these activities should also help to protect and enhance the environment and may be beneficial for participants’ employment opportunities, for example by enhancing practical and life skills.

Appendix 1: SA Framework

Table 4 sets out the SA Sustainability Objectives, relevant SEA themes, and the decision-making criteria used to help assess the strategic objectives in the Broads Plan. It should be noted that the same SA Framework is being used to assess the policies and allocations in the emerging Broads Local Plan, and some of the decision-making criteria will be more relevant to that document.

Table 4
SA Sustainability Objectives (SO) decision-making criteria

SO	SEA themes	Reason for SO	Decision-making criteria
ENV1: To reduce the adverse effects of traffic (on roads and water)	Climate change, air and pollution	Modes of transport can impact local air quality, heritage, health and carbon emissions.	<ul style="list-style-type: none"> • How does the policy/allocation/strategic objective affect: <ul style="list-style-type: none"> ○ Walking, cycling, public transport? ○ Air quality? ○ Amenity? ○ Single occupancy car use? ○ Use of waterways? ○ Access to special qualities of the Broads by sustainable transport modes? ○ The net impact of transport infrastructure such as road signage, lighting, conspicuous structures and parking? • What is the resulting impact of traffic on: <ul style="list-style-type: none"> ○ Heritage? ○ Landscape? ○ People? ○ Water? • Is the allocation within walking distance³ of key services?

³ Manual for Streets states this as being 10 minutes/800m

SO	SEA themes	Reason for SO	Decision-making criteria
			<ul style="list-style-type: none"> • Will routes be: <ul style="list-style-type: none"> ○ functional and accessible for all? ○ safe and attractive public spaces? • Does it consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles?
ENV2: To safeguard a sustainable supply of water, to improve water quality and to use water efficiently	Land, water and soil resources	Water quality in the Broads is critical to the area's value for wildlife, and to its appeal for recreation providing a higher value tourism economy. Anglia Water Services estimate that the Norwich and the Broads (Norwich) resource zone will be in deficit by 2045.	<ul style="list-style-type: none"> • How does the policy/allocation/strategic objective affect: <ul style="list-style-type: none"> ○ Water quality? ○ Water quantity? ○ Surface water run off? Does it reduce run-off rates? Does it increase water absorption / management? ○ Wastewater? ○ Drainage? ○ Pathways for pollutants?
ENV3: To protect and enhance biodiversity and geodiversity	Biodiversity	One of the statutory purposes of the Broads Authority is to conserve and enhance the natural beauty and wildlife of the Broads. It is one of the most important freshwater wetlands in Europe and over 25% of the 300km of the nationally protected landscape has a European designation for its	<ul style="list-style-type: none"> • How does the policy/allocation/strategic objective affect: <ul style="list-style-type: none"> ○ The ability to retain and maintain soil carbon? ○ Geological interests? ○ The potential for managed accessible geological feature exposures? ○ County Wildlife Sites? ○ Local and National Nature Reserves? ○ Ramsar Sites? ○ SPAs, SACs? ○ SSSIs? ○ BAP Priority Species and habitats?

SO	SEA themes	Reason for SO	Decision-making criteria
		<p>nature conservation interest, including three Special Areas of Conservation and two Special Protection Areas; large parts are designated as an internationally important wetland under the Ramsar convention. Soils in the Broads contain and continue to store large amounts of carbon and archaeological remains.</p> <p><u>There are geological features which provide evidence for the area's unique environmental history.</u></p>	<ul style="list-style-type: none"> ○ Habitat connectivity and Ecological Networks? ○ Trees and hedgerows? ○ Waterbodies? ○ Green Infrastructure?
ENV4: To conserve and where appropriate enhance the quality and local distinctiveness	Cultural heritage, landscape and townscape	It is the tranquil character or the characteristic of the Broads together with its expansive character of open undeveloped skylines that are among the primary special qualities underpinning the national designation of the Broads. The	<ul style="list-style-type: none"> ● How does the allocation/policy/strategic objective affect: <ul style="list-style-type: none"> ○ The setting of the Broads? ○ The perception of the Broads? ○ The landscape character? ○ Cultural heritage and heritage assets? ○ Dark skies and tranquillity? ○ The special qualities of the Broads⁴? ○ Landscape features?

⁴ Taken from the Broads Climate Change Adaptation Plan: Open water in lakes and rivers, Breydon Water (estuary), Fens/reed beds, Grazing marshes and ditches, Wet woodlands, Historic buildings, especially mills, Boating and the riverside economy, Farmland (including rights of way), Open landscapes, big skies and tranquillity and the coast.

SO	SEA themes	Reason for SO	Decision-making criteria
of landscapes and towns/villages		open distinctive landscape comprises a complex and interlinked mosaic of wetland habitats including open water, reedbeds, carr woodland, grazing marsh and fen meadow. Human interaction has helped shape the Broads.	<ul style="list-style-type: none"> ○ Peat? ○ Conservation Areas? ○ Designated and undesignated heritage assets? ○ The quality and local distinctiveness of the Broads towns/villages/buildings? ○ Open Space? ○ Green Infrastructure? ○ Harmful incremental change?
ENV5: To adapt to and mitigate against the impacts of climate change	Climate change, air and pollution	The Broads is an ever-changing living landscape, shaped over centuries by the interaction between people, the environment and the climate. While these dynamic processes will continue, sea level rise and the predicted more rapid changes to the climate pose considerable challenges and opportunities to this easterly, low-lying wetland.	<ul style="list-style-type: none"> ● How does the allocation/policy/strategic objective affect: <ul style="list-style-type: none"> ○ Emissions of greenhouse gases? ○ Sequestering carbon dioxide? ○ Single occupancy car use? ○ HGV/delivery movements? ○ Public transport? ○ Cycling/walking? ○ Boat emissions? ○ The ability of communities to adapt? ○ The ability of habitats and species to adapt? ○ Peat? ○ Energy use? ○ Open Space? ○ Green Infrastructure?
ENV6: To avoid, reduce and manage	Land, water and soil resources,	80% of the Broads Executive Area is at risk of flooding. There are well-known impacts of	<ul style="list-style-type: none"> ● Is flood risk avoided? ● Is flood risk managed/mitigated? ● How does the allocation/policy/strategic action affect flooding:

SO	SEA themes	Reason for SO	Decision-making criteria
flood risk and to become more resilient to flood risk and coastal change	climate change, air and pollution	flooding to people, the environment and the economy. The coastal area of the Broads is at risk of saline incursion further up the rivers during spring tides and storm surges, drought and flooding events as well as erosion or breach of the sea defences.	<ul style="list-style-type: none"> ○ On site? ○ In the vicinity? ○ Elsewhere? ● Is the allocation in the area of highest risk of flooding? ● Is the allocation appropriate to the flood risk on site? ● Does the policy/strategic objective consider different sources of flooding⁵? ● What is the impact of climate change on flood risk? ● Can flood risk be reduced? ● How vulnerable is the proposed land use⁶? ● Does the policy/allocation/strategic objective reduce run-off rates? ● Does it increase water absorption / management? ● Does it affect risk to people or property? ● Does it affect opportunities for future coastal management? ● Does it restrict choice for managing the coast in the future? ● Does it consider the effect of or potential for damage (e.g. to a structure)?
ENV7: To manage resources sustainably through the effective use of land, energy	Land, water and soil resources	The efficient and effective use of resources is a key consideration in plan making, especially with regards to not sterilising mineral resources, the re-use of brownfield land appropriately and reducing	<ul style="list-style-type: none"> ● Is the allocation on: <ul style="list-style-type: none"> ○ Brownfield Land? ○ Greenfield Land? ● Does the allocation use land effectively? ● Does the allocation/policy/strategic objective affect energy efficiency? ● Are there any safeguarded mineral sites? ● Will it prevent the sterilisation of known or suspected mineral resources by development?

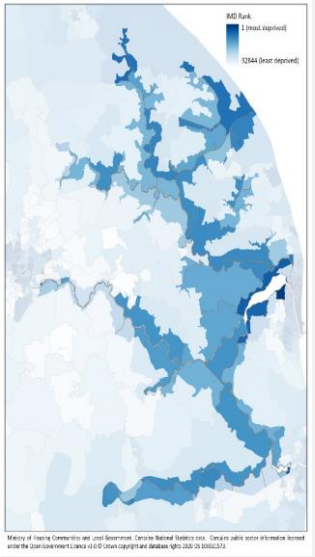
⁵ Including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

⁶ <http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/>

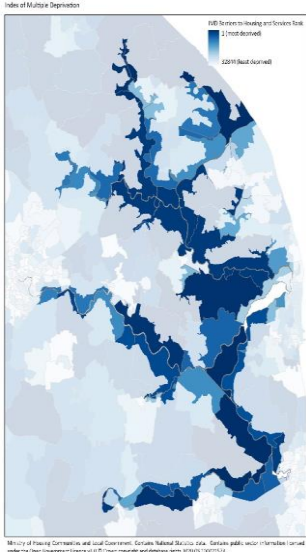
SO	SEA themes	Reason for SO	Decision-making criteria
and materials		energy consumption.	<ul style="list-style-type: none"> • Does the policy consider origin of resource/where resource derived from?
ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left	Population and human health, climate change, air and pollution	National and local policy aims to reduce the amount of waste produced and to reduce the amount and proportion of waste disposed of to landfill, in accordance with the waste hierarchy, to meet the Landfill Directive targets.	<ul style="list-style-type: none"> • Does the policy/strategic objective help reduce waste, reuse waste or recycle/compost?
ENV9: To conserve and where appropriate enhance the cultural heritage and archaeological importance of the area	Cultural heritage, landscape and townscape	The cultural heritage includes the landscape and built environment, archaeology, conservation areas, and local skills, crafts and traditions. The Broads is of significant cultural value. Its landscape reflects historic patterns of human activity over thousands of years, and contains features particular to the area.	<ul style="list-style-type: none"> • Does the allocation/policy/strategic objective affect: <ul style="list-style-type: none"> ○ The quality and local distinctiveness of the Broads towns/villages/buildings? ○ Designated and undesignated heritage assets? ○ Conservation Areas? ○ Archaeology? ○ Local culture and traditions? ○ The wider cultural heritage of the broads? ○ The history, traditions, customs and the spaces and places these rely upon or relate to?
ENV10: To achieve the highest quality	Cultural heritage, landscape	Design is crucial in a protected landscape like the Broads. Development needs to take	<ul style="list-style-type: none"> • Does the allocation/policy/strategic objective: <ul style="list-style-type: none"> ○ Appreciate what is special about the site? ○ Relate to the site's setting in the landscape/townscape?

SO	SEA themes	Reason for SO	Decision-making criteria
of design that is innovative, imaginable, and sustainable and reflects local distinctiveness	and townscape	account of the characteristics of the site as well as what is distinctive in the wider Broads setting.	<ul style="list-style-type: none"> ○ Appreciate the rich cultural heritage of the area? ● Are these issues considered? <ul style="list-style-type: none"> ○ local character (including landscape setting) ○ safe, connected and efficient streets ○ a network of greenspaces (including parks) and public places ○ crime prevention ○ security and lighting measures in the context of dark skies ○ access and inclusion ○ efficient use of natural resources ○ cohesive & vibrant neighbourhoods ○ layout – the way in which buildings and spaces relate to each other ○ form – the shape of buildings ○ scale – the size of buildings ○ detailing – the important smaller elements of building and spaces ○ materials – what a building is made from ○ sensitive design of road infrastructure? (e.g. reduced signage road markings, use of local materials and alternative traffic calming methods)
ENV11: To improve air quality and minimise noise, vibration and light pollution	Population and human health. Climate change, air and pollution	Air quality, noise and light can affect health, well-being and biodiversity.	<ul style="list-style-type: none"> ● Does the allocation/policy/strategic objective affect: <ul style="list-style-type: none"> ○ Air quality? ○ Noise production? ○ Vibration? ○ Light pollution/dark skies? ● How does it relate to Air Quality Management Areas? ● Would it make additional noise or be sensitive to the prevailing acoustic environment? ● Have cumulative impacts of development/change been considered? ● Does it affect the tranquillity of the Broads?

SO	SEA themes	Reason for SO	Decision-making criteria
ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape	Climate change, air and pollution, cultural heritage, landscape and townscape	National policy seeks renewable energy generation to reduce carbon emissions and potentially have economic benefits, but generating equipment and supporting infrastructure can affect landscape character.	<ul style="list-style-type: none"> • Does the allocation/policy/strategic objective affect: <ul style="list-style-type: none"> ○ Renewable/low carbon energy generation? ○ Renewable/low carbon energy transmission? ○ The setting of the Broads? ○ The perception of the Broads? ○ The landscape character? ○ The special qualities of the Broads? • Have cumulative impacts of renewable/low carbon energy generation been considered?
SOC1: To improve the health of the population and promote a healthy lifestyle	Population and human health	Mental health, healthy life styles, wellbeing and reducing health inequalities.	<ul style="list-style-type: none"> • Does the allocation/policy/strategic objective: <ul style="list-style-type: none"> ○ Affect physical and/or mental health? ○ Affect wellbeing? ○ Promote active lifestyles? ○ Promote active travel? • Does it include: <ul style="list-style-type: none"> ○ Publicly accessible open space? ○ Sports facilities? ○ Health infrastructure? • Does it enable active use of water space?

SO	SEA themes	Reason for SO	Decision-making criteria
<p>SOC2: To reduce poverty, inequality and social exclusion</p>	<p>Population and human health, inclusive communities</p>	 <p>The darker the blue, the more deprived the area.</p>	<ul style="list-style-type: none"> • Does the policy/allocation/strategic objective affect any of these domains: <ul style="list-style-type: none"> ○ Income ○ Employment ○ Health and Disability ○ Education, Skills and Training ○ Barriers to Housing and Services ○ Crime ○ Living Environment • Does it affect inclusive communities? • Does it affect community cohesion? • Does it affect quality of life? • Does it avoid potential for inequality or serve to positively address existing identified inequalities through its implementation?
<p>SOC3: To improve education and skills including those related to local traditional</p>	<p>Population and human health, economic activity</p>	<p>Children and young people in Norfolk schools achieve less well than in other parts of England. Suffolk is still performing poorly in comparison with national averages and its statistical</p>	<ul style="list-style-type: none"> • Is the policy/allocation/strategic objective for an education/skills establishment? • Does it enable improved understanding of the special qualities, pressures and management of the Broads to all? • Does it relate to traditional Broads industries? • Will it facilitate improved access to vocational training, education and skills for all, including young people? • Will it facilitate opportunity for delivery and uptake of traditional skills training which may

SO	SEA themes	Reason for SO	Decision-making criteria
industries		neighbours. 'Special qualities' of the Broads include cultural heritage, wetland landscape, biodiversity, navigable waterways. National policy supports heritage and cultural skills training and employment in traditional Broads industries.	benefit wider Broads purposes?
SOC4: To enable suitable stock of housing meeting local needs including affordability	Population and human health. Inclusive communities	The Broads Authority will have a housing need figure for the Local Plan to address. With constraints on new development, meeting the residential needs of the local community for affordable housing is a key challenge.	<ul style="list-style-type: none"> • Does the policy/allocation/strategic objective affect: <ul style="list-style-type: none"> ○ Housing? ○ Affordable Housing? ○ Gypsy and Traveller accommodation? ○ Residential moorings/boats used as residences?
SOC5: To maximise opportunities for new/additional employment	Economic activity	Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. Sustainable economic development.	<ul style="list-style-type: none"> • Does the policy/allocation/strategic objective affect: <ul style="list-style-type: none"> ○ Employment land uses? ○ Numbers of jobs? ○ Tourism? ○ Does it relate to traditional Broads industries?

SO	SEA themes	Reason for SO	Decision-making criteria
<p>SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities</p>	<p>Population and human health, inclusive communities</p>	 <p>The darker the blue, the more deprived in terms of barriers to Housing and Services. With a sparse population, it can be difficult to maintain essential rural services such as shops, post offices and public transport.</p>	<ul style="list-style-type: none"> • Is the allocation/policy/strategic action within walking distance (800m) from Key Services? • Is the allocation within a settlement boundary? • Is the allocation/policy/strategic action for a key service? • Will the allocation/policy/strategic action affect public transport, walking and cycling? • Does the policy/allocation/strategic action relate to Local Green Space? • Will routes be functional and accessible for all? • Will routes be safe and attractive public spaces? • Does it consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles? • Will it support the retention of key facilities and services ensuring that local needs are met locally wherever possible or alternative sustainable access is provided?

SO	SEA themes	Reason for SO	Decision-making criteria
SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity	Population and human health, inclusive communities	The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.	<ul style="list-style-type: none"> • Does the policy/allocation/strategic objective relate to: <ul style="list-style-type: none"> ○ Designing out crime? ○ Designing in community safety? ○ An inclusive environment? ○ Robust structure and identity? ○ Interaction with other uses positively? ○ Avoiding opportunities for conflict?
ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas	Economic activity	Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. Sustainable economic development. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.	<ul style="list-style-type: none"> • Will the policy/allocation provide the spaces and infrastructure to support self-employment opportunities and business start-up? • Will it support existing business viability and local employment growth? • Does it contribute to a thriving rural community? • Does it contribute to a prosperous rural community?

SO	SEA themes	Reason for SO	Decision-making criteria
ECO2: To ensure the economy actively contributes to social and environmental well-being	Economic activity, population and human health, inclusive communities	Local plans need to positively and proactively encourage sustainable economic growth.	<ul style="list-style-type: none"> • How does the policy/allocation/strategic objective affect 'Social Capital'? <ul style="list-style-type: none"> ○ Skills development ○ Community cohesion ○ Amenity ○ Job provision ○ Quality of life • How does it affect 'Low Carbon'? <ul style="list-style-type: none"> ○ Innovation ○ Resource efficiency • How does it affect 'Natural Capital'? <ul style="list-style-type: none"> ○ Landscape ○ Biodiversity
ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.	Economic activity. Population and human health. Inclusive communities	Tourism is important to the Broads economy and promoting the area for enjoyment and recreation is a statutory purpose of the Broads Authority. The Broads is one of the most extensive and varied inland waterway systems in the UK, offering 190km of boating on lock-free tidal navigable rivers, including navigation to the sea. Wetland and coastal habitats and species can be negatively affected by	<ul style="list-style-type: none"> • Does the policy/allocation/strategic objective affect: <ul style="list-style-type: none"> ○ Sustainable tourism ○ Responsible tourism • Does it: <ul style="list-style-type: none"> ○ Promote enjoyment and understanding of the Broads? ○ Raise awareness of the Broads as a special destination? ○ Drive up the quality of the visitor experience? ○ Strengthen tourism performance across the whole Broads area? ○ Maintain the Broads' position as a premier inland boating destination in the UK? ○ Respect the sensitive environment of the Broads? ○ Provide the right conditions for successful tourism businesses? ○ Will it maximise benefits and minimise impacts from visitors to communities?

SO	SEA themes	Reason for SO	Decision-making criteria
		recreational disturbance. Land based tourism is popular (and the Broads Authority would like to encourage more land-based activity) and contributes significantly to the local tourist economy.	

DRAFT

Appendix 2: The Broads: Sustainability baseline

A2.1. Biodiversity, geodiversity, flora and fauna

The Broads contains a mosaic of habitats which gives the area a high conservation value and contributes to the distinctiveness of the landscape. The wetlands which characterise the Broads are essentially a freshwater system, becoming more brackish towards the coast. As well as rivers, estuary and broads, there are fens, reedbeds, wet woodlands, coastal dunes and grazing marshes.

The Biodiversity Audit headlines are that the Broads is home to around 1,500 species of conservation concern, with 66 species relying almost entirely on the Broads for UK survival.

As well as having status equivalent to a national park, the Broads contains many areas with national and international designations for their environmental and wildlife importance, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, Sites of Special Scientific Interest (SSSI), numerous County Wildlife Sites (both within the area and close to or on the border of the Broads), as well as 8 National Nature Reserves and one Local Nature Reserve, [and 29 candidate County Geodiversity Sites.](#) - Virtually the entire SSSI network is designated as internationally important for nature conservation and has either SPA or SAC status under European legislation. A large number of SPAs are also Ramsar sites. Table 1 shows the condition of SSSI in the Broads area. (Source: [Natural England, December 2021](#))

Table 1

SSSI condition in Broads (Dec 2021)

SSSI	% area of favourable/unfavourable recovering	% area favourable	% area unfavourable recovering	% area unfavourable no change	% area unfavourable declining
Alderfen Broad	100.00%	8.65%	91.35%	0.00%	0.00%
Ant Broads and Marshes	92.71%	49.90%	42.81%	0.00%	7.29%
Barnby Broad & Marshes	100.00%	59.93%	40.07%	0.00%	0.00%
Breydon Water	100.00%	100.00%	0.00%	0.00%	0.00%
Broad Fen, Dilham	100.00%	0.00%	100.00%	0.00%	0.00%
Bure Broads and Marshes	89.93%	43.08%	46.85%	10.07%	0.00%
Burgh Common and Muckfleet Marshes	96.57%	27.00%	69.57%	3.43%	0.00%
Croswick Marsh	0.00%	0.00%	0.00%	100.00%	0.00%
Damgate Marshes, Acle	100.00%	74.73%	25.27%	0.00%	0.00%
Decoy Carr, Acle	100.00%	70.21%	29.79%	0.00%	0.00%
East Ruston Common	100.00%	38.11%	61.89%	0.00%	0.00%
Geldeston Meadows	0.00%	0.00%	0.00%	97.18%	2.82%

SSSI	% area of favourable/unfavourable recovering	% area favourable	% area unfavourable recovering	% area unfavourable no change	% area unfavourable declining
Hall Farm Fen, Hemsby	100.00%	100.00%	0.00%	0.00%	0.00%
Halvergate Marshes	81.77%	72.75%	9.02%	18.23%	0.00%
Hardley Flood	100.00%	100.00%	0.00%	0.00%	0.00%
Leet Hill, Kirby Cane (near to BA boundary)	0.00%	0.00%	0.00%	0.00%	100%
Limpenhoe Meadows	100.00%	0.00%	100.00%	0.00%	0.00%
Ludham - Potter Heigham Marshes	100.00%	100.00%	0.00%	0.00%	0.00%
Poplar Farm Meadows, Langley	100.00%	100.00%	0.00%	0.00%	0.00%
Priory Meadows, Hickling	100.00%	29.79%	70.21%	0.00%	0.00%
Sprat's Water and Marshes, Carlton Colville	99.67%	80.48%	19.19%	0.33%	0.00%
Stanley and Alder Carrs, Aldeby	100.00%	0.00%	100.00%	0.00%	0.00%
Trinity Broads	87.46%	45.48%	41.98%	12.54%	0.00%
Upper Thurne Broads and Marshes	80.62%	63.97%	16.65%	4.82%	14.57%
Upton Broad & Marshes	99.28%	7.43%	91.84%	0.72%	0.00%
Winterton-Horsey Dunes	77.80%	67.92%	9.88%	22.20%	0.00%
Yare Broads and Marshes	50.52%	39.22%	11.30%	47.27%	2.20%

Where unfavourable condition exists, it is mostly due to eutrophication, excessive nutrients and water abstraction, agricultural runoff and water pollution from sewage, and industrial and urban discharge.

Peatland is a particularly important feature of the Broads, covering about 27% of the area and the basis of both fen and wet woodland habitats and some drained marshes (or fen meadows). These are highly valuable for the characteristic and specialised wildlife of the Broads. Altogether, the Broads contains the largest expanse of species-rich fen in lowland Britain as well as the most extensive tract of wet woodland within the region. Grazing marshes are another characteristic habitat of the area. Each of these habitats supports a different wealth of species, and each requires active management to maintain.

Biodiversity within the Broads is being affected by a number of threats and pressures. These include land-take for development, invasion of non-native species, pollution, habitat fragmentation, disturbance (such as recreation impact), sea level rise and climate change. In particular, the area is threatened by two sets of water resource problems – low river flows and depleted groundwater and the threat of increased salt water incursion and tidal salt water flooding. Water quality is also an issue – the main threat comes from waste

water and diffuse pollution, often arising from outside the Broads boundary, for example, from sewage, farm and road run-off.

A2.2. Habitats

The various habitat sites of the Broads (area circled in red) and the wider local area shown on Map 1 and in Table 2 (Source: [Natural Capital Evidence Compendium for Norfolk and Suffolk, 2020](#)) show that much of the Broads is pastures and natural grassland.

Map 1

Broads habitat classes

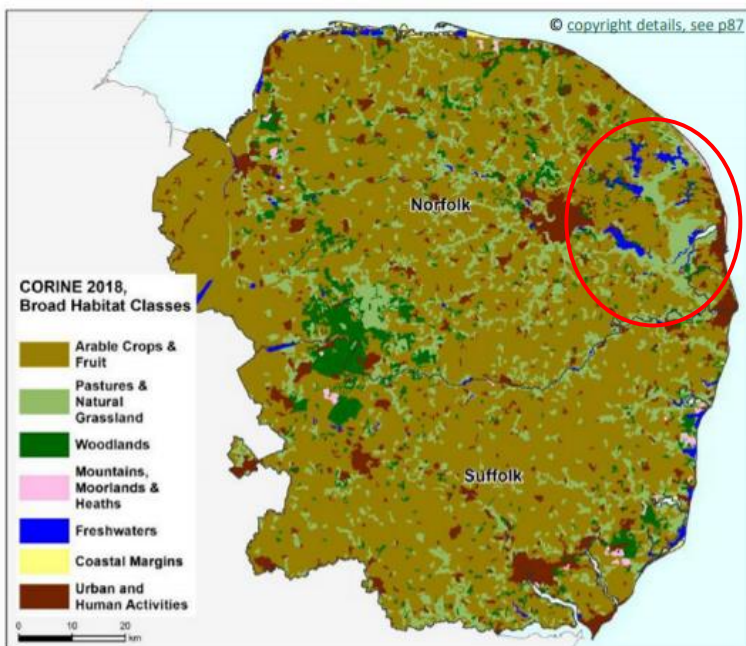


Table 2

Broads habitats by type (data)

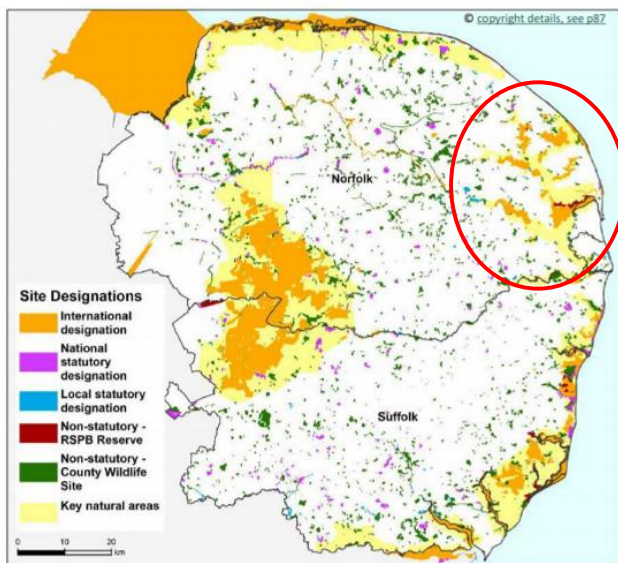
LAND TYPES BY AREA (Ha)	Norfolk	Suffolk	England TOTAL	The Brecks	Broads NP	N&S AONBs TOTAL
Arable crops and Fruit	380,622	280,916	5,759,358	55,206	6,623	45,954
Pastures and Natural Grassland	71,618	41,734	3,967,464	15,077	15,358	14,336
Heaths (Mountains, Moors & Heaths)	1,198	1,732	671,428	407	111	1,935
Woodlands	35,814	20,443	831,116	24,532	2,371	9,481
Freshwaters	7,445	2,677	77,755	240	4,640	2,634
Coastal Margins	3,674	1,587	49,046	0	501	14,460
Urban and Human Activities	37,477	31,020	1,696,614	6,465	547	5,019
Unclassified	164	60	1,679	0	-1	369
TOTAL AREA	538,011	380,169	13,054,460	101,926	30,151	94,187

A2.3. Land under conservation management

Map 2 shows how much of the Broads (circled in red) and the wider local area are under conservation management (map taken from [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) 2020). This shows that a lot of the Broads is under an international designation.

Map 2

Broads area under conservation management



A2.4. Landscape

The Broads is considered to be the UK's premier wetland and is part of a global network of protected landscapes. Its national designation, equivalent to a national park, both reflects its landscape value and provides the highest level of landscape protection under national planning policy. The Broads has a largely undeveloped yet highly managed landscape of water, fens, marshes and woodland. The 2.7 km long coastal strip at Winterton is also part of the North Norfolk Coast Area of Outstanding Natural Beauty.

'Landscape' is a term with a variety of meanings. It can include components such as visual amenity, character, integrity and sensory factors, which are harder to identify and quantify than a view, and consequently more sensitive and vulnerable to change. Anecdotal evidence suggests a continuing incremental change to some aspects of the Broads' landscape.

Although the area benefits from protection, there are pressures from development, including large scale housing development planned for the areas outside but close to the Broads, which could adversely affect the landscape of the area. In the past the area has been threatened by, for instance, the impact of intensive agriculture. To counter this, Halvergate Marshes became the birthplace of agri-environment support, with the Broads Grazing Marsh Scheme which led to the Environmentally Sensitive Area (ESA) scheme – the total

area eligible for grant support was 32,400 ha (75% of the wider ESA). The recent ELM scheme has been developed by Defra to provide public benefits such as sustainable farming, nature recovery and landscape recovery.

Above all, it is the landscape of the Broads that gives rise to the unique character and distinctiveness of the area. One of the main issues for the Broads Plan and the Local Plan, therefore, is the need to protect the landscape character, and to conserve the Broads as a living, working landscape.

A2.5. Cultural heritage

The historic landscape reflects patterns of human activity over hundreds of years, and contains distinctive landscape features particular to the area. These include drainage mills, waterside chalets and villages with houses of brick and thatch. This unique environment has a high economic value, attracting business and tourism to the area.

The built and historic environment are important parts of the cultural landscape and reflect the activities of people living and working in the Broads over time; for example, there are over 70 surviving drainage mills. Together these contribute significantly to the character and distinctiveness of the Broads.

There is evidence that there has been gradual erosion of the Broads' historical assets, and of the quality and distinctiveness of the built environment. Successive development plans and management plans for the Broads have recognised the need to protect and enhance the historic and cultural landscape of the area, which is as important as its natural assets. Nevertheless, it is essential that these general aims be framed within the context of a changing Broads. It is neither possible nor desirable to protect the area exactly as it is now, but it is feasible to maintain the best elements and enhance those that have been degraded. Enhancement may necessitate a dramatic change in management in certain areas.

Conservation Area Appraisals reviewed

(Source: Broads Authority)

- 2021: Horning Conservation Area ready to be consulted
- 2021: Belaugh Conservation Area re-appraisal to be consulted upon May-June 2021
- 2021: Halvergate and Tunstall Conservation Area re-appraisal being prepared
- 2020: Ludham Conservation Area adopted
- 2018-2019: Somerton Conservation Area adopted
- 2016-2017: Loddon and Chedgrave Conservation Area re-appraisal adopted, Stalham Staithe Conservation Area re-appraisal adopted
- 2015-2016: Oulton Broad Conservation Area re-appraisal adopted
- 2014-2015: Beccles and Halvergate Marshes Conservation Area re-appraisals were adopted
- 2013- 2014: Langley Abbey re-appraisal adopted
- 2012-2013: Ellingham, Ditchingham Dam and Geldeston Conservation Areas re-appraisals adopted

- 2011-2012: Neatishead and Somerleyton Conservation Areas re-appraisals adopted
- 2010-2011: Belaugh and Wroxham Conservation Areas re-appraisals adopted

Number of Listed Buildings at Risk

(Source: Broads Authority)

- 2020-2021: 18
- 2019- 2020: 18
- 2018 - 2019: 18
- 2017 - 2018: 22
- 2016 - 2017: 26
- 2015 - 2016: 28
- 2014 - 2015: 28
- 2013 - 2014: 29
- 2012 - 2013: 26
- 2011 - 2012: 37
- 2010 - 2011: 49

A2.7. Geodiversity

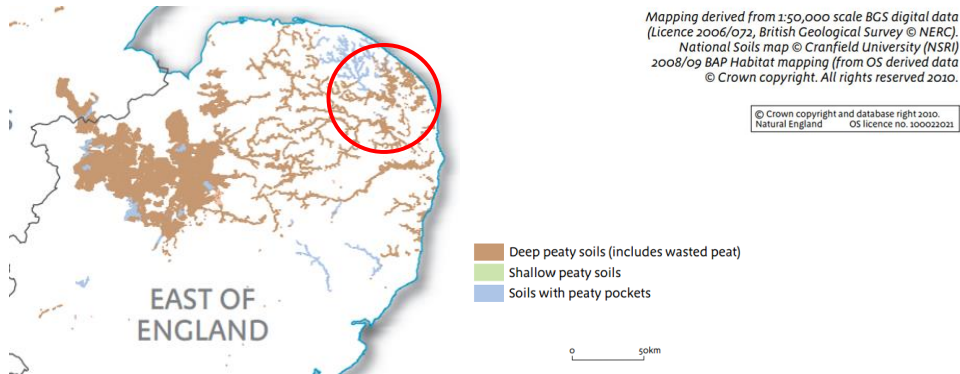
Peat

England's deep peatlands cover much of our uplands, but also include large lowland areas. Shallower peaty soils fringe the uplands. Map 3 shows the general areas of peat around the Broads (circled in red).

Map 3

Areas of peat around the Broads

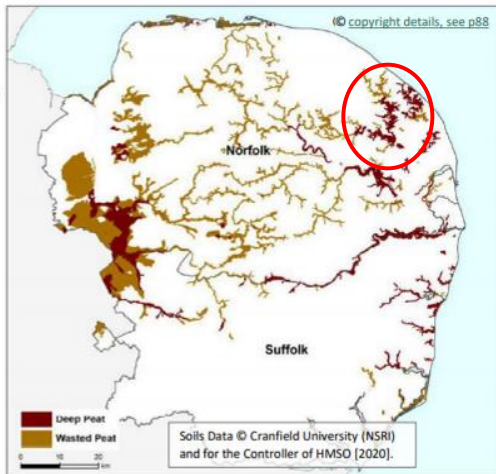
Source: [England's peatlands – carbon storage and greenhouse gases, Natural England \(2010\).](#)



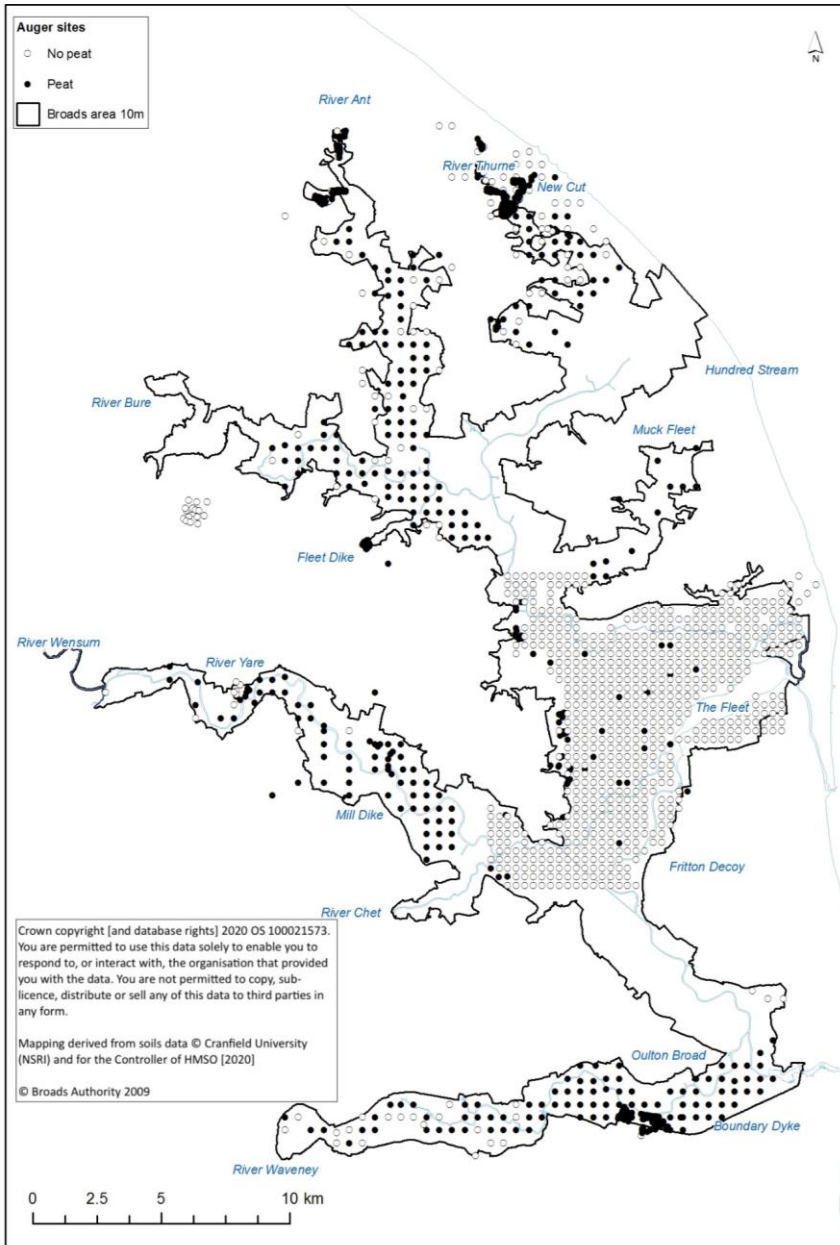
Map 4a, taken from [Natural Capital Evidence Compendium for Norfolk and Suffolk \(2020\)](#), shows the location of deep and wasted peat (Broads area circled in red). Map 4b shows data gained from peat coring and is from [Assessing carbon stocks within the peat of the Broads National Park \(2021\)](#).

Map 4a

Location of deep and wasted peat



Map 4b
Peat coring



Bedrock and soils

Maps 5a and 5b show that the Broads lie on Crag Group bedrock and Alluvium soil. Source: [Norfolk's Earth Heritage - valuing our geodiversity](#) (2010).

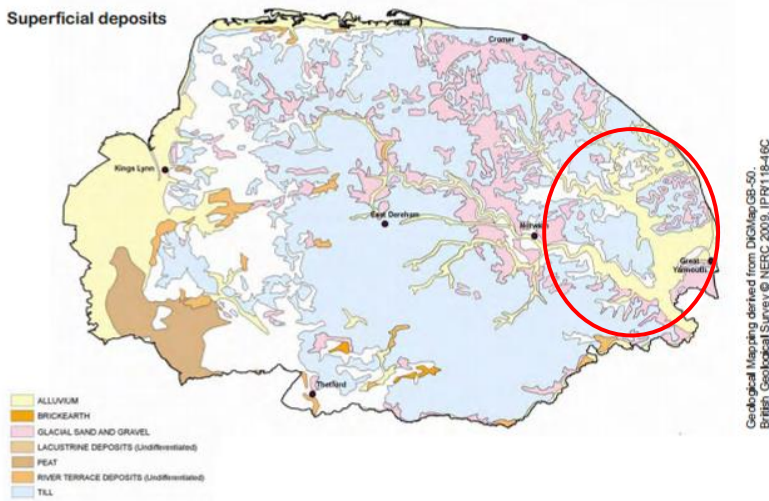
Map 5a

Bedrock deposits



Map 5b

Bedrock deposits - superficial



Soils

The Agricultural Land Class map shows that the majority of the Broads area is Grade 3.

2.7. Water

Water is an essential natural resource, but especially important for the Broads as a sensitive wetland. Before reaching the Broads, its rivers drain large parts of Norfolk and Suffolk, including some of the most built up areas and those planned to receive major growth in housing and other development. The Broads therefore remains vulnerable to impacts of upstream abstraction and pollution. In the East of England there is a deficiency between demand for water and supply; influx during the tourist season will only exacerbate the problem.

Water supply

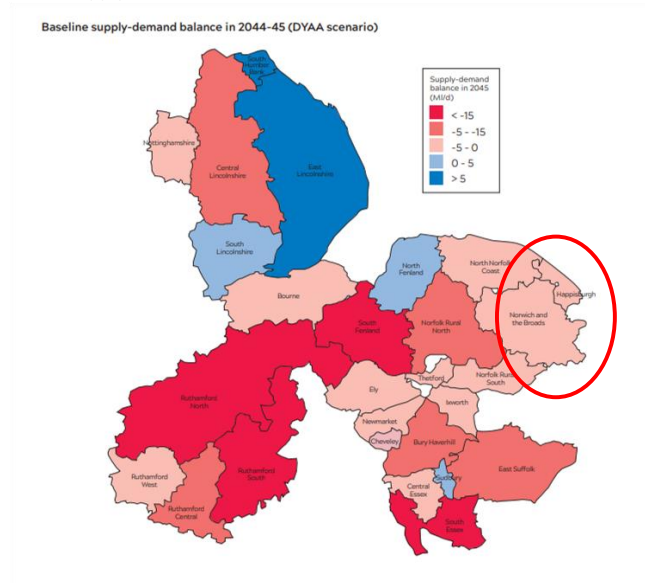
Source: [Anglian Water Resource Management Plan 2019](#)

Map 6 shows that the Norwich and the Broads zone will be in deficit by 2045.

‘Impacts are not distributed evenly; some Water Resource Zones (WRZs) are affected more than others. Central Lincolnshire, Ruthamford North and South, South Fenland, Bury Haverhill, East Suffolk and South Essex are particularly affected. By 2045, only six WRZs remain in surplus: East Lincolnshire, South Lincolnshire, North Fenland, Sudbury, South Humber Bank and Hartlepool’.

Map 6

Water supply demand balance in 2045



Part of the Broads is covered by Essex & Suffolk Water, and their [WRMP](#) is shown in Table 3.

Table 3

Suffolk Northern Central balance of supply

Table 8.4: Suffolk Northern Central balance of supply

Northern Central WRZ	End of AMP6	End of AMP7	End of AMP8	End of AMP9	End of AMP10	End of Planning Horizon	End of 40 Year Planning Horizon
Year	2019/20	2024/25	2029/30	2034/35	2039/40	2044/45	2059/60
Balance of Supply (excluding headroom)	23.93	24.03	23.95	23.62	22.91	22.13	19.97
Balance of Supply (including headroom)	19.16	18.66	18.93	18.93	18.42	17.76	15.99

The balance of supply with target headroom ranges from 19.16 MI/d at the end of AMP6 to 17.76 MI/d at the end of the 25 year planning horizon and 15.99 MI/d at the end of the 40year planning horizon.

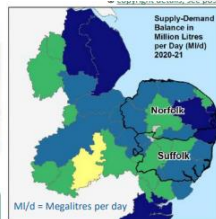
Given the supply surplus, no supply or demand schemes will be required.

Figure 1 is taken from the [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) (2020).

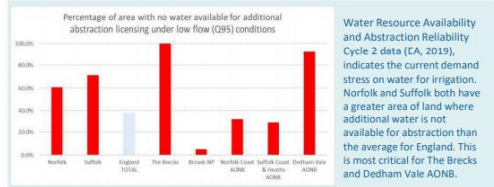
Figure 1

Water related information, including pressures and responses.

Water Resources East (WRE) is the organisation tasked under the National Framework for Water Resources (EA, 2020) with producing an integrated water resource plan for eastern England. The WRE initial position statement (2020) includes an assessment of the current and future supply-demand balance based on water company Water Resource Management Plans, taking into consideration climate change impacts, abstraction reductions in environmentally-sensitive areas, and demand considerations based on forecasted economic growth and development. The maps on the right show the current supply-demand status and projections out to 2040. Across the whole region there is a **net projected deficit of around -200 MI/d by 2050** (WRE, 2020).



Water Use: (Baseline 2020/21): "On an average day, in a dry year, the total consumptive demand for water in the WRE region is equivalent to 2,311 million litres (megalitres) per day. Most of this water (85%) is used for public water supply. Most of the rest is used for spray irrigation (8%), power generation (3%) and in the manufacturing, food and drink sectors (2%). (WRE, 2020 p.9)



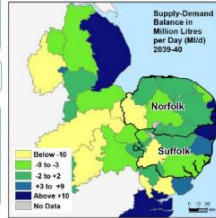
Pressures

- Driest region in the UK
- Highest forecast growth outside London
- Internationally important natural habitats
- Leading agricultural producer
- Tension between water needed for the environment, public supply and irrigation
- Little surplus water currently available

Responses

- Increase efficiency of all water users
- Promote need for additional water storage within the landscape through opportunities to link water scarcity with flood risk management solutions
- Transfer water from areas of surplus to areas of deficit, increasing connectivity and maximising open water channels
- Explore other technologies, e.g. water transfers, desalination and water re-use.

Source: WRE (2020)



Water quality

Water quality is a key issue for the Broads. Poor water quality had become a serious problem in the Broads in the mid to late 20th century, affecting both biodiversity and recreational enjoyment. Sustained efforts on particular water bodies and on reducing pollution inputs from agricultural and waste water sources have produced major improvements to date, but more remains to be done. Both maintenance of previous gains and further improvements depend on Asset Management Planning schemes, the Review of Abstraction Consents, Catchment Sensitive Farming Projects and control and co-ordination of development over the Broads and beyond. The Norwich Growth Area Water Cycle Study is an important component of the latter.

Water is essential for wetland habitats and species. The Broads is rich in wetland and related habitats including wet woodland, grazing marsh, reedbed, lakes, and fen. Many animal and plant species supported by these are important in national and European terms.

The majority of the water bodies in the Broads are rated as Moderate, with some as poor and some as bad.

Water management is also important for biodiversity within drained areas. Management of water levels and the poor-quality river water has continued to significantly constrain the environmental potential of the Broads. SSSIs in unfavourable condition in the Broads are due mainly to the impacts of water pollution and water management problems on biodiversity. Some of this will be addressed by Internal Drainage Board investment and agri-environment schemes.

Water quality (particularly phosphate levels) in parts of the Broads improved since the 1970s, helped by improvements and new initiatives in sewage treatment and agri-environmental practices. However, in most recent decades, further improvements have not occurred and levels have largely stabilised. WFD targets measure 30 different elements with a principle of 'one out, all out' (i.e. the poorest individual result drives the overall classification). The lake specific targets for Natura 2000 Protected Area - Special Areas of Conservation (SACs) - requires a lower level of phosphate. As many of these lakes are connected to their river catchments, achievement of the SAC target requires that all factors that affect phosphates are regulated throughout the catchment, including development⁷. In March 2022, Natural England released nutrient neutrality advice that requires competent authorities under the Habitats Regulations to carefully consider the nutrient impacts of any new planning applications and projects on habitats sites, and whether those impacts may have an adverse effect on the integrity of a habitats site that requires mitigation.

Map 7 shows the ecological status of waterbodies in the Broads (and wider area) in 2019 as moderate.

⁷ [Proposed total phosphorus targets for Lake Natura 2000 Protected Area Special Areas of Conservation for the updated river basin management plan consultation \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/consultations/2022/03/22/proposed-total-phosphorus-targets-for-lake-natura-2000-protected-area-special-areas-of-conservation-for-the-updated-river-basin-management-plan-consultation)

Map 7

Ecological status of waterbodies in the Broads



Nitrate Vulnerable Zones and Drinking Water Safeguard Zones

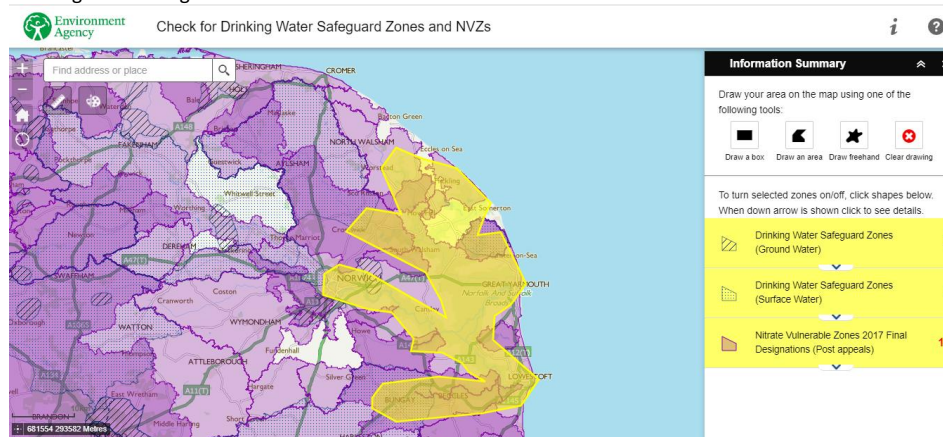
A Nitrate Vulnerable Zone (NVZ) is designated where land drains and contributes to the nitrate found in “polluted” waters. Polluted waters include:

- Surface or ground waters that contain at least 50mg per litre (mg/l) nitrate
- Surface or ground waters that are likely to contain at least 50mg/l nitrate if no action is taken
- Waters which are eutrophic, or are likely to become eutrophic if no action is taken

Drinking Water Safeguard Zones are designated areas in which the use of certain substances (including fertilisers, pesticides or other chemicals) must be carefully managed to prevent the pollution of water that is abstracted for use as drinking water.

Map 8

Drinking water safeguard zones and nitrate vulnerable zones



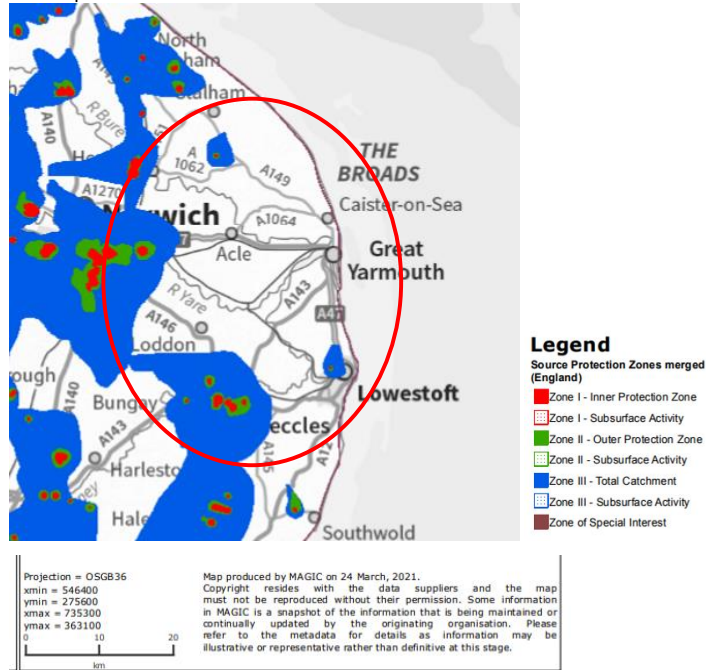
Source: [Check for Drinking Water Safeguard Zones and NVZs \(data.gov.uk\)](https://data.gov.uk)

Source Protection Zones

The Environment Agency has defined Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment) and a fourth zone of special interest, which we occasionally apply, to a groundwater - see map 9. Source: [Magic Map Application \(defra.gov.uk\)](https://defra.gov.uk).

Map 9

Source protection zones



A2.8. Climate change

Climate change and the emissions of greenhouse gases that contribute to climate change are a matter of concern for the Broads Authority, both in terms of mitigation and adaptation to climate change. Our approach is not to assign blame to a particular group, but it is worth noting that two significant direct emitters are the traffic on the A47 and Cantley Sugar Factory.

Figure 2 includes graphs and tables taken from [Towards a GHG Reduction Strategy for the Broads – Identifying and Prioritising Actions Final Report On Behalf of: The Broads Authority May 2010](#).

The Broads Authority has commissioned an updated carbon footprint for the Broads, which will be presented in subsequent Sustainability Appraisals.

Figure 2

Extracts from the greenhouse gas reduction strategy for the Broads.

Caveats explained, the data suggests emissions at the various levels with the following approximate magnitudes:

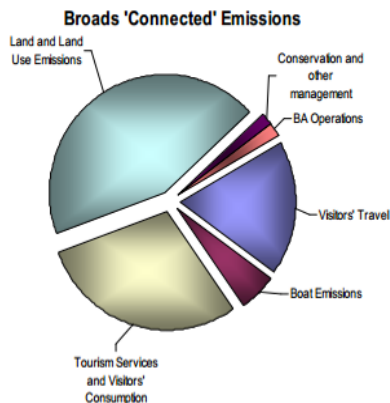
- Broads Authority operations (Level1): **~1,900 tCO₂e**;
- Activities and operations connected with Broads services (including the above): **~131,000 tCO₂e**; and
- Other activities in the Executive Area (but not specifically connected with the Broads itself): **~359,000 tCO₂e**.

In addition to GHG emissions, the carbon stored in soils and vegetation within the Broads Executive Area has also been estimated. This suggests a total carbon store within the Broads Executive Area of the order of **40 million tCO₂e**.

Table 1.1: Overview of the likely magnitude and context of GHG emissions and carbon stores (t CO₂e)

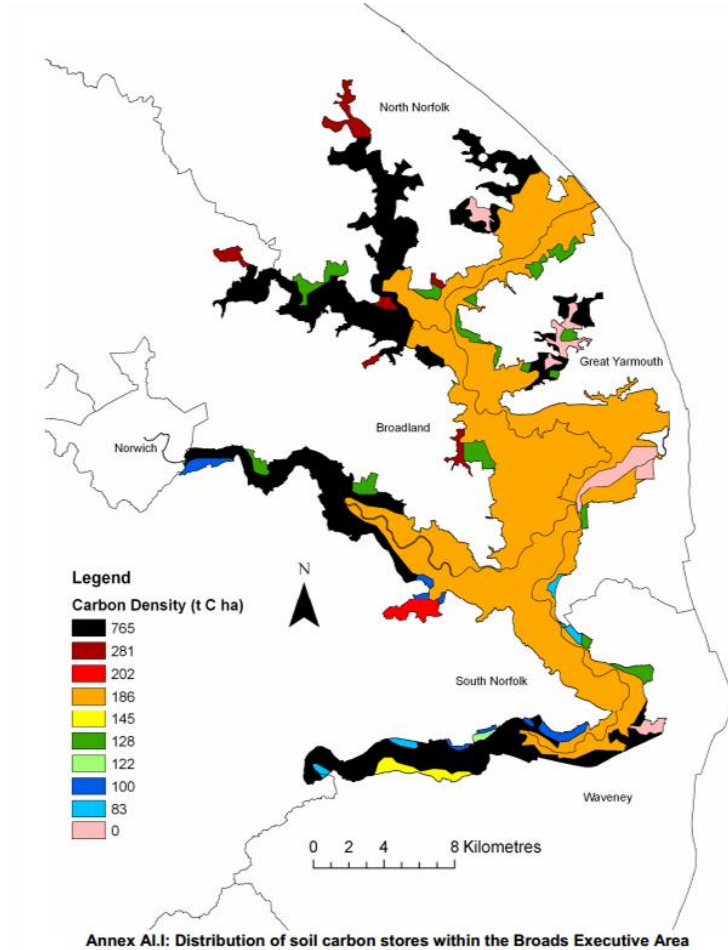
Category	Level	Description	Value	Total
			(t CO ₂ e)	
Broads Emissions	Level 2a: estimated magnitude of GHG emissions 'connected with' the Broads	Level 1: Broads Authority Operations	1,900	131,000
		Other management and organisations	1,900	
		Tourism and Recreation	54,000	
		Land and Land Use	73,500	
	Level 2b: estimated magnitude of emissions 'NOT connected with' the Broads	Emissions from industry & commerce*	75,000	360,000
		Emissions from domestic sources	55,000	
		Emissions from transport**	76,000	
		Point source emissions (British Sugar Canteley factory)	154,000	
Broads Carbon Stores	Soil	38,800,000	39,900,000	
	Vegetation	1,100,000		

Category	Sub-category	Value (t CO ₂ e)
BA Operations	BA Operations	1,900
	Visitor's Transport	18,920
Tourism and Recreation	Boat Emissions	5,500
	Services	30,000
Land and Land Use	Land Use Emissions	73,500
	Conservation and other management	1,900
	TOTAL	~131,000



Map 10

Soil carbon stores in the Broads



A2.9. Flooding

In the longer term, a critical issue for the Broads is the potential impacts of climate change, particularly the anticipated and possible rises in sea level. These have the potential to affect the character and integrity of the area through breaches of the coast, increase water and soil salinity, and temporary and permanent flooding. More immediate issues include the protection of water resources and water quality. Elevated water levels are already a problem in many of the river valleys. Parts of the Yare Broads and Marshes SSSI, SAC, SPA and Ramsar site are already in an unfavourable condition and one of the management principles is 'Sympathetic management of water levels is necessary for the maintenance of optimal water depths

throughout the year, according to the requirements of the plant and animal species present'. A report on the future impacts of climate change on flood risk was published by the Broadland Futures Initiative (BFI).

The implementation of the Water Framework Directive will also be important. The Environment Agency produces a number of plans and programmes to address these issues. In particular, the Broadland Rivers Catchment Flood Management Plan (CFMP) and the Broadland Rivers Catchment Abstraction Management Strategy will exert a considerable influence on the Broads Plan and the Local Plan. In overall terms, this catchment-based approach to water management will be critical for the future of the Broads.

As a low-lying wetland area sited almost wholly within the flood plains of the rivers Yare, Bure, Ant, Thurne and Waveney, over **85%** of the Broads area is at risk from flooding. The [flood zone maps](#) produced by the 2017 and 2018 SFRA show the extent of flooding in the Broads (these are interactive PDFs, but you will need to save them first before clicking layers on or off).

Flooding can occur as a result of high river flows or, more frequently, high sea levels and the risk of flooding will increase with sea level rise, more intense rainfall and the other changes predicted as a consequence of climate change. The impacts of such flooding are often minor, as buildings and occupiers have adapted to the usually low levels and speeds of flood water in the Broads. History shows, however, that this is not always the case and the effects can occasionally be devastating to communities and to wildlife and biodiversity within the Broads, with the latter being particularly affected by saline intrusion into the freshwater system.

Flood alleviation and management are constant issues for the Broads. Much of the flooding occurs from tidal surges, which damage property and introduce brackish water into fresh water habitats. Flood defences require regular maintenance and will need to be strengthened in areas of special risk. In particular, continued flood management is required to sustain those areas that currently rely on earth embankments for flood defence.

There are c.240km of flood banks protecting approximately 21,300 hectares, almost wholly within the designated Broads area, containing more than 1,700 properties of which more than 1,000 are residential. This network of flood defences was subject to a 20-year programme (Broadland Flood Alleviation Project) of repair and strengthening.

Flood risk to existing property in the Broads area, however, remains significant and widespread. The anticipated future increase in serious flood events as a result of sea level change, climate change, and continuing settlement and erosion of flood defences, adds impetus to the need to take a very cautious approach to developing in the flood plain which makes up most of the Broads area.

As part of the BFI the Environment Agency is reviewing and updating the hydraulic modelling for fluvial, tidal and coastal flooding relevant to the Broads area. This work is underway, but due to the size of the project it is not due to be completed for some time (~~estimated delivery date of spring 2024~~[around the end of 2023](#)). As well as informing the BFI this modelling will update our understanding of flood risk to communities in the Broads and help us identify locations where flood risk management could be improved.

The Environment Agency is also currently working on the following flood risk management projects in the Broads Authority area:

- Great Yarmouth flood defences Project - The EA is currently delivering the Great Yarmouth flood defences Epoch 2 (2016–2021) project to refurbish and improve approximately 4km of flood defences and the supporting quayside in the town to help manage the flood risk to around 2000 homes and 700 businesses. Epoch 3 (2021-2026) is at an early stage of business case development. A substantial amount of partnership funding will again need to be secured in order for this project to progress as planned. Partners are beginning work to identify funding sources for Epoch 3 and to identify a sustainable income stream to meet future investment required to manage flood risk to the town.
- Beccles Flood Risk Management Project - The Environment Agency is in the early stages of a project to investigate ways to reduce the number of people and properties at risk of flooding from the River Waveney in Beccles. We have undertaken an 'initial assessment' report which produced a number of potential ways to improve the management of flood risk in Beccles. Options include maintaining the existing flood wall but replacing the flood boards with flood gates and individual Property Flood Resilience (PFR) measures i.e. flood doors or barriers, air brick covers. The EA will be undertaking a number of surveys and additional assessments of the existing defences in Beccles. This along with information from the flooding in December 2020 will help to inform the projects next steps.
- Bungay Flood Risk Management Project – The EA is in the early stages of a project in Bungay. They are updating our flood risk model of the River Waveney to help improve our understanding of flood risk in Bungay and the surrounding area. This update will use information obtained from the December flood event to make the modelling as representative as possible. This modelling will help inform an 'initial assessment' to explore options to manage the flood risk, working with the community and partners, such as East Suffolk Council, Suffolk County Council and Norfolk County Council.

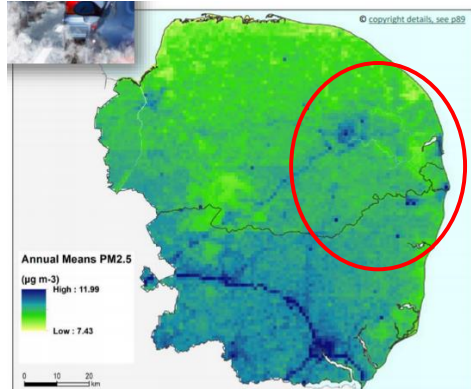
A2.10. Air

There are no air quality management areas currently declared for breaching Government objective threshold limits for air pollutants in the Broads. However, there are areas, such as just north of the bridge in Hoveton, where congested traffic has adverse air quality impacts.

Map 11 is taken from the [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) (2020). It shows that the annual PM2.5 levels are greater in the urban areas.

Map 11

PM2.5 levels



The [NAEI interactive map](#) allows you to explore emissions data from the UK National Atmospheric Emissions Inventory for 2018 (the maps have not been copied over to this document).

A2.11 Material assets

Notwithstanding the generally rural and undeveloped appearance of most of the Broads, the area does contain a great deal in the way of physical infrastructure, including important sections of the road network (including the A47 Acle Straight and Postwick Bridge), railway lines, waterworks and public water supply reservoir at Trinity Broads, 240km of flood defences, a 200km navigation with around 30 bridges (including swing or lifting bridges) and many stretches of moorings.

A2.12. Minerals and waste

The Minerals and Waste designations in the Broads are shown on the following map links. The Broads Authority will consider and include such designations as it produces the Local Plan.

- [Nature conservation & heritage assets - North East](#)
- [Nature conservation & heritage assets - North West](#)
- [Nature conservation & heritage assets - South](#)

A2.13. Ecosystem services

The [Natural Capital Evidence Compendium for Norfolk and Suffolk](#) (2020) identifies ten nationally important assets such as soil quality, peat and high productive aquifers as shown on Map 12.

Map 12

National important assets

State: Nationally important assets

Norfolk and Suffolk constitute 7% of the land area of England and in 2018, supported 3% of its population. As the maps to the right show, the counties include over 10% of a variety of natural assets and protected areas. These examples span provisioning, regulating and cultural ecosystem services, as well as aspects of biodiversity and terrestrial and marine designations. The land, coast and sea of Norfolk and Suffolk therefore make a substantial contribution to the total stock of England's natural assets.

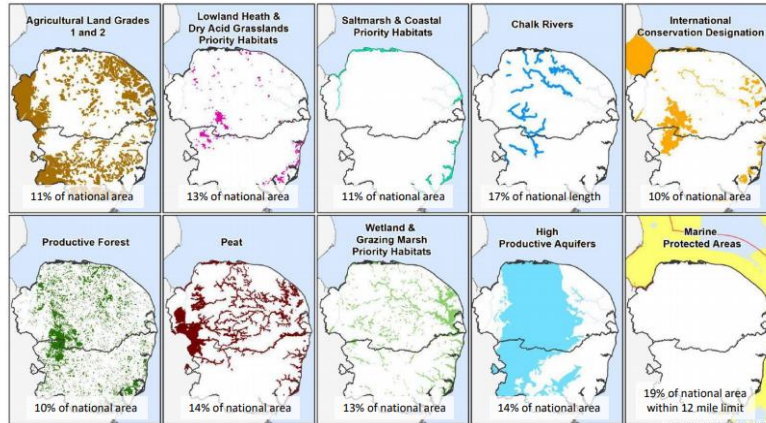


Figure 3, from the Compendium, shows the outcome of comparing the ten nationally important assets, shown above, against the key findings of the risk review.

Figure 3

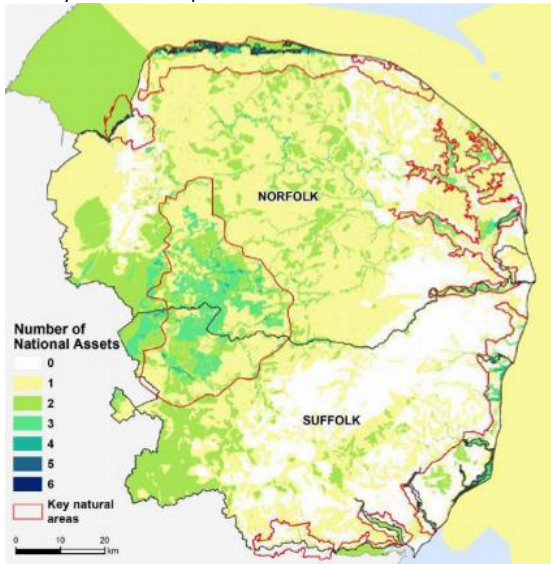
Risk of nationally important assets

Risk Category	Nationally Important Assets
High	High productive aquifers
	Peat
	Saltmarsh & coastal habitats
Medium	Wetlands & grazing marsh
	Grade 1 & 2 agricultural land
	Productive forest
	Chalk rivers
	Marine Protected Areas
Low	International conservation designations
	Lowland heath & dry acid grasslands

Map 13 overlays the ten important assets and shows that much of the Broads is covered by at least one asset. The Compendium suggests that 'initiatives in areas currently without such assets (the 'white space' on the map) might well improve quality further afield and indeed may be places where the greatest benefits could be achieved from investments in the local environment'.

Map 13

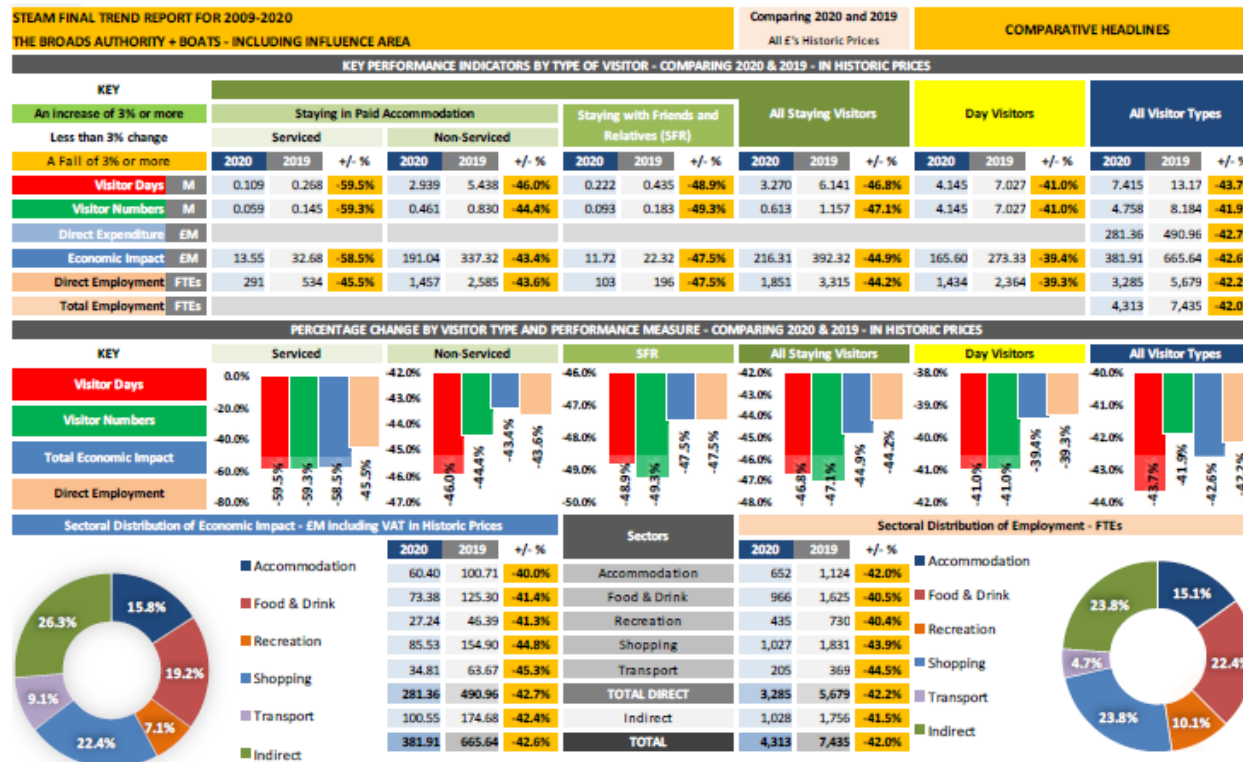
Overlay of the ten important assets



A2.14 Recreation and economy

Figure 4 is taken from the STEAM report [2020](#), and shows facts and figures about tourism in the Broads and surrounding area (known as the 'area of influence').

Figure 4
 STEAM report data from 2020 comparing indicators with the same indicators in 2019. Covid-19 restrictions of access and movement during much of 2020 significantly impacted figures for that year.



A2.15 Demographic profile

According to the 2011 Census, the population of the Broads Executive Area was 6,300, which was 6.7% (400 people) greater than at the 2001 Census. With an area of 290 km², the population density is 21.7 per km². The population is markedly elderly, as shown in Graph 1.

Graph 1
Census age profile

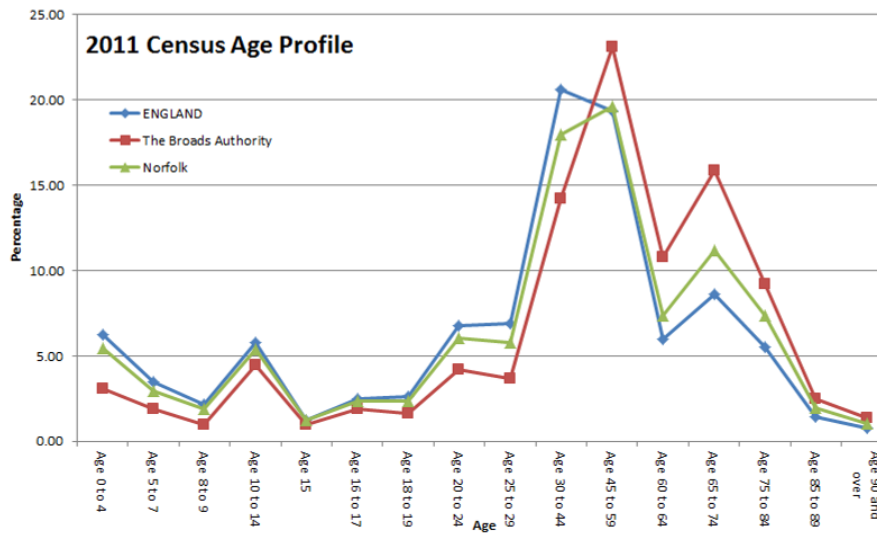


Table 4
Population comparisons between 2001 and 2011 Census

2001 pop	2011 pop	Pop change	Pop change (%)	Area (km ²)	2011 Pop density (per km ²)
5,900	6,300	400	6.7	290	21.7

Compared to the other National Parks, the Broads has the second greatest increase in population (South Downs increase was 6.8%; in contrast, Exmoor had a 5.5% decrease in population). The % change in size of usual resident population by age between 2001 and 2011 (Census 2011 data) is in Table 5. Compared to the other National Parks, the Broads had the greatest increase in change in the age category 75 and over.

Table 5
Percentage change in size of usual resident population by age between 2001 and 2011

Age	0 - 14	15 - 29	30 - 44	45 - 59	60 - 74	75 and over
Change	-11.4	6.7	-13.8	-5.0	41.6	23.8

The Broads Authority Executive Area has the least percentage of households with dependent children when compared to the national average, neighbouring districts and other National Parks. Table 6 shows data from the 2011 Census.

Table 6

Percentage of households with dependent children

Area	Dependent children in household: All ages %	Dependent children in household: Age 0 to 4 %
Broads Authority	16.2	5.2
National Park average	21.7	7.1
Broadland	26.3	9
Great Yarmouth	27.6	10.6
South Norfolk	26.7	10
North Norfolk	20.7	7.4
Waveney	25.3	9.7
Norwich	23.3	11
England	29.1	11.8

Table 7 shows country of birth (2011 Census). The Broads Authority Executive Area is similar to the other more rural districts in Norfolk.

Table 7

Country of birth (percentages)

Area	England	Northern Ireland	Scotland	Wales	UK not otherwise specified	Ireland	Other EU	Other countries
Broads Authority	93.4	0.1	1.2	0.7	0.0	0.3	1.6	2.7
National Park Average	78.3	0.29	1.65	14.78	0.01	0.34	1.73	2.86
Broadland	93.6	0.3	1.3	0.7	0	0.3	1.4	2.5
Great Yarmouth	91.3	0.3	1.4	0.5	0	0.4	3.5	2.7
South Norfolk	92.9	0.3	1.3	0.7	0	0.3	1.8	2.8
North Norfolk	93.6	0.3	1.2	0.8	0	0.3	1.7	2.1
Waveney	94	0.2	1.3	0.7	0	0.3	1.5	2
Norwich	84.8	0.4	1.3	0.6	0	0.5	4.6	7.8
England	83.5	0.4	1.3	1	0	0.7	1.9	9.4

A2.16 Economic activity

Table 8 shows the economically active and inactive in the Broads (2011 Census).

Table 8

Economically active and inactive according to the 2011 Census (%)

Area	Part-time	Full-time	Self-employed	Unemployed	F/T student
Broads Authority	13.1	30.9	16.3	3.0	1.7
National Park average	13.9	30.5	20.1	2.4	1.9
England	13.7	38.6	9.8	4.4	3.4

The Broads area is on a par with other National Parks. Like the National Park average, the Broads has fewer full-time workers, but more people self-employed when compared to England's average.

Table 9

Economically inactive and unemployed

Area	Economically inactive %					Unemployed %	
	Retired	Student	Looking after home or family	Long-term sick or disabled	Other	Never worked	Long-term
Broads Authority	24.2	2.6	3.1	3.5	1.5	0.3	1.0
National Park average	20.3	3.3	3.1	2.8	1.6	0.2	0.9
England	13.7	5.8	4.4	4.0	0.8	0.7	1.7

The Broads area has a higher proportion of retirees and a lower proportion of students compared to the National Park average and to England.

Table 10

Professions

Area	Managers, directors, senior officials	Professional	Associate professional and technical	Admin and secretarial	Skilled trades	Caring, leisure and other service	Sales and customer service	Process, plant and machine operatives	Elementary
Broads Authority	18.1	16.4	11.0	10.2	14.4	9.0	5.5	5.9	9.4
National Park average	15.3	17.4	10.5	8.5	18.9	8.5	5.3	5.1	10.4
England	10.9	17.5	12.8	11.5	11.4	9.3	8.4	7.2	11.1

According to the 2011 Census, the Broads shows a higher proportion of Managerial occupations and a lower proportion of Elementary occupations when compared to both England and other National Parks.

Table 11

Detailed occupation data

Area name	A Agriculture, forestry and fishing	B Mining and quarrying	C Manufacturing	D Electricity, gas, steam and air conditioning supply	E Water supply; sewerage, waste management and remediation activities	F Construction	G Wholesale and retail trade; repair of motor vehicles and motor cycles	H Transport and storage	I Accommodation and food service activities	J Information and communication	K Financial and insurance activities	L Real estate activities	M Professional, scientific and technical activities	N Administrative and support service activities	O Public administration and defence; compulsory social security	P Education	Q Human health and social work activities	R, S, T, U Other
The Broads Authority	3.8	0.9	9.7	0.4	0.8	7.8	13.9	3.6	7.2	2.6	3.1	1.6	6.7	5.5	4.9	9.3	12.5	5.8
National Park Average	7.5	0.5	6.9	0.4	0.6	8.1	12.9	3.0	10.7	2.4	1.9	1.6	6.4	4.2	5.1	10.3	11.4	5.9
Broadland	1.4	0.3	8.8	0.5	0.7	9.7	17.6	4.0	4.8	2.6	6.4	1.4	5.2	4.1	5.8	8.9	13.3	4.6
Great Yarmouth	1.1	1.6	9.4	0.6	0.7	8.1	18.0	4.9	9.5	1.2	2.0	0.9	4.8	4.7	4.4	7.7	14.7	5.4
North Norfolk	3.7	0.3	9.3	0.5	0.7	9.1	17.5	3.7	7.9	1.6	2.3	1.4	4.9	4.6	4.2	9.2	13.1	5.8
Norwich	0.3	0.1	6.9	0.2	0.6	6.3	17.2	3.6	7.5	3.4	6.4	1.3	5.9	4.7	4.7	11.5	13.9	5.5
South Norfolk	3.0	0.2	9.3	0.3	0.6	8.8	16.1	3.8	4.3	2.5	5.2	1.6	6.5	3.9	5.4	10.6	13.4	4.5
Waveney	1.6	1.1	11.6	1.1	1.1	9.3	17.4	4.1	7.1	1.4	2.0	1.2	5.1	4.5	4.8	9.0	12.9	4.8

More detailed occupation data from the 2011 census shows the main industry in the Broads wholesale and retail trade.

Table 12 shows out of work claimants for February and October 2021 (the trend can be seen on [nomisweb](#) by adding the ward name). Rates are high at the moment, which may be as a result of Covid-19 restrictions.

Table 12

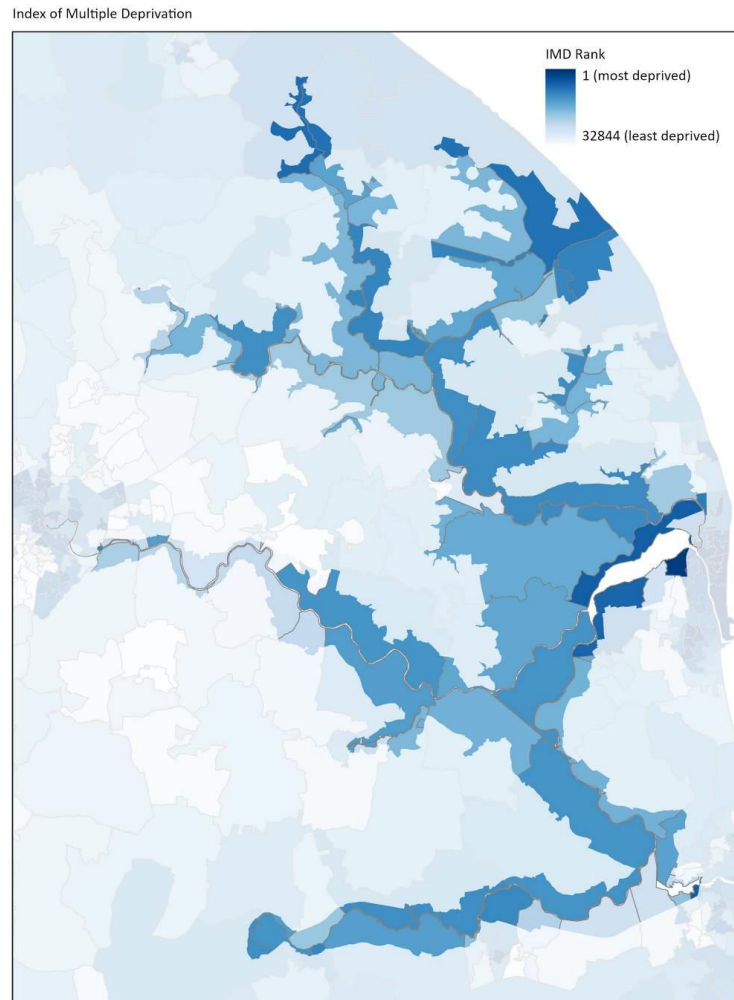
Out of work benefits claimants

Ward	Out of work benefits Feb 2021	Out of work benefits Oct 2021
33UCGN: Acle	4.3%	2.7%
33UCGQ: Blofield with South Walsham	3.4%	1.9%
33UCGR: Brundall	4.1%	2.6%
33UCGT: Buxton	2.7%	2.0%
33UCGU: Coltishall	3.8%	2.6%
33UCHE: Marshes	3.9%	2.6%
33UCHQ: Thorpe St Andrew South East	4.2%	2.5%
33UCHR: Wroxham	3.7%	1.8%
33UDFY: Bradwell North	4.3%	2.3%
33UDGB: Caister South	6.4%	4.0%
33UDGE: East Flegg	6.7%	2.9%
33UDGF: Fleggburgh	4.3%	3.0%
33UDGL: Ormesby	6.3%	3.7%
33UDGP: West Flegg	5.1%	2.9%
33UFGY: Happisburgh	4.9%	3.0%
33UFHB: Hoveton	5.1%	3.2%
33UFHM: Scottow	3.1%	1.7%
33UFHR: Stalham and Sutton	5.6%	3.8%
33UFHX: Waterside	4.9%	2.8%
33UFHY: Waxham	4.9%	2.4%
33UHHA: Chedgrave and Thurton	4.9%	3.5%
33UHHF: Ditchingham and Broome	2.7%	2.3%
33UHHG: Earsham	3.3%	3.1%
33UH HK: Gillingham	4.4%	3.4%
33UH HQ: Loddon	5.2%	3.4%
33UH HY: Rockland	3.3%	2.7%

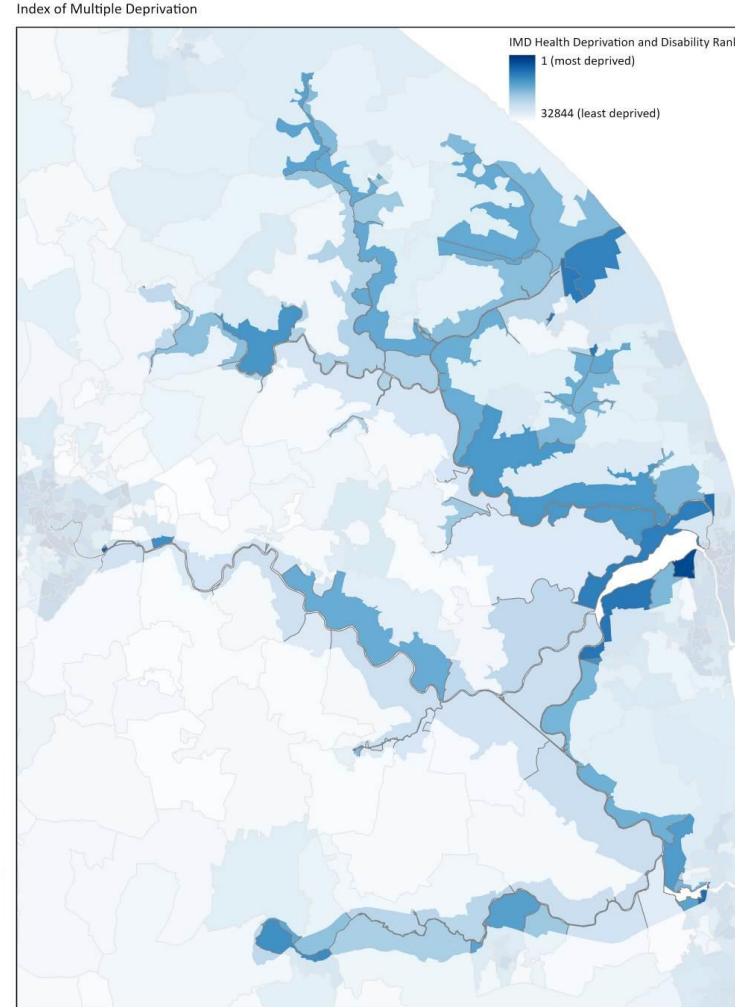
Ward	Out of work benefits Feb 2021	Out of work benefits Oct 2021
33UHJC: Stoke Holy Cross	3.1%	2.3%
33UHJF: Thurlton	4.6%	2.4%
42UHFY: Beccles North	5.8%	2.4%
42UHGB: Bungay	5.7%	4.4%
42UHGD: Carlton Colville	3.7%	2.8%
42UHGE: Gunton and Corton	4.6%	2.4%
42UHGK: Lothingland (GYBC)	6.4%	3.6%
42UHGN: Oulton Broad (Whitton)	5.1%	3.5%
42UHGT: Wainford	4.2%	3.1%
42UHGW: Worlingham	3.3%	2.2%

A2.17 Deprivation

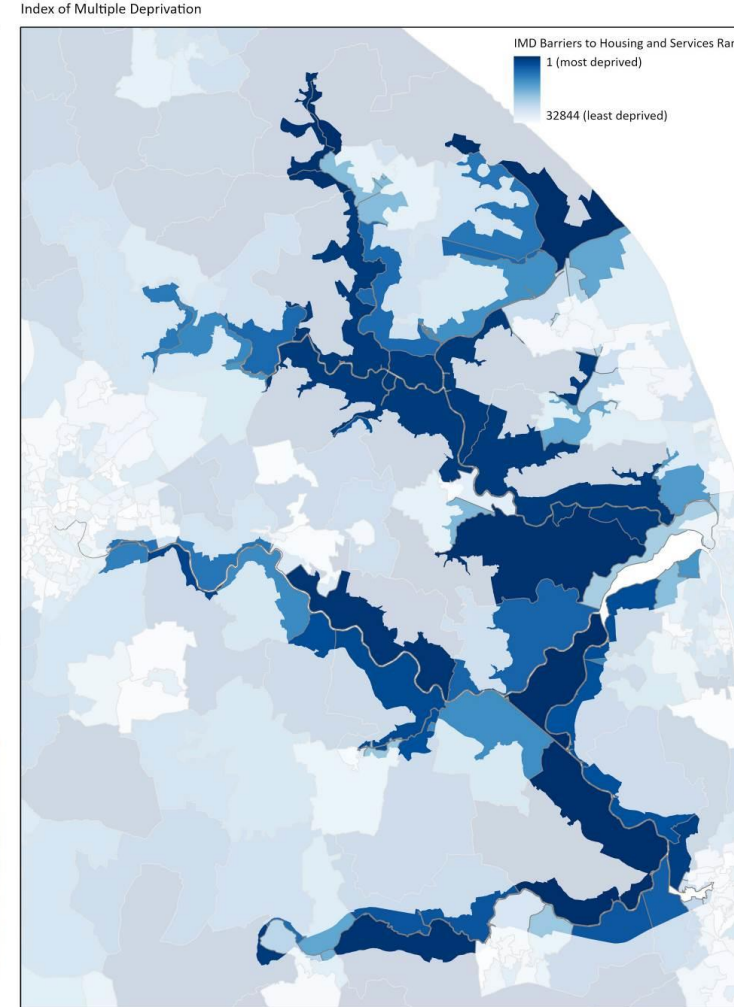
Indices of Multiple Deprivation (IMD) are often used to highlight those areas most likely to suffer from social exclusion. Maps 13, 14 and 15 reflect the most recent IMD data (2019) at Lower Super Output Area. The English IMD 2019 provide a relative measure of deprivation at small area level across England. Areas are ranked from least deprived (green) to most deprived (red) on seven different dimensions and an overall composite measure of multiple deprivation.



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Map 13
Index of Multiple Deprivation for the Broads constructed by combining the seven transformed domain scores, using the following weights: Income (22.5%) Employment (22.5%) Health and Disability (13.5%) Education, Skills and Training (13.5%) Barriers to Housing and Services (9.3%) Crime (9.3%) Living Environment (9.3%)

Map 14
Health Deprivation and Disability Rank for the Broads Authority Executive Area. In the main, the Broads area reflects the rest of the surrounding areas.

Map 15
Barriers to housing and services for the Broads
This shows much dark blue, although in Norfolk the Broads is not alone in having barriers to houses and services.

A2.18 Housing

Accommodation type

Tables 16 and 17 show accommodation types as set out in the 2011 Census.

Table 16
Accommodation types

Area	Whole house or bungalow						Flat, maisonette or apartment		Caravan or other mobile / temporary structure	
	Detached		Semi-detached		Terraced		Number	%	Number	%
	Number	%	Number	%	Number	%				
Broads Authority	1,900	53.6	700	19.3	400	11.9	440	12.1	110	3.2
National parks	89,800	44.2	50,430	24.8	39,500	19.4	21,100	10.4	2,420	1.2
England and Wales	5,512,300	22.6	7,506,350	30.7	6,028,300	24.7	5,276,620	21.6	106,010	0.4

A greater number proportion of residents in the Broads live in detached properties compared to other National Parks and nationally, with fewest in terraced properties.

Table 17
Property ownership

Area	Owned: Owned outright	Owned: Owned with a mortgage or loan	Shared ownership (part owned and part rented)	Social rented: Rented from council (Local Authority)	Social rented: Other	Private rented: Private landlord or letting agency	Private rented: Other	Living rent free
Broads Authority	48.2	23.3	0.4	2.4	3.0	18.0	2.0	2.7
National Park average	45.9	24.5	0.5	4.0	5.9	13.7	2.4	3.0

While the level of owner occupation is roughly similar to that for the English National Parks average, the level of outright ownership (without a mortgage) in the Broads is significantly higher than each of the comparator averages. The level of private renting in the Broads is higher, and the level of social housing (council and housing association, etc.) significantly lower, than the averages for the English National Parks.

Residential development in the Broads

Housing development in the Broads typically comprises primarily replacement dwellings or conversion to dwellings and small infill development. This applies both to permanent residential

properties and holiday accommodation. A small number of new houses are permitted each year. A major constraint on housing development is flood risk and the application of national planning policy in relation to this.

The number of dwellings permitted in the Broads in given below (taken from Broads Authority Annual Monitoring Report):

- 2020/2021 – 7 net new residential dwellings and 0 holiday homes.
- 2019/2020 – 13 net new residential dwellings and 8 holiday dwellings.
- 2018/2019 – 6 net new residential dwellings and 7 holiday dwellings.
- 2017/2018 – 10 net new residential dwellings and 16 holiday dwellings.
- 2016/2017 – 4 net new residential dwellings and 8 holiday dwellings.

Settlements in the Broads are often dominated by the importance of the waterways, with their associated trades and activities. Villages are typically centred around the staithe, with building designs that reflect their special functions, whether connected with riverside trade or management of the land.

Housing costs in the Broads are generally very high, because of the attractiveness of the area. The high cost of housing could impact on the economy of the Broads, as it affects those traditional trades such as agriculture and boat manufacture. Reed and sedge cutters have also indicated the importance of the proximity of living close to the reed and sedge beds. Because of the relative remoteness of parts of the Broads, housing and services in general are in some cases less accessible than elsewhere in the Norfolk and Suffolk counties.

All six Housing Authorities in the Broads area have identified a need for additional local affordable housing, but it will be rarely possible to provide this within the Broads because of the flood risk in most of the area and high land values.

Household composition

Table 18

Household composition

Area	One person household: Aged 65 and over	One person household: Other	One family only: All aged 65 and over	One family only: Married or same-sex civil partnership couple: No children	One family only: Married or same-sex civil partnership couple: Dependent children	One family only: Married or same-sex civil partnership couple: All children non-dependent	One family only: Cohabiting couple: No children	One family only: Cohabiting couple: Dependent children	One family only: Cohabiting couple: All children non-dependent	One family only: Lone parent: Dependent children	One family only: Lone parent: All children non-dependent	Other household types: With dependent children	Other household types: All full-time students	Other household types: All aged 65 and over	Other household types: Other
National Park average	15.5	14.6	12.9	18.3	13.3	5.6	4.8	3.1	0.4	3.7	2.7	1.6	0.0	0.5	3.0
Broads Authority	16.0	16.6	14.3	19.0	9.3	5.3	5.9	3.0	0.6	2.7	2.1	1.3	0.0	0.5	3.4
Broadland	14.1	12.3	12.6	16.8	16.2	6.3	5.5	3.9	0.5	4.9	2.7	1.3	0.0	0.3	2.6
Great Yarmouth	14.8	15.0	10.3	13.4	12.0	5.8	4.9	5.7	0.7	7.7	3.4	2.2	0.0	0.3	3.7
North Norfolk	17.9	13.2	15.2	16.5	11.1	5.0	4.9	3.8	0.5	4.3	2.7	1.4	0.0	0.6	2.8
Norwich	12.7	25.4	6.0	9.7	9.8	3.3	7.7	4.7	0.4	7.3	3.0	1.5	2.4	0.2	5.9
South Norfolk	13.5	12.8	12.5	16.8	16.4	5.7	6.0	4.1	0.5	4.9	2.6	1.3	0.0	0.4	2.5
Waveney	16.3	14.6	12.6	14.4	12.4	5.2	5.0	4.8	0.6	6.2	3.1	1.8	0.0	0.3	2.5

The percentage of 'one family only, with no children' households in the Broads is slightly higher than the National Park average, but much higher than constituent councils. The percentage of 'lone parent with dependent children' households is much lower than constituent councils. Around a hundred residents live in around 10 private residential care homes in the Broads. There are no NHS, local authority, housing association, children's home or psychiatric communal residential establishments in the Broads.

A2.19 Access and transport

Access

The Broads is a living and working environment, and because of its geography there is a high level of inter-dependence with the surrounding areas. Although the population within the area is small, and includes a high proportion of retirees, there are many adjacent villages and communities that are economically dependent on the Broads and are part of its social and cultural network. Conversely, many of those who live within the Broads boundaries rely on facilities and employment in the surrounding villages, towns and city.

Access to facilities and services is critical for the well-being of the local population and the continued enjoyment of the Broads by its many visitors. Improvement and maintenance of safe access for all to facilities, services and recreational facilities have been identified as a key issue.

Access to the Broads is of varied quality, and is difficult, without private transport, to many parts of the area. Due to the geography and network of waterways, much of the Broads area is also relatively difficult to access and the best – and sometimes only – way to reach certain parts of the system is by water. Moreover, links between land and water-based recreational provisions are not as plentiful as they might be. Nevertheless, there are 29km of Bridleways and 291km of footpaths. There are also many community transport schemes based in and around Broads villages. For example, Acle Area Ring and Ride flexi bus serves the villages of Martham, Ormesby, Rollesby, Thurne, Filby, Fleggburgh, Stokesby, Thrigby, Clippeby, Upton, Pilsen Green, South Walsham, Ranworth, Woodbastwick, Salhouse and Wroxham. Another example is Transport Plus which is a unique public transport service provided jointly by Norfolk County Council, East of England Ambulance Service and NHS Norfolk assisting adult members of the public to access essential health, social and wellbeing services. There is also Beccles and Bungay Area Community Transport.

The Broads area is crossed by a number of major transportation links, including the A47 trunk road east of Norwich, the A12 south of Great Yarmouth, and a number of other important roads. Despite this, access to the villages, rivers and Broads is usually off minor roads, as the area is predominantly rural in nature.

Car ownership

Looking at car ownership figures from the 2011 Census, in the 0, 1 and 2 cars or vans categories, the Broads area is similar to other rural districts of Norfolk. The proportion of households with 3 or more cars is greatest in the Broads when compared to the other areas in Table 19.

Table 19

Car ownership (percentages)

Area	No cars or vans in household	1 car or van in household	2 cars or vans in household	3 cars or vans in household	4 or more cars or vans in household
Broads Authority	12.4	40.7	32.3	10.3	4.3
National Park average	11.9	40.8	33.6	9.6	4.1
Broadland	11.4	44.4	33.5	7.8	2.9
Great Yarmouth	27.2	44.8	21.2	5	1.8
South Norfolk	11.7	42.4	34.3	8.4	3.3
North Norfolk	16.2	46.1	28.1	6.9	2.7
Waveney	21.9	46.4	24.3	5.6	1.9
Norwich	33.4	47.6	15.8	2.5	0.7
England	25.8	42.2	24.7	5.5	1.9

Most visitors to the Broads arrive by private car, causing seasonal congestion during the summer travel period, particularly in and around towns acting as a focus for attractions and which provide easy access to the rivers or Broads. The result is increased pressure on the area in terms of demands for visitor attractions, accommodation, road space and parking. This creates a contradictory impression to visitors who expect the Broads to be tranquil and not an area of dense traffic and congestion.

Rail

There are three railway lines that cross the Broads – these serve many of the smaller settlements between Norwich, Great Yarmouth and Lowestoft. The Bittern Line goes north from Norwich via Wroxham, whilst the Wherry Line service runs from Norwich to Great Yarmouth and Lowestoft. Service improvements on the latter resulted in a marked increase in the use of the line. There is also a route from Lowestoft south to Ipswich, with a connection to London Liverpool Street, giving a total journey time of less than three hours.

Air

Norwich International Airport is within a few miles of the western edge of the Broads and offers an increasing number of commercial and low-cost flights. However, air traffic from the airport remains relatively low, and the Broads has as yet not suffered the adverse impacts of air traffic on tranquillity and quiet enjoyment that affect several UK national parks. Stansted Airport is well connected to the area by rail and road.




Travel to work by car

According to the 2001 Census, the Broads has a higher level of travel to work by car, and a lower level of travel on foot than the English National Parks', Norfolk county's and England's averages. The level of cycling to work in the Broads is about the national average, but this is around half the Norfolk average though higher than any of the English National Parks. At the time of writing, 2011 Census Travel to Work data was not available.

Road Traffic Incidents

Maps 20 and 21 show data relating to road traffic collisions in the Broads Authority Area.

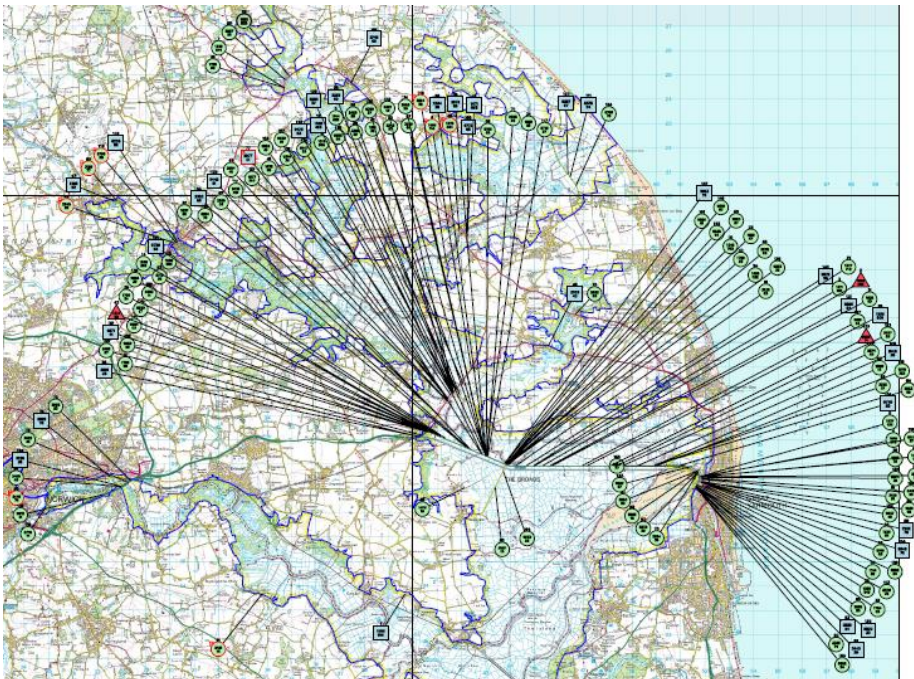
Source: Norfolk County Council. Covering 30/11/2016 to 30/11/2021. Legend: Icons with red outlined shapes and "P" are collisions involving pedestrians. Numbers inside shapes are accident references.

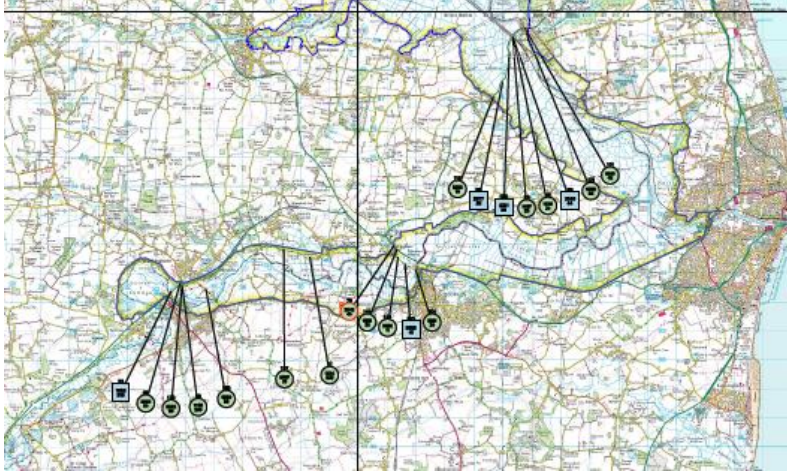
Fatal Collision:  Serious Collision:  Slight Collision: 

Map 20

Traffic incidents in the Norfolk part of the Broads

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Map 21

Traffic incidences in Suffolk part of the Broads Authority

Source: Suffolk County Council.

Covering 01/09/2019 to 31/08/2021

TRAFFMAP
AccMap - Accident Analysis System

SELECTION RESULTS

Run on: 03/12/2021

Accidents between dates 01/09/2016 and 31/08/2021 (60) months
Selection: Notes:
Selected using Mammal Selection

Police Ref.	Date	Ca.	Sev.	P2W	Cycs	Peds	Ch	OAP:	Vi.	Manv.	Road Cond.	Time	Location
16142741	26/12/2016	1	Slight	0	0	0	0	0	Light	No turn	Dry	1400	CHERRY TREE FARMLOW ROAD
17151970	31/01/2017	1	Serious	1	0	0	0	0	Dark	No turn	Wet/Damp	1715	B & MGEORGE WESTWOOD WAY (A145)
17184221	19/05/2017	3	Slight	0	0	0	1	0	Light	No turn	Dry	1223	BECCLIS NEW BRIDGE
17198351	14/06/2017	2	Slight	1	0	0	0	0	Light	No turn	Dry	1240	NORWICH ROAD (A146)
17227059	12/09/2017	1	Slight	0	0	0	0	0	Light	No turn	Dry	1921	BECCLIS ROAD (A146)
17231256	14/10/2017	1	Slight	1	0	0	0	0	Light	No turn	Dry	1118	GEORGE WESTWOOD WAY A145
18268983	02/02/2018	3	Slight	0	0	0	0	1	Dark	No turn	Wet/Damp	1705	NORWICH ROAD A146
18290034	01/05/2018	1	Serious	0	0	0	0	1	Light	No turn	Dry	1700	A146 AT JN WITH GEORGE WESTWOOD WAY
18320993	28/07/2018	2	Slight	0	0	0	0	0	Light	No turn	Dry	1211	A146 NEAR JN WITH A145
18355200	20/12/2018	1	Slight	0	0	0	0	0	Light	No turn	Dry	0807	BECCLIS (A146) 100 METRES EAST OF JUNCTION WITH GEORGE WES
19813071	11/01/2019	1	Slight	0	0	0	0	0	Dark	Both	Dry	1653	MORRISONS CAR PARK
19815056	09/02/2019	1	Slight	0	0	0	0	0	Dark	No turn	Wet/Damp	2000	NORWICH ROAD (A146)
19865429	30/06/2019	1	Serious	1	0	0	0	0	Light	Right	Dry	1635	NORWICH ROAD (A146)
19911399	30/09/2019	3	Slight	0	0	0	0	1	Light	No turn	Dry	0951	A146
19921583	02/11/2019	5	Slight	0	0	0	3	0	Light	No turn	Wet/Damp	1315	NORWICH ROAD (A146)
19923697	10/11/2019	1	Slight	0	0	0	0	0	Light	No turn	Dry	1210	GEORGE WESTWOOD WAY NEAR JUNCTION WITH A146
19926695	26/11/2019	1	Slight	0	0	0	0	1	Light	No turn	Wet/Damp	1030	NORWICH ROAD (A146) - 68 METRES FROM JUNCTION WITH UNCLA
19930537	04/12/2019	2	Serious	0	0	2	0	0	Dark	No turn	Wet/Damp	1958	NORWICH ROAD (A146)
20942645	25/02/2020	2	Slight	0	0	0	0	0	Dark	No turn	Wet/Damp	1635	NORWICH ROAD (A146)
20944675	13/03/2020	1	Slight	0	1	0	0	1	Light	No turn	Dry	1726	WATCH HOUSE HILL (B1062) - 75 METRES FROM JUNCTION WITH V
20947853	24/04/2020	1	Slight	0	1	0	0	1	Light	No turn	Dry	1628	BECCLIS ROAD (B1062) - 38 METRES FROM JUNCTION WITH UNCLA
20996649	18/10/2020	1	Slight	0	1	0	0	0	Light	No turn	Wet/Damp	1200	NORTHGATE
21107001	25/06/2021	2	Slight	0	0	0	0	1	Light	Right	Dry	1136	MORRISONS EXIT AT JUNCTION WITH GEORGE WESTWOOD WAY
Column Totals		38		4	3	2	4	7					
No. of Accidents				4	3	1	2	7					

Total number of accidents listed: 23

Water

Table 22 shows the length in metres of public moorings managed by the Broads Authority.

Table 22

Public moorings (m) in the Broads. (Source: Broads Authority Asset Management figures)

	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/8	2018/9	2019/202	2020/21
Total Length	7778.6m	7824.6m	7847.6m	7814.5	7568.50	7568.50	7760.30	8456.3	8625.8	8636.8	8741.8

Boat usage

Table 23 shows a breakdown of various types of craft registered to use the Broads.

Table 23

Boat usage

Source: Broads Authority (November 2021)

Annual Boat Numbers as at 1st November

PRIVATE BOATS	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Motor Cruisers	4,945	4,987	5,059	5,091	5,088	5,110	5,079	5,083	5,004	5,237
Auxiliary Yachts	1,188	1,166	1,168	1,152	1,127	1,132	1,093	1,107	985	1,048
Day Launches	542	521	514	504	495	556	574	558	562	582
Outboard Dinghies	1,058	1,043	1,062	1,016	962	1,094	1,060	1,058	1,051	1,140
Workboats	179	188	180	172	156	158	156	153	144	142
Passenger Vessels SPB	<i>Small Passenger Boats (Charitable Trusts & Ferries)</i>									
	22	21	23	13	19					
TOTAL MOTOR BOATS:	7,912	7,885	7,983	7,935	7,826	8,042	7,983	7,982	7,739	8,168
Sailing Craft	1,282	1,214	1,230	1,191	1,107	1,078	1,081	1,023	844	920
Rowing Craft	1,701	1,636	1,578	1,532	1,513	1,493	1,513	1,545	1,800	2,039
Houseboats	23	33	27	33	45	45	49	52	49	52
Total	10,898	10,768	10,818	10,891	10,491	10,646	10,826	10,602	10,432	11,179
HIRE BOATS	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Motor Cruisers	894	889	842	821	789	802	808	801	734	729
Auxiliary Yachts	46	46	47	43	44	45	46	44	39	45
ALL CABIN HIRE BOATS:	940	915	889	864	833	847	852	845	773	774
Day Launches	294	289	299	290	295	290	301	297	261	326
Outboard Dinghies	4	7	8	10	11	9	9	8	4	4
Passenger Vessels MCA	13	11	10	10	6	6	6	6	5	6
Passenger Vessels SPB	<i>Small Passenger Boats (Commercial)</i>									
	6	7	7	4	8					
TOTAL MOTOR BOATS:	1,251	1,222	1,206	1,174	1,145	1,158	1,175	1,183	1,047	1,118
Sailing Craft	110	109	110	108	102	101	95	87	74	88
Rowing Craft	184	188	175	184	192	191	194	193	182	227
Houseboats	16	16	16	16	16	28	26	26	27	27
Total	1,561	1,535	1,507	1,482	1,455	1,478	1,480	1,489	1,330	1,460
Grand Total	12,459	12,303	12,325	12,173	11,946	12,124	12,116	12,071	11,762	12,639

The numbers of boats on the Broads has reduced gradually, although 2021 shows a upwards move.

A2.20 Health

Those who completed the 2011 Census were asked to rate their health, as shown in Table 24.

Table 24

Health rating of population (Source: 2011 Census)

Area	Very good health	Good health	Fair health	Bad health	Very bad health
Broadland	44.3	37	14	3.6	1.1
Gt Yarmouth	40.3	36	16.6	5.5	1.6
North Norfolk	38.9	37.8	17.2	4.8	1.4
Norwich	44.9	35.4	14.1	4.4	1.2
South Norfolk	46.4	35.8	13.4	3.5	1
Waveney	41.1	36.3	16.1	5.1	1.5
Broads Authority	39.9	38.1	16.0	4.8	1.3

A2.21 Crime

Statistics from Norfolk Police (March 2021) are as follows:

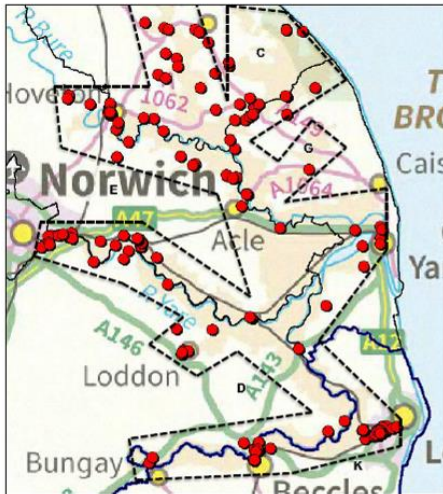
- Between 1st January 2018 to 31st December 2020 a total of 247 crimes were reported across the Broads in Norfolk and Suffolk. The yearly figures have remained relatively constant with a mean average of 82 crimes per year.
- The peak times for crime to be committed is during the summer months. This coincides with the high season on the Broads when the public visit the area for a holiday.
- Theft accounts for 47 of total crime committed in the past 3 years. This includes the theft of various types of property such as boats, outboard engines, navigational equipment and fuel.
- Crime has been reported from locations across the whole of the Broads; however, there are repeat locations. These include Oulton Broad, Wroxham, Potter Heigham, Trowse, Brundall and Beccles.
- Of the five districts that cover the Broads, East Suffolk has reported the highest number of crimes in the last 3 years (73). This is reflected by the hot spot seen at Oulton Broad. In Norfolk, Broadland district has reported the most crime (69).
- In addition to the crimes reported on the Broads, there were 23 marine crimes along the River Wensum in Norwich City Centre. A third of these are located around the Yacht Station on Riverside Road. A quarter of the crime reported in Norwich is theft. The property reported stolen include kayak, boats and canoes.

Map 25

Crime on the Broads in Norfolk and Suffolk



Crime on the Broad in Norfolk and Suffolk



Map 1: location of crimes reported in the area of the Broads. The Broads have been outlined using a dashed line.

KEY

- Crime Point
- Suffolk/Norfolk boarder Region
- District boundary Region
- Approximate outline of the Broads

Districts

- C North Norfolk district
- D South Norfolk district
- E Broadland district
- G Great Yarmouth district
- K East Suffolk district

STRATEGIC, BUSINESS & OPERATIONAL SERVICES

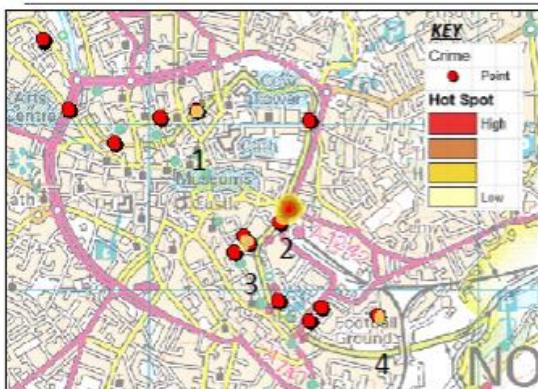
OFFICIAL

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Map 26

Crime in Norwich

Crime in Norwich



Map 3: location of crimes reported on or along the banks of the River Wensum in Norwich only. The hotspots highlight repeat locations.

A2.22 Qualifications

Table 27

Qualifications (Source: 2011 Census)

Area	None	Level 1 highest	Level 2 highest	Apprenticeship highest	Level 3 highest	Level 4 highest	Other highest	School children and full-time students age 16 to 17	School children and full-time students 18 and over	Full-time students 18 to 74: economically active in employment	Full-time students 18 to 74: economically active unemployed	Full-time students 18 to 74: economically inactive
Broads Authority	23.8	12.3	15.6	5.3	11.1	27.9	4.0	1.8	1.7	0.8	0.1	0.8
National Park average	19.8	11.8	15.6	3.9	11.2	33.6	4.0	2.4	2.0	0.8	0.1	1.1
Broadland	22.9	14.8	17.5	5.5	12.0	23.2	4.3	2.6	2.1	1.1	0.1	0.8
Great Yarmouth	32.8	15.7	16.1	4.7	10.6	14.2	5.9	2.6	2.5	1.0	0.3	1.2
North Norfolk	27.5	14.1	16.2	4.7	10.5	22.3	4.7	2.2	1.5	0.7	0.1	0.7
Norwich	22.6	12.8	13.8	2.6	15.2	27.7	5.2	1.9	11.6	3.3	1.0	7.3
South Norfolk	22.6	13.6	17.1	4.2	11.5	27.0	4.0	2.7	2.1	1.0	0.1	1.0
Waveney	29.8	14.2	16.2	5.4	11.7	17.9	4.7	2.6	2.1	0.9	0.3	0.9

The Broads has a greater proportion of people with no qualifications than the National Park average.

A.23 Ethnic group

Table 28

Ethnic Group (Source: 2011 Census)

Area	White: English/Welsh/Scottish/ Northern Irish/British	White: Irish	White: Gypsy or Irish Traveller	White: Other White	Mixed/multiple ethnic group: White and Black Caribbean	Mixed/multiple ethnic group: White and Black African	Mixed/multiple ethnic group: White and Asian	Mixed/multiple ethnic group: Other Mixed	Asian/Asian British: Indian	Asian/Asian British: Pakistani	Asian/Asian British: Bangladeshi	Asian/Asian British: Chinese	Asian/Asian British: Other Asian	Black/African/Caribbean/Black British: African	Black/African/Caribbean/Black British: Caribbean	Black/African/Caribbean/Black British: Other Black	Other ethnic group: Arab	Other ethnic group: Any other ethnic group
Broads Authority	96.4	0.6	0.0	1.6	0.2	0.1	0.2	0.2	0.1	0.0	0.0	0.0	0.3	0.1	0.1	0.0	0.0	0.0
National Parks average	95.9	0.4	0.1	1.9	0.2	0.1	0.3	0.2	0.1	0	0	0.2	0.4	0.1	0	0	0	0.1

Appendix 3: Literature review

This literature review was produced for the review of the Local Plan for the Broads. For the purposes of this Sustainability Appraisal Report, it also relates to the review of the Broads Plan where relevant.

A3.1. International

[Ramsar Convention on Wetlands of International Importance, Especially Waterfowl Habitat](#) (1971) (amended 1982)

The Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat (also known as the Convention on Wetlands) is an international treaty for the conservation and sustainable use of wetlands. It is named after the city of Ramsar in Iran, where the convention was signed in 1971.

[Kyoto Protocol](#) (1997)

The Kyoto Protocol is an international treaty. It extends the 1992 United Nations Framework Convention on Climate Change that commits state parties to reduce greenhouse gas emissions, based on the scientific consensus that global warming is occurring and that human-made CO₂ emissions are driving it.

[Rio Earth Summit 1992](#)

Through this summit the United Nations sought to help national governments to rethink economic development and find ways to stop polluting the planet and depleting its natural resources.

[Johannesburg Declaration on Health and Sustainable Development](#) (2002)

The Johannesburg Declaration builds on earlier declarations made at the United Nations Conference on the Human Environment at Stockholm in 1972, and the Earth Summit in Rio de Janeiro in 1992. While committing the nations of the world to sustainable development, it also includes substantial mention of multilateralism as the path forward.

[UN Convention on Human Rights](#)

The Universal Declaration of Human Rights (UDHR) is an international document adopted by the United Nations General Assembly. It enshrines the rights and freedoms of all human beings.

[Paris Agreement](#) (2016)

The Paris Agreement is a legally binding international treaty on climate change. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. To achieve this long-term temperature goal, countries aim to reach global peaking of greenhouse gas emissions as soon as possible to achieve a climate neutral world by mid-century. Climate change will be a key topic in the Local Plan and the Broads Plan.

A3.2. European

While the UK has left the EU, there are still some documents of relevance as they have been transposed into UK law, as listed below. Over the period of producing the Local Plan and the Broads Plan, some of these documents may no longer be relevant, and these plans will meet all necessary requirements as they are produced.

[European Climate Change Programme](#)

The European Commission established the European Climate Change Programme (ECCP) in 2000 to help identify the most environmentally and cost-effective policies and measures that can be taken at European level to cut greenhouse gas emissions.

[Air Quality Framework Directives](#)

European Union policy on air quality aims to develop and implement appropriate instruments to improve air quality. The main instruments are a series of Directives setting ambient air quality standards to provide protection from excessive pollution concentrations, based on the latest research on the health effects of air pollution.

[Directive 2002/49/EC on the Assessment and Management of Environmental Noise](#)

This Directive aims to “define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to the exposure to environmental noise.”

[Birds Directive 1979 79/409/EEC](#)

Habitat loss and degradation are the most serious threats to the conservation of wild birds. The Directive therefore places great emphasis on the protection of habitats for endangered and migratory species. It establishes a network of Special Protection Areas (SPAs) including all the most suitable territories for these species. Since 1994, all SPAs are included in the Natura 2000 ecological network, set up under the Habitats Directive 92/43/EEC. Protecting and enhancing wildlife is key to the Local Plan and the Broads Plan, and impacts will be assessed through Habitats Regulations Assessment.

[Conservation of Natural Habitats and of Wild Flora and Fauna Directive \(92/43/EC\)](#)

The Habitats Directive ensures the conservation of a wide range of rare, threatened or endemic animal and plant species. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right. It forms the cornerstone of Europe's nature conservation policy with the Birds Directive and establishes the EU wide Natura 2000 ecological network of protected areas, safeguarded against potentially damaging developments. Protecting and enhancing wildlife is key to the Local Plan and the Broads Plan, and impacts will be assessed through Habitats Regulations Assessment.

[Water Framework Directive 2000 2000/60/EC](#)

Citizens, environmental organisations, nature, water-using sectors in the economy all need cleaner rivers and lakes, groundwater and bathing waters. Water protection is therefore one of the priorities of the Commission. European Water Policy should get polluted waters clean again, and ensure clean waters are kept clean. Water management will be a key consideration in the Local Plan and the Broads Plan.

[European Strategic Environmental Assessment Directive \(2001/42/EC\)](#)

The Protocol on Strategic Environmental Assessment augments the Espoo Convention by ensuring that individual Parties integrate environmental assessment into their plans and programmes at the earliest stages, and thus help in laying down the groundwork for sustainable development. This Directive is met through Sustainability Appraisals.

[European Renewable Energy Directive \(2018/2001/EU\)](#)

In December 2018, the recast Renewable Energy Directive 2018/2001/EU entered into force, as part of the Clean Energy for all Europeans package, aimed at keeping the EU a global leader in renewables and, more broadly, helping the EU to meet its emissions reduction commitments under the Paris Agreement.

[Transforming our World: the 2030 Agenda for Sustainable Development \(2015\)](#)

This agenda, including its 17 Sustainable Development Goals (SDGs) and 169 targets, was adopted on 25 September 2015 by Heads of State and Government at a special UN summit. The Agenda is a commitment to eradicate poverty and achieve sustainable development by 2030 world-wide, ensuring that no one is left behind. The adoption of the 2030 Agenda was a landmark achievement, providing for a shared global vision towards sustainable development for all.

A3.3. National

[National Planning Policy Framework \(NPPF\) \(2019\)](#)

The NPPF sets out Government planning policy and will influence Local Plans. The Local Plan for the Broads will reflect the most up-to-date national policy.

[National Planning Policy Guidance \(NPPG\)](#)

The NPPG sets out guidance to Government planning policy and will influence Local Plans. From time to time, aspects are updated, and the Local Plan for the Broads will reflect the most up-to-date national policy.

[Dark Skies APPG Policy Plan \(2021\)](#)

The All-Party Parliamentary Group has produced policy areas where there could be improvements relating to dark skies.

[National design code \(consultation version, February 2021\)](#)

The National Model Design Code provides detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government's priorities and provides a common overarching framework for design.

[Indices of Multiple Deprivation \(IMD\) \(2019\)](#)

The Indices of Multiple Deprivation are updated every five years or so. A Local Plan topic paper will be produced on how the Broads rates against the IMD.

[English National Parks and the Broads UK Government Vision and Circular \(2010\)](#)

The purpose of this circular is to provide updated policy guidance on the English National Parks and the Broads ('the Parks').

[Planning for the Future, White Paper \(2020\)](#)

This White Paper proposes many changes to the planning system, and any changes will be reflected in the Local Plan.

[Fixing our broken housing market \(2017\)](#)

This housing white paper sets out the Government's plans to reform the housing market and boost the

supply of new homes in England. While the scale of growth in the Broads is quite small, the economic section of the Local Plan will reflect this strategy as appropriate.

[Building our Industrial Strategy](#) (2017)

This document identifies 10 pillars we believe are important to drive forward our industrial strategy across the entire economy: science, research and innovation; skills; infrastructure; business growth and investment; procurement; trade and investment; affordable energy; sectoral policies; driving growth across the whole country; and creating the right institutions to bring together sectors and places. These pillars frame our approach, and across each of them we set out a programme of new policy. While the scale of growth in the Broads is quite small, the economic section of the Local Plan will reflect this strategy as appropriate.

[National Planning Policy for Waste](#) (2014)

This document sets out the Government's detailed waste planning policies. It may be more relevant to Minerals and Waste Planning Authorities than to the Broads Authority, but this will be checked when producing the Local Plan. The Authority will also work closely with the county councils regarding minerals and waste.

[Air quality plan for nitrogen dioxide \(NO₂\) in UK](#) (2017)

This plan sets out the UK's plan for reducing roadside nitrogen dioxide concentrations. This may be of relevance to the transport and health policies of the Local Plan, as well as the Habitats Regulations Assessment.

[UK Marine Policy Statement](#) (2011)

The Marine Policy Statement is the framework for preparing Marine Plans and taking decisions affecting the marine environment. The East inshore and offshore plans relate to the Statement.

[Planning policy for traveller sites](#) CLG (2012 and 2015)

This Government planning policy for traveller sites should be read in conjunction with the National Planning Policy Framework.

Various consultations on planning reforms

There could be changes to the planning system over the coming years, and the Local Plan will need to reflect and be in conformity with those changes.

[Landscapes Review: National Parks and AONBs](#) (2019)

The Landscapes Review contains proposals for the future management of National Parks and Areas of Outstanding Natural Beauty (AONBs) in England. Any proposals taken forward by the Government could have implications for the Local Plan and the Broads Plan.

[Environment Bill](#) (ongoing)

The Environment Bill will make provision about targets, plans and policies for improving the natural environment; for statements and reports about environmental protection; for the Office for Environmental Protection; about waste and resource efficiency; about air quality; for the recall of products that fail to meet environmental standards; about water; about nature and biodiversity; for conservation covenants; about the

regulation of chemicals; and for connected purposes. These aspects could influence the Local Plan and Broads Plan.

A3.4. East Anglia

[A47 Business Case](#) (2017)

The Acle Straight passes through the Broads and is part of the A47. We are aware of the desire of some people to dual this part of the A47. The Local Plan already has a policy relating to this, and it is likely that this policy will be rolled forward into the new Local Plan.

[East Anglia Rail Prospectus](#) (2015)

Rail lines and rail stations run throughout the Broads. There is a policy in the Local Plan that relates to rail stations and halts, and this is likely to be rolled forward into the new Local Plan.

[Norfolk and Suffolk Gypsy and Traveller Strategy](#) (2012)

The actual need for Gypsy, Travellers and Travelling Show People was calculated as part of a 'needs assessment', completed jointly with other Local Planning Authorities. This concluded a need of zero in the Broads, but we included a development management policy relating to such sites, which is likely to be rolled forward in the new Local Plan.

[East Inshore and East Offshore Marine Plans / MMO](#) (2014)

These Marine Plans are already reflected in the Local Plan. The MMO is a key stakeholder and will be consulted at various stages of plan production.

[Anglian Water: Water Resources Management Plan](#) (2019)

Anglian Water supplies water to parts of the Broads and is responsible for waste water for the whole of the Broads Authority Executive Area. Their plans will be of relevance to the Local Plan and the Broads Plan.

[Essex & Suffolk Water WRMP](#) (2019)

Essex & Suffolk Water supplies water to parts of the Broads. They also extract water from the Broads. Their plans will be of relevance to the Local Plan and the Broads Plan.

[Shoreline Management Plans](#)

There is a small section of coastline in the Broads executive area. There is a policy that seeks to protect the general openness and low-key development on the coast in the current Local Plan, and this policy stance is likely to be rolled forward in the new Local Plan. The SMPs are also relevant to the Broads Plan review.

[Broadland Catchment Plan](#) (2018) and [Anglian River Basin District River Basin Management Plan](#) (2018)

What happens upstream of the Broads can have significant impacts on the Broads. These reports will inform the Local Plan and the Broads Plan.

[Water Resource East Updated Resource Position Statement](#) (February 2021)

Water Resources East (WRE) is one of five Regional Planning Groups working under the National Framework for Water Resources to develop a long-term integrated water management plan for Eastern England. WRE's vision is for Eastern England to have sufficient water resources to support a flourishing economy, a thriving environment and the needs of its population, and for the region to be seen as an international exemplar for

collaborative integrated water resource management. Water resource management will be an important theme for the Local Plan and the Broads Plan.

[Norfolk and Suffolk Natural Capital Assets Evidence Compendium | Norfolk Biodiversity Information Service \(nbis.org.uk\)](#) (2020)

The counties of Norfolk and Suffolk have stewardship of a wealth of natural assets. The purpose of this Evidence Compendium is to present information about these assets and the potential risks to them, to provide an element of the preparatory work that will feed into a Norfolk & Suffolk 25 Year Environment Plan. Where possible, data is provided by county and also for five important natural areas within them: the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and Suffolk Coasts & Heaths AONB, plus The Broads, The Brecks and the Dedham Vale AONB.

A3.5. New Anglia LEP

[Local Industrial Strategy](#) (2020)

This Local Industrial Strategy is based on strong evidence and sets out the actions local partners are taking and how they are working with government to continue to make this one of the best places in the world to live, work, learn and succeed in business. While the scale of growth in the Broads is quite small, we will ensure that the economic section of the Local Plan reflects this strategy as appropriate.

[Economic Strategy and Investment Plan](#) (2017)

The Economic Strategy for Norfolk and Suffolk is a shared endeavour between businesses, education providers, local councils, the voluntary and community sector and is led by New Anglia LEP. It outlines ambitious plans for future growth across Norfolk and Suffolk. While the scale of growth in the Broads is quite small, we will ensure that the economic section of the Local Plan reflects this strategy as appropriate.

[Covid-19 Economic Recovery Plan](#) (ongoing)

The Norfolk and Suffolk Covid-19 Economic Recovery Restart Plan brings together commitments and actions from local authority, private sector, third sector and education organisations to outline the key activities in place to help our region's economy restart after the COVID-19 pandemic. The Norfolk and Suffolk Visitor Economy Recovery Plan, from New Anglia LEP and Visit East of England, outlines commitments and actions to support our tourism and cultural sectors.

[Local Energy East Strategy](#) (2018)

The three LEP areas of Cambridgeshire and Peterborough (formerly Greater Cambridge and Greater Peterborough), Hertfordshire and New Anglia have joined together to create a tri-LEP area project. The project also involves their constituent local authorities, the Distribution Network Operator (DNO), universities, third sector and energy sector businesses. This strategy sets out the collective ambitions to 2030. These are underpinned by a range of activities that the LEE Network and the Greater South East Energy Hub will take forward to ensure that we remain at the forefront of Clean Growth in the UK and grasp the opportunities ahead. This will be relevant to the energy section of the Local Plan.

[Rail Prospectus](#) (2015)

There are rail lines and rail stations that run throughout the Broads. There is a policy already in the Local Plan that relates to rail stations and halts and this is likely to be rolled forward into the new Local Plan.

A3.6. Norfolk

[Central Norfolk SHMA](#) (2017)

This SHMA calculated the housing need for the Broads. While it is a few years old, it still contains relevant information. The BA will shortly start work on calculating the housing need for the new Local Plan.

[Norfolk Minerals and Waste Core Strategy and Site Allocations documents.](#)

There may be some sites that the new Local Plan allocates near or on sites that have been identified as sources of minerals. Working with the planners at Norfolk County Council, we will seek to safeguard/seek the use of such materials as relevant.

[Norfolk Rural Development Strategy](#) (2017)

This strategy is relevant to the Local Plan and Broads Plan, as much of the Broads is rural.

[Norfolk's Earth Heritage - valuing our geodiversity](#) (2010)

Geodiversity is addressed through the natural environment policy of the Local Plan, which is likely to be rolled forward to the new Local Plan.

Norfolk Strategic Planning Framework, Version 3 (2021)

This framework includes agreements that Local Plans need to address as they are produced. This is also important in addressing the Duty to Cooperate requirements. At the time of writing, the document is in the process of being endorsed by the Norfolk Local Planning Authorities.

[Norfolk County Council Environment Policy](#) (2019)

This policy reflects the areas that the Council sees as key to protecting and maintaining the health of Norfolk's distinctive environment and its occupants. The Policy signposts to overarching activity spanning a range of environmental interactions the Council is involved with, including those where it already has its own statutory environmental responsibilities. Generally, the policy aligns with the general aims of the Local Plan.

[Norfolk Local Transport Plan](#) (being updated)

This plan sets out the approach to transport over the coming years. As well as liaising with the County Council Highways team, this document will be of relevance to the Local Plan.

[Norfolk Strategic Infrastructure Plan](#) (2020)

The Strategic Infrastructure Delivery Plan (SIDP) sets out Norfolk's high-level infrastructure priorities for the next 10 years (see [project map](#)). Some projects are near to the Broads. The Acle Straight passes through the Broads and is part of the A47. We are aware of the desire of some to dual this part of the A47. The current Local Plan already has a policy relating to the dualling and it is likely that this policy will be rolled forward into the new Local Plan.

[Norfolk Rail Prospectus](#) (being updated)

There are rail lines and rail stations that run through the Broads. There is a policy already in the Local Plan that relates to rail stations and halts and this is likely to be rolled forward into the new Local Plan.

[Wroxham and Hoveton Network Improvement Strategy](#) (2020)

This strategy could influence the Hoveton and Wroxham sections of the Local Plan.

[Public Health Strategy](#) (2016) and [Joint Health and Wellbeing Strategy](#) (2018)

These strategies look at health issues across Norfolk and review Public Health priorities and vision for the next four years. The link between health and planning is clear and we will ensure health continues to be addressed in the new Local Plan.

[Norfolk Access Improvement Plan](#) (2019)

This looks into land and water-based ways to enjoy the area, with benefits to the economy and health and wellbeing. The Local Plan will look to protect existing routes and safeguard future routes, and the Broads Plan includes an objective for improving integrated access.

[Digital Inclusion Strategy](#) (2018)

The strategy's aim is that: "Every Norfolk resident has ability to take full advantage of the opportunities and benefits of accessing online services and harnessing internet technology." Generally, this aim is supported in the current Local Plan and the relevant policies are likely to be rolled forward into the new Local Plan. Care needs to be taken to balance the importance of providing telecommunications and the impact on protected landscapes.

[Local Flood Risk Management Strategy](#) (most recent parts adopted 2020)

Flood risk from all sources of flooding and the impact of climate change are fundamental issues the Local Plan will need to address. The Pitt Review produced 91 recommendations for the Government to act upon. At the heart of these recommendations are: Knowing where and when it will flood, reducing the risk and impact of flooding, better advice and help for people to protect their families and homes, maintaining power and water supplies and protecting essential services, rescuing and caring for people during an emergency, staying healthy and speeding up recovery. To fulfil these recommendations locally, Norfolk County Council as Lead Local Flood Authority is required to develop, maintain, apply and monitor a Local Flood Risk Management Strategy.

[Surface Water Management Plans](#)

As Lead Local Flood Authority, Norfolk County Council is responsible for looking at the causes of surface water flooding and its consequences, in order to learn lessons and help predict potential future flooding and minimise its effects. They do this through our Surface Water Management Plans (SWMP) which use historical flood records and detailed models of potential future floods. If there are any SWMP for areas that are allocated for development in the Local Plan, we will liaise with the LLFA.

Emerging documents

The Norfolk Green Infrastructure and Recreation Impact Avoidance and Mitigation Strategy and the Norfolk Older Persons Accommodation report were in preparation at the time of preparing this report. Their findings will inform the new Local Plan and Broads Plan.

A3.7. Suffolk

[Suffolk Minerals and Waste Local Plan](#) (2020)

There may be some sites that the new Local Plan allocates near or on sites that have been identified as sources of minerals. Working with the planners at Suffolk County Council, we will seek to safeguard/seek the use of such materials as relevant.

[Suffolk Green Access Strategy](#) (2020)

This strategy looks into land and water-based ways to enjoy the area, with benefits to the economy and health and wellbeing. The Local Plan will look to protect existing routes and safeguard future routes.

[Suffolk Transport Plan](#) (2011)

This plan sets out the approach to transport over the coming years. As well as liaising with the County Council Highways team, this document will be of relevance to the Local Plan and the Broads Plan.

[Suffolk Growth Strategy](#)

This strategy provides the broad framework showing how the county, district and borough councils, working together, intend to do “whatever they can” to enable business to be successful. This will be relevant to the economic section of the Local Plan.

[Suffolk Design](#)

Suffolk Design is an initiative to ensure the quality of new buildings, public spaces and neighbourhoods throughout the county meets today’s needs and tomorrow’s challenges. This will be relevant to the design section of the Local Plan.

[Suffolk’s Nature Strategy](#) (2015) and [Suffolk Biodiversity Action Plan](#) (2012)

These documents outline priorities and how the landscapes and wildlife in Suffolk contribute to economic growth and health and wellbeing. This will be relevant to the natural environment aspects of the Local Plan and the Broads Plan.

[Suffolk Flood Risk Management Strategy](#) (2016) and [Preliminary Flood Risk Assessment](#)

Flood risk from all sources of flooding and the impact of climate change are a fundamental issue that the Local Plan will need to address. This is an important tool to help everyone understand and manage flood risk within Suffolk. The strategy summarises the information available on the risk of flooding in Suffolk and way to manage that risk. The strategy document has been published by the Suffolk Flood Risk Management Partnership, which is made up of all the relevant Risk Management Authorities (RMAs) relevant to flood risk in Suffolk. The Preliminary Flood Risk Assessment is an assessment of floods that have taken place in the past, floods that could take place in the future. It considers flooding from surface water runoff, groundwater and ordinary watercourses.

[A policy to address poverty in Suffolk](#) (2015)

The aim of this policy is to ensure that we build on work that is already in place to address poverty, so that it is embedded in the planning and delivery of all services, in particular for our most vulnerable groups.

[Suffolk Local Geodiversity Action Plan](#) (2006)

Geodiversity is addressed through the natural environment policy of the Local Plan, and is likely to be rolled forward to the new Local Plan.

[Health and Wellbeing Strategy](#) (2019)

The link between health and planning is clear, and we will ensure health continues to be addressed in the new Local Plan and through objectives in the Broads Plan.

A3.8. Local

[North Norfolk AONB Management Plan](#) (2014) and ([more recent version under preparation](#))

Part of the AONB is in the Broads and therefore this management plan is an important consideration.

Neighbouring Local Planning Authority Local Plans, Core Strategies, Development Management and Site Allocations documents

More Local Plans will be adopted while the Local Plan for the Broads is being prepared. These documents will not directly be relevant to the Broads, as the Broads Authority is the Local Planning Authority and produces its own documents, but it will be important to understand local policy approaches, particularly for settlements that are partly in the Broads and partly in the neighbouring Local Planning authority's area.

Constituent county/district/borough council economic strategies, environment strategies, housing strategies and business plans

While the Broads Authority is the Local Planning Authority for the Broads, the Broads sits within six district council and two county council areas that provide services to residents, and the various strategies produced by these councils will therefore be of relevance and could inform the Local Plan for the Broads.

District and County Sustainable Community Strategies

While these strategies are past their published end date, they are still in place as far as we are aware. A note produced to support the 2019 Local Plan will be updated when policies of the new Local Plan are formulated.

[Solar PV and Building Regulations in Conservation areas](#) – covering Suffolk

This was produced to cover all of Suffolk. As we produce the Local Plan, we will review the potential and need to incorporate this into the Local Plan.

[Strategic Flood Risk Assessment](#) (2017, 2018 and 2019) and [Broadland Futures Initiative](#) (ongoing)

This sets out detailed flood risk zones. Working with other Local Planning Authorities and the Environment Agency, we will assess the need to review these documents. But flood risk from all sources of flooding and the impact of climate change are a fundamental issue that the Local Plan and the Broads will address. The Broadland Futures Initiative work will be relevant to these plans.

[River Wensum Strategy](#)

The River Wensum Strategy's vision is: "To breathe new life into the river by enhancing it for the benefit of all and increasing access to, and greater use of, this important asset. An enhanced river corridor, with its unique natural and historic environment, will once again play an important part in the growth and vitality of the city, strengthening the visitor economy and helping to give the city a competitive advantage in attracting inward investment."

[Suffolk Coast RAMS strategy](#)

The RAMS project allows for a strategic approach to mitigating the in-combination effects of development on these designated areas and allows mitigation to be delivered across the project area.

A3.9. Broads-specific

[Broads Integrated Access Strategy](#) (2019)

This strategy looks into land and water-based ways to enjoy the Broads, with benefits to the economy and health and wellbeing. The Local Plan will look to protect existing routes and safeguard future routes. The

Authority's Waterways and Recreation Officer will advise on relevant aspects of the Local Plan and Broads Plan.

[Broads Flood Risk SPD \(2020\)](#)

Flood risk is a key constraint in the Broads. This elaborates on adopted policy. It does provide more detail than might be relevant for a Local Plan, but the potential to incorporate elements of the SPD into the Local Plan will be reviewed. The SPD may need updating over the coming years, certainly when a new Local Plan is adopted.

[Landscape Character Assessment \(2016\)](#) and [Landscape Sensitivity Study \(2012\)](#)

Impact of development on landscape character is a key consideration for the Local Plan. These documents will be reviewed and may be updated and findings will be reflected in the Local Plan.

[Sustainable Tourism in the Broads \(2016\)](#)

Tourism is an important part of the local economy, and for the wider economy as many businesses, located outside of the Broads, rely on the Broads. The Strategy will be updated during the production of the Local Plan.

[Education Strategy \(2017-2022\)](#)

The Education Strategy provides a framework for environmental education and wider outreach in the Broads, including the [Broads Curriculum](#).

[Volunteer Strategy \(2017-2022\)](#)

The Volunteer Strategy outlines how the Broads Authority uses volunteers to help its work in the Broads, and identifies objectives to develop and refine our volunteer offer.

[Broads Climate Change Adaptation Plan \(2016\)](#) and [Cutting the Broads' Carbon Footprint \(ongoing\)](#)

The Broads Authority, like many other Authorities, has declared a climate emergency. A lot of work is ongoing on the issue of climate change mitigation and adaptation. Climate change will be a fundamental theme in the Local Plan and the Broads Plan, and the Authority's Climate Reduction Project Manager will provide advice.

[Knackers Wood Water Recycling Centre Joint Position Statement \(2017\)](#)

Produced in 2017, this Statement will be reviewed and updated. Depending on the current position, development may still be difficult to bring forward in Horning, until the capacity issues at the Water Recycling Centre are addressed.

[Mooring Design Guide \(2015\)](#)

Moorings, including their design and availability, is a key consideration for the Broads. The topics covered in this guide will be important when producing the Local Plan. The need to review and update this guide will be scoped out during the Local Plan production alongside the potential to incorporate elements of the guide into the Local Plan.

[River bank stabilisation guide \(2015\)](#)

Most of the Broads is water and so there are many river banks. With natural erosion and the effects of climate change, as well as the need to protect the character of the area, the topics covered in this guide will be important when producing the Local Plan. The need to review and update this guide will be scoped out

during the Local Plan production alongside the potential to incorporate elements of the guide into the Local Plan.

[Peat Guide](#) (2021)

With part of the Broads being peat soils and pressures from development, and considering the special qualities of peat, peat will be an important consideration in the Local Plan. The potential to incorporate elements of the guide into the Local Plan will be reviewed.

[Biodiversity Enhancements Guide](#) (2016)

Protecting and enhancing biodiversity is an important theme in the Local Plan and the Broads Plan. It is anticipated that over the coming months/years the need for biodiversity net gain will be a requirement, which could inform the review of this guide.

[Planning for waterside bungalows/chalets](#) (2016)

There are many riverside bungalows and chalets, which are part of the character of the area, and with owners often wishing to undertake work to them, these buildings will be an important consideration when producing the Local Plan. The need to review and update this guide will be scoped out during the Local Plan production, alongside the potential to incorporate elements of the guide into the Local Plan.

[Guide to integrating development into the Broads Landscape](#) (2017)

Protecting and enhancing landscape character will be an important theme in this Local Plan. The need to review and update this guide will be scoped out during the Local Plan production alongside the potential to incorporate elements of the guide into the Local Plan.

[Annual Monitoring Reports](#) (various years)

The most recent AMRs (2019/20 and 2020/21) will be of particular relevance to the Broads Plan review as they are the first to reflect the 2019 Local Plan; showing, for example, where some policies are used more than others or where schemes tend to depart from some policies.

[Statement of Community Involvement](#) (2020)

The SCI sets out how we will consult on the Local Plan, Broads Plan and other key documents. The SCI may need to be updated to reflect Covid-19 social distancing requirements during public consultation on these documents.

[Broads Biodiversity and Water Strategy](#) and [action plan](#) (2019)

Protecting and enhancing biodiversity will be an important theme in the Local Plan and the Broads Plan. We will work closely with our ecologists and external environment advisors when producing the plans.

[Evidence Base](#) and [Examination Library](#) to support the 2019 Local Plan

The evidence base produced to support the last Local Plan may still be relevant to the new Local Plan and will be reviewed and updated as required.

[Management of the Marshes](#) (2014)

This document is an analysis of the intentions of farmers and landowners in respect of marsh management post ESA and Environmental Stewardship.

A3.10. Neighbourhood Plans

Numerous Neighbourhood Plans are in production, and details are on the Authority's website at [Neighbourhood planning \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/Neighbourhood-planning). The following Plans have been adopted:

- [Acle](#) (2015)
- [Brundall](#) (2016)
- [Salhouse](#) (2016)
- [Strumpshaw](#) (2014)
- [Wroxham](#) (2019)

The Local Plan will have a site-specific policies section. Neighbourhood Plans will be checked as policies for each area are formulated.

(end of document)

Habitats Regulations Assessment of the Broads Plan

Report to Inform the Habitats Regulations
Assessment

May 2022



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Habitats Regulations Assessment of the Broads Plan Consultation of Draft Plan

Report to Inform the Habitats Regulations Assessment

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Abbreviations

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
APIS	Air Pollution Information System
AWS	Anglian Water Services
CJEU	Court of Justice of the European Union
CIEEM	Chartered Institute of Ecology and Environmental Management
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley and Associates
GI	Green Infrastructure
HDV	Heavy Duty Vehicles
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
IRZ	Impact Risk Zone
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
LPA	Local Planning Authority
LSE	Likely Significant Effect
LTP	Local Transport Plan
NBP	Norfolk Biodiversity Partnership
NE	Natural England
NSPF	Norfolk Strategic Planning Framework
pSAC	Possible / proposed Special Area of Conservation
pSPA	Potential Special Protection Area
RAMS	Recreational Impact Avoidance Mitigation Strategy
RBMP	River Basin Management Plan
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SANG	Suitable Alternative Natural Greenspace
SIP	Site Improvement Plan
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage
WFD	Water Framework Directive

WMS	Waterways Management Strategy
WRMP	Water Resources Management Plan
WRZ	Water Resource Zone
WwTW	Wastewater Treatment Works
Zol	Zone of Influence

1 Introduction

1.1 Background

1.1.1 The Broads Authority is a Special Statutory Authority established under the 1988 Norfolk and Suffolk Broads Act. The Act places a requirement on the Authority to produce a Management Plan for the Broads and to review it at least once in every five years. The existing Broads Plan was adopted in 2017 and covers the period up to 2022¹. The Broads Plan sets out a long-term vision for the area and shorter-term actions to benefit the environment, local communities and visitors. As a high-level overarching plan, it also draws together and guides a wide range of partnership plans, programmes and policies relevant to the area.

1.1.2 Lepus Consulting has prepared this report to inform the Habitats Regulations Assessment (HRA) of the Broads Plan on behalf of the Broads Authority. The area covered by the Broads Authority, and the Broads Plan, is illustrated in **Figure 1.1**.

¹The Broads Authority. March 2017. Broads Plan 2017. Partnership strategy for the Norfolk & Suffolk Broads. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0023/240665/Broads-Plan-2017.pdf [Date Accessed: 04/04/22]

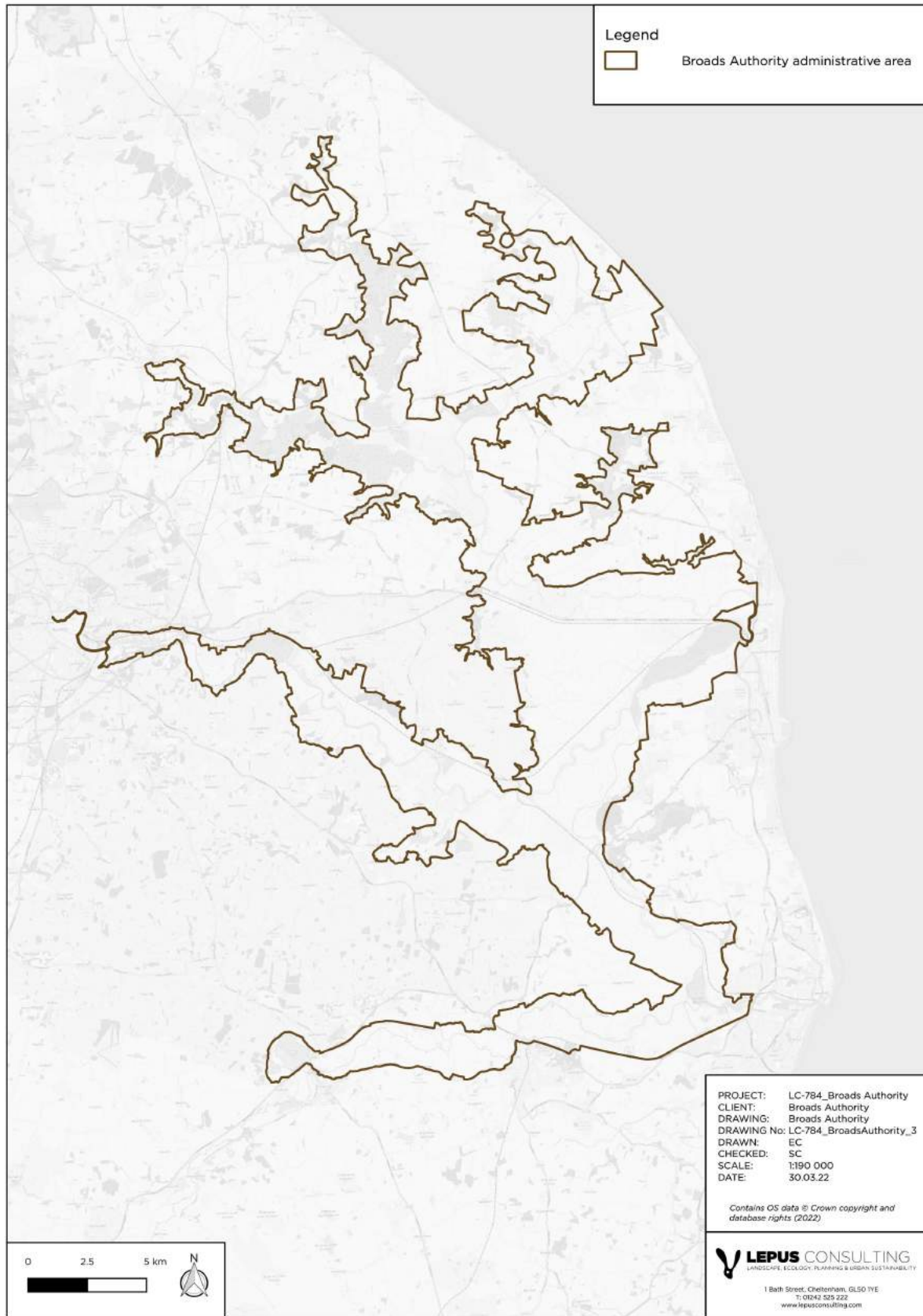


Figure 1.1: The Broads Authority administrative area

1.2 Purpose of this report

- 1.2.1 This HRA has been prepared in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)², known as the Habitats Regulations. When a plan is not directly connected with, or necessary for, the conservation management of a Habitats site, a competent authority is required to carry out an assessment under the Habitats Regulations, known as a Habitats Regulations Assessment (HRA), to test if that plan could significantly harm the designated features of a Habitats site³.
- 1.2.2 The purpose of this report is to inform the HRA of the Broads Plan using best available information. The Broads Authority, as the Competent Authority, will have responsibility to make the Integrity Test. This can be undertaken in light of the conclusions set out in this report, having regard to representations made by Natural England under the provisions of Regulations 63(3) and 105(2) of the Habitats Regulations.
- 1.2.3 Given the strategic over-arching nature of the Broads Plan, this HRA provides a high-level assessment of potentially significant effects at Habitats sites due to the plan. Subsequent lower tier projects and plans will be able to use the outputs from this report to inform their HRA assessments in more detail. This HRA also outlines the types of mitigation that may be required to enable management measures across the Broads to be implemented in accordance with the Habitats Regulations.

² The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 29/01/21] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 24/02/22]

³ Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment

2 The Broads Plan

2.1 The Broads Authority

2.1.1 The Broads Authority is a statutory body with very similar responsibilities to those of the English, Welsh and Scottish National Park Authorities. The Authority was established under the Norfolk and Suffolk Broads Act 1988. Further provisions for the management of the navigation area were made through the Broads Authority Act 2009. The Broads Authority is the local planning authority, and a harbour and navigation authority.

2.1.2 The Broads Authority administrative area (**Figure 1.1**) extends around the floodplains and lower reaches of the main rivers which flow through the area (Bure, Yare and Waveney) and their tributaries (Thurne, Ant, Wensum and Chet).

2.1.3 The Authority has a duty to manage the Broads for the following three purposes:

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

2.2 The Broads Plan

2.2.1 The Broads Plan is the key management plan for the Broads National Park and provides an overarching strategy. It sets out a long-term vision for the area and shorter-term actions to benefit the environment, local communities and visitors. As a high-level overarching plan, it also draws together and guides a wide range of partnership plans, programmes and policies relevant to the area. These include the Local Plan for the Broads, which sets out spatial planning policies and proposals for development and land use in the Broads, and other guiding strategies as listed below⁴:

- Biodiversity and Water Strategy;
- Broadland Futures Initiative;
- Broadland Rivers Catchment Plan;
- Climate change and carbon reduction planning;
- Education Strategy;
- Fen Management Strategy;
- Integrated Access Strategy;
- Lake Restoration Strategy;
- Waterways Management Strategy; and
- Sustainable Tourism Strategy.

⁴Details available at: <https://www.broads-authority.gov.uk/about-us/how-we-work/strategy#:~:text=The%20Broads%20Plan%20is%20the,covers%20the%20period%202017%2D22>. [Date Accessed: 04/05/22]

- 2.2.2 The Broads Authority is currently in the process of undertaking its five yearly review of the Broads Plan. This review is intended to refresh and update actions for the next period and also take into consideration issues such as green recovery, biodiversity and a landscape style approach.
- 2.2.3 The revised Broads Plan sets out a long-term vision for the Broads National Park as detailed in **Box 1**.

Box 1: Vision for the Broads National Park to 2042

Our vision for the Broads National Park is that:

Biodiversity is at the heart of nature recovery. The natural environment and the beneficial goods, services and cultural values it provides from food and energy to landscape character and recreation are in good condition, used fairly and sustainably, and valued by society. In particular, the precious nature of plentiful, clean, fresh water as a fundamental resource is understood and respected by all.

We are meeting the challenges of climate change and sea level rise, and are on track to meet the carbon reduction targets of 'net zero' by 2040, with well-maintained peatland retaining and increasing its stored carbon.

Wildlife flourishes and habitats are maintained, restored, expanded and linked effectively to other ecological networks. Land and water are managed in an integrated way, with local and landscape-scale management creating resilience and space for nature and agriculture, enabling adaptive approaches to changing environmental, economic and social needs

The past and present importance of the waterways for navigation, biodiversity and recreation is recognised and cherished, and the asset is protected, maintained and enhanced. This living, working, 'big skies' landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances enjoy it as a place of escape, adventure, work, learning and tranquillity, and as a source of national pride and identity. Sustainable living is seen in action, with a buoyant rural economy and a well-used public transport network.

The Broads National Park is forever recognised as fundamental to our prosperity and our mental and physical health and wellbeing, and is forever treasured as a unique and special place that provides a breathing space for the cure of souls.

- 2.2.4 The Broads Authority uses three fundamental principles to help guide the development and implementation of the Broads Plan as follows:
- **Principle 1:** Where there are likely threats of serious or irreversible damage to the environment, as a precaution, cost-effective measures are taken to prevent environmental degradation in the absence of full scientific certainty of the outcome of such threats. Such precautionary action is based on assessment of the costs and benefits of action, taking into account both the proportionality between the costs and benefits and the degree of certainty in their calculation, and transparency in decision making. Gaps in knowledge are addressed by research and, where feasible, precautionary measures taken while such knowledge is outstanding.
 - **Principle 2:** We seek to understand and respect the complexity and biological limits of our ecosystems, and conserve their structures to maintain their health and productivity. Management is at a local scale, while recognizing the direct or indirect effects on wider, interconnected ecosystems and the public goods and services they provide. We manage for long-term, multiple benefits, not just for short-term or single interest gains.

- **Principle 3:** We plan and work in partnership to make the best use of shared knowledge and resources and to avoid duplication of effort. People are involved from an early stage, and throughout, in decisions that may interest or affect them. Decisions are supported with robust evidence, including scientific and local knowledge, innovation and best practice.

2.2.5 The Broads Plan sets out 28 strategic objectives for 2022 – 2027 under six headline themes, as detailed in **Table 2.1**, under which a number of key actions are provided to ensure their delivery over the plan period.

Table 2.1: The Broads Plan Strategic Objectives 2022 - 2027

Theme	Strategic Objective
A: Responding to climate change and flood risk	A1. Prepare a long-term, integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area
	A2. Work towards making all Broads Authority operations carbon neutral by 2030 and carbon zero by 2040
	A3. Agree carbon reduction targets for the Broads National Park and promote action to reduce emissions
B: Improving landscapes for biodiversity and agriculture	B1. Restore, maintain and enhance lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques
	B2. Promote best practice water capture and usage across the Broadland rivers catchment and reduce point and diffuse pollution into the floodplain and water courses
	B3. Maintain, enhance and increase areas of priority fen, reed bed, grazing marsh and wet woodland, protecting peatland ecosystems as carbon sinks and seeking environmental net gain
	B4. Define, implement and monitor management regimes for priority species and invasive non-native species
	B5. Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to national biodiversity network
C: Maintaining and enhancing the navigation	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 and 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

Theme	Strategic Objective
D: Protecting landscape character and the historic environment	D1. Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including 'at risk' assets
	D2. Maintain an up-to-date Broads Landscape Character Assessment and use to inform conservation action plans
	D3. Maintain up-to-date Conservation Area designations, appraisals and management proposals
	D4. Reduce the impacts on the Broads of visual intrusion and noise and light pollution, and promote Dark Sky Discovery Sites
E: Promoting understanding and enjoyment	E1. Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities
	E2. Offer a coordinated and year-round programme of visitor activities that promote a 'Broads' experience', taking measures to prevent any adverse environmental impacts
	E3. Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities of the Broads National Park, and 'point of need' information for visitors
	E4. Strengthen the quality and distinctiveness of the Broads tourism offer, including careers and skills training
F: Connecting and inspiring communities	F1. Increase and promote of accessible and 'taster' activities that foster physical and mental health and wellbeing for all, including under-represented groups
	F2. Offer varied, flexible and sustainable volunteering opportunities and skills training to suit diverse audiences
	F3. Provide and expand schools-based and outreach environmental education opportunities for young people, using the Broads as a learning resource
	F4. Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits
	F5. Increase income generation to support Broads-themed projects

3 The HRA process

3.1 Overview

3.1.1 The HRA process assesses the potential effects of a plan or project on the conservation objectives of Habitats sites designated under the Habitats⁵ and Birds⁶ Directives. These sites form a system of internationally important sites throughout Europe known collectively as the ‘Natura 2000 Network’. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU, have become part of the National Site Network.

3.1.2 The Habitats Regulations⁷ provide a definition of a ‘European site’ at Regulation 8. These include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive.

3.1.3 In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site⁸. European sites together with sites set out in national policy (listed below) are referred to in England and Wales as a Habitats site⁹.

- A potential SPA (pSPA);
- A possible / proposed SAC (pSAC);
- Listed and proposed Ramsar Sites (Wetland of International Importance under the Ramsar Convention); and
- In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPA, pSAC and listed or proposed Ramsar sites.

⁵ Official Journal of the European Communities (1992). Council Directive 92 /43 /EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

⁶ Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

⁷ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 24/02/22] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 24/02/22]

⁸ Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf [Date Accessed: 02/02/22]

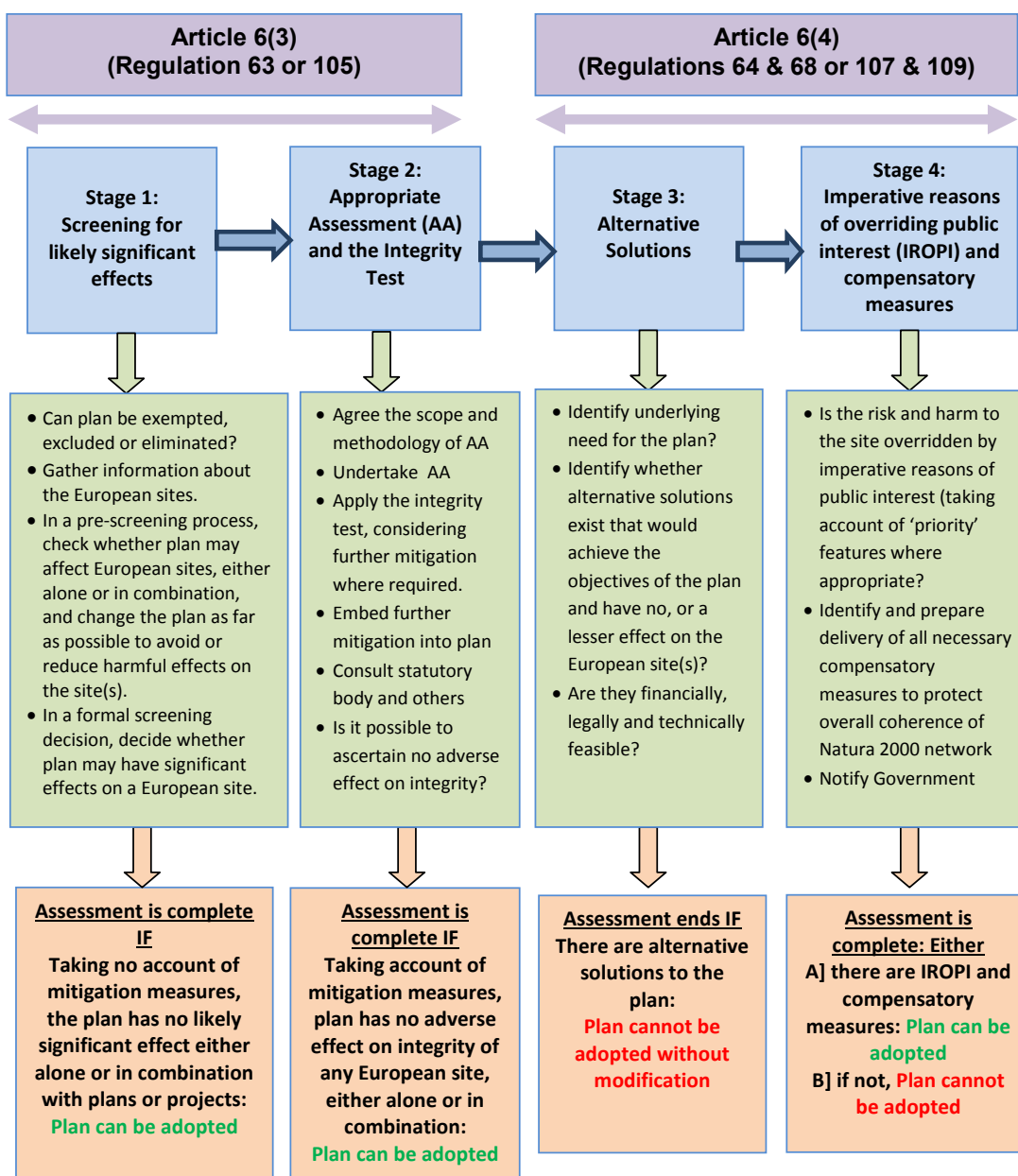
⁹ Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites. Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available in Annex 2 (Glossary) at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf [Date Accessed: 02/02/22]

- 3.1.4 This report refers to both statutory sites and sites protected through national planning policy as a 'Habitats site' for ease of reference. Regulation 63 of the Habitats Regulations notes a competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project, must make an appropriate assessment of the implications of the plan or project for that site in view of its site conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA).
- 3.1.5 HRA applies to plans or projects which are likely to have a significant effect on a Habitats site (either alone or in combination with other plans or projects), and / or are not directly connected with or necessary to the management of that site.
- 3.1.6 There is no set methodology or specification for carrying out and recording the outcomes of the assessment process. The Habitats Regulations Assessment Handbook, produced by David Tyldesley Associates (referred to hereafter as the 'DTA Handbook'), provides an industry recognised good practice approach to HRA. The DTA Handbook, and in particular 'Practical Guidance for the Assessment of Plans under the Regulations'¹⁰, which forms part F, has therefore been used to prepare this report, alongside reference to Government Guidance on Appropriate Assessment¹¹. The DTA Handbook is used by Natural England, the Government's statutory nature conservation organisation and is widely considered to be an appropriate basis for the HRA of plans.
- 3.1.7 A step-by-step guide to the methodology adopted in this assessment, as outlined in the DTA Handbook, is illustrated in **Figure 3.1**. In summary, the four key stages of the HRA process are as follows:
- **Stage 1. Screening:** Screening to determine if the Broads Plan would be likely to have a significant effect on a Habitats site. This stage comprises the identification of potential effects associated with the Broads Plan on Habitats sites and an assessment of the likely significance of these effects.
 - **Stage 2. Appropriate Assessment and the 'Integrity Test':** Assessment to ascertain whether or not the Broads Plan would have a significant adverse effect on the integrity of any Habitats site to be made by the Competent Authority (in this instance the Broads Authority). This stage comprises an impact assessment and evaluation in view of a Habitats site's conservation objectives. Where adverse impacts on site integrity are identified, consideration is given to alternative options and mitigation measures which are tested.
 - **Stage 3. Alternative solutions:** Deciding whether there are alternative solutions which would avoid or have a lesser effect on a Habitats site.
 - **Stage 4. Imperative reasons of overriding public interest and compensatory measures:** Considering imperative reasons of overriding public interest and securing compensatory measures.

¹⁰ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (September) (2013) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

¹¹ Government Guidance on Appropriate Assessment. July 2019. Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment>

Outline of the four-stage approach to the assessment of plans under the Habitats Regulations



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Figure 3.1: Stages in the Habitats Regulations Assessment process¹²

¹² Tyldesley, D., and Chapman, C. (2013) *The Habitats Regulations Assessment Handbook* (October) (2018) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

3.2 2017 Broads Plan HRA

3.2.1 The 2017 Broads Plan was supported by an HRA which was undertaken at both draft and final plan preparation stage¹³. The HRA comprised a screening of likely significant effects and provided wording and recommendations to inform the plan. It recognised the requirement for HRA of lower tiered plans and HRA at the project level. Subject to the incorporation of recommended plan modifications, it concluded that the final plan should be considered fully compliant with the requirements of the Habitats Regulations.

3.2.2 It looked at likely significant effects on a number of Habitats sites, listed below, from a number of risk areas including increased recreational impacts, dredging, development, flood risk management and navigation:

- Broadland SPA;
- Breydon Water SPA;
- Great Yarmouth North Denes SPA;
- Outer Thames Estuary SPA;
- The Broads SAC;
- Winterton-Horsey Dunes SAC;
- Haisborough, Hammond and Winterton SAC;
- Broadland Ramsar; and
- Breydon Water Ramsar.

¹³ Liley, D., Hoskin, R., Panter, C. and Lake, S. 2016 Habitats Regulations Assessment (HRA) of the Broads Plan 2017 at Consultation of the 'Revised Draft'. Unpublished report by Footprint Ecology.

4 Methodology

4.1 HRA methodology

4.1.1 HRA is a rigorous precautionary process centred around the conservation objectives of a Habitats site's qualifying interests. It is intended to ensure that designated Habitats sites are protected from impacts that could adversely affect their integrity, as required by the Birds and Habitats Directives. A step-by-step guide to this methodology is outlined in the DTA Handbook and has been reproduced in **Figure 3.1**.

4.2 Stage 1: Screening for likely significant effects

4.2.1 The first stage in the HRA process comprises the screening stage. The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with or necessary to the management of a Habitats site), (2) whether it can be excluded (because it is not a plan), or (3) eliminated (because there would be no conceivable effects), from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of the plan which may lead to likely significant effects at a Habitats site, either alone or in combination with other plans or projects.

4.2.2 Screening considers the potential 'significance' of adverse effects. Where elements of the Broads Plan will not result in a likely significant effect (LSE) on a Habitats site these are screened out and not considered in further detail in the process. The screening stage follows a number of steps which are outlined in **Figure 4.1**.

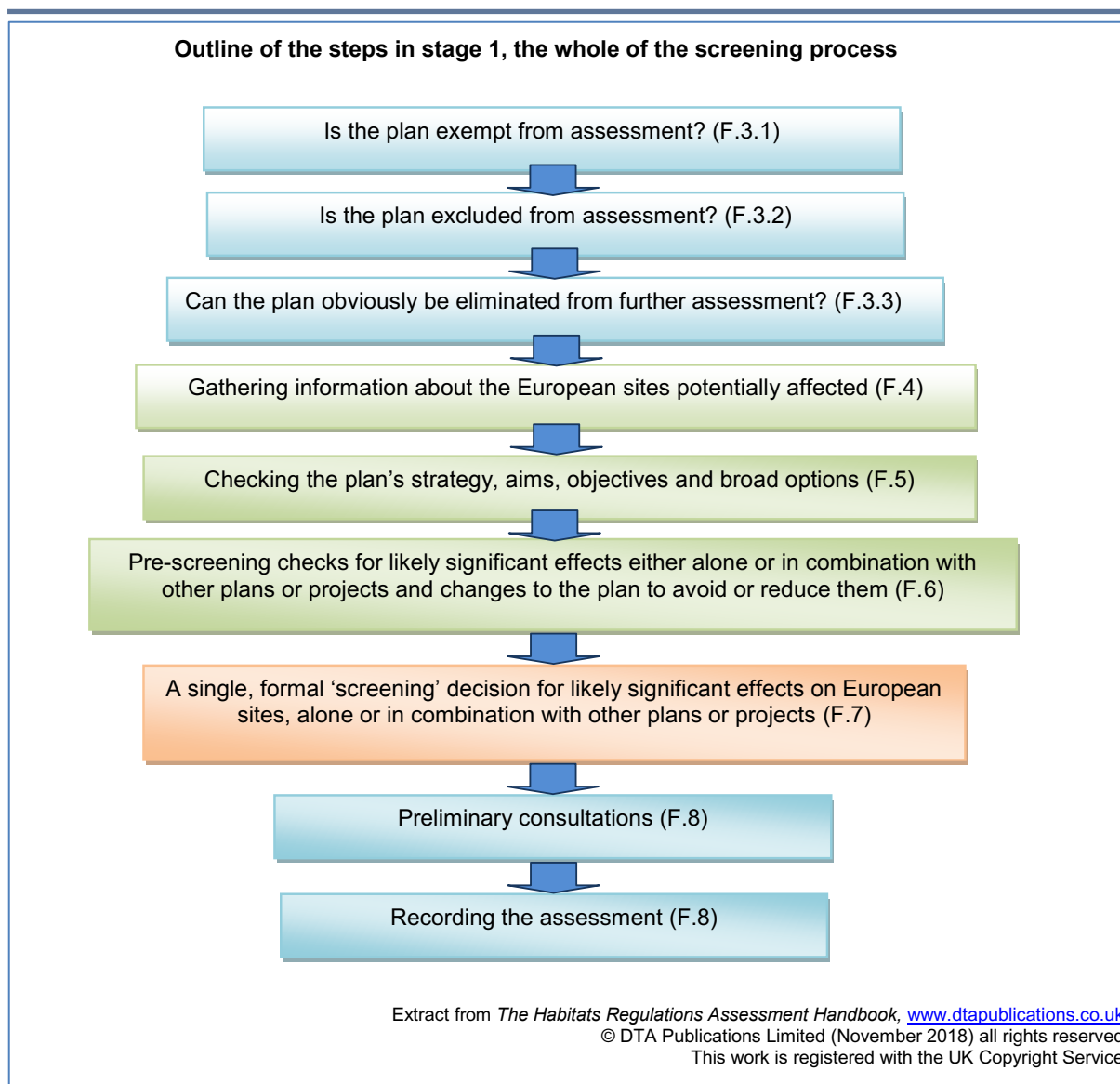


Figure 4.1: Outline of steps in stage 1; the whole screening process

- 4.2.3 Pre-screening the components of a plan at the early stage of the plan-making process helps to minimise or avoid LSEs upon any Habitats site and as such improve the plan. The pre-screening process has used a number of evaluation codes to summarise whether or not a component of the Broads Plan is likely to have LSEs alone or in-combination, see **Table 4.1**, and inform the formal screening decision.

Table 4.1: Assessment and reasoning categories from Part F of the DTA Handbook

Assessment and reasoning categories from Chapter F of The Habitats Regulations Assessment Handbook (DTA Publications, 2013) ¹⁴:

- A. General statements of policy / general aspirations.
- B. Policies listing general criteria for testing the acceptability / sustainability of proposals.
- C. Proposal referred to but not proposed by the plan.
- D. General plan-wide environmental protection / site safeguarding / threshold policies
- E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.
- F. Policies or proposals that cannot lead to development or other change.
- G. Policies or proposals that could not have any conceivable or adverse effect on a site.
- H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects).
- I. Policies or proposals with a likely significant effect on a site alone.
- J. Policies or proposals unlikely to have a significant effect alone.
- K. Policies or proposals unlikely to have a significant effect either alone or in combination.
- L. Policies or proposals which might be likely to have a significant effect in combination.
- M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a Habitats site.

4.3 What is a Likely Significant Effect?

- 4.3.1 HRA screening provides an analysis of LSEs identified during the HRA screening process. It considers the nature, magnitude and permanence of potential effects in order to inform the plan making process.
- 4.3.2 The DTA Handbook guidance provides the following interpretation of LSEs:
- 4.3.3 *“In this context, ‘likely’ means risk or possibility of effects occurring that cannot be ruled out on the basis of objective information. ‘Significant’ effects are those that would undermine the conservation objectives for the qualifying features potentially affected, either alone or in combination with other plans or projects ... even a possibility of a significant effect occurring is sufficient to trigger an ‘appropriate assessment’”¹⁵.*
- 4.3.4 With reference to the conservation status of a given species in the Habitats or Birds Directives, the following examples would be considered to constitute a significant effect:
- Any event which contributes to the long-term decline of the population of the species on the site;
 - Any event contributing to the reduction, or to the risk of reduction, of the range of the species within the site; and

¹⁴ Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook. December 2019 edition UK: DTA Publications Ltd, www.dtapublications.co.uk

¹⁵ Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook. December 2019 edition UK: DTA Publications Ltd, www.dtapublications.co.uk

- Any event which contributes to the reduction of the size of the habitat of the species within the site.

4.3.5 Rulings from the 2012 ‘Sweetman’¹⁶ case provide further clarification:

4.3.6 *“The requirement that the effect in question be ‘significant’ exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill”.*

4.3.7 Therefore, it is not necessary for the Broads Authority to show that the Broads Plan will result in no effects whatsoever on any Habitats site. Instead, the Broads Authority is required to show that the Broads Plan, either alone or in-combination with other plans and projects, will not result in an effect which undermines the conservation objectives of one or more qualifying features.

4.3.8 Determining whether an effect is significant requires careful consideration of the environmental conditions and characteristics of the European site in question, as per the 2004 ‘Waddenzee’¹⁷ case:

4.3.9 *“In assessing the potential effects of a plan or project, their significance must be established in the light, inter alia, of the characteristics and specific environmental conditions of the site concerned by that plan or project”.*

4.4 In-combination effects

4.4.1 Where screening has concluded that there are no LSEs from the Broads Plan alone, it is next necessary to consider whether the effects of the policies in-combination with other plans and projects would combine to result in an LSE on any Habitats site. It may be that the Broads Plan alone may not have a significant effect but could have a residual effect that may contribute to in-combination effects on a Habitats site.

4.4.2 The DTA Handbook¹⁸ notes that *“where an aspect of a plan could have some effect on the qualifying feature(s) of a European site, but that aspect of the plan alone are unlikely to be significant, the effects of that aspect of the plan will need to be checked in combination firstly, with other effects of the same plan, and then with the effects of other plans and projects”.*

4.4.3 As such an in-combination assessment was undertaken as part of the HRA process at both the screening stage (where no LSE are considered possible alone, but in-combination effects are likely) and at the Appropriate Assessment stage (where, following Appropriate Assessment and mitigation, an insignificant adverse effect is still likely which has the potential to act in-combination with other plans and projects).

4.4.4 The in-combination assessment presented in Chapter F of the DTA Handbook comprises a ten-step approach as illustrated in **Figure 4.2** below.

¹⁶ Source: EC Case C-258-11 Reference for a Preliminary Ruling, Opinion of Advocate General Sharpston ‘Sweetman’ delivered on 22nd November 2012 (para 48)

¹⁷ Source: EC Case C-127/02 Reference for a Preliminary Ruling ‘Waddenzee’ 7th Sept 2004 (para 48)

¹⁸ Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook. December 2019 edition UK: DTA Publications Ltd, www.dtapublications.co.uk

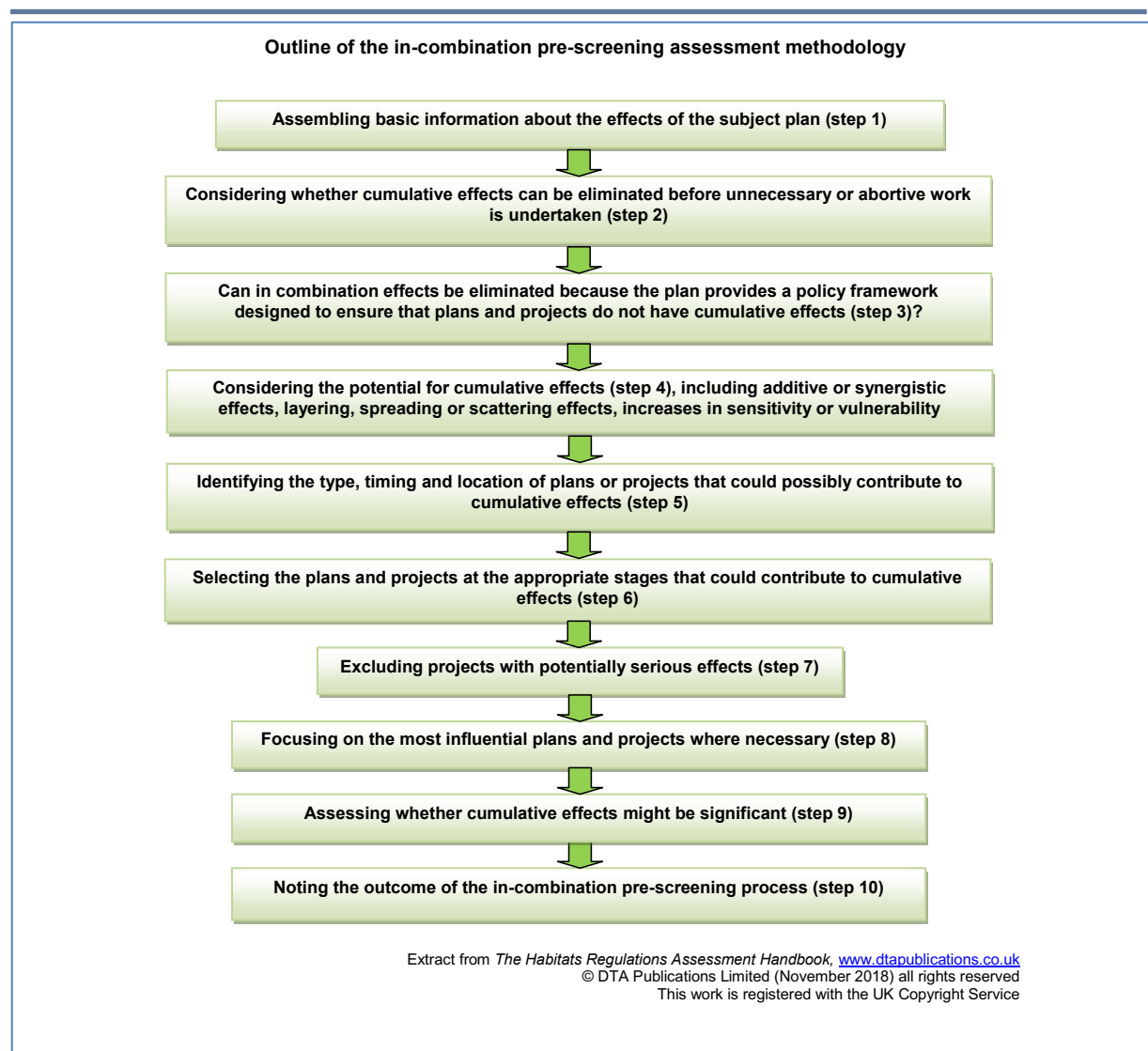


Figure 4.2: Outline of the in-combination pre-screening assessment methodology

4.4.5 Plans and projects which are considered to be of most relevance to the in-combination assessment of the Broads Plan include those that have similar impact pathways. These include those plans and projects which have the potential to increase development in the HRA study area, increase recreational pressures and result in hydrological change.

4.4.6 The assessment of potential in-combination effects has not resulted in additional impact pathways being screened in, however, a number of links between other plans and projects and the Broads Plan have been identified.

4.4.7 The following neighbouring local authorities' local plans, and other relevant plans and projects, and their HRA work have been reviewed as part of the screening assessment (see **Appendix A**).

- Anglian Draft Flood Risk Management Plan¹⁹;

¹⁹ Environment Agency (October 2021). Anglian River Basin District Draft Flood Risk Management Plan 2021 to 2027. Available at: https://consult.environment-agency.gov.uk/fcrm/draft-second-cycle-flood-risk-management-plans/supporting_documents/Anglian_FRMP_20212027WM.pdf [Date Accessed: 25/004/22]

- Anglian River Basin Management Plan²⁰;
- Anglian Water - Water Resource Management Plan²¹;
- Broads Biodiversity and Water Strategy²²;
- Broadland Catchment Abstraction Licence Strategy²³;
- Broadland Flood Alleviation Project;
- Broads Futures Initiative²⁴;
- Broadland Rivers Catchment Plan²⁵;
- Broadland Catchment Abstraction Management Area²⁶
- Education Strategy²⁷;
- Hoveton Great Broad Restoration Project;
- Integrated Access Strategy²⁸;
- Norfolk Water Strategy Programme²⁹;
- The Local Plan for the Broads³⁰;
- Sustainable Tourism Strategy³¹;
- Waterways Management Strategy³²;
- Greater Norwich Local Plan³³;

²⁰ Environment Agency (2015). Water for life and livelihoods. Part 1 Anglian River Basin District River Basin Management Plan. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf [Date Accessed 22/03/22]

²¹ Anglian Water. 2019. Water Resources Management Plan 2019. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>. [Date Accessed: 22/03/22]

²² Broads Authority. Broads Biodiversity and Water Strategy 2019-2024. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0029/180965/broads-biodiversity-strategy-2019.pdf [Date Accessed: 05/04/22]

²³ Environment Agency. May 2017. Broadland Abstraction Licensing Strategy.

²⁴ Available at: <https://www.broads-authority.gov.uk/looking-after/climate-change/broadland-futures-initiative> [Date Accessed: 05/04/22]

²⁵ Broadland Catchment Partnership (2014). Broadland Rivers Catchment Plan. Available at: <https://broadlandcatchmentpartnership.org.uk/wp-content/uploads/2018/08/Catchment-Plan-website-final.pdf> [Date Accessed: 22/03/22]

²⁶ Environment Agency. May 2017. Broadland Abstraction Licensing Strategy.

²⁷ Broads Authority. Education Strategy 2017 – 2022. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0028/239554/Broads-Education-Strategy-2017-22-FINAL-APPENDIX-1.pdf [Date Accessed: 05/04/22]

²⁸ Broads Authority. 2019. Integrated Access Strategy. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0020/260822/Appendix-Broads-Integrated-Access-Strategy-and-action-plan.pdf [Date Accessed: 05/04/22]

²⁹ Available at: <https://wre.org.uk/projects/norfolk-water-strategy-programme/> [Date Accessed: 25/04/22]

³⁰ Broads Authority. Local Plan for the Broads Plan Period 2015 – 2036. Adopted May 2019. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf [Date Accessed: 22/03/22]

³¹ The Tourism Company. 2016. Sustainable Tourism in the Broads. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0023/226247/Sustainable-Tourism-in-the-Broads-2016-20-May-2016.pdf [Date Accessed: 22/03/22]

³² Waterways Management Strategy and Action Plan 2022/23 – 2026/27. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0027/399240/Waterways-Management-Strategy-v1.2.pdf [Date Accessed: 22/03/22]

³³ Available at: <https://www.gnlp.org.uk/> [Date Accessed 25/04/22]

- North Norfolk Local Plan 2016 - 2036³⁴;
- East Suffolk District - Waveney Local Plan³⁵;
- Norfolk County Council Minerals and Waste Local Plan Review³⁶; and
- Norfolk County Council Local Transport Plan 4 Strategy 2021 - 2036³⁷.

4.4.8 The approach taken to the consideration of in-combination effects is compliant with the Wealden Judgement³⁸ which requires an in-combination approach that considers the development of neighbouring and nearby authorities when assessing likely significant effects.

4.5 Consideration of mitigation measures

4.5.1 The European Court Judgement on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (Case C-323/17³⁹) determined that mitigation measures are only permitted to be considered as part of an appropriate assessment (**Box 2**).

Box 2: The Sweetman Case (April 2018)

A recent decision by the Court of Justice of the European Union (CJEU) People Over Wind and Sweetman v Coillte Teoranta (C-323/17) (from here on known as the 'Sweetman Case') has important consequences for the HRA process in the UK.

In summary, the ruling reinforces the position that if an LSE is identified during the HRA screening process it is not appropriate to incorporate mitigation measures to prevent the LSE at this stage. An appropriate assessment (AA) of the potential effects and the possible avoidance or mitigation measures must be undertaken. The 're-screening the Plan after mitigation has been applied' is no longer an option which would be legally compliant:

"Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site."

³⁴ North Norfolk District Council. January 2022. Publication Stage North Norfolk Local Plan 2016 - 2036. Available at: <https://www.north-norfolk.gov.uk/media/7466/local-plan-proposed-submission-version-reg-19-publication.pdf> [Date Accessed: 25/04/22]

³⁵ East Suffolk Council. 2019. Waveney Local Plan. Covering the former Waveney Local Planning Authority Area. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf> [Date Accessed: 27/04/22]

³⁶ Norfolk County Council. Minerals and Waste Local Plan Review. Available at: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review> [Date Accessed: 27/04/22]

³⁷ Norfolk County Council. Norfolk County Council Local Transport Plan 4 Strategy 2021 - 2036. Available at: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-travel-policies/local-transport-plan> [Date Accessed: 27/04/22]

³⁸ Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date Accessed: 02/02/22]

³⁹ InfoCuria (2018) Case C-323/17. Available at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date Accessed: 02/02/22]

4.5.2 In light of the above, it is necessary to further define mitigation measures. The DTA Handbook notes that there are two types of measures as follows⁴⁰:

- *“Measures intended to avoid or reduce harmful effects on a European site; or*
- *Features or characteristics of a plan which are essential in defining the nature, scale, location, timing, frequency or duration of the plan’s proposals, or they may be inseparable aspects of the plan, without which an assessment of the plan could not properly be made, in the screening decision, even though these features or characteristics may incidentally have the effect of avoiding or reducing some or all of the potentially adverse effects of a plan”.*

4.5.3 The HRA screening process undertaken for the Broads Plan has not taken account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a Habitats site when assessing the LSE of the Broads Plan on Habitats sites. These are measures, which if removed (i.e. should they no longer be required for the benefit of a Habitats site), would still allow the lawful and practical implementation of a plan.

4.6 Stage 2: Appropriate Assessment and Integrity Test

4.6.1 Where LSEs are identified from the Broads Plan either alone or in-combination it is necessary to move to Stage 2 of the HRA process – the Appropriate Assessment and Integrity Test.

4.6.2 The purpose of the Appropriate Assessment (as defined by the DTA Handbook) is to *“undertake an objective, scientific assessment of the implications for the European site qualifying features potentially affected by the plan in light of their consideration objectives and other information for assessment”*⁴¹.

4.6.3 As part of this process decision makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on Habitats sites. Mitigation measures may take the form of policies within the Broads Plan or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate adverse effects for which they are targeted.

4.6.4 The Appropriate Assessment aims to present information in respect of all aspects of the Broads Plan and ways in which it could, either alone or in-combination with other plans and projects, affect a Habitats site.

4.6.5 The Broads Authority (as the Competent Authority) must then ascertain, based on the findings of the Appropriate Assessment, whether the Broads Plan will adversely affect the integrity of a Habitats site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test and will draw on the conclusions of this report and take into consideration representations made by Natural England.

⁴⁰ Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook. November 2018 edition UK: DTA Publications Ltd, www.dtapublications.co.uk

⁴¹ Tyldesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook. November 2018 edition UK: DTA Publications Ltd, www.dtapublications.co.uk

4.7 Dealing with uncertainty

4.7.1 Uncertainty is an inherent characteristic of HRA, and decisions can be made only on currently available and relevant information. This concept is reinforced in the 7th September 2004 ‘Waddenzee’ ruling⁴²:

4.7.2 *“However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead it is clear from the second sentence of Article 6(3) of the habitats directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the appropriate assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty”.*

4.8 The Precautionary Principle

4.8.1 The HRA process is characterised by the precautionary principle. This is described by the European Commission as being:

4.8.2 *“If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.*

⁴²EC Case C-127/02 Reference for a Preliminary Ruling ‘Waddenzee’ 7th September 2004 Advocate General’s Opinion (para 107)

5 Habitats sites

5.1 HRA Study Area

- 5.1.1 There is no guidance that defines the study area for inclusion in HRA. Planning Practice Guidance for Appropriate Assessment indicates that⁴³:
- 5.1.2 *“The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. ‘Appropriate’ is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site”.*
- 5.1.3 Therefore, in order to determine a study area for the HRA, consideration has been given to the nature and extent of potential impact pathways from the Broads Plan and its relationship to Habitats sites. Where impact pathways to Habitats sites have been identified these are considered further in the HRA.
- 5.1.4 The Broads Authority Executive Area forms the geographic extent of the Broads Plan (**Figure 1.1**). However, impacts at Habitats sites often take place outside administrative boundaries, for instance where residents travel to tourist destinations beyond an administrative area, or where Habitats sites are hydrologically connected to a plan area.

5.2 Identification of Habitats sites

- 5.2.1 Habitats sites to be assessed in this HRA report are identified in **Table 5.1**. The inclusion of sites has taken into consideration a review of pathways of impact (for instance recreational zones of influence and hydrological connectivity) and previous HRA work undertaken in support of the current Broads Plan (see **Section 3.2**).

⁴³ Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment. <https://www.gov.uk/guidance/appropriate-assessment> [Date Accessed: 02/02/22]

Table 5.1: Habitats sites for consideration in HRA

Habitats site	Location in relation to the Broads Authority administrative area
Broads SAC	Located within administrative area
Broadland SPA	Located within administrative area
Broadland Ramsar	Located within administrative area
Breydon Water SPA	Located within administrative area
Breydon Water Ramsar	Located within administrative area
Outer Thames Estuary SPA	Located within administrative area (extending along the River Bure)
Great Yarmouth North Denes SPA	Located immediately adjacent to administrative area
Winterton-Horsey Dunes SAC	Located immediately adjacent to administrative area
Southern North Sea SAC	Located immediately adjacent to administrative area
Greater Wash SPA	Located immediately adjacent to administrative area
Benacre to Easton Barents SPA	Approximately 7.3km to the south of the Broads Authority administrative area
Norfolk Valley Fens SAC	Closest component is located approximately 8.7km to the northwest of the Broads Authority administrative boundary
The Wash and North Norfolk Coast SAC	Approximately 28.3km to the north of the Broads Authority administrative area
North Norfolk Coast SAC	Approximately 28.3km to the north of the Broads Authority administrative area
North Norfolk Coast SPA	Approximately 28.3km to the north of the Broads Authority administrative area
North Norfolk Coast Ramsar	Approximately 28.3km to the north of the Broads Authority administrative area

5.2.2 The locations of these sites are shown in **Figures 5.2, 5.3 and 5.4.**

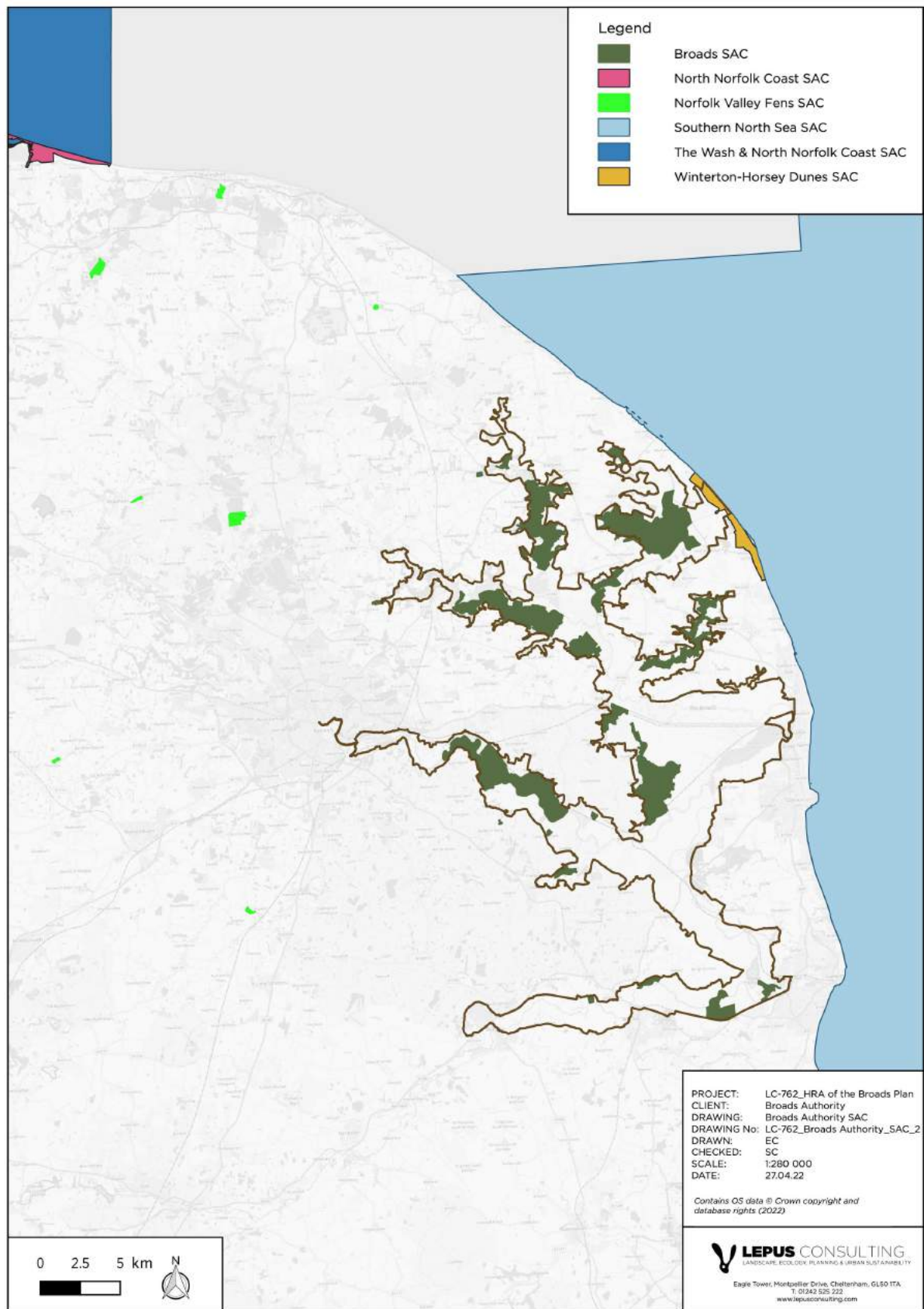


Figure 5.1: SAC designations located within HRA study area

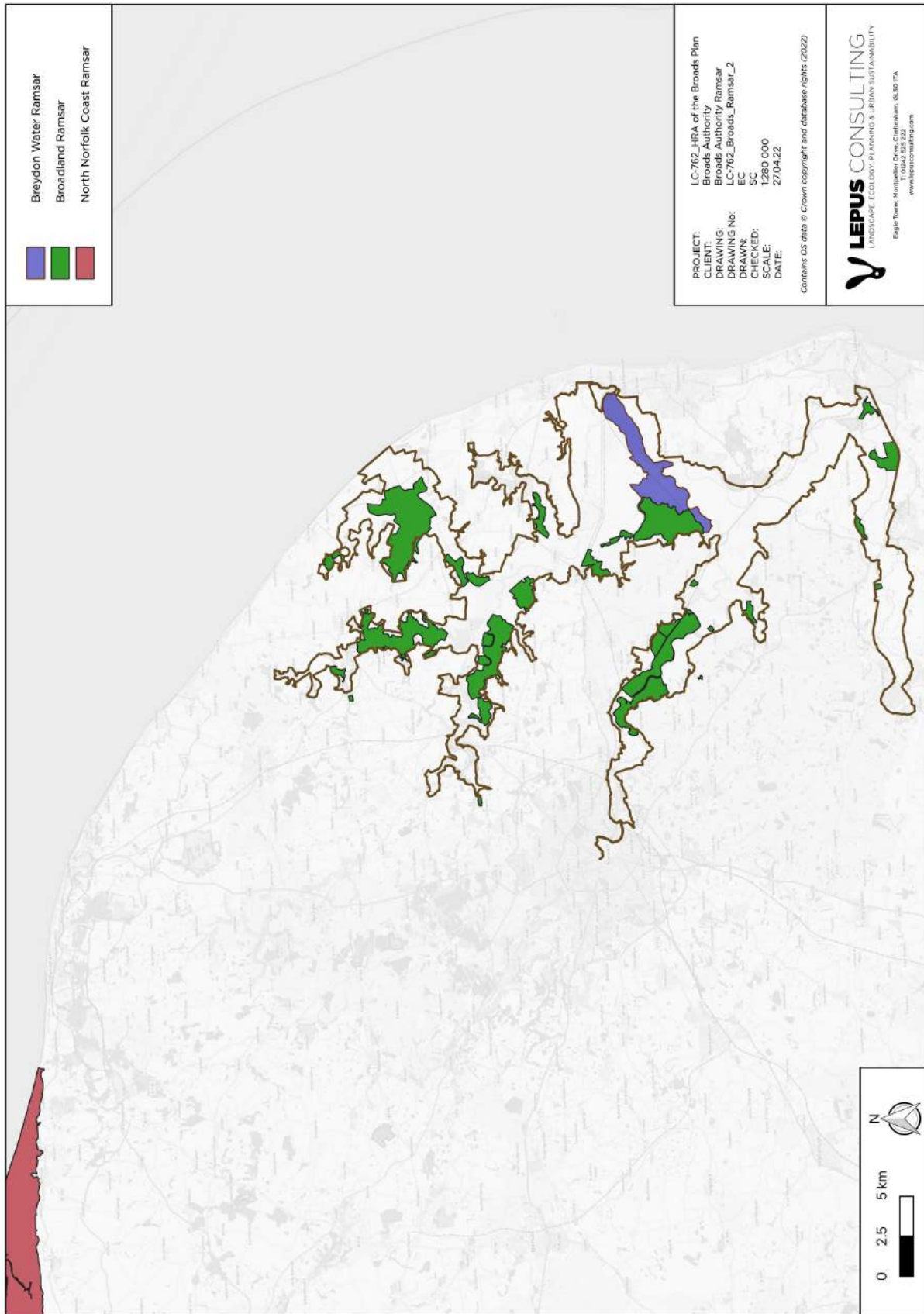


Figure 5.2: Ramsar designations located within HRA study area

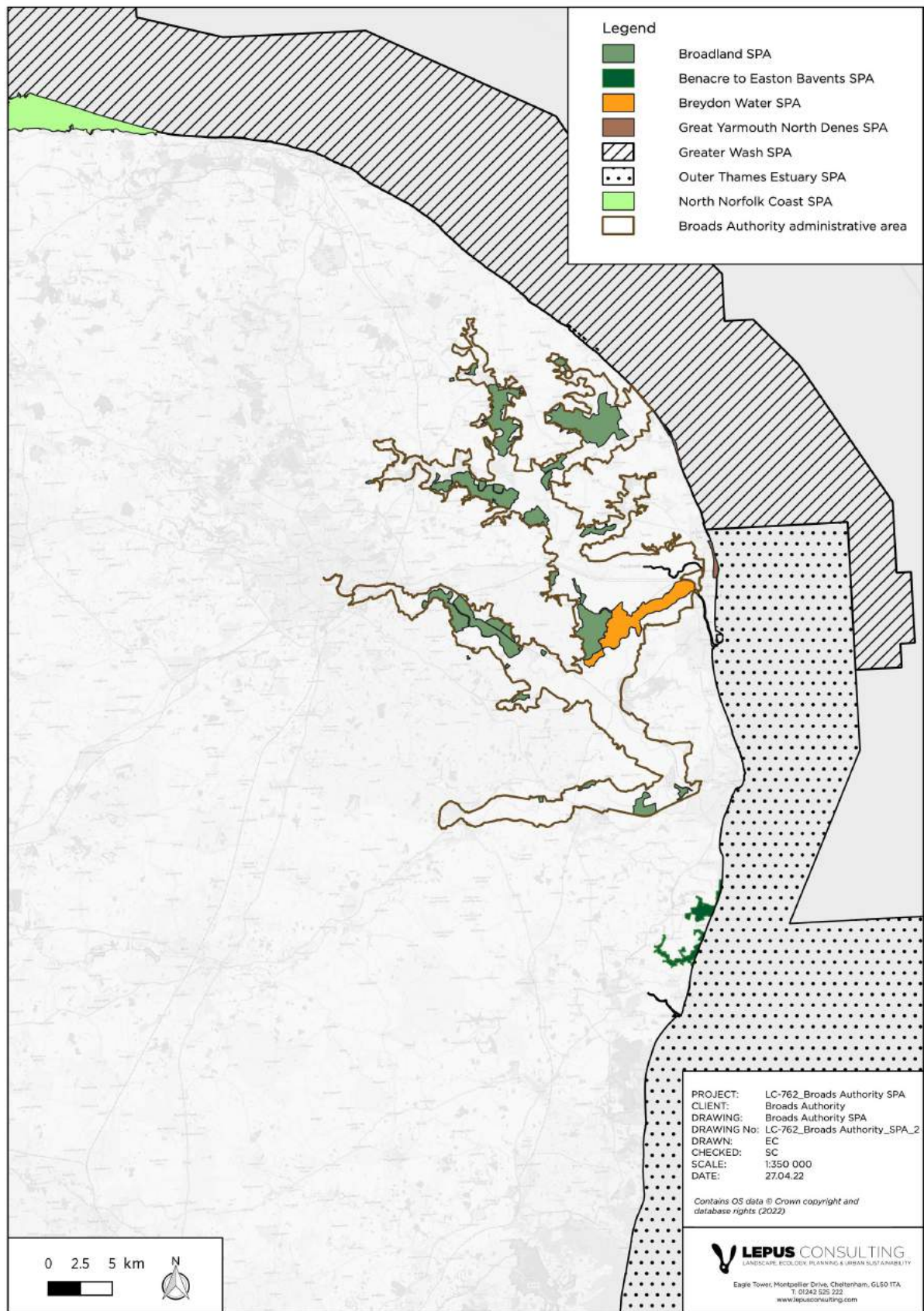


Figure 5.3: SPA designations located within HRA study area

5.2.3 Each Habitats site has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support the ecosystems that it does. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment (known as pressures and threats).

5.2.4 An intrinsic quality of any Habitats site is its functionality at the landscape ecology scale. This refers to how the site interacts with the zone of influence of its immediate surroundings, as well as the wider area. Adverse effects may also occur via impacts to mobile species occurring outside a designated site, but which are qualifying features of the site. For example, there may be effects on protected birds that use land outside the designated site for foraging, feeding, roosting or other activities.

5.3 Ecological information

5.3.1 The CJEU ruling in the *Holohan* case (C-461/17⁴⁴) confirmed that Appropriate Assessment should: (i) catalogue (i.e. list) all habitats and species for which the site is protected and (ii) include in its assessment other (i.e. non-protected) habitat types or species which are on the site and habitats and species located outside of the site if they are necessary to the conservation of the habitat types and species listed for the protected area (**Box 3**).

Box 3: *Holohan v An Bord Pleanala* (November 2018)

“Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the ‘appropriate assessment’ must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned”.

5.3.2 This report fully considers the potential for effects on species and habitats. This includes those not listed as a qualifying feature for the Habitats site, but which may be important to achieving its conservation objectives. This ensures that the functional relationships underlying Habitats sites and the achievement of their conservation objectives are adequately understood.

⁴⁴ EUR-Lex (2018) Case C-461/17. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62017CJ0461&from=EN> [Date Accessed 02/02/22]

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- 5.3.3 **Appendix B** identifies the qualifying features of each of these sites and presents details of their conservation objectives. This information is drawn from the Joint Nature Conservancy Council (JNCC)⁴⁵ and Natural England⁴⁶.
- 5.3.4 The overall objective of the Habitats Regulations is to maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of importance. Meeting site conservation objectives will ensure that the integrity of the National Site Network is maintained or restored as appropriate and ensures that each site contributes to achieving the ‘favourable conservation status’ of its qualifying features.
- 5.3.5 Natural England provides advice on what meeting conservation objectives means in terms of the environmental conditions (targets) and ecological requirements expected for designated habitats and species at sites which form the National Site Network. The targets are set to measure the condition of designated features, and progress towards meeting the objectives, is based on UK Common Standards for Monitoring Guidance (CSMG), published by the Joint Nature Conservation Committee.
- 5.3.6 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for its designation can be entirely different to those for which the same area is designated as a SAC, SPA or Ramsar.
- 5.3.7 Natural England periodically assesses the conservation conditions of each SSSI unit against the CSMG standards. SSSIs located either entirely or partially within the Habitats sites considered in this report are listed in **Appendix C** along with their current conservation status. The conservation status of each SSSI highlights any SAC/SPA that is currently particularly vulnerable to threats/pressures. Conservation status is defined as follows:
- Favourable;
 - Unfavourable – recovering;
 - Unfavourable – no change; or
 - Unfavourable – declining.
- 5.3.8 SSSI units in either an ‘Unfavourable – no change’ or ‘Unfavourable – declining’ condition indicate that the Euro Habitats pean site may be particularly vulnerable to certain threats or pressures. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its Habitats designation. However, it is considered that the conservation status of SSSI units that overlap with Habitats designated sites offer a useful indicator of habitat health at that location.

⁴⁵ JNCC (2019) Available at: <http://jncc.defra.gov.uk/page-1458> [Date Accessed: 02/02/22]

⁴⁶ Natural England (2019) Available at: <http://publications.naturalengland.org.uk/> [Date Accessed: 02/02/22]

5.3.9 Natural England defines zones around each SSSI which may be at risk from specific types of development, these are known as Impact Risk Zones (IRZ). These IRZs are “a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and “Compensation Sites”, which have been secured as compensation for impacts on Natura 2000/Ramsar sites”⁴⁷. The location of IRZs has been taken into consideration in this assessment as they provide a useful guide as to the location of functionally linked land and likely vulnerabilities.

⁴⁷ Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Date Accessed: 02/02/22]

6 Impact Pathways

6.1 Gathering information about Habitats sites and impact pathways

- 6.1.1 It is important to understand how the Broads Plan may affect a Habitats site to determine LSEs. Consideration must first be given to potential links or causal connections between the effects of the Broads Plan and Habitats sites. This section of the report therefore scopes potential impact pathways to Habitats sites.
- 6.1.2 As detailed in **Chapter 2**, the Broads Plan is a high-level overarching plan for the Broads Authority administrative area which aims to deliver its duties under the Broads Act. The plan ensures that management in the Broads is focused through actions set out under 28 strategic objectives.
- 6.1.3 Many management actions in the Broads Plan are designed to positively protect, conserve, and enhance the environment of the Broads and will indirectly benefit Habitats sites. Given the location of the Broads Authority, within a water environment, waterways management for navigation, responding to climate change and flood risk is a key theme throughout the Broads Plan. Actions for waterways management, such as dredging, flood and vegetation management, have the potential to result in hydrological change with direct / indirect impacts upon water dependent Habitats sites. In addition, the Broads Plan commits to review and update the Local Plan for the Broads which will set out a land use planning framework for the area. Increased development has the potential to result in a number of impacts such as atmospheric pollution (from traffic emissions), increased recreational pressures and changes in water flows and water quality at Habitats sites. Recreation is itself a key theme throughout the Broads Plan as the Broads Authority aims to promote understanding and enjoyment of the area. Promotion of the recreational offering and navigation itself can result in increased recreational pressures at Habitats sites.
- 6.1.4 As a high-level document, the Broads Plan does not provide details on the location and scale of actions but instead provides a framework within which lower tiered plans and projects will sit.

6.2 Threats and pressures

- 6.2.1 Threats and pressures to which each Habitats site is vulnerable have been identified through reference to data held by the JNCC and Natural England on Natura 2000 Data Forms, Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each Habitats site. Supplementary advice notices prepared by Natural England provide more recent information on threats and pressures upon Habitats sites than SIPs and have therefore also been reviewed. A number of threats and pressures are unlikely to be exacerbated by the Broads Plan. Threats and pressures which could be affected by the by the Broads Plan at each Habitats site are provided at **Appendix B**.
- 6.2.2 Following a review of HRA assessment work undertaken for the current Broads Plan and an identification of causal connections and links, the following themes are considered to be within the scope of influence of the Broads Plan:
- **Air pollution:** Land use planning (through and update to the Local Plan for the Broads) and increased recreational pressure during peak seasons has the potential to increase atmospheric emissions of pollutants to the air. These can

result in adverse effects at Habitats sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)⁴⁸.

- **Water resources and water levels:** Urban development can change run off rates from urbanised areas to Habitats sites or watercourses which run through them. In addition, dredging and waterways management has the potential to influence water levels at water sensitive Habitats sites.
- **Water Quality:** Urbanisation run-off, waterways management techniques and dredging have the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through effluent discharges from new development at Wastewater Treatment Works (WwTWs), release of toxic and non-toxic contamination and saline penetration.
- **Habitat loss, change in habitat type, degradation and fragmentation:** Urbanisation and waterways management has the potential to lead to the direct loss and / or degradation of Habitats sites and also impacts upon qualifying features which occur outside a designated site boundary.
- **Recreational impacts:** Increased development and the promotion of the Broads as a tourist destination has the potential to increase recreational pressure and navigational impacts upon Habitats sites which are accessible to the public.
- **Disturbance:** Urbanisation and waterways management techniques have the potential to result in disturbing activities (such as noise, lighting and visual disturbance). Disturbance effects may impact upon both Habitats sites and their qualifying features when outside a designated site boundary.

6.3 Air Pollution

- 6.3.1 Air pollution can affect Habitats sites if it has an adverse effect on the features of qualifying interest. The main mechanisms through which air pollution can have an adverse effect is through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides). Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.
- 6.3.2 As highlighted through the review of threats and pressures at Habitats sites, (**Appendix B**) air pollution, and in particular atmospheric nitrogen deposition, has been identified as a threat or pressure for qualifying features of a number of Habitats sites within the relevant Natural England SIPs and Supplementary Advice Notes.
- 6.3.3 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilic plants. It also upsets the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.

⁴⁸ APIS (2016) Ecosystem Services and air pollution impacts. Available at: <http://www.apis.ac.uk/ecosystem-services-and-air-pollution-impacts>
[Date Accessed: 08/04/22]

- 6.3.4 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils' buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.
- 6.3.5 As an attempt to manage the negative consequences of atmospheric nitrogen deposition, 'critical loads' and 'critical levels' have been established for ecosystems in Europe. Each Habitats site is host to a variety of habitats and species, the features of which are often designated a critical load for nitrogen deposition. The critical loads of pollutants are defined as a "...quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge"⁴⁹.
- 6.3.6 Critical levels are defined as "concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge"⁵⁰.
- 6.3.7 Natural England has prepared a standard methodology for the assessment of traffic related air quality impacts under the Habitats Regulations which is relevant to the HRA of plans which may result in a change in traffic flows⁵¹. In addition, the Institute of Air Quality Management (IAQM)⁵² and the Chartered Institute of Ecology and Environmental Management (CIEEM)⁵³ have also prepared advice on the assessment of air quality impacts at designated sites. This guidance sets thresholds for screening of likely significant (air quality) effects at the HRA screening stage (Stage 1 of the HRA process) and methodologies for further Appropriate Assessment (Stage 2 of the HRA process) of air quality impacts where relevant.
- 6.3.8 This advice from NE notes that for screening LSEs, an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT) as a proxy for emissions. The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory, or guideline threshold, is based on a predicted change of daily traffic flows of 1,000 AADT or more (or a change in heavy-duty vehicle (HDV) flows on motorways of 200 AADT or more).

⁴⁹ UNECE (date unavailable) ICP Modeling and Mapping Critical loads and levels approach. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date Accessed: 13/04/22]

⁵⁰ UNECE (date unavailable) ICP Modeling and Mapping Critical loads and levels approach. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date Accessed: 13/04/22]

⁵¹ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Date Accessed: 13/04/22]

⁵² Holman et al (2020). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1, Institute of Air Quality Management, London.

⁵³ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

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- 6.3.9 The guidance also notes it is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance^{54,55,56}.
- 6.3.10 At the screening stage, and based on the level of information available at this high-level plan making stage, Natural England's guidance (in the form of a series of questions) has been applied to determine LSEs as follows:
- Does the Broads Plan give rise to emission which are likely to reach a Habitats site?
 - Are the qualifying features of sites within 200m of a road sensitive to air pollution?
 - Could the sensitive qualifying features of the site be exposed to emissions?
- 6.3.11 The Broads Plan through its requirement to review and update the Local Plan for the Broads will trigger development. In addition, it aims to promote the Broads as a tourist destination, increasing visitors to the area. The scale, location and nature of this development is however not known at this high-level plan making stage.
- 6.3.12 Baseline mapping data has been used to determine the proximity of Habitats sites, and their qualifying features, to roads which may result in an exceedance of Natural England's screening thresholds (A and B roads) within an approximate 10km buffer from the Broads Authority administrative area⁵⁷. The UK Air Pollution Information System (APIS) provides information on all Habitats sites and the sensitivity of their qualifying features (habitats and / or species) to air pollution. This data has been interrogated, alongside a desk-based review of site-based data (**Appendix B**), to determine whether there may be pathways of impact from the Broads Plan to any Habitats site through a change in atmospheric emissions (**Table 6.1**).

⁵⁴ The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality.

⁵⁵ Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

⁵⁶ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁵⁷ 10km covers a sufficiently precautionary area over which traffic flows may increase due to development in the Broads Authority area due to the rural nature of the area.

Table 6.1: Atmospheric pollution pathways of impact to Habitats sites⁵⁸

Habitats site name	Is the Habitats site sensitive to air quality impacts (as indicated in SIP / NE Supplementary Advice – Appendix B)?	Is there a strategic road link (A and B roads) located within 200m of the Habitats site?	Is nitrogen deposition or acidification over critical loads at the Habitats site (based on a review of APIS data)?	Will the Habitats site be scoped in for further assessment in the HRA process
Broads SAC	Yes	Yes	Yes, for some qualifying features	Yes
Broadland SPA	Yes	Yes	Yes, for some qualifying features	Yes
Broadland Ramsar	Yes	Yes	Yes, for some qualifying features of the SAC and SPA for which the Ramsar site is designated	Yes
Breydon Water SPA	No	-	-	-
Breydon Water Ramsar	No	-	-	-
Outer Thames Estuary SPA	No	-	-	-
Great Yarmouth North Denes SPA	Yes	No	-	-
Winterton-Horsey Dunes SAC	Yes	No	-	-
Southern North Sea SAC	No	-	-	-
Greater Wash SPA	No	-	-	-
Benacre to Easton Bavents SPA	No	-	-	-
Norfolk Valley Fens SAC	Yes	No components within 10km buffer ⁵⁹	-	-

6.4 Hydrology (water resource and quality)

6.4.1 The Broads Authority is located with the Anglian River Basin District area. This is divided into several management catchments, with the Authority situated within the Broadland Rivers catchment management area⁶⁰.

⁵⁸ APIS does not provide air quality information on the sensitivity of specific Ramsar features. However, all Ramsar sites included in this HRA are coincident with either a SAC or SPA designation and therefore air quality information for these Habitats sites has been used for this scoping assessment.

⁵⁹ 10km covers a sufficiently precautionary area over which traffic flows may increase due to development in the Broads Authority area.

⁶⁰ <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/5>

- 6.4.2 Urban development set out in lower tier plans required through the Broads Plan, such as the Local Plan for the Broads, can reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to Habitats sites or watercourses which run through them. Water mains leakage and sewer infiltration may also affect the water balance. In addition, new growth will increase water demand. Dredging and waterways management has the potential to influence water levels at designated sites. Features for which a Habitats site is designated are often sensitive to changes in water balance and levels. Therefore, any change to water flows through and water levels at a water sensitive Habitats site has the potential to adversely affect the features for which they are designated.
- 6.4.3 Urbanisation run-off, waterways management techniques and dredging all have the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through effluent discharges at Wastewater Treatment Works (WwTWs), release of toxic and non-toxic contamination and cause saline penetration. Any change to water quality at a water sensitive Habitats site has the potential to adversely affect the features for which they are designated.
- 6.4.4 Advice from the Chief Planning Officer from the Department for Levelling Up, Housing and Communities (DLUHC) on 16 March 2022⁶¹ and advice from Natural England on the same date, highlighted the importance of nutrient impacts on The Broads SAC and Broadlands Ramsar. This is relevant to components of the SAC and Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds. These components include those underpinned by the following SSSIs:
- Ant Broads and Marshes SSSI
 - Bure Broads and Marshes SSSI
 - Trinity Broads and Marshes SSSI
 - Upper Thurne Broads and Marshes SSSI
 - Yare Broads and Marshes SSSI
- 6.4.5 Water quality data indicates that these SSSI designations are overall exceeding the targets for Total Phosphorus and Total Nitrogen. Within these areas, four units are achieving the target for Total Nitrogen (Cocksfoot Broad, Filby Broad, Ormesby Little Broad and Rollesby Broad Sailing Club).
- 6.4.6 Natural England's advice requires the Broads Authority (as the Competent Authority) to fully consider nutrients implications on these sites when determining relevant plans or projects and to secure appropriate mitigation measures. Natural England suggests that nutrient neutrality may be a potential solution to enable developments to proceed in the catchment(s) (see **Figure 6.1**) where an adverse effect on site integrity cannot be ruled out⁶². LSEs on water quality must be considered in the context of this advice.

⁶¹ Letter from DLUHC to Chief Planning Officers and Local Planning Authorities affected by nutrient pollution. NUTRIENT POLLUTION: NEUTRALITY, SUPPORT AND FUNDING. 16 March 2022. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1061531/Chief_Planner_Letter_about_nutrient_pollution_March_2022.pdf [Date Accessed 16/03/22]

⁶² Letter from Natural England to LPA Chief Executives & Heads of Planning, County Council Chief Executives and Heads of Planning, EA Area and National Team Directors, Planning Inspectorate, Natural Resources Wales (Cross border sites only) & Secretary of State for Department for

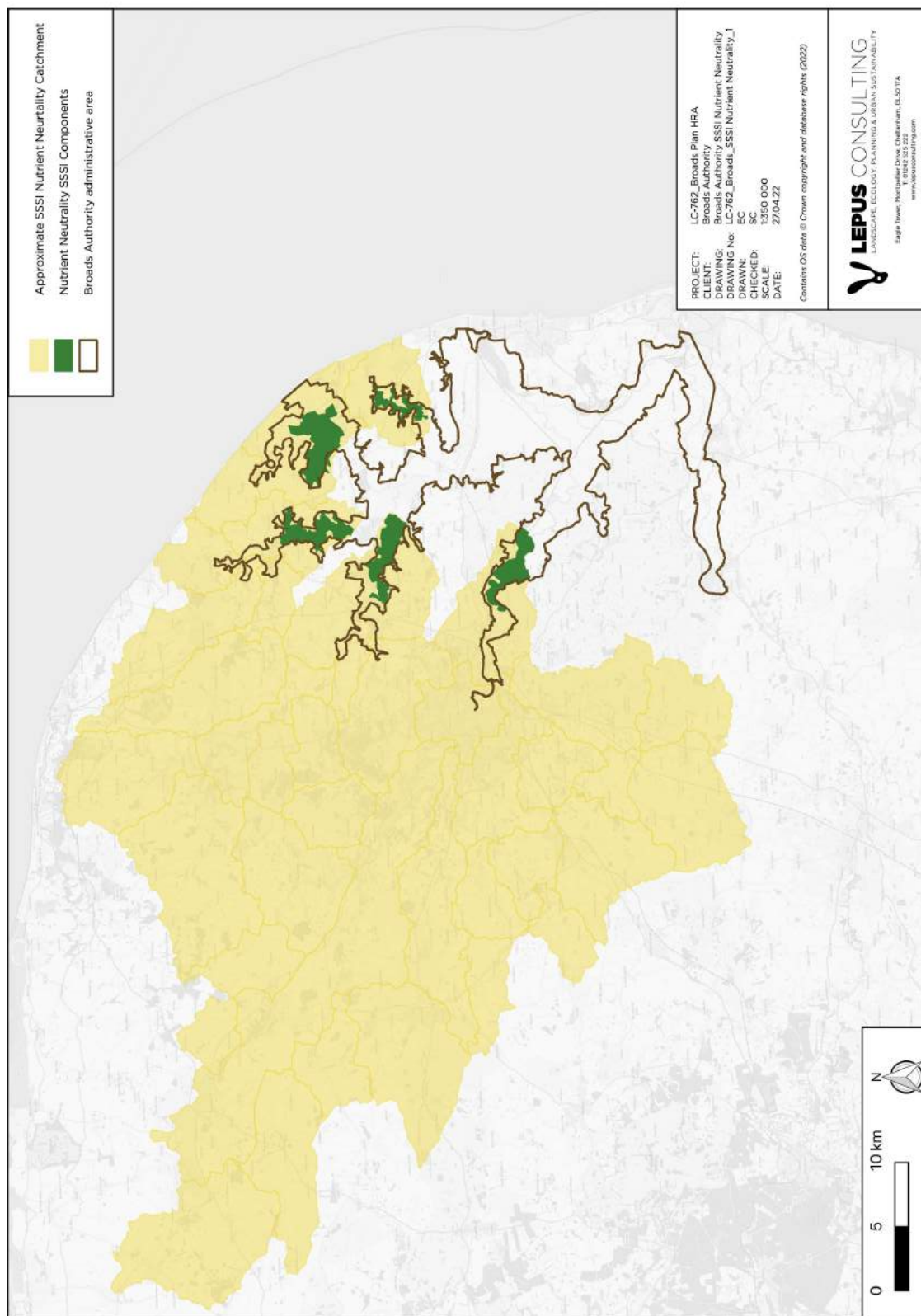


Figure 6.1: Approximate SSSI Nutrient Neutrality Catchment area (based on Water Framework Directive catchments)⁶³

Levelling Up Housing & Communities (DLUHC). Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites. 16 March 2022.

⁶³ <https://environment.data.gov.uk/catchment-planning/>

Table 6.2: Water resource, levels and quality pathways of impact to Habitats sites

Habitats site name	Is the Habitats site sensitive to a change in water quality and /or water level impacts and is it hydrologically connected to the plan area?	Will the Habitats site be scoped in for further assessment in the HRA process
Broads SAC	The Broads SAC is located within the Plan area and is formed of a network of naturally nutrient-rich lakes which were artificially created through peat extraction in medieval times. This network of lakes and ditches in areas of fen and drained marshlands support a range of water dependent habitats and species. Any change in water levels, flows or water quality (In particular in relation to nutrient inputs) has the potential to have direct / indirect effects on the features for which the SAC is designated.	Yes
Broadland SPA	Broadland SPA is located within the Plan area and comprises a low-lying wetland complex created by a series of flooded medieval peat cuttings. It lies within the floodplains of five principal river systems, including the River Bure, River Yare and River Waveney and their major tributaries. It comprises a complex and interlinked mosaic of wetland habitats. Any change in water levels, flows or water quality has the potential to have indirect effects on the features for which the SPA is designated for instance through a change in food resource availability.	Yes
Broadland Ramsar	Broadland Ramsar, similarly to the SAC and SPA is located within the Plan area, and comprises a series of flooded medieval peat cuttings which support a diverse range of habitat types and species. Any change in water levels, flows or water quality (In particular in relation to nutrient inputs) has the potential to have direct and indirect effects on the features for which the Ramsar has been notified.	Yes
Breydon Water SPA	Breydon Water SPA is a large stretch of sheltered estuary and wetland habitat which forms the lower reaches of the River Yare and River Waveney. It comprises an inland tidal estuary with extensive areas of mud flats that are exposed during low tide forming intertidal flats. These habitats provide important feeding areas for internationally important wildfowl and waders which overwinter at the site. Any change in water levels, flows or water quality may indirectly affect the qualifying features of the SAP such as through a change in the availability of food resource.	Yes
Breydon Water Ramsar	Breydon Water Ramsar is a large stretch of sheltered estuary and wetland habitat which forms the lower reaches of the River Yare and River Waveney. It comprises an inland tidal estuary with extensive areas of mud flats which support a diverse range of habitat types and species. Any change in water levels, flows or water quality has the potential to have direct and indirect effects on the features for which the Ramsar has been notified.	Yes
Outer Thames Estuary SPA	The Outer Thames Estuary SPA is located within the Plan area (extending along the River Bure) and stretching from Caister-on-Sea in Norfolk (Suffolk) to Sheerness in Kent, and reaching as far as Canvey Island into the Thames Estuary. Hydrology impacts from onshore sources are not identified as a threat which could impact upon the qualifying features of this SPA (Appendix B). Habitat requirements for the qualifying bird species are located at some distance away from the influence of the Broads Plan. As such water pathways of impact from the Broads Plan are not considered likely. This Habitats site is therefore not considered further in terms of water LSEs.	No
Great Yarmouth and North Denes SPA	Great Yarmouth and North Denes SPA is located immediately adjacent to the Plan Area and comprises two component areas, the Great Yarmouth North Denes actively accreting low dune system and beach, together with the beach and foredune ridge at Winterton-Horsey Dunes.	No

Habitats site name	Is the Habitats site sensitive to a change in water quality and /or water level impacts and is it hydrologically connected to the plan area?	Will the Habitats site be scoped in for further assessment in the HRA process
	Hydrology impacts are identified as a threat which could impact upon the qualifying features of this designation (Appendix B). However, habitat requirements for the little tern are located at some distance from the influence of the Broads Plan. As such water LSEs are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	
Winterton-Horseley Dunes SAC	Winterton-Horseley Dunes SAC is located immediately adjacent to administrative area and comprises a large acidic dune system with associated areas of grazing marsh, dune slacks, dune heath, dune grassland and downy birch dominated woodland with oaks. Hydrology impacts are identified as a threat which could impact upon this designation (Appendix B). However, the dune system associated with the SAC is unlikely to be influenced by actions set out in the Broads Plans. As such this Habitats site is therefore not considered further in terms of this pathway of impact.	No
Southern North Sea SAC	The majority of the Southern North Sea SAC lies offshore, extending into coastal areas of Norfolk and Suffolk crossing the 12 nautical mile boundary and comprising a mix of habitats, such as sandbanks and gravel beds. Hydrology impacts from onshore sources are not identified as a threat which could impact upon the qualifying features of this designation (Appendix B). Habitat requirements for the harbour porpoise are located at some distance from the influence of the Broads Plan. As such pathways of impact are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	No
Greater Wash SPA	The Greater Wash SPA is located in the mid-southern North Sea, immediately adjacent to administrative area. Extensive areas of subtidal sandbanks are present off The Wash as well as north and east Norfolk coasts which support the qualifying species of bird. The SPA is not hydrologically linked with the Plan area, being outside the Broadlands River management area. As such pathways of impact are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	No
Benacre to Easton Barents SPA	Benacre to Easton Barents SPA is located approximately 7.3km to the south of the Broads Authority administrative area outside the Broadlands River management area. It is not hydrologically connected to the Plan area and as such hydrology pathways of impact are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	No
Norfolk Valley Fens SAC	The closest component of the Norfolk Valley Fens SAC is located upstream of the Plan area. As such hydrology pathways of impact are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	No
The Wash and North Norfolk Coast SAC	This SAC is located approximately 28.3km to the north of the Plan area and is not hydrologically linked. As such pathways of impact are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	No
North Norfolk Coast SAC	This SAC is located approximately 28.3km to the north of the Plan area and is not hydrologically linked. As such pathways of impact are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	No
North Norfolk Coast SPA	This SPA is located approximately 28.3km to the north of the Plan area and is not hydrologically linked. As such pathways of impact are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	No

Habitats site name	Is the Habitats site sensitive to a change in water quality and /or water level impacts and is it hydrologically connected to the plan area?	Will the Habitats site be scoped in for further assessment in the HRA process
North Norfolk Coast Ramsar	This Ramsar is located approximately 28.3km to the north of the Plan area and is not hydrologically linked. As such pathways of impact are not considered likely. This Habitats site is therefore not considered further in terms of this pathway of impact.	No

6.5 Recreational impacts

- 6.5.1 Public access/disturbance can take a number of forms. It can include both physical disturbance, as a result of urbanisation (discussed further in **Section 6.6** below), and increased recreational pressure. These can result in damage to habitats through erosion and compaction, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, cat predation, dog fouling, litter and fly-tipping, tree climbing, wildfire and arson, noise, vibration, light pollution and vandalism. Typically, disturbance of habitat and species is the unintentional consequence of people's presence which can impact breeding success and survival.
- 6.5.2 Increased development and the promotion of the Broads as a tourist destination has the potential to increase recreational and navigational pressures upon Habitats sites which are accessible to the public.
- 6.5.3 A common approach taken across the UK to address recreational impacts at Habitats sites is to establish a Zone of Influence (Zoi) based on detailed visitor survey data. The Zoi is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees surveyed have travelled to reach a particular site (based on a review of visitor survey data).

6.5.4 In 2015 and 2016 Norfolk County Council/the Norfolk Biodiversity Partnership (NBP) commissioned visitor surveys on behalf of all local planning authorities, to determine current and projected visitor patterns to Habitats sites across Norfolk⁶⁴. Based on this work, a Zol was established for each Habitats site within the study area based on resident and tourist visitors. Drawing on the visitor survey data, the Councils⁶⁵ and the Broads Authority (working together to address cross-boundary issues and offer a strategic solution through a Norfolk Strategic Planning Framework (NSPF)), prepared a Green Infrastructure (GI) and Recreational Impact Avoidance and Mitigation Strategy (RAMS)⁶⁶. This strategy is referred to as GIRAMS and provides information to support Local Planning Authorities (LPAs) in Norfolk in their statutory requirement to produce ‘sound’ i.e. legally compliant Local Plans for their administrative or Plan making areas and is of relevance to the Broads Authority area⁶⁷. Relevant Zol which were established through the visitor survey work (for both residential and tourism development) have been applied in this assessment to determine recreational impact pathways from the Broads Plan to Habitats sites. These have informed Natural England’s SSSI IRZs. An overall Zol map has been prepared for the Norfolk RAMS which covers the whole county. The Zol for tourist accommodation is countywide for all Habitats sites. Habitats sites covered by this mitigation strategy, and which will be scoped into this HRA in terms of potential recreational LSEs, include the following:

- Brecks sites: Breckland SPA and Breckland SAC;
- Broads sites: The Broads SAC and Broadland SPA;
- East Coast sites: Breydon Water SPA, Winterton-Horsey Dunes SAC and Great Yarmouth and North Denes SPA;
- North Coast sites: North Norfolk Coast SAC, North Norfolk Coast SPA, North Norfolk Coast Ramsar and the Wash and North Norfolk Coast SAC;
- Roydon and Dersingham Bog SAC and Ramsar;
- Norfolk Valley Fens SAC; and
- The Wash: The Wash SPA, The Wash Ramsar and The Wash and North Norfolk Coast SAC.

⁶⁴ Panter, C., Liley, D. & Lowen, S. (2016). Visitor surveys at European protected sites across Norfolk during 2015 and 2016. Unpublished report for Norfolk County Council. Footprint Ecology.

⁶⁵ Broadland District Council, Breckland District Council, Great Yarmouth Borough Council, The Borough Council of King’s Lynn & West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council

⁶⁶ Place Services. March 2021. *Draft subject to approval by the Norfolk Strategic Planning Group*. Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS). Habitats Regulations Strategy Document.

⁶⁷ <https://www.broads-authority.gov.uk/planning/other-planning-issues/habitat-mitigation> and https://www.broads-authority.gov.uk/data/assets/word_doc/0024/413754/Norfolk-RAMS-Habitats-Regulations-Assessment-HRA-record-template-DRAFT-002.docx

6.5.5 East Suffolk Council (formally Suffolk Coastal District Council and Waveney District Council), Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council have set out a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) to address recreational pressure at Habitats sites within Suffolk^{68,69}. This Strategy set outs a tariff-based approach to mitigating the impact of recreational disturbance on Habitat Sites resulting from increased residential development across the Local Authority areas. It also sets out the requirement for additional mitigation measures such as Suitable Alternative Natural Green Space (SANGS) or green infrastructure measures such as enhanced walking routes and connections to the Public Right of Way network. A ZOI for each Habitats site has been developed based on visitor survey data, to determine where likely significant recreational effects may take place. For all Habitats sites covered by the strategy this is defined as 13km. The Broads Plan is only located with 13km Benacre to Easton Bavents SPA. As such this Habitats site has been included in this assessment when considering recreational LSEs.

6.6 Disturbance

6.6.1 Urbanisation and waterways management techniques have the potential to result in disturbance within / adjacent to the Broads waterways (such as noise and visual disturbance). Disturbance effects may impact upon both designated sites and functionally linked habitat and species.

6.6.2 Urbanisation effects typically occur when development is located close to a Habitats site boundary. These may include impacts such as noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering and vandalism. Strategic mitigation schemes elsewhere in the UK have set a presumption against development (i.e. no net increase in residential dwellings) on the basis of site-specific evidence to safeguard against these impacts of approximately 400m to 500m. As such this buffer distance will be applied in the case of urbanisation effects at the screening stage on a site-by-site basis, taking into consideration the sensitivities of each Habitats site individually. Habitats sites located within and immediately adjacent to the Broads Authority administrative area have been considered further in terms of disturbance impacts and include:

- The Broads SAC;
- Broadlands SPA;
- Broadlands Ramsar;
- Breydon Water SPA;
- Breydon Water Ramsar;
- Outer Thames Estuary SPA;
- Great Yarmouth North Denes SPA; and
- Winterton-Horsey Dues SAC.

⁶⁸ East Suffolk Council. May 2021. Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD). A guide to implementing the Suffolk Coast Disturbance Avoidance and Mitigation Strategy.

⁶⁹ <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf>

6.7 Habitat loss, change in habitat type, degradation and fragmentation

- 6.7.1 Land use planning and waterways management in particular have the potential to lead to direct loss and / or degradation at Habitats sites through the mechanisms described above, reduction in air quality, hydrology impacts and public access and disturbance. They also have the potential to result in impacts upon qualifying features (for instance mobile species of bird) when located outside a designation boundary, known as functionally linked habitat⁷⁰.
- 6.7.2 The term ‘functional linkage’ is defined by Natural England as “the role or ‘function’ that land or sea beyond the boundary of a Habitats site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore ‘linked’ to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status”⁷¹.
- 6.7.3 In addition to direct loss or degradation of habitat (designated or functionally linked), development has the potential to result in the fragmentation of habitats through the loss of connecting corridors which would hinder the movement of mobile qualifying species which are associated with some designations.
- 6.7.4 The tests set out under Article 6(3) and 6(4) of the Habitats Regulations need to be applied in respect of plans or projects which may significantly affect functionally linked habitat that plays an important role in contributing to the favourable conservation status of the relevant species for which a European site is designated.
- 6.7.5 The CJEU ruling in the Holohan case (**Box 3**) confirmed that habitat and / or species which are located outside of a designated site, if they are necessary to the conservation of the habitat types and species listed for the protected area, must be considered in an Appropriate Assessment.
- 6.7.6 The HRA will therefore focus on Habitats sites, or associated areas of potentially functionally linked land, which are located within or adjacent to the Broads Authority administrative area. Impacts upon both designated and functionally linked sites / species will be considered in terms of water, public access and disturbance and air quality impacts as discussed in **Sections 6.3 to 6.6** above.

6.8 Summary

- 6.8.1 **Table 6.3** provides a summary of impact pathways which will be considered at each Habitats site in the test of likely significance.

⁷⁰ “The term ‘functional linkage’ refers to the role or ‘function’ that land or sea beyond the boundary of a Habitats site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore ‘linked’ to the Habitats site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status”. Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

⁷¹ Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

Table 6.3: Summary of pathways of impact at each Habitat site

Habitats Sites	Potential pathways of impact from the Broads Plan			
	Air Pollution	Water Resources and Water Levels and Water Quality	Recreational effects	Disturbance Effects
Broads SAC	✓	✓	✓	✓
Broadland SPA	✓	✓	✓	✓
Broadland Ramsar	✓	✓	✓	✓
Breydon Water SPA	x	✓	✓	✓
Breydon Water Ramsar	x	✓	✓	✓
Outer Thames Estuary SPA	x	x	✓	✓
Great Yarmouth North Denes SPA	x	x	✓	✓
Winterton-Horsey Dues SAC	x	x	✓	✓
Southern North Sea SAC	x	x	✓	x
Greater Wash SPA	x	x	✓	x
Benacre to Easton Barents SPA	x	x	✓	x
Norfolk Valley Fens SAC	x	x	✓	x
The Wash and North Norfolk Coast SAC	x	x	✓	x
North Norfolk Coast SAC	x	x	✓	x
North Norfolk Coast SPA	x	x	✓	x
North Norfolk Coast Ramsar	x	x	✓	x

7 Screening (HRA Stage 1)

7.1 Pre-screening

7.1.1 Each element of the Draft Broads Plan has been appraised against the HRA pre-screening criteria (see **Table 4.1**), taking into consideration case law and best practice. **Appendix D** provides the output of this pre-screening exercise.

7.1.2 It is concluded that LSEs, either from the Broads Plan alone or in- combination with other plans or projects, could be screened out for most components. This is because components fell into the following categories (see **Table 4.1** for a description of each category):

- Category A: General statements of policy / general aspirations;
- Category D: Environmental protection / site safeguarding; and
- Category F: Proposals that cannot lead to development or other change.

7.1.3 A number of components were however considered likely to have an LSE on the basis of this assessment as they fell into the following categories:

- Category I: Proposals with a likely significant effect on a site alone;
- Category L: Proposals which might be likely to have a significant effect in combination; and
- Category M: Bespoke area, site or case-specific proposals intended to avoid or reduce harmful effects on a Habitats site.

7.1.4 The following components will therefore be explored in the Appropriate Assessment (Stage 2 of the HRA process) in more detail. **Table 7.1** provides a summary of policies that have been screened into the HRA.

Table 7.1: Summary of pre-screening (Note: only elements of the Broads Plan that have been screened into the HRA have been included in the summary table below. The pre-screening outcome for all policies and allocations is provided at Appendix D).

Broads Plan Component	Screening conclusion	Pre-Screening Category
A1: Prepare a long-term, integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area	Screen in	I
B1. Restore, maintain and enhance lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques	Screen in	I
B2. Promote best practice water capture and usage across the Broadland rivers catchment and reduce point and diffuse pollution into the floodplain and water courses	Screen in	I
C1. Maintain navigation water depths to defined specifications, reduce sediment input and dispose of dredged material in sustainable and beneficial ways	Screen in	I
C2. Maintain existing navigation water space and develop appropriate opportunities to extend access for various types of craft	Screen in	I
C3. Manage water plants and riverside trees and scrub, and seek resources to increase operational targets	Screen in	I
C4. Maintain and improve safety and security standards and user behaviour on the waterways	Screen in	I
E1. Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities	Screen in	L
E2. Offer a coordinated and year-round programme of visitor activities that promote a 'Broads' experience', taking measures to prevent any adverse environmental impacts	Screen in	L and M
E3. Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities of the Broads National Park, and 'point of need' information for visitors	Screen in	L and M

Broads Plan Component	Screening conclusion	Pre-Screening Category
F1. Increase and promote of accessible and ‘taster’ activities that foster physical and mental health and wellbeing for all, including under-represented groups	Screen in	L
F4. Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits	Screen in	L and M

7.1.5 Threats at each Habitats site are summarised above in **Table 6.3**.

7.2 Screening Conclusion

7.2.1 As required under Regulation 105 of the Habitats Regulations, an assessment has been undertaken of LSEs of the Broads Plan upon Habitats sites. The pre-screening checks (**Table 7.1**) indicate that several components of the Broads Plan have the potential to have LSEs on a number of Habitats sites, both alone and in-combination. The Broads Plan is not directly connected with or necessary to the management of any Habitats site. The screening assessment takes no account of mitigation measures that the Broads Plan may incorporate to mitigate adverse impacts upon Habitats sites. It is therefore concluded that the Broads Plan will be screened into the HRA process. The next stage of the HRA process is Stage 2 - Appropriate Assessment.

8 Overview of Mitigation

8.1 Introduction to mitigation

- 8.1.1 As set out in **Chapter 2**, the Broads Plan is the high-level overarching plan for the Broads National Park. It sets out a long-term vision for the area and shorter-term actions to benefit the environment, local communities and visitors. It draws together and guides a wide range of partnership plans, programmes and policies relevant to the area, several of relevance to this HRA being set out in **Appendix A**.
- 8.1.2 At this level of plan making, details around specific actions to deliver the long term and shorter-term priorities, in terms of scope, scale and locations, are not yet in a format which would allow a meaningful assessment of impacts at Habitats sites. As such it is only possible to predict and assess the potential effects the Broads Plan in the Appropriate Assessment with the details currently available.
- 8.1.3 Once detailed information on the exact nature, scope, timing, location and scale of effects is known, these will be assessed, and mitigation defined and secured to ensure compliance with the Habitats Regulations.
- 8.1.4 It is important to note that the Broads Plan does not remove the requirement for lower tier plans and projects to be subject to HRA through the Habitats Regulations. HRA of lower tiered plans and projects, is required as a matter of law and Government policy. This HRA sets out where lower tiered HRA will apply to ensure compliance with legislation and case law.
- 8.1.5 The Broads Plan outlines a range of actions which must be applied to lower tier plans and / or project level assessment to provide certainty that adverse effects will not occur. These measures give confidence that there are options available at the lower tier plan / project stage to adequately mitigate for any potential adverse impacts, notwithstanding the fact that lower tier HRA will still be required.
- 8.1.6 The Advocate General's opinion in the European Court of Justice case C-6/04 *European Commission v United Kingdom* confirmed the progression of assessment that must take place either from higher level to lower-level plans, or as the plan becomes more specific. She notes at paragraph 49:
- 8.1.7 *'adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure'*⁷².
- 8.1.8 Lower tier plan and project level assessment must have regard to the recommendations made in this HRA. All plans and projects taken forward by the Broads Authority and its partners must satisfy requirements under the Habitats Regulations.

⁷²Opinion available at:

<https://curia.europa.eu/juris/showPdf.jsf?jsessionid=3D44C34DA890BCDA175840065B4AECE4?text=&docid=58359&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=3054642> [Date Accessed: 24/03/22]

9 Appropriate Assessment - Air Pollution

9.1 Introduction

9.1.1 The HRA screening process (**Appendix D**) concluded that the following components of the Broads Plan have the potential to result in LSEs at a number of Habitats sites as a result of changes to air quality:

- E1. Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities.
- E2. Offer a coordinated and year-round programme of visitor activities that promote a ‘Broads’ experience’, taking measures to prevent any adverse environmental impacts.
- E3. Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities of the Broads National Park, and ‘point of need’ information for visitors.
- F4. Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits.

9.1.2 These strategic objectives relate to the promotion of the Broads as a tourist destination and its land use planning function.

9.1.3 On the basis of the screening exercise (**Appendix D**), Habitats sites which were screened in and will be considered in this Appropriate Assessment in terms of air quality impacts include:

- The Broads SAC;
- Broadland SPA; and
- Broadland Ramsar.

9.1.4 The following Appropriate Assessment focuses on assessing more precisely the ecological impacts of the emissions at each Habitats site in view of its qualifying features and conservation objectives taking into account air quality information. This assessment follows Natural England’s current guidance and therefore assesses the likely effects to inform a conclusion as to whether an adverse effect on site integrity can be ruled out. The following assessment also draws on Chartered Institute of Ecology and Environmental Management (CIEEM’s) guidance following a six-step methodology. It includes consideration of factors such as: *‘the action needed to achieve the conservation objectives for the SAC; the expected future trend in pollutants of concern (and the scientific reasonableness of any trend); the magnitude of any future ‘in combination’ dose and how it may change the trend; and the physical extent of the affected area as a proportion of that interest feature within the European site’*⁷³.

⁷³ CIEEM. January 2021. Paragraph 20. Advisory Note: Ecological Assessment of Air Quality Impacts

9.2 Air Pollutants

- 9.2.1 Nitrogen oxides (NOx) are produced during combustion processes, partly from nitrogen compounds in fuel, but mostly by direct combination of atmospheric oxygen and nitrogen in flames⁷⁴. Road transport emissions of NOx in 2018 were the largest contributor to UK total emissions of NOx with most emissions related to diesel vehicles⁷⁵. The introduction of catalytic converters has seen an overall reduction in emissions since 1990. NOx has the potential to impact habitats through direct toxicity and through their contribution to nitrogen deposition.
- 9.2.2 Ammonia originates from both natural and anthropogenic sources, with the main man-made source being agriculture. Other man-made sources of ammonia include industrial processes and vehicular emissions (from catalyst-equipped petrol vehicles and selective catalytic reduction on light and heavy goods diesel fuelled vehicles). As with NOx, elevated levels of ammonia can be directly toxic to plants and can also enrich a system with nitrogen causing eutrophication and acidification effects on habitats.
- 9.2.3 APIS describes nitrogen deposition as *the input of reactive nitrogen from the atmosphere to the biosphere both as gases, dry deposition and in precipitation as wet deposition*⁷⁶. Anthropogenic sources of enhanced reactive nitrogen deposition come from emissions of oxidised nitrogen (NOx) and fossil fuel combustion and reduced nitrogen from agricultural sources.
- 9.2.4 Nitrogen is a major growth nutrient for plants. An increase in nitrogen can be toxic to plants and can lead to eutrophication which can cause species loss and changes in the structure and function of ecosystems. Nitrogen can also cause acidification of soils. Traffic related inputs of NOx and ammonia have an impact on the rates of nitrogen deposition. Nitrogen deposition rates are habitat specific as different habitats have different tolerances to different levels.
- 9.2.5 The Broads Plan indicates that most visitors to the National Park arrive to the Broads by car. In some areas, particularly at honeypot sites, this increased seasonal traffic can cause congestion and increased vehicle emissions with impacts upon air quality. Land use planning, and in particular development of land for employment or housing use, will result in increased traffic related emissions with impacts upon air quality. Whilst the increase in traffic emissions alone may not cause adverse impacts upon a Habitats site, when taken together with emissions from neighbouring authority development, they have the potential to have a cumulative adverse impact.

⁷⁴ Air Pollution Information Systems (2017) Pollutants, available at: <http://www.apis.ac.uk/src/select-a-feature?site=UK9012171&SiteType=SPA&submit=Next> [Date Accessed: 27/04/21]

⁷⁵ National Atmospheric Emissions Inventory. Available at: https://naei.beis.gov.uk/overview/pollutants?pollutant_id=6 [Date Accessed: 27/04/21]

⁷⁶ APIS. Nitrogen Deposition. Available at: http://www.apis.ac.uk/overview/pollutants/overview_N_deposition.htm [Date Accessed: 05/05/21]

9.3 Mitigation

9.3.1 The Broads Plan and other Broads Authority strategic plans and guiding strategies set out a series of measures which will have a positive impact and contribute towards the mitigation of air quality impacts from traffic sources at Habitats sites. Other plans and projects are set out in more detail in **Appendix A**. The Appropriate Assessment in respect of air quality therefore takes these into consideration.

- The Broads Plan. Several strategic objectives under the climate change theme aim to reduce climate emissions through initiatives such as replacing all Broads Authority operating vehicles with electric options (A2), initiatives such as 'Electrifying the Broads' and promotion of tourism hotspots with electric vehicle and alternative fuel strategies and visitor green travel (A3). Other objectives under the 'promoting understating and enjoyment' theme support initiatives for active travel around the Broads (E1).
- The Broads Authority Integrated Transport Strategy. This strategy aims to encourage sustainable travel choices such as public transport, walking, cycling and non-powered boating, and improve links between public transport provision, visitor destination points and access routes.
- Norfolk County Council Local Transport Plan (LTP) 4 Strategy. LTP4 aims to address issues such as air quality and carbon reduction and tackle infrastructure issues in relation to major road, bus and rail connections. It sets out a series of strategies and policies in relation to this. Policy 2 of LTPS4 notes the priority for reducing emissions will be to support a shift to more sustainable modes and more efficient vehicles, including lower carbon technology and cleaner fuels. Policy 3 notes that innovation and new technologies will be embraced and used proactively to meet new targets set by the recently adopted environmental policy. Policy 4 encourages a behaviour change and interventions that can help to increase the use of sustainable transport.

9.3.2 Acting together, the Broads Plans strategic objectives, guiding strategies and wider county initiatives will promote sustainable transport options with reductions in reliance on the private car and associated reductions in traffic emissions.

9.4 Assessment of impacts

9.4.1 **Appendix B** provides an overview of The Broads SAC, Broadland SPA and Broadland Ramsar, their qualifying features and threats and vulnerabilities.

9.4.2 The SIP covers The Broads SAC and Broadland SPA and indicates that features of both the SAC and SPA are sensitive to air quality impacts, in particular the impact of atmospheric nitrogen deposition⁷⁷. It notes that nitrogen deposition exceeds the site relevant critical load for ecosystem protection and hence there is a risk of harmful effects, particularly in the light of a changing climate.

⁷⁷ Natural England (2018) Broadland SIP (covering Broadland SPA and The Broads SAC). Available at: <http://publications.naturalengland.org.uk/file/6218680128241664> [Date Accessed: 11/04/22]

- 9.4.3 Natural England’s Supplementary Advice⁷⁸ for the SAC notes that all qualifying features, with the exception of otter (*Lutra lutra*) and Alder woodland on floodplains, are sensitive to air pollution. It indicates that a change in air quality may modify the chemical status of its substrate, accelerate or damage plant growth, alter vegetation structure and composition and result in the loss of sensitive typical species associated with it. The management target for this habitat in terms of air quality is to ‘*maintain as necessary, the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System*’.
- 9.4.4 Broadland SPA is of international importance for a variety of wintering and breeding raptors and waterbirds associated with extensive lowland marshes. Natural England’s Supplementary Advice for the SPA indicates that all qualifying features are sensitive to changes in air quality. It notes that ‘*the structure and function of the habitats which support this SPA feature may be sensitive to changes in air quality. Exceeding critical values for air pollutants may result in changes to the chemical status of its habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats*’. It has similar targets for air quality as The Broads SAC ‘*reduce concentrations and deposition of air pollutants for a site-relevant Critical Load or Level*⁷⁹’. The Broadland Ramsar information sheet does not identify a threat from air quality⁸⁰.
- 9.4.5 APIS⁸¹ provides current levels of nitrogen deposition and acidification at the SAC and SPA alongside critical loads for each qualifying feature, these are summarised in **Table 9.1** and **Table 9.2**.
- 9.4.6 At the SAC, Nitrogen deposition is currently exceeding the critical load for a number of qualifying features at an average of 18kg N/ha/yr. APIS has no comparable habitat with established critical load estimate available for a number of qualifying features e.g. water bodies.

Table 9.1: Nitrogen Critical Load Information for The Broads SAC

Qualifying Feature	Critical Load Class	Critical Load (N) kg/ha/yr	Current levels of deposition Kg/ha/yr	Source Attribution Data (local contributions)
Transition mires and quaking bogs	Valley mires, poor fens and transition mires	10-15	Maximum: 24.8 Minimum: 15.6 Average: 18	Livestock: 34.5% Fertiliser Application: 19.2%
<i>Liparis loeselii</i> - Fen orchid	Moist to wet dune slacks	10-20	Maximum: 24.8 Minimum: 15.6 Average: 18	Others: 10.6% Other Transport: 10%

⁷⁸ Natural England (2019) The Broads SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/6067900213624832> [Date Accessed 11/04/22]

⁷⁹ Natural England (2019) Broadland SPA Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/publication/5310905998901248> [Date Accessed 19/04/22]

⁸⁰ Ramsar Information Sheet. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11010.pdf> [Date Accessed 19/04/22]

⁸¹ Air Pollution Information System. <http://www.apis.ac.uk/src1>

Qualifying Feature	Critical Load Class	Critical Load (N) kg/ha/yr	Current levels of deposition Kg/ha/yr	Source Attribution Data (local contributions)
Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caeruleae</i>)	Moist and wet oligotrophic grasslands: Molinia caerulea meadows	15-25	Maximum: 24.8 Minimum: 15.6 Average: 18	Europe Import: 9.55% Road Transport: 7.66% Non-agricultural non abatable: 5.07%
Calcareous fens with Cladium mariscus and species of the <i>Caricion davallianae</i>	Rich fens	15-30	Maximum: 24.8 Minimum: 15.6 Average: 18	Non-agricultural abatable: 3.28%
Alkaline fens	Rich fens	15-30	Maximum: 24.8 Minimum: 15.6 Average: 18	
<i>Vertigo moulinsiana</i> - Desmoulin's whorl snail	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 12.9 Minimum: 9.5 Average: 10.3	
<i>Lutra lutra</i> - Otter	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 12.9 Minimum: 9.5 Average: 10.3	
<i>Anisus vorticulus</i> - Ramshorn snail	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 12.9 Minimum: 9.5 Average: 10.3	
Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara spp</i>	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 12.9 Minimum: 9.5 Average: 10.3	
Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 12.9 Minimum: 9.5 Average: 10.3	

9.4.7 Acidity is currently exceeding the critical load for two qualifying features of the SAC: transition mires and quaking bogs; and *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinia caeruleae*).

Table 9.2: Acidity Critical Load Information for The Broads SAC (only qualifying features sensitive to acidity are included)

Qualifying Feature	Critical Load Class	Critical Load keq/ha/yr	Current levels of deposition Nitrogen Sulphur (keq/ha/yr):
Transition mires and quaking bogs	Bogs	Maximum: CLminN:.321 CLmaxN: .528 CLmaxS: .207 Minimum: CLminN: .321 CLmaxN: .497 CLmaxS: .176	Maximum: 1.79 0.2 Minimum: 1.09 0.14 Average: 1.29 0.16
<i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caeruleae</i>)	Acid grassland	Maximum: CLminN:.438 CLmaxN: 4.568 CLmaxS: 4.13 Minimum: CLminN: .223 CLmaxN: .542 CLmaxS: .176	Maximum: 1.79 0.2 Minimum: 1.09 0.14 Average: 1.29 0.16
<i>Liparis loeselii</i> - Fen orchid	Calcareous grassland (using base cation)	Maximum: CLminN:1.071 CLmaxN: 5.071 CLmaxS: 4 Minimum: CLminN: .856 CLmaxN: 4.856 CLmaxS: 4	Maximum: 1.79 0.2 Minimum: 1.09 0.14 Average: 1.29 0.16
<i>Vertigo moulinsiana</i> - Desmoulin`s whorl snail	Freshwater	Maximum: no critical loads available for this feature Minimum: no critical loads available for this feature	Maximum: 0.93 0.18 Minimum: 0.65 0.13 Average: 0.73 0.15
<i>Lutra lutra</i> - Otter	Freshwater	Maximum: no critical loads available for this feature Minimum: no critical loads available for this feature	Maximum: 0.93 0.18 Minimum: 0.65 0.13 Average: 0.73 0.15
<i>Anisus vorticulus</i> - Ramshorn snail	Freshwater	Maximum: no critical loads available for this feature Minimum: no critical loads available for this feature	Maximum: 0.93 0.18 Minimum: 0.65 0.13 Average: 0.73 0.15

9.4.8 APIS indicates that there would be no expected negative impact from increased nitrogen deposition on species broad habitat types for all qualifying features of the SPA, with the exception of Great bittern and Eurasian marsh harrier when using fen, marsh and swap habitat for reproducing and Eurasian wigeon when using littoral sediment for wintering activity. For species using open standing water habitat type, the impact of nitrogen deposition will be dependent on whether the water body is nitrogen or phosphorus limited.

Table 9.3: Nitrogen Critical Load Information for Broadlands SPA qualifying features broad habitat types⁸²

Broad Habitat Types for SPA Qualifying Features	Qualifying Features	Critical Load (N) kg/ha/yr	Current levels of deposition Kg/ha/yr	Source Attribution Data (local contributions)
Dwarf shrub heath	Hen harrier	10-20	Maximum: 24.8 Minimum: 15.6 Average: 17.8	Livestock: 34.5% Fertiliser Application: 19.2% Others: 10.6% Other Transport: 10% Europe Import: 9.55% Road Transport: 7.66% Non-agricultural non abatable: 5.07% Non-agricultural abatable: 3.28%
Fen, marsh and swamp	Hen harrier Great bitter Eurasian marsh harrier	15-30	Maximum: 24.8 Minimum: 15.6 Average: 17.8	
Littoral sediment	Hen harrier Eurasian wigeon Ruff	20-30	Maximum: 24.8 Minimum: 15.6 Average: 17.8	
Standing open water and canals	Eurasian wigeon Tundra swan Whooper swan Gadwall Northern shoveler	No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often P limited	Maximum: 12.9 Minimum: 9.5 Average: 10.2	
Neutral grassland	Ruff	20-30	Maximum: 24.8 Minimum: 15.6 Average: 17.8	

⁸² Table only includes broad habitats which are sensitive to nitrogen.

9.4.9 APIS indicates there would be no expected negative impact from increased acid deposition on the species broad habitat types for all SPA qualifying features.

Table 9.4: Acid deposition Information for Broadlands SPA qualifying features broad habitat types⁸³

Broad Habitat Types for SPA Qualifying Features	Qualifying Features	Acidity Critical Load keq/ha/yr	Current levels of deposition Nitrogen Sulphur (keq/ha/yr):
Neutral grassland – acid grassland	Ruff	MinCLminN: 0.223 MaxCLminN: 0.438 MinCLMaxS: 0.176 MaxCLMaxS: 4.13 MinCLMaxN: 0.542 MaxCLMaxN: 4.568	Maximum: 1.8 0.2 Minimum: 1.1 0.1 Average: 1.3 0.2
Neutral grassland – calcareous grassland	Ruff	MinCLminN: 0.856 MaxCLminN: 1.071 MinCLMaxS: 4 MaxCLMaxS: 4 MinCLMaxN: 4.856 MaxCLMaxN: 5.071	Maximum: 1.8 0.2 Minimum: 1.1 0.1 Average: 1.3 0.2
Dwarf shrub heath	Hen harrier	MinCLminN: 0.499 MaxCLminN: 1.035 MinCLMaxS: 0.176 MaxCLMaxS: 4.13 MinCLMaxN: 0.837 MaxCLMaxN: 5.165	Maximum: 1.8 0.2 Minimum: 1.1 0.1 Average: 1.3 0.2
Standing open water and canals	Tundra swan Whooper swan Eurasian wigeon Gadwall Northern shoveler	MinCLminN: 0 MaxCLminN: 0 MinCLMaxS: 0 MaxCLMaxS: 0 MinCLMaxN: 0 MaxCLMaxN: 0	Maximum: 0.9 0.2 Minimum: 0.7 0.1 Average: 0.7 0.2

9.4.10 Source attribution data for nitrogen indicates that the farming sector (agriculture and livestock) represent the largest contribution to emissions, together over 50% of all contributions. This suggests that the SAC is located within an agricultural ‘hotspot’. It is clear from this data that steps to avoid critical load exceedance and restore the site to ‘at or below’ critical loads, will require action to reduce emissions from existing agricultural sources as a priority. CIEEM’s guidance notes that where ‘road transport makes only a small contribution to the critical load exceedance, investment to encourage cleaner car technology may be sufficient to regard a new proposal which leads to a small increase in traffic on local roads as acceptable’.

⁸³ Table only includes broad habitats which are sensitive to acidity.

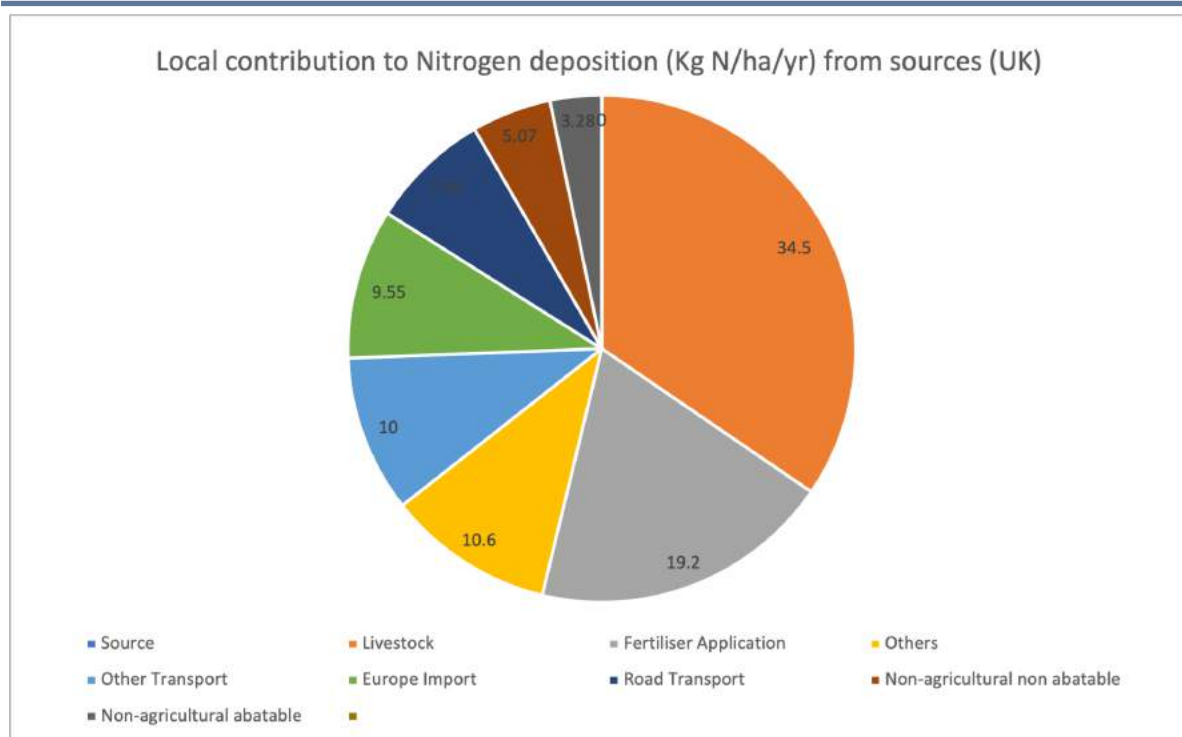


Figure 9.1: Local contributions to source attribution data obtained from APIS for the The Broads SAC and Broadland SPA⁸⁴

- 9.4.11 As noted on APIS, CIEEM’s air quality guidance also states that freshwater systems are often phosphorus, rather than nitrogen, limited. This requires careful consideration of the availability from sources such as wastewater treatment works. This is considered in more detail in the water appropriate assessment at **Chapter 10**.
- 9.4.12 A review of background air quality trends provided on APIS⁸⁵ indicates that there was an overall small decrease in nitrogen and acid deposition, at the SAC and SPA between 2005 and 2018. This may be attributed to national initiatives such as improvements in vehicle technologies (new standard Euro 6/VI vehicles) and implementation of other catchment wide initiatives.
- 9.4.13 The conservation objectives for the SAC and SPA in relation to air quality is that the integrity of the site is to maintain as necessary, the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the APIS.
- 9.4.14 A review of source attribution data indicates that the key issue to ensure conservation objectives are achieved in relation to air quality, will be a strategic approach taken towards agricultural emissions.

⁸⁴ <http://www.apis.ac.uk/app> [Date Accessed: 14/04/22]

⁸⁵ <http://www.apis.ac.uk/app> [Date Accessed: 14/04/22]

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- 9.4.15 Strategic road links within 200m of the SAC and SPA include the A416, A47, A1064, A149, B1150. The impact of development to be set out in the Local Plan for the Broads and promotion of the Broads as a tourism destination on traffic flows on these road links is not known at this stage in the Plan making process. Given the sensitivity of the SAC and SPA's qualifying features to changes in air quality, this impact will be further investigated within the HRA process at lower tier plan making levels, notably and HRA of the Local Plan for the Broads and the Sustainable Tourism Strategy. Consideration will also be given to effects upon areas of functionally linked land / water bodies and in-combination effects on air quality when considered with growth promoted in neighbouring LPA areas (see **Appendix A**).
- 9.4.16 As noted at **Section 9.3**, the Broads Plan and guiding strategies incorporate measures for sustainable transport and a requirement to encourage modal shift.
- 9.4.17 Taking into consideration the small contribution of traffic sources to baseline nitrogen and acidity levels, decreasing pollution trends, the positive contribution of policies in the Broads Plan, guiding strategies and other plans, lower tier plan requirements to undertake HRA and consider air quality implications once details on allocations (location and scale) is known, it is considered that there will be no adverse impact on site integrity at the SAC or SPA from the Broads Plan (either alone or in-combination) due to changes in air quality. It is noted that the key management issue at the SAC in terms of nitrogen and acid deposition is associated with management of agricultural sources.
- 9.4.18 It is recognised that the notified Ramsar features for the Broadland Ramsar are the same as the qualifying features of the SAC and SPA and the appropriate assessment above therefore also applies to the Broadland Ramsar designation.

10 Appropriate Assessment – Hydrology

10.1 Introduction

10.1.1 The HRA screening process (**Appendix D**) concluded that the following components of the Broads Plan have the potential to result in LSEs at a number of Habitats sites as a result of hydrology (changes in water quality or water resources / levels):

- A1: Prepare a long-term, integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area.
- B1: Restore, maintain and enhance **lakes** and use monitoring evidence to trial and implement further innovative **lake** restoration techniques.
- B2: Promote best practice water capture and usage across the Broadland rivers catchment and reduce point and diffuse pollution into the floodplain and water courses.
- 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 and 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.
- E1. Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities.
- E2. Offer a coordinated and year-round programme of visitor activities that promote a 'Broads' experience', taking measures to prevent any adverse environmental impacts.
- E3. Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities of the Broads National Park, and 'point of need' information for visitors.
- F1: Increase and promote of accessible and 'taster' activities that foster physical and mental health and wellbeing for all, including under-represented groups.
- F4. Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits.

10.1.2 These strategic objectives relate to the promotion of the Broads as a tourist destination, waterways management and its land use planning function.

10.1.3 On the basis of the screening exercise (**Appendix D**), Habitats sites which were screened in and will be considered in this Appropriate Assessment in terms of hydrology impacts include:

- The Broads SAC;
- Broadland SPA;
- Broadland Ramsar;

- Breydon Water SPA; and
- Breydon Water Ramsar.

10.1.4 The following Appropriate Assessment focuses on assessing more precisely the ecological impacts of hydrology changes at each Habitats site in view of their qualifying features and conservation objectives taking into account baseline information.

10.2 Water quality, water resources and water levels

10.2.1 As noted in **Section 6.4** increased urban growth, waterways management and increased water-based tourism, can lead to a deterioration of water quality and a change in water levels and flows at water sensitive Habitats sites.

10.2.2 Waterways management (in particular the process of dredging) has the potential to change tidal and flood water levels in open water bodies, marshes and fens and increase saline penetration. Urban development can reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to Habitats sites or watercourses which run through them. Water mains leakage and sewer infiltration may also affect the water balance. Increased development may also increase pressures upon water resources for supply.

10.2.3 Water quality can change through either polluted surface water run-off due to urban development, release of toxic and non-toxic contamination due to waterways management and recreational activities and increased discharges from WWTWs.

10.3 Mitigation

10.3.1 The Broads Plan itself and other Broads Authority strategic plans and guiding strategies set out a series of measures which will have a positive impact and contribute towards the mitigation of hydrology impacts at Habitats sites. The Appropriate Assessment in respect of water therefore takes these into consideration.

- The Broads Plan. Strategic Objective B2 aims to promote best practice water capture and usage across the Broadland Rivers catchment and reduce pollution. It also aims to adopt and implement objectives set out in other water-based plans (as detailed below and set out in **Appendix A**). Section 1.3 sets out the requirement for all lower tier plans and projects (required to implement the strategic objectives in the Broads Plan) to be undertaken in a manner that is sensitive to the environment. It notes that works will also need to comply with relevant permits and controls to ensure environmental protection on Habitats Sites, and where relevant, such plans, programmes and works will be subject to HRA. Theme F sets out Natural England's guidance received on the requirement for new development to achieve nutrient neutrality.
- Broadland Rivers Catchment Plan. This plan aims to reduce run-off of contaminants, soil and nutrients from entering the Broadland Rivers catchment. It also aims to increase water capture and manage water efficiency within the catchment.

- The Norfolk Water Strategy Programme. This Programme aims to look at the significant pressures on water resources in the eastern area and address the effects of climate change.
 - The Waterways Management Strategy (WMS). Whilst the WMS will act in combination with the Broads Plan to create water pathways of impact at Habitats sites, it also sets out a series of protective policies and mechanism within which work will take place to ensure water quality and water levels are protected. In particular it sets out the requirement for lower tier plan and project HRA. The WMS, as set out in Section 1.3 of the Broads Plan, will be subject to HRA.
- 10.3.2 A statutory plan and policy framework protects water quality and water resources across the UK. A review of these plans is presented in detail at **Appendix A** and discussed below. This strategic planning framework is subject to HRA to ensure compliance with the Habitats Regulations.
- 10.3.3 The Plan area lies within the Anglian River management basin and within the Broadland Rivers surface water management catchment area. The upper reaches of the Broadland Rivers' management catchment include the River Wensum and the River Waveney. The River Wensum is a calcareous groundwater dominated river which originates in northwest Norfolk, flowing in a south easterly direction before joining the River Yare to the south east of Norwich. Further down the catchment the land is mostly at or below sea level and forms an area of slow-flowing rivers and interconnected lakes and wetlands. These lower reaches are affected by tidal surges from the North Sea as well as upstream inputs. The Broadland Rivers management catchment is further divided into four operational management catchments associated with the River Bure, River Waveney, River Wensum and River Yare⁸⁶.
- 10.3.4 The Water Framework Directive (WFD) provides an indication of the health of the water environment and whether a water body is at good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve good ecological status or potential, good chemical status or good groundwater status every single element assessed must be at good status or better. If one element is below its threshold for good status, then the whole water body's status is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status.
- 10.3.5 The WFD sets out areas which require special protection. These include areas (Habitats sites) designated for "*the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in their protection including relevant Natura 2000 sites designated under Directive 92/43/EEC (the Habitats Directive) and Directive 79/409/EEC (the Birds Directive)*"⁸⁷.

⁸⁶ Environment Agency. Catchment Data Explorer. <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/5> [Date Accessed: 10/04/22]

⁸⁷ Official Journal of the European Communities (2000) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC_1&format=PDF [Date Accessed: 19/04/22]

- 10.3.6 Anglian Water and Essex & Suffolk Water are the potable water provider for the Broads catchment. The East of England is one of the driest regions of the UK with the Anglian region being classed by the Environment Agency as being under serious water stress⁸⁸. Water companies divide their supply into Water Resource Zones (WRZs). The plan area lies within the Broads WRZ.
- 10.3.7 It is a statutory requirement that every five years water companies produce and publish a Water Resources Management Plan (WRMP). A WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty in order to balance supply and demand. Anglian Water's WRMP⁸⁹ and Essex & Suffolk Water WRMP⁹⁰ set out a series of measures to ensure the water supply - demand balance is achieved whilst taking into consideration environmental water requirements. This includes measures such as smart metering, leakage reduction, water efficiency, strategic water planning / transfers. Following application of these measures the WRMPs conclude that adequate water supplies will be available up to the end of the plan periods and will cater for proposed levels of growth in the region.
- 10.3.8 An HRA was undertaken alongside the preparation of the Anglian Water WRMP⁹¹. This concluded there would be no adverse effects on the integrity of any Habitats site but highlighted the importance of lower tier project-level HRA of future plans, projects, or permissions which may act in-combination with WRMP options to refine mitigation strategies and assessment conclusions once appropriate detailed design is available. At the time of writing an HRA was not publicly available for the Essex & Suffolk Water WRMP.
- 10.3.9 The plan area falls within the Broadland Catchment Abstraction Management Area (CAMS)⁹². This indicates that all rivers are defined as having restricted or no water available for licensing during periods of low flow.
- 10.3.10 Wastewater treatment in the Plan area is provided via wastewater recycling centres (WRCs) operated and maintained by Anglian Water Services (AWS). Treated wastewater is ultimately discharged to nearby water bodies. Each WRC is connected to development by a network of wastewater pipes (the sewerage system) which collects wastewater generated by homes and businesses to the WRC. The Environment Agency control discharges to WRC through issue of permits.

⁸⁸ Environment Agency. Areas of water stress: final classification. Available at: <https://www.iow.gov.uk/azservices/documents/2782-FE1-Areas-of-Water-Stress.pdf> [Date Accessed: 19/04/22].

⁸⁹ Anglian Water. 2019. Water Resources Management Plan 2019. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>. [Date Accessed: 19/04/22]

⁹⁰ Essex & Suffolk Water. August 2019. Final Water Resources Management Plan 2019. A Summary. Available at: <https://www.nwg.co.uk/responsibility/environment/wrmp/current-wrmp-2015-2020/> [Date Accessed: 28/04/22]

⁹¹ Mott McDonald. 2019. Anglian Water - Water Resources Management Plan Habitats Regulations Assessment Task II: Appropriate Assessment Final for Publication.

⁹² Environment Agency. May 2017. Broadland Abstraction Licensing Strategy.

- 10.3.11 The current Anglian River Basin Management Plan (RBMP)⁹³ provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. It provides strategic level policy guidance in relation to baseline classification of water bodies, statutory objectives for protected areas and water bodies and a summary of measures to achieve statutory protection. Draft RBMPs have been prepared and are out for consultation at the time of writing⁹⁴.
- 10.3.12 The current Anglian RBMP outlines a number of measures to tackle water management issues and achieve a series of environmental objectives set out within the plan. Local measures are set out on a catchment basis. The Plan area sits within the Broadland Rivers management catchment area. Within this catchment the priority river basin management issues include tackling diffuse pollution from rural areas, physical modification of rivers and lakes, and pollution from wastewater. An HRA was undertaken alongside the preparation of the current RBMP⁹⁵. This HRA concluded that, at the strategic plan level, and given the range of potential mitigation options available, the RBMP is not likely to have any significant effects on any Habitats sites, alone or in combination with other plans or projects. It notes the requirement for project level HRA where necessary for lower tier plans.

10.4 Assessment of impacts

- 10.4.1 The Broads SAC, Broadland SPA, Broadlands Ramsar, Breydon Water SPA and Breydon Water Ramsar are all situated within the Broadland Rivers catchment management area⁹⁶ and are hydrologically connected to the Plan area. They form a network of naturally nutrient-rich lakes which were artificially created through peat extraction in medieval times, with Breydon Water forming an inland tidal estuary in the lower reaches of the River Yare and River Waveney. This network supports a range of water dependent habitats and species unique to the local area. Any change in water levels, flows or water quality has the potential to have direct and indirect effects on the qualifying features, such as direct damage to habitat and change in food resource availability.

⁹³ Environment Agency (2015) Anglian River Basin Management Plan. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf [Date Accessed: 19/04/22]

⁹⁴ <https://www.gov.uk/government/collections/draft-river-basin-management-plans-2021#anglian-rbd> [Date Accessed: 19/04/22]

⁹⁵ Environment Agency (2015). River basin management plan for the Anglian River Basin District Habitats Regulations Assessment Updated December 2015. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496430/RBMP_HRA_Anglian_FINAL_Jan_2016.pdf [Date Accessed 19/04/22]

⁹⁶ <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/5>

- 10.4.2 In terms of water quality, Natural England's Supplementary Advice notes that the target for the qualifying features is to '*maintain and where necessary restore water quality*'. DLUHC and Natural England's recent advice on nutrient loadings in the catchment of the SAC and Broadland Ramsar will apply to ensure that the conservation status of these designations is maintained and restored (**Section 6**). In relation to water levels and flows, the Supplementary Advice notes that the target is to '*maintain natural hydrological processes to provide the conditions necessary to sustain the feature within the site*'. In relation to sediment loading, the Supplementary Advice notes that the target is to '*maintain and where necessary restore the natural sediment load*'⁹⁷.
- 10.4.3 In relation to water quality and quantity Natural England's Supplementary advice for the Broadland SPA notes that where the supporting habitats of the SPA feature are dependent on surface water, *the target is to maintain and / or restore water quality and quantity to a standard which provides the necessary conditions to support the qualifying features of Broadland SPA in terms of their habitat requirements*⁹⁸.
- 10.4.4 Sediment management for navigation in the Broads is currently set out in the Sediment Management Strategy. This strategy sets out known issues and principles for addressing the task of sediment management⁹⁹. The WMS will replace the Sediment Management Strategy and provide a framework and action plan for sustainable and cost-effective management of the Broads navigable waterways from 2022/23 to 2026/27. The WMS will contain a set of guiding principles to determine where and how operational activities will be carried out. The WMS will be subject to HRA. In addition, lower tiered plans and projects which stem from the WMS, will be subject to HRA as a matter of law and Government policy (as noted at Section 1.3 of the Broads Plan). All HRA work will need to take into consideration impacts upon functionally linked water bodies and also the in-combination impact upon the water environment. The WMS outlines a range of mitigation options which must be applied to lower tier plans and / or project level HRA to provide certainty that adverse effects will not occur. These include Broads Authority Environmental Standard Operating Procedures (as noted under Theme C of the Broads Plan). Such measures give confidence that there are options available at the lower tier plan / project stage to adequately mitigate any potential adverse impacts, notwithstanding the fact that lower tier HRA will still be required.

⁹⁷ Natural England (2019) The Broads SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/6067900213624832> [Date Accessed 20/04/22]

⁹⁸ Natural England (2019) Broadland SPA Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/publication/5310905998901248> [Date Accessed 20/04/22]

⁹⁹ Broads Authority. 2010. Sediment Management Strategy Action Plan 2010/11.

- 10.4.5 Development planning is managed in the Broads through the Local Plan for the Broads which sets out planning policy and allocations for the local area. The current Local Plan for the Broads¹⁰⁰ provides a policy framework to protect water quality, ensure adequate sewage treatment provision is in place, control boat wash down facilities and surface water run-off, promote water efficiency and incorporate sustainable drainage (SuDS) (Policy DM2: Water quality and foul drainage, Policy DM3: Boar wash-down facilities, DM4: Water efficiency, Policy SP2: Strategic flood risk policy and DM6: Surface water run-off). This plan was subject to HRA¹⁰¹. The Broads Authority is in the process of reviewing the Local Plan for the Broads and undertaking an accompanying HRA, which will need to take into consideration impacts upon functionally linked water bodies and also the in-combination impact upon the water environment. This HRA will also need to have regard to advice from the Chief Planning Officer from DLUHC and Natural England on the importance of nutrient impacts at The Broads SAC and Broadlands Ramsar and requirements around nutrient neutrality. It will also be necessary for the Broads Authority to liaise with Anglian Water and the Environment Agency as the Local Plan for the Broads is finalised and development progressed, to ensure that adequate water supply is available, and levels are maintained at water sensitive designated sites.
- 10.4.6 In addition, the wider strategic water planning and policy framework discussed in **Section 10.3**, will provide protective mechanisms for the water environment in terms of water quality, water resources and water levels.
- 10.4.7 When taking into consideration this protective high level land use and water planning framework, and the requirement for HRA of lower tiered plans and projects, it is considered that the Broads Plan will have no adverse impact upon the integrity of any Habitats site either alone or in-combination.

¹⁰⁰ Broads Authority. 2019. Local Plan for the Broads 2015 – 2036. Available at: https://www.broads-authority.gov.uk/data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf [Date Accessed: 19/04/22]

¹⁰¹ : Liley, D., Hoskin, R., Lake, S. and Panter, C. 2019. Habitats Regulations Assessment of the Local Plan for the Broads at Modifications stage. Unpublished report by Footprint Ecology

11 Appropriate Assessment – Public Access and Disturbance

11.1 Introduction

11.1.1 The HRA screening process (**Appendix D**) concluded that the following plan components have the potential to result in LSEs at a number of Habitats sites as a result of public access and disturbance impacts:

- E1. Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities.
- E2. Offer a coordinated and year-round programme of visitor activities that promote a ‘Broads’ experience’, taking measures to prevent any adverse environmental impacts.
- E3. Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities of the Broads National Park, and ‘point of need’ information for visitors.
- F1: Increase and promote of accessible and ‘taster’ activities that foster physical and mental health and wellbeing for all, including under-represented groups.
- F4. Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits.

11.1.2 These strategic objectives relate to the promotion of the Broads as a tourism destination and its land use planning function.

11.1.3 On the basis of the screening exercise (**Appendix D**), Habitats sites which were screened in and will be considered in this Appropriate Assessment in terms of public access and disturbance impacts include:

- The Broads SAC;
- Broadland SPA;
- Broadland Ramsar;
- Breydon Water SPA;
- Breydon Ramsar;
- Breckland SPA;
- Breckland SAC;
- Winterton-Horsey Dunes SAC;
- Great Yarmouth and North Denes SPA;
- North Norfolk Coast SAC;
- North Norfolk Coast SPA;
- North Norfolk Coast Ramsar;
- The Wash and North Norfolk Coast SAC;
- Roydon and Dersingham Bog SAC;
- Roydon and Dersingham Bog Ramsar;
- Norfolk Valley Fens SAC;

- The Wash SPA;
- The Wash Ramsar; and
- Benacre to Easton Bavents SPA.

11.1.4 The following Appropriate Assessment focuses on assessing more precisely the ecological impacts of public access and disturbance impacts at each Habitats site in view of their qualifying features and conservation objectives.

11.2 Public access and disturbance

11.2.1 The Broads Plan indicates that more than eight million people a year visit the Broads National Park for recreational activities¹⁰². These visitors are attracted by the inland waterways, coast and other recreational offerings in the area.

11.2.2 The Broads Plan indicates that in 2021 there were 12,639 craft licenced to use the Broads with the majority being privately owned but a large number also registered to the boat hire industry. Other popular recreational activities set out in the Broads Plan include angling, walking, cycling, horse riding, visiting local sites of interest and the draw of local wildlife interest.

11.2.3 Promotion of the Broads as a tourist destination and increased development have the potential to result in public access and disturbance pressures at Habitats sites, which can take the form of urbanisation and / or recreational impacts (as discussed in **Sections 6.6 to 6.7**).

11.3 Mitigation

11.3.1 The Broads Plan itself and other Broads Authority strategic plans and guiding strategies set out a series of measures which will have a positive impact and contribute towards the mitigation of public access and disturbance impacts at Habitats sites. The Appropriate Assessment in respect of public access and disturbance therefore takes these into consideration.

- The Broads Plan. Strategic Objective E2 aims to create and promote year-round high quality / low environmental impact 'experiential' itineraries. Strategic Objective E3 aims to provide information and other resources to encourage environmentally aware and responsible visitor behaviour which includes access to protected habitats. Strategic Objective E4 aims to implement measures to assess and guide quality and environmental sustainability standards. Strategic Objective F4 promotes the implementation of the Green Infrastructure and Recreational Disturbance Avoidance Mitigation Strategies to extend and protect biodiversity value of sites.
- The Sustainable Tourism Strategy. This strategy sets out the overall strategic direction for tourism in the Broads and is written to be in line with the requirements of the European Charter for Sustainable Tourism in Protected areas, which requires there to be a sustainable tourism strategy and action plan for the protected areas. This strategy is currently under review. The current

¹⁰² STEAM data for Broads and area of influence

strategy, Sustainable Tourism in the Broads, has an overall aim to prevent negative impacts of tourism on the environment.

- 11.3.2 Recreational mitigation strategies (as outlined in **Section 6.6**) provide a package of mitigation measures to address alone and in-combination impacts of development (tourism and residential) on the Norfolk and Suffolk network of Habitats sites. This mitigation package will be taken into consideration in preparation of the Local Plan for the Broads and includes GIRAMS for the Norfolk Habitats sites and the RAMS to address recreational pressure at Habitats sites within Suffolk. This package of mitigation will be considered in the HRA which will be prepared to support the Local Plan for the Broads.
- 11.3.3 The HRA of the Local Plan for the Broads will also need to take into consideration the proximity of development to Habitats sites in terms of urbanisation impacts (outlined in **Section 6.7**). Urbanisation effects have the potential to impact upon both designated sites and parcels of functionally linked land and / or water bodies. As noted in **Section 6.7** urbanisation effects often occur within 400/500m of a Habitats site. Potential operational and construction related noise, visual and lighting will need to be addressed. Mitigation options may include the incorporation of screens, bunds, fencing, directional lighting, and low noise emitting equipment among other solutions. Further details on the nature of mitigation required will be better understood when the HRA of the Local Plan for the Broads is prepared. Given there are widely used techniques available to mitigate urbanisation impacts, there is no uncertainty over the deliverability of these allocations. This approach is compliant with case law which requires the Competent Authority to be satisfied that mitigation solutions can be achieved in practice^{103,104}, whilst recognising the multi-staged planning and approval procedural approach to plan making¹⁰⁵.
- 11.3.4 The Broads Plan recognises the value of the National Park to tourism and aims to promote this in suitable locations in harmony with the special status and qualities of the area. It promotes regenerative tourism – which goes beyond sustainable tourism to contribute to the regeneration of the places and communities in which it operates. This will be captured in the Sustainable Tourism Strategy which is currently under review and will be subject to plan level HRA (as set out in Section 1.3 of the Broads Plan). The current Tourism Strategy¹⁰⁶ focuses on sustainable activity, with connected benefits for local communities and conservation. Its main aims are to raise awareness of this unique wetland, strengthen the tourism offer and manage the flow of visitors around the Broads, encouraging exploration and environmental awareness. The Broads Plan aims to promote more clearly the special qualities of the National Park and encourage visitors to value and care for it.

¹⁰³ Ltd (NANT Ltd) v Suffolk Coastal District Council, Court of Appeal, 17 February 2015. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Core-Strategy-and-DMP/No-Adastral-New-Town-Ltd-v-SCDC.pdf> [Date Accessed: 20/04/22]

¹⁰⁴ Opinion of Advocate General Kokott delivered on 9 June 2005. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland. Failure of a Member State to fulfil obligations - Directive 92/43/EEC - Conservation of natural habitats - Wild fauna and flora. Case C-6/04. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62004CC0006> [Date Accessed: 20/04/22].

¹⁰⁵ R (o a o Devon Wildlife Trust) v. Teignbridge DC [2015] EWHC 2159 (Admin). 28 July 2015. Available at: <https://www.casemine.com/judgement/uk/5a8ff76460d03e7f57eac083> [Date Accessed: 20/04/22]

¹⁰⁶ The Tourism Company. 2016. Sustainable Tourism in the Broads. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0023/226247/Sustainable-Tourism-in-the-Broads-2016-20-May-2016.pdf [Date Accessed: 22/03/22]

11.3.5 The Broads Authority already promotes environmentally friendly boating options within the Broads¹⁰⁷. This includes low wash hulls, guidance on maintaining water quality (from detergents and anti-fouling paints), the Green Boat Mark which is an eco-accreditation scheme for motor cruisers and the promotion of electric day boats and charging points. In addition, there are codes of conduct for most waterway activities available on the Broads Authority website¹⁰⁸.

11.4 Assessment of impacts

11.4.1 Habitats sites within the recreational ZoI have the potential to be adversely impacted by the promotion of the Broads as a tourism destination, promotion of the waterways for navigation and increased residential development alone and in-combination with neighbouring LPA development.

11.4.2 These pressures are noted in the SIPs and Supplementary advice for the network of Habitats sites within Norfolk and Suffolk (**Appendix B**). Threats include increased recreational pressures and urbanisation which may have direct impacts upon qualifying features and also indirect impacts upon areas of functionally linked land and / or water bodies.

11.4.3 The current Tourism Strategy aims are to raise awareness of the environmental sensitivities of the Broads. This plan is currently under review and will be subject to HRA (as set out at Section 1.3 of the Broads Plan) which will assess the impact of the next strategy in more detail.

11.4.4 The Local Plan for the Broads review will take into consideration mitigation strategies (Norfolk GIRAMS and Suffolk RAMS) to address alone and in-combination recreational impacts upon the network of Habitats site across Suffolk and Norfolk. This plan will also be subject to an HRA.

11.4.5 The Broads Plan itself provides a protective framework of policy wording which seeks to protect the environmental from public access and disturbance threats and pressures (as set out in **Section 11.3**).

11.4.6 When taking into consideration this protective planning framework, strategic recreational mitigation strategies and the requirement for HRA of lower tiered plans and projects, it is considered that the Broads Plan will have no adverse impact upon the integrity of any Habitats site either alone or in-combination.

¹⁰⁷ Available at: <https://www.broads-authority.gov.uk/boating/owning-a-boat/environmentally-friendly-boating> [Date Accessed: 27/04/22]

¹⁰⁸ Available at: <https://www.broads-authority.gov.uk/boating/navigating-the-broads> [Date Accessed: 27/04/22]

12 Conclusions

12.1 Summary

12.1.1 The Broads Plan is not directly connected with or necessary to the management of any Habitats site. A screening assessment was therefore undertaken which identified a number of likely significant effects associated with implementation of management techniques set out in the Broads Plan. Taking no account of mitigation measures these had the potential to affect the following Habitats sites:

- The Broads SAC;
- Broadlands SPA;
- Broadlands Ramsar;
- Breydon Water SPA;
- Breydon Water Ramsar;
- Outer Thames Estuary SPA;
- Great Yarmouth North Denes SPA;
- Winterton-Horsey Dunes SAC;
- Southern North Sea SAC;
- Greater Wash SPA;
- Benacre to Easton Bavents SPA;
- Norfolk Valley Fens SAC;
- The Wash and North Norfolk Coast SAC;
- North Norfolk Coast SAC;
- North Norfolk Coast SPA; and
- North Norfolk Coast Ramsar.

12.1.2 The HRA therefore progressed to an Appropriate Assessment which looked at the impacts of a change in air quality, hydrology and public access and disturbance effects upon the qualifying features and conservation objectives of each Habitats site. The assessment also looked at impacts upon functionally linked land and water bodies.

12.1.3 The appropriate assessment has drawn on the Precautionary Principle to identify a number of potential threats and pressures that might be exacerbated by proposals in the plan. Turning to mitigation considerations, the appropriate assessment has taken into consideration the hierarchical nature of plan making i.e. the requirement for HRA at lower tiered stages of the plan making process and project application stage. A number of existing protection measures are set out in high level strategic policy frameworks and strategic mitigation strategies that serve to help overcome the identified potential adverse effects. Local protective policy frameworks such as the Broads Authorities Environmental Standard Operating Procedures and codes of conduct are also relevant and apply to project level work within the Broads (as set out in Section 1.3 of the Broads Plan). The HRA made a series of recommendations during the development of the Broads Plan aimed at strengthening the plan's wording to ensure adequate policy protection is provided. Recommendations which have been included as a result of the HRA in the Broads Plan are summarised in **Box 4**.

Box 4: Overview of Recommendations

- Wording to note that work / projects within the administrative area will be undertaken in a manner which is sensitive to the environment and complies with relevant permits and controls (Section 1.3 of the Broads Plan).
- Wording which sets out the requirement for lower tier plan and project level HRA, such as that required for the WMS and Sustainable Tourism Strategy (Section 1.3 of the Broads Plan).
- Reference to Natural England and DLUHC advice on neutrality requirements (Theme F).
- Reference to Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (Theme F).

12.1.4 Following adoption of these recommendations and consideration of the hierarchical nature of plan making, the HRA concluded that the Broads Plan would have no adverse impact on site integrity at any Habitats site either alone or in-combination.

12.2 Next Steps

12.2.1 The purpose of this report is to inform the Broads Plan using best available information.

12.2.2 The Broads Authority, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions set out in this report.

12.2.3 This report will be submitted to Natural England, the statutory nature conservation body, for formal consultation. The Authority must 'have regard' to their representations under the provisions of Regulations 63(3) and 105(2) prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

Appendix A: In-combination plans and projects

Plan / Project Name	Background and potential in-combination impact pathways
<p>Anglian River Basin District Draft Flood Risk Management Plan 2021 - 2027¹</p>	<p>The draft second cycle FRMP aims to manage significant flood risks in designated Flood Risk Areas (FRAs) within the Anglian River Basin District (RBD). The draft version of the plan has been subject to recent consultation.</p> <p>The FRMP focuses on the more significant areas of flooding and describe the risk of flooding now and in the future. These plans will help the EA to:</p> <ul style="list-style-type: none"> • identify actions that will reduce the likelihood and consequences of flooding • update plans to improve resilience whilst informing the delivery of existing flood programmes • work in partnership to explore wider resilience measures, including nature-based solutions for flood and water • set longer-term, adaptive approaches to help improve the nation’s resilience <p>The measures set out in the FRMP will be displayed on an online map-based tool called flood plan explorer. This will show what flood risk management measures are proposed at a national and local scale and how they are progressing.</p> <p>The Broadland Rivers management catchment is looked at specifically in the draft FRMP. It notes that the area is at risk of flooding from both rivers and the sea. It notes that approx. 78% of SSSIs and 94% of Ramsar sites are at risk of flooding from rivers and the sea. It also notes that 11% of SSSIs and more than 7% of Ramsar sites are at risk of flooding from surface water sources. It states that the main areas of flood risk remain the three urban areas of Norwich, Great Yarmouth and Lowestoft. Due to the low-lying nature of the Broads, climate change will increase the probability of tidal flooding and increase the length of time watercourses will not be able to flow freely to the sea at high tide, causing tide-locking. In addition, surface water outfalls will remain tide-locked for lengthier durations where these discharge to tidal rivers via flapvalved sluices, heightening the risks of surface water flooding during storm rainfall events.</p> <p>The FRMP will be subject to an HRA. The FRMP will act positively alongside the Broads Plan to protect and enhance the benefits provided by the water environment with no</p>

¹ Environment Agency (October 2021). Anglian River Basin District Draft Flood Risk Management Plan 2021 to 2027. Available at: https://consult.environment-agency.gov.uk/fcrm/draft-second-cycle-flood-risk-management-plans/supporting_documents/Anglian_FRMP_20212027WM.pdf [Date Accessed: 25/004/22]

Plan / Project Name	Background and potential in-combination impact pathways
<p>Anglian River Basin Management Plan²</p>	<p>The Anglian River Basin Management Plan (RBMP) provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. It provides strategic level policy guidance in relation to baseline classification of water bodies, statutory objectives for protected areas and water bodies and a summary of measures to achieve statutory protection.</p> <p>The Anglian RBMP outlines a number of measures to tackle water management issues and achieve a series of environmental objectives set out within the plan. Local measures are set out on a catchment basis. The Plan area sits within the Broadland Rivers management catchment area. Within this catchment the priority river basin management issues include tackling diffuse pollution from rural areas, physical modification of rivers and lakes, and pollution from wastewater.</p> <p>An HRA was undertaken alongside the preparation of the RBMP³. This HRA concluded that, at the strategic plan level, and given the range of potential mitigation options available, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects. It notes the requirement for project level HRA where necessary for lower tier plans.</p> <p>RBMPs are currently being reviewed and updated. The revised RBMP will be subject to HRA.</p>
<p>Anglian Water - Water Resource Management Plan⁴</p>	<p>Anglian Water is the sole public sewerage provider in the catchment and also provides public drinking water supply to much of the catchment's population.</p> <p>It is a statutory requirement that every five years water companies produce and publish a Water Resources Management Plan (WRMP). The WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty in order to balance supply and demand. Anglian Water's WRMP, which covers the period to 2045, sets out a series of measures to ensure the water supply - demand balance is achieved. This includes measures such as smart metering, leakage reduction, water efficiency, strategic water planning / transfers.</p> <p>An HRA was undertaken alongside the preparation of the WRMP⁵. This concluded there would be no adverse effects on the integrity of any European site but highlighted the importance of lower tier project-level HRA of future plans, projects, or permissions which may act in-combination with WRMP options to refine mitigation strategies and assessment conclusions once appropriate detailed design is available.</p> <p>This plan will act positively alongside the Broads Plan to protect the water environment with no new pathways of impact being introduced.</p>

² Environment Agency (2015). Water for life and livelihoods. Part 1 Anglian River Basin District River Basin Management Plan. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf [Date Accessed 22/03/22]

³ Environment Agency (2015). River basin management plan for the Anglian River Basin District Habitats Regulations Assessment Updated December 2015. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496430/RBMP_HRA_Anglian_FINAL_Jan_2016.pdf [Date Accessed: 22/03/22]

⁴ Anglian Water. 2019. Water Resources Management Plan 2019. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>. [Date Accessed: 22/03/22]

⁵ Mott McDonald. 2019. Anglian Water - Water Resources Management Plan Habitats Regulations Assessment Task II: Appropriate Assessment Final for Publication.

Plan / Project Name	Background and potential in-combination impact pathways
Essex & Suffolk Water WRMP ⁶	<p>Essex & Suffolk provides public drinking water supply to parts of Norfolk and Suffolk in the east of the catchment.</p> <p>Essex & Suffolk was prepared in 2019 and sets out long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty in order to balance supply and demand. The Essex & Suffolk WRMP, which covers the period to 2060, and aims to forecast the demand for water in the future and consider this against the water that will be available. Decisions are then made to address any areas where there are shortfalls in supply. It provides an assessment of climate change on supply and provides actions to improve the environment on a five yearly basis in line with national requirements. It also looks at delivering innovative and effective water efficiency schemes and reduce leakage over the plan period.</p> <p>An HRA was not publicly available on the WRMP website at the time of writing.</p> <p>This plan will act positively alongside the Broads Plan to protect the water environment with no new pathways of impact being introduced.</p>
Broads Biodiversity and Water Strategy ⁷	<p>The Broads Biodiversity and Water Strategy (BBWS) is produced by the Broads Authority. The BBWS focuses on working with partners on key projects led by other organisations working in the Broads. It helps to deliver work for habitat enhancement, creation and restoration in and around the Broads, with a focus on actions that create multiple benefits for biodiversity, water and people</p> <p>This plan will act positively alongside the Broads Plan to protect the natural environment with no new pathways of impact being introduced.</p>
Broadland Abstraction Licence Strategy ⁸	<p>The abstraction licence strategy sets out the EA's approach to managing new and existing abstraction and impoundment within the Broadland catchment in the Anglian river basin district. This strategy ensures sustainable use of water resources to prevent a deterioration in the ecology of rivers, wetlands and estuaries or depletion of groundwater resources and takes into consideration Habitats sites within the licence area.</p> <p>This plan will act positively alongside the Broads Plan to prevent over abstraction with no new pathways of impact being introduced.</p>
Broadland Flood Alleviation Project ⁹	<p>The Broadland Flood Alleviation Project aims to improve and maintain 240km of flood defences in the Norfolk Broads. This project has improved flood defences, maintenance and emergency response services in the tidal areas of the River Yare, River Bure and River Waveney.</p> <p>This plan will act positively alongside the Broads Plan to protect the area from flood risk whilst also safeguarding the natural environment with no new pathways of impact being introduced.</p>

⁶ Essex & Suffolk Water. August 2019. Final Water Resources Management Plan 2019. A Summary. Available at: <https://www.nwg.co.uk/responsibility/environment/wrmp/current-wrmp-2015-2020/> [Date Accessed: 28/04/22]

⁷ Broads Authority. Broads Biodiversity and Water Strategy 2019-2024. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0029/180965/broads-biodiversity-strategy-2019.pdf [Date Accessed: 05/04/22]

⁸ Environment Agency. May 2017. Broadland Abstraction Licensing Strategy.

⁹ Available at: <https://www.gov.uk/government/news/broadland-flood-alleviation-project-reaches-20-year-landmark> [Date Accessed: 25/04/22]

Plan / Project Name	Background and potential in-combination impact pathways
Broadland Rivers Catchment Plan ¹⁰	<p>The goals of the Broadland Rivers Catchment Plan area as follows:</p> <ol style="list-style-type: none"> 1. Land management to reduce run-off, and soil, nutrient and pesticide loss, and to link habitats and access 2. Waste water management to reduce nutrients in watercourses from public and private waste water 3. Water management to increase water capture and water efficiency 4. Flood risk management and sustainable drainage to reduce and slow run-off and increase aquifer recharge 5. River and floodplain management to increase connectivity, reduce fish barriers and control invasive species 6. Recreation and understanding to increase sustainable use of, and learning about, water and wetlands 7. Investment to increase, combine and attract funding for projects <p>This plan will act positively alongside the Broads Plan to reduce sediment input and maintain water quality with no new pathways of impact being introduced.</p>
Broads Futures Initiative ¹¹	<p>The Broadland Futures Initiative (BFI) is a partnership for future flood risk management in the Broadland area. Its main goal is to agree a framework for future flood risk management that better copes with the changing climate and rising sea level. The BFI is driven by a series of objectives to manage flooding including:</p> <ul style="list-style-type: none"> - Engagement and participation; - Built environment; - Cultural heritage and sense of place; - Integrated catchment management; - Healthy waters; - Climate adaption and mitigation; - Natural capital; - Economic viability and development; - Sustainable agriculture; and - Recreational, tourism and navigation. <p>This plan will act positively alongside the Broads Plan to protect the water and natural environment with no new pathways of impact being introduced.</p>
Broadland Catchment Abstraction Management Area ¹²	<p>The Plan area falls within the Broadland Catchment Abstraction Management Area (CAMS). This licensing strategy sets out how water resources are managed in the Broadland catchment. It provides information about where water is available for further abstraction. It also gives an indication of how reliable a new abstraction licence may be.</p> <p>This plan will act positively alongside the Broads Plan to prevent over abstraction from the water environment with no new pathways of impact being introduced.</p>

¹⁰ Broadland Catchment Partnership (2014). Broadland Rivers Catchment Plan. Available at: <https://broadlandcatchmentpartnership.org.uk/wp-content/uploads/2018/08/Catchment-Plan-website-final.pdf> [Date Accessed: 22/03/22]

¹¹ Available at: <https://www.broads-authority.gov.uk/looking-after/climate-change/broadland-futures-initiative> [Date Accessed: 05/04/22]

¹² Environment Agency. May 2017. Broadland Abstraction Licensing Strategy.

Plan / Project Name	Background and potential in-combination impact pathways
Education Strategy ¹³	<p>The Education Strategy for the Broads provides a framework for formal environmental education and wider outreach in the Broads National Park over the plan period. It takes into account the high level aims and objectives of the Broads Plan.</p> <p>This strategy will act positively alongside the Broads Plan, promoting the sensitivity of the Broad's environment with no new pathways of impact being introduced.</p>
Hoveton Great Broad Restoration Project	<p>This project aims to improve water quality in Hoveton Great Broad through sediment removal and biomanipulation. Taking no account of mitigation measures, this project has the potential to act in-combination with waterways management promoted in the Broads plan with in-combination effects on water quality and levels.</p>
Integrated Access Strategy ¹⁴	<p>The Integrated Access Strategy aims to deliver aspects of the Broads Plan in relation to accessibility in terms of schemes to upgrade and improve the network of access points and routes that are linked to visitor facilities and include easier access for people with mobility and sensory needs.</p> <p>Improved visitor access to Habitats sites can increase recreational pressures upon these with potential in-combination effects.</p>
Norfolk Water Strategy Programme ¹⁵	<p>Water Resources East (WRE), Norfolk County Council, Anglian Water and The Nature Conservancy (TNC) have formed a partnership to prepare a sustainable Norfolk Water Strategy. This aims to address the significant pressures on water resources in the eastern area and address the effects of climate change. The objectives of the Norfolk Water Strategy 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.</p> <p>The Programme seeks to demonstrate how cross-sector, integrated water management action can deliver multiple benefits and help achieve the county's net zero targets. Early outputs and learnings from the project will feed into the development of the long-term WRMP.</p>

¹³ Broads Authority. Education Strategy 2017 – 2022. Available at: https://www.broads-authority.gov.uk/data/assets/pdf_file/0028/239554/Broads-Education-Strategy-2017-22-FINAL-APPENDIX-1.pdf [Date Accessed: 05/04/22]

¹⁴ Broads Authority. 2019. Integrated Access Strategy. Available at: https://www.broads-authority.gov.uk/data/assets/pdf_file/0020/260822/Appendix-Broads-Integrated-Access-Strategy-and-action-plan.pdf [Date Accessed: 05/04/22]

¹⁵ Available at: <https://wre.org.uk/projects/norfolk-water-strategy-programme/> [Date Accessed: 25/04/22]

Plan / Project Name	Background and potential in-combination impact pathways
<p>The Local Plan for the Broads¹⁶</p>	<p>The Local Plan for the Broads guides development and land use within the Broads, providing policy and land allocations. The current version of the plan was adopted in 2019 and is currently under review.</p> <p>The current Local Plan for the Broads was subject to HRA^{17,18}. This concluded that, following incorporation of recommendations, the Local Plan would not lead to adverse effects on European site integrity, and would be compliant with the Habitats Regulations upon adoption.</p> <p>Urban development can reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to European sites or watercourses which run through them. Water mains leakage and sewer infiltration may also affect the water balance. In addition, urbanisation has the potential to reduce the quality of water entering a catchment during the construction of a development through processes such as sedimentation, accidental spillage of chemicals and materials. Water quality may also be reduced through effluent discharges and pollution as well as an increased water temperature. These hydrological impact pathways will be assessed in the HRA process.</p> <p>New development can also increase traffic flows on the road network which may contribute in-combination to a deterioration in air quality at Habitats sites.</p> <p>Depending on the location and proximity of new development to Habitats sites it can</p>
<p>Sustainable Tourism Strategy (2016-2020)¹⁹</p>	<p>The Sustainable Tourism Strategy sets out the overall strategic direction for tourism in the Broads and is written to be in line with the requirements of the European Charter for Sustainable Tourism in Protected areas. It is currently under review. The current version of the plan was subject to HRA²⁰. The HRA provided recommendations to plan wording and concluded that there would be no LSEs at any European site.</p> <p>Tourism has the potential to increase navigational and recreational pressures upon inland waterways and also at coastal sites a number of which are designated as Habitats sites or have the potential to provide supporting habitat.</p>

¹⁶ Broads Authority. Local Plan for the Broads Plan Period 2015 – 2036. Adopted May 2019. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf [Date Accessed: 22/03/22]

¹⁷ Liley, D., Hoskin, R., Lake, S. and Panter, C. 2019. Habitats Regulations Assessment of the Local Plan for the Broads at Modifications stage. Unpublished report by Footprint Ecology.

¹⁸ Hoskin, R., 2019. Broads Local Plan Habitats Regulations Assessment Addendum.

¹⁹ The Tourism Company. 2016. Sustainable Tourism in the Broads. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0023/226247/Sustainable-Tourism-in-the-Broads-2016-20-May-2016.pdf [Date Accessed: 22/03/22]

²⁰ Liley, D., Lake, S. & Panter, C. (2016). Habitats Regulations Assessment (HRA) of the Strategy for Sustainable Tourism in the Broads 2016-2020. Report by Footprint Ecology for the Broads Authority.

Plan / Project Name	Background and potential in-combination impact pathways
Waterways Management Strategy ²¹	<p>The Waterways Management Strategy (WMS) provides a framework for sustainable and cost effective management of the Broads navigable waterways from 2022/23 to 2026/27 in line with the long term vision and aspirations as set out in the Broads Plan. It outlines a number of management techniques which will be implemented across the Broads Authority administrative area as follows:</p> <ul style="list-style-type: none">• Sediment management. Removal of sedimentation accumulations to ensure adequate water depth for navigation.• Water plant management. Removal of significant water plant growth to provide clear access along the main rivers and within the marked channels.• Riverside tree management. Management of riverside trees and scrub to maintain safe and navigable waterways.• Bankside habitat and erosion management. Management to protect bankside erosion.• Channel marking. Channel marking to show where it is safe to navigate within a channel. <p>Management of waterways has the potential to have in-combination effects upon water</p>

²¹ Waterways Management Strategy and Action Plan 2022/23 – 2026/27. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0027/399240/Waterways-Management-Strategy-v1.2.pdf [Date Accessed: 22/03/22]

Plan / Project Name	Background and potential in-combination impact pathways
<p>Greater Norwich Local Plan²²</p>	<p>The GNLP covers the three authorities of South Norfolk Council, Broadland Council and Norwich City Council. It was submitted to the Secretary of State for independent examination on 30 July 2021.</p> <p>The GNLP identifies how many homes need to be built across the three authorities of South Norfolk Council, Broadland Council and Norwich City Council between now and 2038, provides up to date policy to guide development and meet Government requirements set out in the National Planning Policy Framework (NPPF). It aims to deliver</p> <ul style="list-style-type: none"> • a minimum of 49,492 new homes; • around 360 hectares of employment land; • supporting infrastructure; and • environmental protection and enhancement measures including further improvements to the green infrastructure network. <p>The GNLP was supported by an HRA²³ of the Draft Submission Reg 19 stage v1.6 of the emerging GNLP. The HRA provided an assessment of impacts upon the same European sites as considered in 2017 and 2019 versions of the HRA.</p> <p>The HRA concluded that there would be no adverse effect upon the integrity of any European site acting alone, subject to the following outstanding matters:</p> <ul style="list-style-type: none"> • Adoption of the Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy (GIRAMS) to achieve mitigation for in-combination recreational effects. • The provision of suitable green space for developments over 50 homes. • Resolution of issues with Water Recycling Centres. • Clarification of policy with regard to tourism accommodation and development which would utilise a Habitats site. <p>The HRA notes that in-combination effects would be taken into consideration through the adoption of the GIRAMS scheme.</p> <p>In summary it concludes that, subject to satisfactory resolution of the outstanding matters listed above, there would be no adverse effect upon the integrity of any Habitats site alone or in-combination.</p> <p>The combined impact of neighbouring authority growth, in-combination with the Broads Plan, on air quality, hydrology and public access and disturbance impacts will be</p>

²² Available at: <https://www.gnlp.org.uk/> [Date Accessed 25/04/22]

²³ The Landscape Partnership. December 2020. Habitats Regulations Assessment of Greater Norwich Regulation 19 Draft Plan For Greater Norwich Development Partnership.

Plan / Project Name	Background and potential in-combination impact pathways
<p>North Norfolk Local Plan 2016 - 2036²⁴</p>	<p>North Norfolk District Council is currently preparing a new Local Plan. A period of public consultation on the Proposed Submission Version Local Plan took place early 2022. This plan will aim to deliver a minimum of 9,600 new homes over the plan period 2016-2036 and a total of 272.07 hectares of land is designated/allocated and retained for employment generating developments.</p> <p>The Submission Version of the Plan was supported by an HRA²⁵. Screening identified likely significant effects for a range of Habitats sites, in relation to urban effects, recreation and hydrological issues. These were taken to appropriate assessment. Following appropriate assessment, the HRA concluded that the North Norfolk Local Plan, proposed submission version, is in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects, alone or in-combination, on Habitats site integrity was concluded.</p> <p>The combined impact of neighbouring authority growth, in-combination with the Broads Plan, on air quality, hydrology and public access and disturbance impacts will be</p>
<p>Great Yarmouth Core Strategy (Local Plan Part 1)²⁶ Local Plan Part 2²⁷</p>	<p>The Local Plan for Great Yarmouth is made up of two parts, the Core Strategy (Local Plan Part 1 - 2015) and the Local Plan Part 2 (2021).</p> <p>The Core Strategy (Local Plan Part 1) was adopted in 2015 and Part 2 in 2021. Part 2 makes provision for 5,303 new homes over the plan period.</p> <p>An HRA was undertaken in support of the Local Plan Part 2²⁸. It refers to the HRA undertaken for the Great Yarmouth Local Plan Part 1: the Core Strategy²⁹. It draws on mitigation provided through the Great Yarmouth Borough Monitoring and Mitigation Strategy which was put in place at the time of the Core Strategy HRA. Following input to policy wording it concludes no adverse effects on site integrity.</p> <p>The combined impact of neighbouring authority growth, in-combination with the Broads Plan, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.</p>

²⁴ North Norfolk District Council. January 2022. Publication Stage North Norfolk Local Plan 2016 – 2036. Available at: <https://www.north-norfolk.gov.uk/media/7466/local-plan-proposed-submission-version-reg-19-publication.pdf> [Date Accessed: 25/04/22]

²⁵ Liley, D., Saunders, P. & Panter, C. (2021) North Norfolk Local Plan HRA Submission Version. Unpublished Report for North Norfolk District Council. Available at: <https://www.north-norfolk.gov.uk/media/7456/habitat-regulations-assessment-north-norfolk-local-plan-reg-19-publication.pdf> [Date Accessed: 27/04/22]

²⁶ Great Yarmouth Borough Council. 2015. Great Yarmouth Local Plan. Core Strategy 2013 – 2030. Available at: <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan> [Date Accessed: 27/04/22]

²⁷ Great Yarmouth Borough Council. 2021. Great Yarmouth Local Plan Part 2. Available at: <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan> [Date Accessed: 27/04/22]

²⁸ Hoskin, R., Liley, D. & Caals, Z. 2019. Habitats Regulations Assessment of the Great Yarmouth Local Plan Part 2. Unpublished report for Great Yarmouth Borough Council.

²⁹ Footprint Ecology. 2015. Habitats Regulations Assessment of the Great Yarmouth Local Plan - Core Strategy at Submission for Examination. Report for Great Yarmouth Borough Council.

Plan / Project Name	Background and potential in-combination impact pathways
<p>East Suffolk District - Waveney Local Plan³⁰ (East Suffolk District comprises Waveney District Council and Suffolk Coastal District)</p>	<p>The Waveney Local Plan was adopted 20th March 2019 and allocates 8,223 new homes over the plan period.</p> <p>An HRA was undertaken in support of the local plan³¹. The HRA informed policy wording and recommended a mitigation approach for Minsmere – Walberswick SPA/SAC/Ramsar site and Benacre to Easton Bavents SPA/SAC, to mitigate for potential increased recreation pressure and disturbance of site interest features. Following incorporation of these measures it concluded no adverse effects on any European site integrity.</p> <p>The combined impact of neighbouring authority growth, in-combination with the Broads Plan, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.</p>
<p>Norfolk County Council Minerals and Waste Local Plan Review³²</p>	<p>Norfolk County Council are re preparing a Norfolk Minerals and Waste Local Plan Review (M&WLPR), to consolidate the three adopted DPDs into one Local Plan, ensure that the policies within them remain up-to-date and to extend the plan period to the end of 2036. This plan has been subject to two stages of Regulation 18 consultation.</p> <p>The M&WLPR includes a vision and strategic objectives for waste management and minerals development for the Plan period to 2036.</p> <p>It includes a spatial strategy (allocating sites) for new waste management facilities and new minerals development.</p> <p>The M&WLPR was supported by a draft HRA³³. It applied a 5km study area for consideration of LSEs at European sites. It concluded no LSEs from any policies forming the plan, noting that developers wanting to extract mineral from specific sites or land within a preferred area or area of search contained in the Norfolk Minerals and Waste Local Plan will still need to apply for and be granted planning permission before mineral extraction can take place.</p> <p>The combined impact of minerals and waste allocations, in-combination with Broads Plan</p>

³⁰ East Suffolk Council. 2019. Waveney Local Plan. Covering the former Waveney Local Planning Authority Area. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf> [Date Accessed: 25/04/22]

³¹ Hoskin, R. & Liley, D. 2018. Habitats Regulations Assessment of the Waveney Local Plan. Unpublished report for Waveney District Council.

³² Norfolk County Council. Minerals and Waste Local Plan Review. Available at: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review> [Date Accessed: 27/04/22]

³³ Norfolk County Council. 2019. Norfolk Minerals and Waste Local Plan Review. Draft Habitats Regulations Assessment. Available at: https://norfolk.oc2.uk/docfiles/50/draft_hra_task_1.pdf [Date Accessed: 27/04/22]

Plan / Project Name	Background and potential in-combination impact pathways
<p>Norfolk County Council Local Transport Plan 4 Strategy 2021 – 2036³⁴</p>	<p>The LTP4 was adopted in November 2021.</p> <p>The plan aims to address issues such as air quality and carbon reduction and tackles infrastructure issues in relation to major road, bus and rail connections. It sets out a series of strategies and policies.</p> <p>An HRA was prepared to support the LTP³⁵. This HRA notes that given the strategic level of LTP4, there is insufficient detail to enable a more in-depth analysis to the degree required for Appropriate Assessment. Given the possibility of LSE associated with the screened-in policies, further, detailed assessment through Appropriate Assessment is therefore considered necessary at a project-level and on a case-by-case basis to satisfy the requirements of the Habitats Regulations.</p> <p>The HRA concludes that the LTP4 Strategy is compliant with the Habitats Regulations and will not result in likely significant effects on any Habitats Sites, either alone or in-combination with other plans or projects. For road schemes or associated development coming forward through implementation of policies, mitigation measures set out specific project-level HRA requirements, regulatory requirements and development management processes.</p>

³⁴ Norfolk County Council. Norfolk County Council Local Transport Plan 4 Strategy 2021 – 2036. Available at: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-travel-policies/local-transport-plan> [Date Accessed: 27/04/22]

³⁵ WSP. June 2021. NORFOLK LOCAL TRANSPORT PLAN 4 STRATEGY 2021- 2036 INFORMATION TO INFORM HABITATS REGULATIONS SCREENING AND APPROPRIATE ASSESSMENT. Available at: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-travel-policies/local-transport-plan> [Date Accessed: 27/04/22]

Appendix B: Habitats Site Conservation Objectives, Threats and Pressures

The Broads SAC¹

Designation Overview

The Broads SAC is formed of a network of naturally nutrient-rich lakes which were artificially created through peat extraction in medieval times. This network of lakes and ditches in areas of fen and drained marshlands support relict vegetation of the original Fenland flora, and collectively this site contains one of the richest assemblages of rare and local aquatic species in the UK. The dyke (ditch) systems are a stronghold of little whirlpool ram's-horn snail (*Anisus vorticulus*) and Desmoulin's whorl snail (*Vertigo moulinsiana*) in East Anglia. The range of wetlands and associated habitats also provides suitable conditions for otters (*Lutra lutra*). The Broads is the richest area for stoneworts (*charophytes*) in Britain and contains the largest blocks of alder (*Alnus glutinosa*) wood in England with a complete successional sequences from open water through reedswamp to alder woodland, which has developed on fen peat. There is a correspondingly wide range of flora, including uncommon species such as marsh fern (*Thelypteris palustris*).

The Broads network also contains the largest example of calcareous fens in the UK. Relatively small transition mires have developed in re-vegetated peat-cuttings as part of the complex habitat mosaic of fen, carr and open water.

A few areas of *Erica tetralix* - *Sphagnum compactum* wet heath, *Molinia* meadows and related communities remain where the floodplain is still hydraulically connected to seepage zones on the edge of the 'upland', particularly from crag aquifers².

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and;
- The distribution of qualifying species within the site.

Qualifying Features:

H3140. Hard oligo-mesotrophic waters with benthic vegetation of *Chara spp.*; Calcium-rich nutrient-poor lakes, lochs and pools

H3150. Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed

¹ Natural England (2018) The Broads SAC Conservation Objectives. Available at:
<http://publications.naturalengland.org.uk/file/6427605842788352> [Date Accessed: 08/03/22]

² Natural England (2019) The Broads SAC Conservation Objectives Supplementary Advice. Available at:
<http://publications.naturalengland.org.uk/file/6067900213624832> [Date Accessed: 08/03/22]

H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinia caerulea*); Purple moor-grass meadows

H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable 'quaking' surface

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davalliana*; Calcium-rich fen dominated by great fen sedge (saw sedge)*

H7230. Alkaline fens; Calcium-rich springwater-fed fens

H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains*

S1016. *Vertigo moulinsiana*; Desmoulin's whorl snail

S1355. *Lutra lutra*; Otter

S1903. *Liparis loeselii*; Fen orchid

S4056. *Anisus vorticulus*; Little whirlpool ram's-horn snail

* Priority natural habitats or species

Threats and Pressures at Habitats site which may be affected by Broads Plan^{3,4}:

- Water pollution;
- Climate change;
- Siltation;
- Inappropriate water levels;
- Adaptation to climate change;
- Inappropriate ditch management;
- Change in land management;
- Inappropriate scrub control;
- Drainage;
- Public access/disturbance;
- Air pollution (atmospheric nitrogen deposition); and
- Inappropriate coastal management.

³ Natural England (2018) Broadland SIP (covering Broadland SPA and The Broads SAC). Available at: <http://publications.naturalengland.org.uk/file/6218680128241664> [Date Accessed: 11/04/22]

⁴ Natural England (2019) The Broads SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/6067900213624832> [Date Accessed 11/04/22]

Broadlands SPA and Broadlands Ramsar⁵

Designation Overview

The Broadland SPA and Broadland Ramsar designations cover the same geographical area and are therefore discussed together below.

Broadland is a low-lying wetland complex created by a series of flooded medieval peat cuttings. They lie within the floodplains of five principal river systems, including the River Bure, River Yare and River Waveney and their major tributaries. They comprise a complex and interlinked mosaic of wetland habitats including open water, reedbeds, carr woodland, grazing marsh, tall herb fen, transition mire and fen meadow, forming one of the finest marshland complexes in the UK. This wetland mosaic has created a range of habitat types which in turn supports a variety of internationally important wintering and breeding raptors and waterbirds which are associated with the extensive lowland marshes. The estuary at the mouth of Broadland is designated as Breydon Water SPA and Breydon Water Ramsar site and the two sites adjoin each other at Halvergate Marshes. Breeding and wintering raptors, and wintering waterbirds spend time on feeding areas outside the Broadland SPA and Ramsar boundaries for instance within agricultural fields (on leftover potatoes and grain) and in adjacent grassland⁶.

The internationally important bird populations are associated with a number of specific habitat types due to their nesting and feeding requirements. These include for instance reedbed, open water (freshwater pools and lakes, rivers and undisturbed creeks), emergent and floating vegetation, wetland fringe and open wetland habitat.

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

⁵ Natural England (2018) The Broads SAC Conservation Objectives. Available at:
<http://publications.naturalengland.org.uk/file/6427605842788352> [Date Accessed: 11/04/22]

⁶ Natural England (2019) Broadland SPA Conservation Objectives Supplementary Advice. Available at:
file:///Users/samantacheater/Downloads/UK9009253_BroadlandSPA_Formal%20Published%208%20Feb%2019.pdf [Date Accessed: 11/04/22]

Qualifying Features:

The qualifying features of the SPA are set out below:

- *Botaurus stellaris*; Great bittern (Breeding)
- *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
- *Cygnus cygnus*; Whooper swan (Non-breeding)
- *Anas penelope*; Eurasian wigeon (Non-breeding)
- *Anas strepera*; Gadwall (Non-breeding)
- *Anas clypeata*; Northern shoveler (Non-breeding)
- *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
- *Circus cyaneus*; Hen harrier (Non-breeding)
- *Philomachus pugnax*; Ruff (Non-breeding)⁷.

The site meets the following Ramsar criteria:

- Criteria Ramsar criterion 2 (rare species and habitats within the biogeographical zone context, including the following Habitats Directive Annex I features and Annex II species)
 - Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*;
 - Alkaline fens Calcium-rich springwater-fed fens;
 - *Alluvial forests with Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*);
 - *Vertigo moulinsiana* Desmoulin's whorl snail;
 - *Lutra lutra* Otter; and
 - *Liparis loeselii* Fen orchid.
- Criteria Ramsar criterion 6 (species/populations occurring at levels of international importance) - Qualifying Species/populations (as identified at designation): Species with peak counts in winter:
 - Tundra swan (*Cygnus columbianus bewickii*);
 - Eurasian wigeon (*Anas penelope*);
 - Gadwall (*Anas strepera strepera*); and
 - Northern shoveler (*Anas clypeata*).
- Criteria Ramsar criterion 6 (species/populations occurring at levels of international importance) - Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter:
 - Pink-footed goose (*Anser brachyrhynchus*); and
 - Greylag goose (*Anser anser anser*).

The site also supports an outstanding assemblage of rare plants and invertebrates including nine British Red Data Book plants and 136 British Red Data Book invertebrates.

⁷ Annex II species present as a qualifying feature, but not the primary reason for selection of this site

Threats and Pressures at Habitats site which may be affected by Broads Plan^{8,9}:

- Water pollution;
- Climate change;
- Siltation;
- Inappropriate water levels;
- Adaptation to climate change;
- Inappropriate ditch management;
- Change in land management;
- Inappropriate scrub control;
- Drainage;
- Public Access/Disturbance;
- Air pollution (atmospheric nitrogen deposition); and
- Inappropriate coastal management.

⁸ Natural England (2018) Broadland SIP (covering Broadland SPA and The Broads SAC). Available at: <http://publications.naturalengland.org.uk/file/6218680128241664> [Date Accessed: 08/03/22]

⁹ Natural England (2019) The Broads SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/file/6067900213624832> [Date Accessed 08/03/22]

Breydon Water SPA and Breydon Water Ramsar¹⁰

Designation Overview

Breydon Water SPA and Breydon Water Ramsar designations cover the same geographical area and are therefore discussed together below.

Breydon Water is a large stretch of sheltered estuary and wetland habitat and forms the lower reaches of the River Yare and River Waveney. It comprises an inland tidal estuary with extensive areas of mud flats that are exposed during low tide forming the only intertidal flats. The habitats present are influenced strongly by the tidal influences. Large numbers of internationally important wildfowl and waders overwinter at the site. They are attracted to the site by the mosaic of habitats (including intertidal mudflats, saltmarsh and freshwater grazing marsh) which provide a diversity of nesting and feeding options and an abundance of food resource¹¹. It is strongly linked with the upstream Broadland SPA designation and birds use both habitats interchangeably.

Conservation objectives:

Breydon Water SPA: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying Features:

The qualifying features of the SPA are set out below¹²:

- *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding);
- *Recurvirostra avosetta*; Pied avocet (Non-breeding);
- *Pluvialis apricaria*; European golden plover (Non-breeding);
- *Vanellus vanellus*; Northern lapwing (Non-breeding);
- *Philomachus pugnax*; Ruff (Non-breeding);
- *Sterna hirundo*; Common tern (Breeding); and

¹⁰ Natural England (2018) Breydon Water SPA SIP. Available at: <http://publications.naturalengland.org.uk/file/5893824219447296> [Date Accessed: 11/04/22]

¹¹ Natural England (2018) Breydon Water SPA SIP. Available at: <http://publications.naturalengland.org.uk/file/5893824219447296> [Date Accessed: 08/03/22]

¹² Natural England (2019) Breydon Water SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/4822248376762368> [Date Accessed: 08/03/22]

- Waterbird assemblage.

The site meets the following Ramsar criteria:

- Criteria Ramsar criterion 5 (Assemblages of international importance) - Species with peak counts in winter: 68175 waterfowl (5 year peak mean 1998/99-2002/2003).
- Criteria Ramsar criterion 6 (species/populations occurring at levels of international importance) - Qualifying Species/populations (as identified at designation): Species with peak counts in winter:
 - Tundra swan (*Cygnus columbianus bewickii*); and
 - Northern lapwing (*Vanellus vanellus*).
- Criteria Ramsar criterion 6 (species/populations occurring at levels of international importance) - Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter:
 - Pink-footed goose (*Anser brachyrhynchus*);
 - Eurasian wigeon (*Anas penelope*);
 - Northern shoveler (*Anas clypeata*);
 - European golden plover (*Pluvialis apricaria apricaria*, *P. a. altifrons*); and
 - Black-tailed godwit (*Limosa limosa islandica*).

Threats and Pressures at Habitats site which may be affected by Broads Plan^{13,14}:

Breydon Water SPA;

- Change in land management;
- Public access/disturbance; and
- Hydrological changes.

No identified threats or pressures to Breydon Water Ramsar

¹³ Natural England (2018) Breydon Water SPA SIP. Available at: <http://publications.naturalengland.org.uk/file/5893824219447296> [Date Accessed: 11/04/22]

¹⁴ JNCC. 2008. Information Sheet on Ramsar Wetlands. Breydon Water Ramsar <https://jncc.gov.uk/jncc-assets/RIS/UK11008.pdf> [Date Accessed: 11/04/22].

Outer Thames Estuary SPA¹⁵

Designation Overview

The Outer Thames Estuary SPA stretches from Caister-on-Sea in Norfolk (Suffolk) to Sheerness in Kent, and reaching as far as Canvey Island into the Thames Estuary. The SPA is divided into three discreet areas:

- The outer estuary of the Thames (including Kent and Essex coastal waters);
- The Suffolk and south Norfolk coastal waters; and
- The offshore area further northeast.

The site crosses the 12 nautical mile boundary and therefore lies partly in territorial and partly in offshore waters. The SPA consists of areas of shallow and deeper water, high tidal current streams and a range of mobile sediments. The seabed in the area of the Norfolk and Suffolk coast is of a similar composition to that in the main estuary with large shallow areas of mud, sand, silt and gravelly sediments. The coastal parts of the site consist of shingle and sand beaches, rapidly eroding low cliffs and mudflat-lined estuaries¹⁶.

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying Features:

The qualifying features of the SPA are set out below¹⁷:

- *Gavia stellata*; Red-throated diver (Non-breeding);
- *Sterna hirundo*; Common tern (Breeding); and
- *Sternula albifrons*; Little tern (Breeding)

¹⁵ Natural England (2015) Outer Thames Estuary SPA SIP. Available at: <http://publications.naturalengland.org.uk/file/5877617494327296> [Date Accessed: 12/04/22]

¹⁶ Natural England. Designated Site Information for the Outer Thames Estuary SPA. Available at: <https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK9020309&SiteName=outer%20thames&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=> [Date Accessed: 12/04/22]

¹⁷ Natural England (2019) Outer Thames Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5184120712069120> [Date Accessed: 12/04/22]

Threats and Pressures at Habitats site which may be affected by Broads Plan^{18, 19}:

- Physical Loss (moderate vulnerability)
- Physical Damage (low vulnerability)
- Non-physical disturbance (high vulnerability)
- Toxic contamination (low - moderate vulnerability)
- Non-toxic contamination (example nutrient loading) (low vulnerability)
- Biological disturbance (low to moderate vulnerability)

¹⁸ Natural England (2015) Outer Thames Estuary SPA SIP. Available at: <http://publications.naturalengland.org.uk/file/5877617494327296> [Date Accessed: 12/04/22]

¹⁹ JNNC and NE. 2013. Draft advice under Regulation 35(3) of The Conservation of Habitats and Species Regulations 2010 (as amended) and Regulation 18 of The Offshore Marine Conservation (Natural Habitats, & c.) Regulations 2007 (as amended). Available at: <http://publications.naturalengland.org.uk/publication/3233957> [Date Accessed: 13/04/22]

Great Yarmouth and North Denes SPA²⁰

Designation Overview

Great Yarmouth and North Denes SPA is comprised of two component areas, the Great Yarmouth North Denes actively accreting low dune system and beach, together with the beach and foredune ridge at Winterton-Horsey Dunes (also designated as a SAC). These two component areas are linked, due to the high mobility of little terns, and to the dynamic nature of the beach shapes which influences suitability for breeding. Little tern populations found at Caister, Eccles, Kessingland and Scroby Sands are functionally linked to colonies protected within the Great Yarmouth North Denes SPA²¹.

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying Features:

The qualifying feature of the SPA is little tern (Breeding - *Sternula albifrons*)²². These are present at the SPA from mid-April to mid-September.

Threats and Pressures at Habitats site which may be affected by Broads Plan²³:

- Coastal Squeeze;
- Public Access/Disturbance;
- Hydrological change;
- Inappropriate scrub control; and
- Air pollution: impact of atmospheric nitrogen deposition.

²⁰ Natural England (2018) The Broads SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6427605842788352> [Date Accessed: 08/03/22]

²¹ Natural England. Designated Site Information for the Great Yarmouth and North Denes SPA. Available at: <https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK9009271&SiteName=great%20Yarmouth&countyCode=&responsiblePerson=&SeaArea=&FCAArea=> [Date Accessed: 11/04/22]

²² Natural England (2019) Great Yarmouth North Denes SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6450939770961920> [Date Accessed: 11/04/22]

²³ Natural England (2018) Great Yarmouth Winterton Horsey SIP (to cover Great Yarmouth North Denes SPA and Winterton-Horsey Dunes SAC). Available at: <http://publications.naturalengland.org.uk/file/6277135286665216> [Date Accessed: 12/04/22]

Winterton-Horsey Dunes SAC²⁴

Designation Overview

Winterton-Horsey Dunes SAC is a large acidic dune system with associated areas of grazing marsh, dune slacks, dune heath, dune grassland and downy birch dominated woodland with oaks. Actively accreting 'ness' features, support a full successional sequence of vegetation through foredune, mobile dune, semi fixed dune and dry acid dune grassland/ dune heath²⁵.

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the qualifying natural habitats;
- The structure and function (including typical species) of the qualifying natural habitats; and
- The supporting processes on which the qualifying natural habitats rely.

Qualifying Features:

The qualifying feature of the SAC include²⁶.

- Embryonic shifting dunes;
- Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram;
- Atlantic decalcified fixed dunes (*Calluno-Ulicetea*); and
- Humid dune slacks.

Threats and Pressures at Habitats site which may be affected by Broads Plan²⁷:

- Coastal Squeeze;
- Public Access/Disturbance;
- Hydrological change;
- Inappropriate scrub control; and
- Air pollution: impact of atmospheric nitrogen deposition.

²⁴ Natural England (2018) Winterton-Horsey Dunes SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5518326646177792> [Date Accessed: 08/03/22]

²⁵ Natural England (2018) Winterton-Horsey Dunes SAC SIP (to cover Great Yarmouth North Denes SPA and Winterton-Horsey Dunes SAC). Available at: <http://publications.naturalengland.org.uk/publication/5518326646177792> [Date Accessed: 08/03/22]

²⁶ Natural England (2018) Winterton-Horsey Dunes SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5518326646177792> [Date Accessed: 08/03/22]

²⁷ Natural England (2018) Great Yarmouth Winterton Horsey SIP (to cover Great Yarmouth North Denes SPA and Winterton-Horsey Dunes SAC). Available at: <http://publications.naturalengland.org.uk/file/6277135286665216> [Date Accessed: 12/04/22]

Southern North Sea SAC²⁸

Designation Overview

The SAC designation stretches from the central North Sea (north of Dogger Bank) to the Straits of Dover in the south, covering an area of 36,951 km². The majority of this site lies offshore, extending into coastal areas of Norfolk and Suffolk crossing the 12 nautical mile boundary. It comprises a mix of habitats, such as sandbanks and gravel beds, are included in the site²⁹.

Conservation objectives:

To ensure that the integrity of the site is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for Harbour Porpoise in UK waters.

In the context of natural change, this will be achieved by ensuring that:

- Harbour porpoise is a viable component of the site;
- There is no significant disturbance of the species; and
- The condition of supporting habitats and processes, and the availability of prey is maintained.

Qualifying Features:

The qualifying feature of the SAC is the Harbour porpoise (*Phocoena phocoena*) as it contains key winter and summer habitat for this species³⁰.

Threats and Pressures at Habitats site which may be affected by Broads Plan³¹:

- Recreational boating activity

²⁸ JNCC. (2019) Southern North Sea SAC. Available at: <https://jncc.gov.uk/our-work/southern-north-sea-mpa/> [Date Accessed: 12/04/22]

²⁹ JNCC. (2019) Southern North Sea MPA. Available at: <https://jncc.gov.uk/our-work/southern-north-sea-mpa> [Date Accessed: 12/04/22]

³⁰ JNCC (2019) Southern North Sea SAC Conservation Objectives. Available at: <http://data.jncc.gov.uk/data/206f2222-5c2b-4312-99ba-d59dfd1dec1d/SouthernNorthSea-conservation-advice.pdf> [Date Accessed: 12/04/22]

³¹ JNCC (2019) Southern North Sea SAC Conservation Objectives. Available at: <http://data.jncc.gov.uk/data/206f2222-5c2b-4312-99ba-d59dfd1dec1d/SouthernNorthSea-conservation-advice.pdf> [Date Accessed: 12/04/22]

Greater Wash SPA³²

Designation Overview

The Greater Wash SPA is located in the mid-southern North Sea between Bridlington Bay in the north and the Outer Thames Estuary SPA in the south. To the north, off the Holderness coast in Yorkshire, seabed habitats primarily comprise coarse sediments, with occasional areas of sand, mud and mixed sediments. Subtidal sandbanks occur at the mouth of the Humber Estuary, primarily comprising sand and coarse sediments. Offshore, soft sediments dominate, with extensive areas of subtidal sandbanks off The Wash as well as north and east Norfolk coasts. Closer inshore at The Wash and north Norfolk coast, sediments comprise a mosaic of sand, muddy sand, mixed sediments and coarse sediments, as well as occasional Annex I reefs. The area off the Suffolk coast continues the mosaic habitats mostly dominated by soft sediment³³.

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying Features:

A001 *Gavia stellata*; Red-throated diver (Non-breeding)

A065 *Melanitta nigra*; Common scoter (Non-breeding)

A177 *Hydrocoloeus minutus*; Little gull (Non-breeding)

A191 *Sterna sandvicensis*; Sandwich tern (Breeding)

A193 *Sterna hirundo*; Common tern (Breeding)

A195 *Sternula albifrons*; Little tern (Breeding)

Threats and Pressures at Habitats site which may be affected by Broads Plan³⁴:

No threats or pressures identified by Natural England.

³² Natural England (2019) Conservation Objectives for Greater Wash SPA. Available at <http://publications.naturalengland.org.uk/publication/4597871528116224> [Date Accessed: 12/04/22]

³³ Natural England (2018) Citation - Greater Wash SPA. Available at <http://publications.naturalengland.org.uk/publication/4597871528116224> [Date Accessed: 12/04/22]

³⁴ Natural England (2018) Citation - Greater Wash SPA. Available at <http://publications.naturalengland.org.uk/publication/4597871528116224> [Date Accessed: 12/04/22]

Benacre to Easton Bavents SPA³⁵

Designation Overview

Benacre to Easton Bavents Lagoons is a series of percolation lagoons. The lagoons (the Denes, Benacre Broad, Covehithe Broad and Easton Broad) have formed behind shingle barriers and are a feature of a geomorphologically dynamic system. Sea water enters the lagoons by percolation through the barriers, or by overtopping them during storms and high spring tides. The three southern lagoons receive freshwater inputs from the local ditch and channel networks.

Benacre to Easton Bavents SPA supports internationally important populations of Bittern, Marsh harrier and Little tern. The site includes areas of shingle, vegetated shingle, reedbed, and wetland habitats as well as geological and geomorphological features³⁶.

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying Features:

A021 *Botaurus stellaris*; Great bittern (Breeding);

A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding); and

A195 *Sterna albifrons*; Little tern (Breeding)³⁷.

Threats and Pressures at Habitats site which may be affected by Broads Plan³⁸:

- Public access/disturbance;
- Water pollution;
- Physical modification; and
- Changes in species distributions.

³⁵ Natural England (2017) Benacre to Easton Bavents SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/4812476415737856> [Date Accessed: 12/04/22]

³⁶ Natural England (2017) Benacre to Easton Bavents SPA SIP. Available at: <http://publications.naturalengland.org.uk/publication/4812476415737856> [Date Accessed: 12/04/22]

³⁷ Natural England (2017) Benacre to Easton Bavents SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/4812476415737856> [Date Accessed: 12/04/22]

³⁸ Natural England (2017) Benacre to Easton Bavents SPA SIP. Available at: <http://publications.naturalengland.org.uk/publication/4812476415737856> [Date Accessed: 12/04/22]

Norfolk Valley Fens SAC³⁹

Designation Overview

Norfolk Valley Fens is one of two sites selected in East Anglia, in eastern England, where the main concentration of lowland Alkaline fens occurs. This site comprises a series of valley-head spring-fed fens. Such spring-fed flush fens are very rare in the lowlands. Most of the vegetation at this site is of the small sedge fen type, mainly referable to M13 *Schoenus nigricans* – *Juncus subnodulosus* mire, but there are transitions to reedswamp and other fen and wet grassland types.

The individual fens vary in their structure according to intensity of management and provide a wide range of variation. There is a rich flora associated with these fens, including species such as grass-of-Parnassus *Parnassia palustris*, common butterwort *Pinguicula vulgaris*, marsh helleborine *Epipactis palustris* and narrow-leaved marsh-orchid *Dactylorhiza traunsteineri*. Six other Annex I habitats are present as qualifying features, but are not a primary reason for the selection of this site.

Two Annex II species are present, narrow-mouthed whorl snail and Desmoulin's whorl snail are also a primary reason for the selection of the site.⁴⁰

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying Features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath

H4030. European dry heaths

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*); Dry grasslands and scrublands on chalk or limestone

H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)*

H7230. Alkaline fens; Calcium-rich springwater-fed fens

³⁹ Natural England (2018) Norfolk Valley Fens SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/6684666086031360> [Date Accessed: 12/04/22]

⁴⁰ Natural England (2017) Norfolk Valley Fens SAC SIP. Available at: <http://publications.naturalengland.org.uk/publication/6261291761008640> [Date Accessed: 12/04/22]

H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains*

S1014. *Vertigo angustior*: Narrow-mouthed whorl snail

S1016. *Vertigo moulinsiana*; Desmoulin`s whorl snail⁴¹

Threats and Pressures at Habitats site which may be affected by Broads Plan⁴²:

- Inappropriate water levels;
- Inappropriate scrub control:
- Hydrological changes:
- Water pollution:
- Inappropriate cutting/mowing:
- Water abstraction:
- Change in land management:
- Changes in species distribution; and
- Air pollution: impact of atmospheric nitrogen deposition.

⁴¹ Natural England (2018) Norfolk Valley Fens SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/6684666086031360> [Date Accessed: 12/04/22]

⁴² Natural England (2017) Norfolk Valley Fens SAC SIP. Available at: <http://publications.naturalengland.org.uk/publication/6261291761008640> [Date Accessed: 12/04/22]

The Wash and North Norfolk Coast SAC⁴³

Designation Overview

The Wash is the largest marine embayment in Britain, with the second largest expanse of intertidal sediment flats in the country. These include extensive fine sands and drying banks of coarser sand which support a community characterised by large numbers of polychaetes, bivalves, and crustaceans. Subtidal sandbanks vary in composition and include coarse sand through to mixed sediment at the mouth of the embayment. Unusual subtidal communities include large areas of dense brittlestar beds and the small but extensive colonies of the reef-building ross worm *Sabellaria spinulosa* which supports a diverse associated fauna.

The North Norfolk coast provides the only typical British example of a barrier beach system. Extensive areas of salt marsh with characteristic creek patterns have developed behind sand and shingle spits and bars. The open coast is characterised by large areas of clean mobile sand subject to functioning coastal and marine processes. Communities vary from typical estuarine examples characterised by the bivalve peppery furrow shell *Scrobicularia plana*, to lugworm *Arenicola marina* dominated muddier sand in the lee of islands and spits, to a sparse infauna in more exposed open coast areas.

The Wash and North Norfolk coast EMS is important for breeding and moulting of one of Europe's largest populations of common seal *Phoca vitulina*. The intertidal mudflats and salt marshes represent one of Britain's most important winter feeding areas for waders and wildfowl outside of the breeding season.

Gibraltar Point (587ha) is of national importance for its sand dunes, other coastal habitats and associated fauna - notably invertebrates and passage and breeding birds. Other habitats present include; grassland, coastal lagoons, shingle, intertidal mud / sand and open water

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying Features:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats

H1150. Coastal lagoons*

⁴³ Natural England (2018) The Wash & North Norfolk Coast SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5950176598425600> [Date Accessed: 12/04/22]

H1160. Large shallow inlets and bays

H1170. Reefs

H1310. *Salicornia* and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

H1420. Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*);
Mediterranean
saltmarsh scrub

S1355. *Lutra lutra*; Otter

S1365. *Phoca vitulina*; Common seal⁴⁴

Threats and Pressures at Habitats site which may be affected by Broads Plan⁴⁵:

- Inappropriate water levels;
- Public access/disturbance;
- Siltation; and
- Coastal squeeze.

⁴⁴ Natural England (2018) The Wash & North Norfolk Coast SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5950176598425600> [Date Accessed: 12/04/22]

⁴⁵ Natural England (2017) The Wash & North Norfolk Coast SAC SIP. Available at: <http://publications.naturalengland.org.uk/publication/5327498292232192> [Date Accessed: 12/04/22]

North Norfolk Coast SAC, North Norfolk Coast SPA and North Norfolk Coast Ramsar

Designation Overview

The North Norfolk coast provides the only typical British example of a barrier beach system. Extensive areas of salt marsh with characteristic creek patterns have developed behind sand and shingle spits and bars. The open coast is characterised by large areas of clean mobile sand subject to functioning coastal and marine processes. Communities vary from typical estuarine examples characterised by the bivalve peppery furrow shell *Scrobicularia plana*, to lugworm *Arenicola marina* dominated muddier sand in the lee of islands and spits, to a sparse infauna in more exposed open coast areas.

Conservation objectives:

North Norfolk Coast SPA⁴⁶:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

North Norfolk Coast SAC⁴⁷:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying Features:

North Norfolk Coast SPA⁴⁸:

A021 *Botaurus stellaris*; Great bittern (Breeding)

A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)

⁴⁶ Natural England (2019) North Norfolk Coast SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/4732349359063040> [Date Accessed: 12/04/22]

⁴⁷ Natural England (2019) North Norfolk Coast SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/6270240262455296> [Date Accessed: 12/04/22]

⁴⁸ Natural England (2019) North Norfolk Coast SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/6270240262455296> [Date Accessed: 12/04/22]

A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)

A050 *Anas penelope*; Eurasian wigeon (Non-breeding)

A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)

A084 *Circus pygargus*; Montagu's harrier (Breeding)

A132 *Recurvirostra avosetta*; Pied avocet (Breeding)

A143 *Calidris canutus*; Red knot (Non-breeding)

A191 *Sterna sandvicensis*; Sandwich tern (Breeding)

A193 *Sterna hirundo*; Common tern (Breeding)

A195 *Sterna albifrons*; Little tern (Breeding)

Waterbird assemblage

North Norfolk Coast SAC⁴⁹:

H1150. Coastal lagoons*

H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves

H1420. Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*);
Mediterranean saltmarsh scrub

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*

H2190. Humid dune slacks

S1355. *Lutra lutra*; Otter

S1395. *Petalophyllum ralfsii*; Petalwort

North Norfolk Coast Ramsar⁵⁰:

The site meets the following Ramsar criteria:

- Ramsar criterion 1:
The site is one of the largest expanses of undeveloped coastal habitat of its type in Europe. It is a particularly good example of a marshland coast with intertidal sand and mud, saltmarshes, shingle banks and sand dunes. There are a series of brackish-water lagoons and extensive areas of freshwater grazing marsh and reed beds.
- Ramsar criterion 2:
Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates.
- Ramsar criterion 5; and

⁴⁹ Natural England (2019) North Norfolk Coast SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/4732349359063040> [Date Accessed: 12/04/22]

⁵⁰ JNCC. 2008. Information Sheet on Ramsar Wetlands. North Norfolk Ramsar. Available at <https://jncc.gov.uk/jncc-assets/RIS/UK11048.pdf> [Date Accessed: 11/04/22].

Assemblages of international importance:

Species with peak counts in winter: 98462 waterfowl (5 year peak mean 1998/99-2002/2003)

- Ramsar criterion 6:

Species/populations occurring at levels of international importance:

- (*Thalasseus*) *sandvicensis sandvicensis*, W Europe;
- Common tern, *Sterna hirundo hirundo*, N & E Europe:
- Little tern, *Sterna albifrons albifrons*, W Europe:
- Red knot, *Calidris canutus islandica*, W & Southern Africa:
- Pink-footed goose, *Anser brachyrhynchus*, Greenland, Iceland/UK:
- Dark-bellied brent goose, *Branta bernicla bernicla*,
- Eurasian wigeon, *Anas penelope*, NW Europe:
- Northern pintail, *Anas acuta*, NW Europe:
- Ringed plover, *Charadrius hiaticula*, Europe/Northwest Africa:
- Sanderling, *Calidris alba*, Eastern Atlantic; and
- Bar-tailed godwit, *Limosa lapponica lapponica*, W Palearctic.

Threats and Pressures at Habitats site which may be affected by Broads Plan⁵¹:

North Norfolk Coast SPA and North Norfolk Coast SAC:

- Inappropriate water levels;
- Public access/disturbance;
- Siltation; and
- Coastal squeeze

North Norfolk Coast Ramsar:

No threats or pressures were identified for North Norfolk Coast Ramsar.

⁵¹ Natural England (2017) The Wash & North Norfolk Coast SAC SIP. Available at:
<http://publications.naturalengland.org.uk/publication/5327498292232192> [Date Accessed: 12/04/22]

Appendix C: Habitats sites and corresponding SSSI conservation status

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.
The Broads SAC	Alderfen Broad SSSI	3	1 Favourable	n/a
			2 Unfavourable - recovering	n/a
	Ant Broads and Marshes SSSI	35	24 Favourable	n/a
			8 Unfavourable - recovering	n/a
			3 Unfavourable - declining	Possible nutrient enrichment.
	Barnby Broad and Marshes SSSI	24	11 Favourable	n/a
			13 Unfavourable - recovering	n/a
	Broad Fen, Dilham SSSI	1	1 Unfavourable - recovering	n/a
	Bure Broads and Marshes SSSI	14	5 Favourable	n/a
			4 Unfavourable - no change	n/a
			5 Unfavourable - recovering	n/a
	Burgh Common and Muckfleet Marshes SSSI	9	4 Favourable	n/a
			1 Unfavourable - no change	n/a
			4 Unfavourable - recovering	n/a
	Calthorpe Broad SSSI	3	2 Favourable	n/a
			1 Unfavourable - recovering	n/a
	Cantley Marshes SSSI	3	3 Favourable	n/a
	Crostwick Marsh SSSI	1	1 Unfavourable - no change	n/a
Damgate Marshes, Acle SSSI	10	6 Favourable	n/a	
		4 Unfavourable - recovering	n/a	
Decoy Car, Acle SSSI	6	4 Favourable	n/a	

¹ Natural England. Designated Site View. <https://designatedsites.naturalengland.org.uk/>. Site condition data is provided for the SSSIs which legally underpin European site designations [Date Accessed: 23/04/21].

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.
			2 Unfavourable - recovering	n/a
	Duncan's Marsh, Claxton SSSI	2	2 Unfavourable - recovering	n/a
	Geldeston Meadows SSSI	2	1 Unfavourable - no change	n/a
			1 Unfavourable - declining	No comment provided.
	Hall Farm Fen, Hemsby SSSI	1	1 Favourable	n/a
	Halvergate Marshes SSSI	36	25 Favourable	n/a
			2 Unfavourable - no change	n/a
			9 Unfavourable - recovering	n/a
	Hardley Flood SSSI	2	2 Favourable	n/a
	Limpenhoe Meadows SSSI	1	1 Unfavourable - recovering	n/a
	Ludham - Potter Heigham Marshes SSSI	6	6 Favourable	n/a
	Poplar Farm Meadows, Langley SSSI	1	1 Favourable	n/a
	Priory Meadows, Hickling SSSI	2	1 Favourable	n/a
			1 Unfavourable - recovering	n/a
	Shallam Dyke Marshes, Thurne SSSI	8	2 Favourable	n/a
			6 Unfavourable - no change	n/a
	Sprat's Water and Marshes, Carlton Colville SSSI	11	7 Favourable	n/a
			2 Unfavourable - no change	n/a
			2 Unfavourable - recovering	n/a
	Smallburgh Fen SSSI	1	1 Favourable	n/a
	Stanley and Alder Carrs, Aldeby SSSI	3	3 Unfavourable - recovering	n/a
	Trinity Broads SSSI	23	15 Favourable	n/a
			1 Unfavourable - no change	n/a
			7 Unfavourable - recovering	n/a
		19	11 Favourable	n/a

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.	
	Upper Thurne Broads and Marshes SSSI		3 Unfavourable - no change	n/a	
			2 Unfavourable - recovering	n/a	
			3 Unfavourable - declining	Water quality and abstraction.	
	Upton Broad & Marshes SSSI	18	8 Favourable	n/a	
			1 Unfavourable - no change	n/a	
			9 Unfavourable - recovering	n/a	
	Yare Broads and Marshes SSSI	28	7 Favourable	n/a	
			10 Unfavourable - no change	n/a	
			6 Unfavourable - recovering	n/a	
			5 Unfavourable - declining	Nutrient enrichment. Overfeeding of duck for shooting with possible contribution from agricultural run-off.	
	Broadland SPA and Ramsar	Alderfen Broad SSSI	3	1 Favourable	n/a
				2 Unfavourable - recovering	n/a
Ant Broads and Marshes SSSI		35	24 Favourable	n/a	
			8 Unfavourable - recovering	n/a	
			3 Unfavourable - declining	Possible nutrient enrichment.	
Barnby Broad and Marshes SSSI		24	11 Favourable	n/a	
			13 Unfavourable - recovering	n/a	
Broad Fen, Dilham SSSI		1	1 Unfavourable - recovering	n/a	
Bure Broads and Marshes SSSI		14	5 Favourable	n/a	
			4 Unfavourable - no change	n/a	
			5 Unfavourable - recovering	n/a	
Burgh Common and Muckfleet Marshes SSSI		9	4 Favourable	n/a	
			1 Unfavourable - no change	n/a	
			4 Unfavourable - recovering	n/a	
Calthorpe Broad SSSI		3	2 Favourable	n/a	

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.
			1 Unfavourable - recovering	n/a
	Cantley Marshes SSSI	3	3 Favourable	n/a
	Crostwick Marsh SSSI	1	1 Unfavourable - no change	n/a
	Decoy Car, Acle SSSI	6	4 Favourable	n/a
			2 Unfavourable - recovering	n/a
	Duncan's Marsh, Claxton SSSI	2	2 Unfavourable - recovering	n/a
	Geldeston Meadows SSSI	2	1 Unfavourable - no change	n/a
			1 Unfavourable - declining	No comment provided.
	Hall Farm Fen, Hemsby SSSI	1	1 Favourable	n/a
	Halvergate Marshes SSSI	36	25 Favourable	n/a
			2 Unfavourable - no change	n/a
			9 Unfavourable - recovering	n/a
	Hardley Flood SSSI	2	2 Favourable	n/a
	Limpenhoe Meadows SSSI	1	1 Unfavourable - recovering	n/a
	Ludham - Potter Heigham Marshes SSSI	6	6 Favourable	n/a
	Poplar Farm Meadows, Langley SSSI	1	1 Favourable	n/a
	Priory Meadows, Hickling SSSI	2	1 Favourable	n/a
			1 Unfavourable - recovering	n/a
	Shallam Dyke Marshes, Thurne SSSI	8	2 Favourable	n/a
			6 Unfavourable - no change	n/a
	Sprat's Water and Marshes, Carlton Colville SSSI	12	7 Favourable	n/a
			2 Unfavourable - no change	n/a
			3 Unfavourable - recovering	n/a
	Smallburgh Fen SSSI	1	1 Favourable	n/a
	Stanley and Alder Carrs, Aldeby SSSI	3	3 Unfavourable - recovering	n/a
		19	11 Favourable	n/a

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.
	Upper Thurne Broads and Marshes SSSI		3 Unfavourable - no change	n/a
			2 Unfavourable - recovering	n/a
			3 Unfavourable - declining	Water quality and abstraction.
	Upton Broad & Marshes SSSI	18	8 Favourable	n/a
			1 Unfavourable - no change	n/a
			9 Unfavourable - recovering	n/a
	Yare Broads and Marshes SSSI	28	7 Favourable	n/a
			9 Unfavourable - no change	n/a
			5 Unfavourable - recovering	n/a
			5 Unfavourable - declining	Nutrient enrichment. Overfeeding of duck for shooting with possible contribution from agricultural run-off.
Breydon Water SPA and Ramsar	Breydon Water SSSI	15	15 Favourable	n/a
	Halvergate Marshes SSSI	36	25 Favourable	n/a
			2 Unfavourable - no change	Pollution, lack of corrective works
			9 Unfavourable - recovering	n/a
Great Yarmouth North Denes SPA	Great Yarmouth North Denes SSSI	2	2 Favourable	n/a
	Winterton-Horsey Dunes SSSI	12	7 Favourable	n/a
			4 Unfavourable - no change	Inappropriate coastal management
			1 Unfavourable - recovering	n/a
Outer Thames Estuary SPA	Benfleet and Southend Marshes SSSI	10	1 Favourable	n/a
			2 Unfavourable - no change	Coastal squeeze
			7 Unfavourable - recovering	n/a
	Corton Cliffs SSSI	1	1 Favourable	n/a
	Crouch and Roach Estuaries SSSI	36	12 Favourable	n/a
			24 Unfavourable - recovering	n/a
Dengie SSSI	8	5 Unfavourable - recovering	n/a	

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.
	Foulness SSSI	34	3 Unfavourable - Declining	n/a
			10 Favourable	n/a
			1 Unfavourable - no change	n/a
			1 Unfavourable - Declining	Undergrazing
			22 Unfavourable - recovering	n/a
	Great Yarmouth North Denes SSSI	2	2 Favourable	n/a
	Minsmere-Walberswick Heaths and Marshes SSSI	36	23 Favourable	n/a
			12 Unfavourable - recovering	n/a
			1 Unfavourable - no change	n/a
	Pakefield to Easton Bavents SSSI	33	23 Favourable	n/a
			1 Unfavourable - no change	Freshwater pollution, deer grazing
			8 Unfavourable - recovering	n/a
			1 Unfavourable - Declining	n/a
	The Cliff, Burnham-On-Crouch SSSI	1	23 Favourable	n/a
	Southern North Sea SAC	SAC Monitored Features not allocated to unit(s)	n/a	n/a
Winterton-Horsey Dunes SAC	Winterton-Horsey Dunes SSSI	12	7 Favourable	n/a
			4 Unfavourable - No change	Inappropriate coastal management
			1 Unfavourable - Recovering	n/a
Greater Wash SPA	Beeston Cliffs SSSI	1	1 Unfavourable - Recovering	n/a
	Chapel Point - Wolla Bank SSSI	1	1 Favourable	n/a
	Dimlington Cliff SSSI	1	1 Favourable	n/a
	Gibraltar Point SSSI	5	2 Favourable	n/a
			2 Unfavourable - Recovering	n/a
			1 Unfavourable - Declining	Air pollution

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.
	Happisburgh Cliffs SSSI	1	1 Favourable	n/a
	Humber Estuary - 2000480 SSSI	187	13 Favourable	n/a
			101 Unfavourable - Recovering	n/a
			36 Unfavourable - Declining	n/a
			2 Unknown	n/a
	Hunstanton Cliffs SSSI	1	1 Favourable	n/a
	Morston Cliff SSSI	1	1 Unfavourable - Recovering	n/a
	Mundesley Cliffs SSSI	1	1 Favourable	n/a
	North Norfolk Coast SSS	70	67 Favourable	n/a
			3 Unfavourable - Recovering	n/a
	Overstrand Cliffs SSSI	2	2 Favourable	n/a
	Saltfleetby - Theddlethorpe Dunes SSSI	2	1 Favourable	n/a
			1 Unfavourable - recovering	n/a
	Sidestrand and Trimmingham Cliffs SSSI	3	2 Favourable	n/a
			1 Unfavourable - declining	Inappropriate coastal management
	The Lagoons SSSI	1	1 Unfavourable - no change	n/a
	The Wash SSSI	60	48 Favourable	n/a
			11 Unfavourable - Recovering	n/a
			1 Unfavourable - Declining	n/a
	West Runton Cliffs SSSI	1	1 Favourable	n/a
Weybourne Cliffs SSSI	1	1 Favourable	n/a	
Winterton-Horsey Dunes SSSI	12	7 Favourable	n/a	
		4 Unfavourable - No change	Inappropriate coastal management	
		1 Unfavourable - Recovering	n/a	
Withow Gap, Skipsea SSSI	1	1 Favourable		
Benacre to Easton Barents SPA	Pakefield to Easton Barents SSSI	51	30 Favourable	n/a
			4 Unfavourable - no change	n/a

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.
			17 Unfavourable - recovering	n/a
			1 Unfavourable - declining	Water pollution
			Partially destroyed	Coastal erosion
Norfolk Valley Fens SAC	Badley Moor SSSI	4	4 Favourable	n/a
	Booton Common SSSI	1	1 Unfavourable - Recovering	n/a
	Buxton Heath SSSI	1	1 Unfavourable - Recovering	n/a
	Coston Fen, Runhall SSSI	1	1 Unfavourable - No change	Freshwater drainage, lack of corrective works, inappropriate scrub control
	East Walton and Adcock's Common SSSI	3	3 Unfavourable - Recovering	n/a
	Flordon Common SSSI	2	1 Favourable	n/a
			1 Unfavourable - Recovering	n/a
	Foulden Common SSSI	7	2 Favourable	n/a
			4 Unfavourable - Recovering	n/a
			1 Unfavourable - Declining	Inappropriate water levels
	Great Cressingham Fen SSSI	1	1 Unfavourable - Recovering	n/a
	Holt Lowes SSSI	2	1 Favourable	n/a
			1 Unfavourable - Recovering	n/a
	Potter & Scarning Fens, East Dereham SSSI	2	2 Unfavourable - Recovering	n/a
	Sheringham and Beeston Regis Commons SSSI	2	2 Unfavourable - Recovering	n/a
	Southrepps Common SSSI	1	1 Unfavourable - Recovering	n/a
Swangey Fen, Attleborough SSSI	6	5 Favourable	n/a	
		1 Unfavourable - Declining	n/a	
Thompson Water, Carr and Common SSSI	11	8 Favourable	n/a	
		2 Unfavourable - Recovering	n/a	
		Unfavourable - Declining	Pollution	

Habitats site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units ¹	Reason for unfavourable declining status where applicable.
The Wash and North Norfolk Coast SAC	Gibraltar Point SSSI	5	2 Favourable	n/a
			2 Unfavourable - recovering	n/a
			1 Unfavourable - Declining	Air pollution
	North Norfolk Coast SSSI	70	67 Favourable	n/a
			3 Unfavourable - recovering	n/a
	The Wash SSSI	60	48 Favourable	n/a
11 Unfavourable - Recovering			n/a	
1 Unfavourable - Declining			n/a	
North Norfolk Coast SAC	North Norfolk Coast SSSI	70	67 Favourable	n/a
			3 Unfavourable - recovering	n/a
North Norfolk Coast SPA and Ramsar	North Norfolk Coast SSSI	70	67 Favourable	n/a
			3 Unfavourable - recovering	n/a
	Morston Cliff	1	1 Unfavourable - recovering	n/a

Appendix D: Broads Plan Pre-Screening Summary – Test of Likely Significance

The draft Broads Plan has been screened using the DTA HRA pre-screening categories¹ presented in Table D.1.

Table D.1: Assessment and reasoning categories from Part F of the DTA Handbook

Assessment and reasoning categories from Chapter F of The Habitats Regulations Assessment Handbook (DTA Publications, 2013):

- A. General statements of policy / general aspirations.
- B. Policies listing general criteria for testing the acceptability / sustainability of proposals.
- C. Proposal referred to but not proposed by the plan.
- D. General plan-wide environmental protection / site safeguarding / threshold policies
- E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.
- F. Policies or proposals that cannot lead to development or other change.
- G. Policies or proposals that could not have any conceivable or adverse effect on a site.
- H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects).
- I. Policies or proposals with a likely significant effect on a site alone.
- J. Policies or proposals unlikely to have a significant effect alone.
- K. Policies or proposals unlikely to have a significant effect either alone or in combination.
- L. Policies or proposals which might be likely to have a significant effect in combination.
- M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.

¹ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (September) (2013) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
Chapter 1 – Introduction	n/a	n/a	This chapter sets out administrative text and baseline information for the Plan.	A	n/a	Screen out
Chapter 2 – Vision and Principles	Long-term vision and fundamental principles	n/a	Section 2.1 of this chapter sets out the vision for the Broads National Park to 2042 and Section 2.2 sets out the fundamental principles. These are general aspirations of the Broads Plan.	A	n/a	Screen out
Chapter 3 – Strategic objectives	A. Responding to climate change and food risk.	Long term aim and background text.	This sets out the general statement / overall goal of this long-term objective to respond to climate change and flood risk.	A	n/a	Screen out
		A1: Prepare a long-term, integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area	This strategic objective aims to develop research into flood risk, update flood risk assessments and look at options for natural flood management. It also supports flood risk mitigation measures as set out in adopted plans (see Appendix A for a review of flood management plans), and infrastructure maintenance works as set out in the Broadland Flood Alleviation Project. Implementation of infrastructure maintenance works has the potential to have LSEs (in particularly in relation to hydrology and disturbance) at water sensitive Habitats sites. These Habitats sites are set out in Chapter 6 .	I	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar	Screen in
		A2: Work towards making all Broads Authority operations	This strategic objective will be delivered through research and implementation of carbon reduction measures and also the identification and	D	n/a	Screen out

² Note: wider tourism zones of influence (at the county scale) have been applied to identify Habitats sites which may be affected by promotion of tourism across the Broads and potential development of tourism accommodation through the Local Plan for the Broads.

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		carbon neutral by 2030 and carbon zero by 2040	implementation of offsetting measures. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.			
		A3: Agree carbon reduction targets for the Broads National Park and promote action to reduce emissions	This strategic objective aims to develop common standards to achieve carbon reduction, undertake research and implement reduction initiatives. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out
	B: Improving landscapes for biodiversity and agriculture	Long term aim and background text.	This long-term aim sets out a general statement / overall goal to improve landscapes for biodiversity and agriculture.	A	n/a	Screen out
		B1. Restore, maintain and enhance lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques	This strategic objective aims to develop and implement lake restoration, maintenance and enhancement works. Restoration projects promoted in plans, such as the Hoveton Great Broad Restoration Project, will take place within areas designated as the Broads SAC, Broadlands SPA and Broadlands Ramsar. These works have the potential to have LSEs at water sensitive Habitats sites. These Habitats sites are set out in Chapter 6 .	I	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar	Screen in
		B2. Promote best practice water capture and usage across the Broadland rivers	This strategic objective aims to promote water efficiency measures to reduce pressures on water resources. It also promotes actions which are set out within other water resource management plans (such as abstraction licencing, WRMP, Drought Plans etc -	I	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA	Screen in

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
		catchment and reduce point and diffuse pollution into the floodplain and water courses	see Appendix A). Promotion of water efficiency measures will have a positive environmental effect. Plans such as the drought plan and WRMPs may have the potential to have LSEs at water sensitive Habitats sites. These Habitats sites are set out in Chapter 6 .		Breydon Ramsar	
		B3. Maintain, enhance and increase areas of priority fen, reed bed, grazing marsh and wet woodland, protecting peatland ecosystems as carbon sinks and seeking environmental net gain	This strategic objective aims to maintain enhance and increase habitats which act as carbon sinks. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out
		B4. Define, implement and monitor management regimes for priority species and invasive non-native species	This strategic objective aims to manage priority species recovery and invasive species. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out
		B5. Improve partnership coordination and communication of Broads biodiversity monitoring and research effort,	This strategic objective promotes research and monitoring. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
		linked to national biodiversity network				
	C: Maintaining and enhancing the navigation	Long term aim and background text.	This long-term objective sets out a general statement / overall goal to maintain and enhance navigation.	A	n/a	Screen out
		C1. Maintain navigation water depths to defined specifications, reduce sediment input and dispose of dredged material in sustainable and beneficial ways	This strategic objective aims to deliver the annual dredging programme, sediment management and identify and address erosion. A number of waterways within the Broads are designated as part of the Broads SAC, Broadlands SPA, Broadlands Ramsar, Breydon Water Ramsar and Breydon Water SPA or are located upstream of these designations. Works set out under this objective have the potential to have LSEs at water sensitive Habitats sites. These Habitats sites are set out in Chapter 6 .	I	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar	Screen in
		C2. Maintain existing navigation water space and develop appropriate opportunities to extend access for various types of craft	This strategic objective aims to develop, extend and maintain navigation. A number of waterways are designated as part of the Broads SAC, Broadlands SPA, Broadlands Ramsar, Breydon Water Ramsar and Breydon Water SPA or are located upstream of these designations. Works set out under this objective have the potential to have LSEs at water sensitive Habitats sites. These Habitats sites are set out in Chapter 6 .	I	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar	Screen in
		C3. Manage water plants and riverside trees and scrub, and seek resources to increase operational targets	This strategic objective aims to manage water plants and riverside vegetation. A number of waterways are designated as part of the Broads SAC, Broadlands SPA, Broadlands Ramsar, Breydon Water Ramsar and Breydon Water SPA or are located upstream of these designations. Works set out under this objective have the potential to have LSEs at water sensitive Habitats sites. These Habitats sites are set out in Chapter 6 .	I	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar	Screen in

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
		C4. Maintain and improve safety and security standards and user behaviour on the waterways	This strategic objective aims to maintain and improve navigation safety through, among other aspects, infrastructure inspection and maintenance. A number of waterways are designated as part of the Broads SAC, Broadlands SPA, Broadlands Ramsar, Breydon Water Ramsar and Breydon Water SPA or are located upstream of these designations. Works set out under this objective have the potential to have LSEs at water sensitive Habitats sites. These Habitats sites are set out in Chapter 6 .	I	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar	Screen in
	D: Protecting landscape character and the historic environment	Long term aim and background text.	This long-term aim sets out a general statement / overall goal to protect landscape character and the historic environment.	A	n/a	Screen out
		D1. Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including 'at risk' assets	This strategic objective aims to protect and enhance the historical features of the Broads, through recording, education and promoting awareness. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out
		D2. Maintain an up-to-date Broads Landscape Character Assessment and use to inform conservation action plans	This strategic objective aims refresh and maintain landscape assessment data. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
		D3. Maintain up-to-date Conservation Area designations, appraisals and management proposals	This strategic objective aims maintain Conservation Area information. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out
		D4. Reduce the impacts on the Broads of visual intrusion and noise and light pollution, and promote Dark Sky Discovery Sites	This strategic objective aims promote reduction of visual, noise and light pollution and monitor this. It will have a positive environmental effect. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out
	E: Promoting understanding and enjoyment	Long term aim and background text.	This long-term objective sets out a general statement / overall goal to promote understanding and enjoyment of the Broads National Park as a visitor destination.	A	n/a	Screen out
		E1. Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities	This strategic objective aims to improve access, facilities and information for visitors, including waterway users. A number of waterways are designated as part of the Broads SAC, Broadlands SPA, Broadlands Ramsar, Breydon Water Ramsar and Breydon Water SPA or are located upstream of these designations. In addition, a number of Habitats sites are located around the coastline. This objective has the potential to increase recreational pressures and have an adverse impact upon air quality with potential LSEs at inland and coastal Habitats sites. These Habitats sites are set out under atmospheric pollution, hydrology and recreational impacts in Chapter 6 .	L	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar Breckland SPA Breckland SAC Winterton-Horsey Dunes SAC Great Yarmouth and North Denes SPA North Norfolk Coast SAC	Screen in

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
					North Norfolk Coast SPA North Norfolk Coast Ramsar The Wash and North Norfolk Coast SAC Roydon and Dersingham Bog SAC Roydon and Dersingham Bog Ramsar Norfolk Valley Fens SAC The Wash SPA The Wash Ramsar Benacre to Easton Barents SPA	
		E2. Offer a coordinated and year-round programme of visitor activities that promote a 'Broads' experience', taking measures to prevent any adverse environmental impacts	This strategic objective aims to promote a 'Broads' visitor experience. A number of waterways are designated as part of the Broads SAC, Broadlands SPA, Broadlands Ramsar, Breydon Water Ramsar and Breydon Water SPA or are located upstream of these designations. In addition, a number of Habitats sites are located around the coastline. This objective has the potential to increase recreational pressures and have an adverse impact upon air quality with potential LSEs at inland and coastal Habitats sites. These Habitats	L and M	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar Breckland SPA Breckland SAC Winterton-Horsey Dunes SAC	Screen in

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
			<p>sites are set out under atmospheric pollution, hydrology and recreational impacts in Chapter 6.</p> <p>This objective also provides some mitigating text (<i>'taking measures to prevent any adverse environmental impacts'</i>) which is intended to avoid or reduce harmful effects on a Habitats site and has therefore been screened in under Category M.</p>		<p>Great Yarmouth and North Denes SPA</p> <p>North Norfolk Coast SAC</p> <p>North Norfolk Coast SPA</p> <p>North Norfolk Coast Ramsar</p> <p>The Wash and North Norfolk Coast SAC</p> <p>Roydon and Dersingham Bog SAC</p> <p>Roydon and Dersingham Bog Ramsar</p> <p>Norfolk Valley Fens SAC</p> <p>The Wash SPA</p> <p>The Wash Ramsar</p> <p>Benacre to Easton Bavents SPA</p>	
		E3. Maintain and upgrade the range and provision of integrated multimedia interpretation about the special qualities	<p>This strategic objective aims to promote the Broads as a visitor destination. A number of waterways are designated as part of the Broads SAC, Broadlands SPA, Broadlands Ramsar, Breydon Water Ramsar and Breydon Water SPA or are located upstream of these designations. In addition, a number of Habitats sites are located around the coastline. This objective has the</p>	L and M	<p>The Broads SAC</p> <p>Broadland SPA</p> <p>Broadland Ramsar</p> <p>Breydon Water SPA</p> <p>Breydon Ramsar</p>	Screen in

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
		of the Broads National Park, and 'point of need' information for visitors	<p>potential to increase recreational pressures and have an adverse impact upon air quality with potential LSEs at inland and coastal Habitats sites. These Habitats sites are set out under atmospheric pollution, hydrology and recreational impacts in Chapter 6.</p> <p>This objective also provides some mitigating text in relation to encouraging environmentally aware and responsible visitor behaviour, which is intended to avoid or reduce harmful effects on a Habitats site and has therefore been screened in under Category M.</p>		Breckland SPA Breckland SAC Winterton-Horsey Dunes SAC Great Yarmouth and North Denes SPA North Norfolk Coast SAC North Norfolk Coast SPA North Norfolk Coast Ramsar The Wash and North Norfolk Coast SAC Roydon and Dersingham Bog SAC Roydon and Dersingham Bog Ramsar Norfolk Valley Fens SAC The Wash SPA The Wash Ramsar Benacre to Easton Barents SPA	
		E4. Strengthen the quality and	This strategic objective aims to develop skills and standards in the Broads tourism industry. It will not	F	n/a	Screen out

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
		distinctiveness of the Broads tourism offer, including careers and skills training	trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.			
	F: Connecting and inspiring communities	Long term aim and background text.	This long-term objective sets out a general statement / overall goal to connect and inspire communities. It includes the requirement to provide strong planning frameworks and cross-boundary cooperation between local authorities on issues such as environmental sustainability.	A	n/a	Screen out
		F1. Increase and promote of accessible and 'taster' activities that foster physical and mental health and wellbeing for all, including under-represented groups	This strategic objective aims to promote the Broads to under-represented groups which may increase recreational pressure. A number of waterways are designated as part of the Broads SAC, Broadlands SPA, Broadlands Ramsar, Breydon Water Ramsar and Breydon Water SPA or are located upstream of these designations. In addition, a number of Habitats sites are located around the coastline. This objective has the potential to increase recreational pressures with potential LSEs at inland and coastal Habitats sites. These Habitats sites are set out under hydrology and recreational impacts in Chapter 6 .	L	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar Breckland SPA Breckland SAC Winterton-Horsey Dunes SAC Great Yarmouth and North Denes SPA North Norfolk Coast SAC North Norfolk Coast SPA North Norfolk Coast Ramsar	Screen in

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
					The Wash and North Norfolk Coast SAC Roydon and Dersingham Bog SAC Roydon and Dersingham Bog Ramsar Norfolk Valley Fens SAC The Wash SPA The Wash Ramsar Benacre to Easton Barents SPA	
		F2. Offer varied, flexible and sustainable volunteering opportunities and skills training to suit diverse audiences	This strategic objective aims to offer volunteering opportunities. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	F	n/a	Screen out
		F3. Provide and expand schools-based and outreach environmental education opportunities for young people, using	This strategic objective aims to provide environmental education opportunities. It will not trigger development or any other change and as such will have no LSE on any Habitats site either alone or in-combination.	F	n/a	Screen out

Chapter	Component	Sub-component	Summary of Plan Component	Screening Category	Habitats Site ²	Screening Conclusion
		the Broads as a learning resource				
		F4. Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits	<p>This strategic objective makes provisions for a review and update of the Local Plan for the Broads and to provide guiding planning policy and masterplan information for new development. The text within this section estimates that approx. 320 new homes are needed for the Broads by 2036³.</p> <p>New development has the potential to have a number of LSEs including a change in air quality (from increased road traffic), increased recreational pressures, urbanisation impacts, hydrology impacts (water resources and water quality) and habitat loss / damage / fragmentation. Such impacts may affect both inland and coastal Habitats sites as set out in Chapter 6.</p> <p>This objective also provides some mitigating text in relation to addressing alone and in-combination effects of increased recreational pressures associated with new growth; 'Implement Green Infrastructure and Recreational Disturbance Avoidance Mitigation Strategies to extend and protect biodiversity value of sites'. This is intended to avoid or reduce harmful effects on Habitats sites and has therefore been screened in under Category M.</p>	L and M	The Broads SAC Broadland SPA Broadland Ramsar Breydon Water SPA Breydon Ramsar Breckland SPA Breckland SAC Winterton-Horsey Dunes SAC Great Yarmouth and North Denes SPA North Norfolk Coast SAC North Norfolk Coast SPA North Norfolk Coast Ramsar The Wash and North Norfolk Coast SAC Roydon and Dersingham Bog SAC	Screen in

³ The Strategic Housing Market Assessment for Central Norfolk (2016) calculated a requirement for 320 new dwellings. This assessment is currently being updated and will inform the Local Plan for the Broads review.

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					Roydon and Dersingham Bog Ramsar Norfolk Valley Fens SAC The Wash SPA The Wash Ramsar Benacre to Easton Barents SPA	
		F5. Increase income generation to support Broads-themed projects	This strategic objective aims to identify income generation including those aimed towards achieving environmental benefits (such as nature recovery and carbon credits). It will not trigger development or any other change but have a positive environmental effect. Therefore, it will have no LSE on any Habitats site either alone or in-combination.	D	n/a	Screen out
Appendices	n/a	n/a	The appendices provide administrative and explanatory text, information on monitoring aims and objectives and maps.	A	n/a	Screen out

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Ecological Services
Green Infrastructure
Landscape and Visual Impact Assessment
Landscape Character Assessment
Habitats Regulations Assessment
Strategic Environmental Assessment
Sustainability Appraisal



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

© Lepus Consulting Ltd
Eagle Tower Montpellier Drive
Cheltenham GL50 1TA
T: 01242 525222
E: enquiries@lepusconsulting.com
W: www.lepusconsulting.com
CHELTENHAM



Lepus Consulting
1 Eagle Tower
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com