

Broads Authority

24 July 2026

Agenda item number 15

Broads Plan 2028 - Update

Report by Broads Plan Coordinator

Purpose

This report provides Broads Authority Members with an update on progress made in respect of the preparation of the new Broads Plan (2028) since the Broads Authority meeting on 27 February 2026.

Broads Plan context

The Broads Plan provides the overall strategic document for the management of the Broads and the collaboration with partners. It is required to be reviewed every 5 years. It is a strategy for the Broads Executive Area not just for the Broads Authority. Whilst principally a 'partnership plan', the Broads Authority has the statutory responsibility for leading and facilitating the review.

Recommended decision

The contents of the report are noted together with any specific member observations on the process and comments received to date

Contents

1.	Introduction	2
2.	Broads Plan Timetable and Progress	2
3.	Financial implications	3
4.	Risk implications	4
5.	Conclusion	4
	Appendix 1 – Feedback from Initial Broads Plan Notification	5
	Appendix 2: High Level summary of content issues raised to date	43
	Appendix 3: High level summary of process comments received to date	45

1. Introduction

- 1.1. Members will recall approving the timetable and process for the review of the Broads Plan and the production of Broads Plan 2028 at the Broads Authority Meeting in February 2026. Members will also recall that the process for reviewing management plans (such as the Broads Plan) is set out in the guidance “Management plans for Protected Landscapes in England” published by Natural England on 12 June 2025. The steps outlined in this guidance have been built into the draft timetable set out in the previous report, with the aim of having an approved new Broads Plan in place for November 2027, approximately five years after the last plan was adopted by the Authority and when the current plan period ends.

2. Broads Plan Timetable and Progress

- 2.1. The timetable (as agreed) is set out below against the steps highlighted in the Defra Guidance:

Step 1: Planning your project – **November 2025 (Achieved)**

Step 2: Notifying others – **April 2026 (Achieved)**

Step 3: Environmental and equality impact assessments – **In progress**

Step 4: Climate Adaptation management plans – **In progress**

Step 5: Engaging stakeholders – **In progress**

Step 6: Monitoring conditions, gathering evidence and reporting – **July to September 2026**

Step 7: Drafting the plan – **September to December 2026**

Step 8: Consultation – **April/May 2027**

Step 9: Adoption – **November 2027**

Step 10: Presentation – **January 2028**

- 2.2. Overarching progress against each stage is recorded above, with the first two initial stages being completed and Stages 3-5 in progress.
- 2.3. In April 2026, the formal notification to Natural England and the Secretary of State of the intention to review the Broads Plan was made. At the same a similar notification went out to a range of organisations. This included key Broads Plan delivery partners listed in Appendix A of the existing Broads Plan, all town and parish councils located within the Broads Authority Executive area and a wide range of national and local interest groups and stakeholders.
- 2.4. As part of this initial notification process, consultees were asked to provide some feedback on what elements of the existing Broads Plan had worked well, which areas had worked less well, what gaps there are in the current plan which would need to be filled by the reviewed Plan and also what are the key issues which must be addressed by the reviewed Plan. The initial feedback is set out in the Table in Appendix 1 of this Report.

- 2.5. In addition to this initial feedback a series of bespoke meetings have been held to understand current positions and identify the key strategic issues going forward. To date these are as follows:

10 June: BA Management Group

11 June: Broads Society

12 June: Broads Authority Members

16 June: Navigation Interests

1 July: Broadland Futures Initiative

23 July: Broads Plan Partnership

Other meetings are also being sought with Broads Plan partners who are unable to attend the main meeting.

- 2.6. The key issues highlighted from each of the meetings will be compiled into an 'evidence base' report together with key data from the State of the Park Report. This evidence report which will highlight the key issues arising from both data collection/monitoring and from the views of relevant stakeholders will then be used as the basis for drafting the revised Broads Plan.
- 2.7. Key issues being raised from the meetings and workshops held to date fall broadly into two categories: **Content** comments i.e. those that will help to formulate the content of the revised Broads Plan and **Process** comments i.e. those which will help to shape how the new plan is produced. A high-level summary of content comments generated by the stakeholder meetings to date is shown in Appendix 2. The process issues are shown in Appendix 3. Some of the issues raised are too detailed for the strategic nature of the Broads Plan and will need to be captured appropriately in other sub-level strategies and work plans ensuring they are not overlooked.
- 2.8. The most immediate tasks which need to be progressed are those required to allow the completion of stages 3-5 and these will be happening between the date of this report and September. Members will receive further updates at each Broads Authority Meeting through the Summary of Progress Agenda item in addition to specific reports at key stages e.g. draft plan approved for consultation, adoption of Plan etc.

3. Financial implications

- 3.1. As highlighted in the February Broads Plan Timetable report, it is difficult to estimate the precise amount of time and resource needed for reviewing the Broads Plan as much is dependent upon the activity and interest of partners and the level and complexity of the responses received. However, Members will recall from the February meeting that this activity will be funded from National Park reserves and a provision of £50,000 has been made in the budget.

4. Risk implications

- 4.1. The Authority is required to review the Broads Plan at least once in every five years. The Authority has agreed a timetable to enable the Plan to be in place for January 2028 and work has begun to implement that.

5. Conclusion

- 5.1. Work has begun on the review of the Broads Plan and the first two steps in the process are complete with steps 3-5 in progress and currently on schedule.
- 5.2. Members will observe from the comments received to date that the long-term vision to 2042, and fundamental principles of the current plan appear to be largely fit for purpose. There is some agreement that the six current themes require some review to bring them up to date with the position in respect of many areas of work. Some may require more review than others. However, it remains that the main task is to review the strategic actions so that they best reflect what will be happening, and what needs to happen in the Broads over the next 5 years, but with a clear eye on the longer term. It is also clear that work is required to ensure that an easy, convenient and clear monitoring framework is in place to enable better reporting on those new strategic actions and to enable a better evidence base for future Plan reviews. Consideration must also be given to how this will align with other measures such as Protected Landscape Targets and Outcomes Framework (PLTOF) and any additional funding requirements from DEFRA. Furthermore, early consideration needs to be given to how the plan is communicated to the wider public and hard to reach groups who may not interact with the Broads on a regular basis and how the formal public consultation stages can be conducted to maximise engagement.

Author: Andrea Long

Date of report: 01 July 2026

Background papers: [Strategic Planning: Broads Plan timetable and NSIP process](#)

[Management plans for Protected Landscapes in England and Wales](#) – Defra June 2025

Appendix 1 – Feedback from Initial Broads Plan Notification

Appendix 2 – High level summary of content issues raised to date

Appendix 3 – High level summary of process comments received to date

Appendix 1 – Feedback from Initial Broads Plan Notification

Responses to initial notification – May 2026

Ref	Plan page or paragraph	Respondent	Comment
1	General	Ashmanhaugh Parish Council	Ashmanhaugh Parish Council broadly supports the review of the Broads Plan 2027-32.
2	General Partnership Working	East Suffolk Council	Many thanks for the opportunity to feed into the review of your Broads Plan. We very much value the Broads as an asset in East Suffolk and the Broads Authority as both a strategic partner and key stakeholder. This is increasingly important as the local government landscape is reorganised, with the formation of the new unitary councils for Norfolk and Suffolk and the potential of a Norfolk and Suffolk Strategic Authority. Given the overlap on the timeline for the Broads Plan 2027-2032 and for the formation of new Unitary Councils for Central and East Suffolk and East Norfolk, I think the first reflection is on the refreshed opportunity for partnership working between local government and the Broads Authority. As we have discussed, maintaining relationships with different tiers of local government has been part of the landscape, but the changes offer a simpler path to collaboration with all local government services in one tier of council. It would be good to reflect the opportunity of a refreshed partnership with local government in the new plan. These are our headline comments and reflections on the plan, and we look forward to being involved in the future development of the Broads Plan 2027-2032.
3	General	RSPB	Which aspects of the current Broads Plan you feel have worked well:

Ref	Plan page or paragraph	Respondent	Comment
	What has worked well		a) Partnership working: There does appear to be a growing appreciation of partnership working. There is more collaboration and different sectors are increasingly talking and working with one another. However, there is more that can be done. b) Evidence gathering: There has been a continued effort to develop the evidence base to support decision-making across the Broads. However, there is a need to review the key questions that need to be answered and ensure that the monitoring programmes in place are appropriate and expanded. c) Nature recovery aspirations: There is a growing join up around action to deliver benefits for habitats and species. It is positive to have a Broads specific nature recovery strategy and encouraging that the work is recognised across sectors. However, there is a lot of work to be done to translate the strategy into action on the ground. d) A focus on action: It has been helpful to get more clarity in the current Plan on what will be delivered to achieve the objectives and to give clarity on who will help deliver the work.
4	General Where the Plan has been less effective or where challenges or barriers to delivery have arisen	RSPB	General points: The objectives are very high level. Having reviewed Tables 3-8, the monitoring objectives are also highly variable with respect to how SMART they are. 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. Will some progress be considered sufficient? Water quality is a good example where despite efforts to improve water quality the majority of watercourses and waterbodies are still failing to meet their targets. There need to be clear targets that drive delivery and at a suitable pace.

Ref	Plan page or paragraph	Respondent	Comment
			b) Accessibility of the Plan There is a lot of information within the plan. It has been helpful to have a summary document, and it is useful to be able to search each section individually via the website. However, some of the language within the Plan could be clearer. c) Vision Whilst this sets out an expectation of what the Broads will look like and be delivering in 2042, it lacks inspiration. There is a lot of detail set out in the vision. A shorter, punchier vision might be useful with more detail provided under each of the themes, for example: “The Broads is a living landscape where wildlife and people thrive side by side, each enriching the other. It is a place where rare species and precious habitats are not only protected but flourishing, forming a vibrant mosaic of Page 2 of 16 life alongside farmed areas that reflects centuries of natural and cultural heritage. Communities, visitors, and partners feel a deep sense of pride and belonging, celebrating the landscape as part of their identity. The Broads is cherished by all who experience it — a place where connection to nature and the landscape is immediate, joyful, and shared. Across the region, all interests work together with purpose and unity, recognising that collaboration is the foundation of a resilient future. Through bold, landscape-scale adaptation, The Broads continues to evolve, ensuring it remains a thriving, dynamic environment for generations to come. This is a landscape shaped by, and strengthened by, partnership, and sustained by the shared belief that The Broads is worth protecting, celebrating, and passing on — wilder, healthier, and more inspiring than ever.” The introduction acknowledged that there would be a need to change and do things differently, but this fails to translate into the current vision. The plan generally is very “nice”, yet we know there will need to be trade-offs, and “win-win” situations will become challenging in some areas. There needs to be clarity on how the competing demands of the Broads will be managed. This will require a meaningful dialogue with stakeholders to assess where compromise is needed and carefully facilitated to find

Ref	Plan page or paragraph	Respondent	Comment
			outcomes that will be acceptable. With a need to adapt to changing conditions and secure a sustainable vision for The Broads the long-term vision must set the direction and provide the clarity on what we will be striving to deliver collectively to shape the future Broads landscape. d) Fundamental Principles Whilst these are outlined, it is not clear how they all have been effectively implemented over the plan period. For example, have we been holding those causing damage to account through the “Polluter Pays Principle”? Is the Broads environment improved as a result of actions taken to manage inputs to the rivers and wetland habitats that are fundamental to the Broads character? Water quality continues to remain poor, monitoring of water quality remains patchy and inadequate in many areas, and actions to address issues at source are only now appearing to be addressed. There has also been shifts in habitat quality across the Broads, especially in areas where management may be lacking and succession has resulted in e.g. fen habitat transition to woodland. It is not clear that under the current plan how much progress has been made to address such issues. e) Aligning work on peat and nature recovery There is a challenge around managing areas of peat to achieve their biodiversity potential. Raising water levels to reduce emissions is something that we support, but the approach to the peat/carbon work has at times seemed disconnected from the work to maintain and restore nature. The Broads supports a wealth of rare and protected species and management must be targeted to support these species. Whilst it is appropriate to explore options such as Paludiculture, these new management approaches must not result in a monoculture that supports generalist species at the expense of those more specialist species. Income generation for landowners will be important and there is an ongoing challenge around clarity on future Conservation Stewardship options and payments and providing longer term certainty for landowners around income.

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			Peat re-wetting projects which are not linked to agriculture are likely to be a positive thing for the species which are adapted to tall, fen-like vegetation structure (Reed Warbler etc.), since permanently waterlogged soils are much more likely to result in that type of vegetation. Paludiculture could deliver similar benefits if executed correctly, but like any other type of agriculture, the benefits to nature will depend on the fine detail of the farming operations. There needs to be clarity on how land use may change and how this might influence the abundance and distribution of species which are characteristic of the Broads. Reducing further emissions is clearly a high priority and re-wetting and paludiculture projects could be positive for species which are adapted to tall, fen-like vegetation structure (Reed Warbler etc.), but the value of the habitat matrix in the Broads, with short sward open grassland communities complementing tall fen/reedbed communities, should be appropriately recognised in the peat/paludiculture ambition: widespread uptake of re-wetting/paludiculture could shift the ratio ever-more towards the latter. Though to some degree an appropriate balance between the open grasslands and fen like communities will be preserved by soil type. Page 4 of 16 The RSPB has been involved in work that explores the relationship between paludiculture and biodiversity, and this area of research is likely to grow. The fine detail of how peat re-wetting initiatives are carried out could make big differences in terms of biodiversity value and it would be good to develop these discussions in the Broads. Currently the guidance from DEFRA is perhaps more single-mindedly focused on the need to prevent further emissions, and this is somewhat divorced from biodiversity value. The carbon capture and biodiversity initiatives could be more intertwined.

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			Certainly, some of the policy changes needed to provide the right backdrop for successful peat re-wetting initiatives in the Broads (higher water tables in some areas) are also highly pertinent for biodiversity objectives, not least the need to retain more surface water on the grazing marshes further into the breeding wader season to address shortages which are becoming more common with climate change. In short, the carbon capture and biodiversity initiatives could be more intertwined. Certainly, some of the policy changes needed to provide the right backdrop for successful peat re-wetting initiatives in the Broads (higher water tables in some areas) are also highly pertinent for RSPB biodiversity objectives, not least the need to retain more surface water on the grazing marshes further into the breeding wader season to address shortages which are becoming more common with climate change. f) Species data There is a concern that a number of species have declined across the Broads protected areas, but there is a lack of data to understand the changes and therefore identify the actions needed to address these changes. This is a particular concern for us with respect to features of the Broadland Special Protection Area. Whilst data are being collected, it is not clear that this is being done in a systematic way. The Broads Plan does not appear to have facilitated an agreed monitoring regime across the Broads to effectively track population trends. This also highlights that there needs to be clarity on the priority questions that need data. This will then enable the required monitoring regime to be identified. Whilst there may be some progress in this area resource (people, time and money) seem challenges to making this more effective.

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			g) Funding and long-term certainty Whilst funding is available for work such as nutrient neutrality and grants through e.g. Farming in Protected Landscapes, these are often constrained pots that are for delivery against a specific target. This can result in projects being tailored to the funding pots rather than delivering the precise actions required. It can also result in actions to create good habitat but the long-term management to maintain sites and ensure they continue to deliver for biodiversity is often missing. Where interventions are made there must be certainty that they will support long-term benefits. This will be important in an adaptation context where land converted to freshwater habitats now should consider the ability to transition to different habitats in the long term where they may be in areas that will experience increasingly saline water. There is also a challenge for landowners around the certainty of income streams. If land use change is needed there are some funds available to support a transition (e.g. holding more water for peat soils and/or waders) but the long-term funding to maintain the sites may be unclear. This is limiting progress and the speed at which habitat is created and adaptation is taking place. h) Monitoring Plan progress, it remains unclear how effective the monitoring of the projects/actions/outcomes has been for the Broads Plan. The progress of the delivery by the Broads Authority and its partners to achieve the plan objectives need to be annually reviewed. The mechanism by which reporting takes place is unclear. 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.

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5	General Ideas and thoughts on issues, priorities opportunities for the new Broads	RSPB	Plan 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 aim of The Broads becoming richer in nature. Linking to the wider Norfolk Local Nature Recovery Strategy will be important, as change within the Broads will necessitate work outside of the Executive Area to support adaptation. To do this it could be helpful to consider the spatial approach within the Broads Plan. The challenges facing the Broads are growing and impacts may be felt differently across river valleys. Approaches to adapt to changes may also differ spatially within the Broads depending on soil type, habitat type, species priorities, distance from tidal influences etc. All of these will require targeted interventions. It would be worth considering if the plan could: • Establish the red line areas where change away from freshwater would be resisted for as long as possible to protect key species and habitats. • Identify areas where impacts will be so significant that an adaptation approach will be required. • Assess the overall potential change and identify what level of compensation may be required outside of the Broads area to address potential change. Some of this work is already in progress and it may only be possible to go so far with a spatial approach.

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			However, clarity about the future direction of travel is needed to secure the right investment and management in the right places to develop a sustainable landscape in the future. There are also a lot of species which could be the focus of action. The Broads Nature Recovery Strategy has identified the 25 priorities for action, but it could be helpful to outline which of these species will be a particular focus over the coming five years. It would also be helpful to audit the work already being delivered by partners around these species. We note the development of a State of the Broads report and would support this, however, the baseline data underpinning such a report must be robust. The Broads Plan should give clarity on where resources should be focussed and taking targeted approach could help drive targeted delivery. The Broads Plan also needs to outline the journey needed to overcome a “status quo” approach to future management. Whilst a lot of this will come through work on the Broadland Futures Initiative, there is a support role for the Broads Plan. An approach similar to that being delivered through Coastwise in North Norfolk could be helpful. Investigating a river valley approach might help to overcome some of the complexities in delivering action. Whilst this has been explored in the past, there seems an opportunity to revisit how this could be made to work. The RSPB has been working with landowners around the Yare valley through to Halvergate Marshes. There is other work taking place that we are aware of through Norfolk FWAG, Water Resources East, Anglian Water and estates that could all deliver at scale for nature and people. This will be mirrored across other river corridors. There needs to be clarity on how the Broads Plan (as a partnership strategy) will facilitate this way of working.

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			We hope these comments are helpful and look forward to continuing to working positively and constructively with the Authority to support the development of the new Plan.
6	General Partnership Working and Governance	Broads Society	A recurring theme throughout the meeting was the importance of stronger partnership working. Participants noted that many of the objectives within the Broads Plan rely on effective coordination among the Broads Authority, the Environment Agency, local authorities, landowners, voluntary organisations, and community groups. There was a view that communication and stakeholder engagement had been steadily declining, for example through the closure of the Broads Forum and the weak impact of the Broads Local Access Forum. There is considerable room for improvement.
7	General	Broads Society	The meeting concluded that the next Broads Plan should adopt a more integrated, long-term, and adaptive approach to planning for the Broads. Participants broadly agreed that climate change, saline incursion, navigation management, biodiversity, heritage protection, and public access will require closer coordination between a variety of partners and agencies and more effective engagement with local communities and stakeholders. There was a strong sense that the Broads should continue to be managed as a distinctive and living freshwater landscape, carefully and equitably balancing conservation, promotion of the navigation, public enjoyment, and local livelihoods while recognising the significant environmental changes in condition and integrity likely to affect the area over the coming decades. The meeting also recognised the Broads' heavy dependence on the wider catchments and landscape within the Broads Special Area of Conservation and the Broadland Ramsar Site and recommended that this be given greater recognition in any future plans.

Ref	Plan page or paragraph	Respondent	Comment
8	General	Norfolk Wildlife Trust	My thoughts would mainly just cover the final question from the 3 asked. I think the plan as a broad-brush top-level strategy for a complex area works well and covers many of the topics required. It is also only set around a 5-year period which is incredibly short for many of the items therein so I imagine the new plan will be much the same with updates on what has been achieved so far.
9	Strategic Direction and Long-Term Planning	Broads Society	Participants reviewed the 2042 Vision for the Broads National Park and recommended that it be redrafted in light of rapid climate change, biodiversity recovery, major changes to navigation, and public access to the Broads for public enjoyment. Concern was expressed that the Broads Plans' five-year planning cycle may be too short to address the long-term environmental and infrastructure challenges that are being faced, yet too long to respond to the rapid rate of change in the park environment. It was also noted that there are significant regional differences in the needs of the Broads. For example, the challenges in the Southern Rivers are quite different from those in the Upper Thurne. A matrix approach, cross-cutting major thematic objectives with regional objectives based on catchments, might be workable and offer greater precision. Members were disappointed by the poor alignment in scheduling between the new Broads Plan and the Broadland Futures Initiative (BFI).

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10	General Local Government Re-organisation	East Suffolk Council	Turning to devolution, the inclusion of Norfolk and Suffolk on the Government's Devolution Priority Programme and the recent royal assent of the English Devolution and Community Empowerment Act following publication of their Devolution White Paper in December 2024 indicates Government's desire to proceed with devolution and broaden the focus of Strategic Authorities. The current Broads Plan pre-dated that policy aspiration. Although the Mayoral election has been delayed to May 2028, any future Strategic Authority across Norfolk and Suffolk will be a critical future partner. In view of this, we believe the Plan should take account of the importance of the potential role of a Strategic Authority (either a Mayoral Strategic Authority or a Foundation Strategic Authority – pre-mayoral) especially in relation to Local Plans and the Spatial Development Strategy. The latter is likely to be prepared by the Strategic Authority to address strategic, cross boundary issues such as housing and infrastructure and particularly water resource and management. The White Paper makes specific reference to the importance of this (see below extract):

Ref	Plan page or paragraph	Respondent	Comment
			Environmental and climate leadership Strategic Authorities will play a crucial role in preparing for the future and tackling climate change and nature emergencies at the local and regional level. Local, place-based environmental leadership is an essential part of this. We will begin the transition by enhancing the roles and functions of the responsible authorities for Local Nature Recovery Strategies. We will empower these authorities, which are already operating at county or combined authority scales, with a clear mandate to take a leadership role on Local Nature Recovery Strategies and wider environmental delivery. This will include convening partnerships, helping coordinate action, funding, and investment in nature recovery and wider environmental delivery across their areas, and monitoring and reporting on delivery. Over time, we envisage Strategic Authorities will be appointed the Local Nature Recovery Strategies responsible authority where they are not already. Future opportunities for devolution and partnership working will be explored with Strategic Authorities. These could include issues like water management, the circular economy, pollution, or flood resilience. We will also explore how Strategic Authorities and Mayors can provide greater local leadership in responding to the impacts of climate change, and a better route for rural communities to be considered in local policy decision making. Alongside these aspects of national legislation, we also have the new National Planning Policy Framework and new housing targets. The new Plan will need to consider how the management of the Broads needs to be approached in conjunction with considerable Local Authority Local Plan growth within its surrounding districts (and future unitary councils). Whilst we appreciate you have asked for feedback on the Broads Corporate Plan, we believe that housing growth and the associated environmental and recreational challenges should feature in the new Plan. In addition to this response we, my planning colleagues will provide a more detailed response in relation to planning aspects under separate cover and we look forward to being involved in more detail in discussions on this aspect of both the Broads Corporate Plan and the Local Plan.

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11	General/Omission Wild Swimming	Ashmanhaugh Parish Council	There appears to be no reference to wild swimming, which is increasingly popular, particularly as seniors are encouraged to keep fit and socialise – and more people are encouraged to join outdoor sessions for better mental health. On the BA website, the only reference to swimming is to indoor and outdoor pools. Should there not be locations marked which are safe for swimmers for access and swimming without encountering any dangers from motorboats, fishing or hidden hazards. Also, any information on the water quality – bearing in mind sewage pollution in particular with the AWA Belaugh pumping station already at full capacity. Not clear if any reference to regular water quality monitoring.
12	General/Omission Access to the waterways for disabled residents	Ashmanhaugh Parish Council	There does not appear to be any reference for older, possibly disabled residents on how to enjoy the waterways via organisations such as the Nancy Oldfield Trust which could be more actively promoted. For youth promotion – BA mention references to schools, but not organisations where young people can join such as sea scout troops who actively encourage every possible kind of water access, confidence, and enjoyment. This is left to non-BA organisations such as Norfolk Broads Yacht club, based in Wroxham who do fantastic work encouraging youngsters, as well as NSSA (Norfolk Schools Sailing Association) – a charity based at Filby. Could there be information included and/or on the BA website promoting where families would connect to these organisations? Also suggest BA to regularly circulate further information via email to local parishes for their residents to connect to activities.
13	General/Omission Historic Environment/Wroxham	Ashmanhaugh Parish Council	As many local residents shop in Hoveton/Wroxham– regarded as Capital of the Norfolk Broads – and as a tourist centre, unclear of any reference to protecting historic buildings, i.e. the big white traditional riverside building (occupied by Greys Fish & Chips etc) beside the Granary

Ref	Plan page or paragraph	Respondent	Comment
			Staithe, or what BA does about the collection of neglected old boats moored near the Kings Head which do not give a good impression or enhance views from the riverside walk.
14	General/Omission	Ashmanhaugh Parish Council	Ashmanhaugh is affected by the plan's environmental and catchment policies yet is not acknowledged anywhere in the document. The parish experiences the consequences (drainage, biodiversity decline, tourism pressure, planning complexity) without receiving targeted support or recognition.
15	General/Omission Nutrient Neutrality	Ashmanhaugh Parish Council	Despite being one of the most significant issues, river water quality is not addressed adequately in the Broads Plan 2022–2027. The plan predates the Nutrient Neutrality crisis but so fails to: • acknowledge nutrient constraints • explain implications for development • set out mitigation pathways Given the scale of the issue, this is a major omission.
16	General Water quality/pollution	Postwick with Witton Parish Council	Reducing water pollution, particularly from litter within the rivers and Broads which constantly washes up on our banks. We feel there should be more deterrence and better vigilance to prevent litter/fly tipping on land adjacent to the Broads waterways. Using aquatic litter traps for example on rivers and having focussed clean up events, as well as focussed enforcement on trouble spots.

Ref	Plan page or paragraph	Respondent	Comment
17	General/Omission Council tax on residential boats	Ashmanhaugh Parish Council	One other observation and question as to whether the Broads Plan should cover is regarding the Government guidance which clearly states that council tax is payable if a boat is a person's 'sole or main residence'. Are the Broads Authority & NNDC making sure that the liveaboards are paying their council tax and tolls? All our residents have to pay (and these boats are mostly moored on the NNDC owned side) and that helps to keep council tax funds stable for all.
18	Residential Boats	South Walsham Parish Council	It is the problem of people living on boats and forming encampments on riverside land and creating mini communes that are out of keeping with the isolated spots they seem to choose. Since mid-summer last year we have had such an encampment on the east bank of Fleet Dyke in the village. The campers erected a fence around part of their adopted site, but up a shed and solar panels and a wind turbine, hung washing on a fixed line, used large bank BBQ's nightly, had fires, played loud music and undertook noisy and heavy boat repairs involving grinding metal working. What has upset the local community, walkers and private boat owners is both the location and visual aspect of their site. At South Walsham, Fleet Dyke is highly regarded for its solitude, natural surroundings, wildlife and peacefulness. The intrusion for months at a time of a noisy and ugly blot in the middle of this area where grazing marshes meet reed beds and St Benet's Abbey presides, is unacceptable. What makes it worse is the fact that nobody wanted to take ownership of the problem. SWPC reported the matter to the BA in the summer and were told that the BA could only ensure the boats were licenced. We were told by the BA that we should contact the land-owner – the

Ref	Plan page or paragraph	Respondent	Comment
			Environment Agency. I rang several numbers across England and was eventually given an email address to which I wrote. I have yet to receive a reply. Meanwhile, the parish council was coming under fire from local residents and the public for allowing this to happen. The knock-on effect was that visitors to the site were walking down the river- bank carrying furniture and all manner of equipment (including a washing machine). The footpath has a bollard to keep the path clear for emergency vehicles access and camp visitors' vehicles were parked for weeks at a time blocking this path. We invoked NCC's help who in turn informed the police. The regular police were helpful, but since they could not easily reach the camp on foot passed word on to the river police. The campers had taken over part of the parish's staithe car park where cars were also parked for months and large vans with camp visitors sleeping in them were commonly parked and the adjoining copse was used as a toilet. A four-wheel trailer with only three wheels and no brakes or lights was parked for two months till removed by the PC. A derelict boat (without a trailer) arrived, and it contained some hundreds of books! We lease this carpark from BDC and they couldn't help either. The constant niggle of this continuous invasion of the parish and having to confront the public's anger at our 'not taking action' was wearing and frustrating. We decided as a council at the bottom of the democratic structure that we had done all we could in reporting the issues to those with the power to act and that we could do no more.

Ref	Plan page or paragraph	Respondent	Comment
			The camp remained till late autumn/winter and we heard nothing till we understand the EA was clearing rubbish from the site in last month – nine months after it commenced. A new camp has now started a few hundred metres nearer the village on the same bank. There has to be a different system of reporting and managing these issues. It is our view that one organisation should receive complaints from parish councils and take on the responsibility for managing the situation. Clearly this needs to be the BA which has an overriding responsibility – not left to unpaid amateur parish councillors who struggle to act. Is there someone at the BA who we can deal with regarding the new camp?
19	General Navigation to Bungay	Bungay Town Council	The Broads Authority should promote and support efforts to reinstate locks etc to re-enable navigation to Bungay.
20	General Planning	Bungay Town Council	The Broads Authority Planning Department should consider the implication of their planning decisions on areas outside the Broads Authority area and work more closely with other authorities in doing so.
21	General Flood risk	Bungay Town Council	The Broads Authority should pay special attention to flood issues for example, they allowed the construction of the Waveney Business park (just off Ditchingham Dam) on the flood plain, thereby increasing the flood risk in Bungay a few years ago.
22	General	Postwick with Witton Parish Council	The parish of Postwick with Witton falls within Broadland District Council, and a significant proportion of the parish lies within the Broads Authority executive area. We broadly agree with the current Broads Plan themes: A. Responding to climate change and flood risk

Ref	Plan page or paragraph	Respondent	Comment
			B. Improving landscapes for biodiversity and agriculture C. Maintaining and enhancing navigation D. Protecting landscape character and the historic environment E. Promoting understanding and enjoyment F. Connecting and inspiring communities
23	Internal Drainage Boards	Water Management Alliance	Thank you for consulting the WMA on the Broads Plan Review ahead of the 2027-2032 plan. The Broads area coincides with both the Broads (2006) IDB and the Waveney, Lower Yare and Lothingland IDB, both member Boards of the WMA. It is positive that IDBs are mentioned as RMAs operating within the Broads area within the existing plan. It would be good to see the Boards referred to by name within the plan, allowing greater understanding to the public of the presence of the Boards and allow them to access us directly. If appropriate, greater reference could be made to the operation of the IDBs, particularly the maintenance of arterial watercourses and operation of pumps, projects carried out in aid of flood risk management, and the regulation of all ordinary watercourses within their districts through Byelaws.
24	Biodiversity and Tourism	Freethorpe Parish Council	The crucial question is how the effects of an ever-increasing population wishing to enjoy the Broads can be mitigated so that biodiversity does not suffer.
25	Trees and Hedgerows	Freethorpe Parish Council	All hedges, trees and wooded areas within the Broads should be treated more sympathetically to promote biodiversity and improve the attractiveness of the area for visitors.

Ref	Plan page or paragraph	Respondent	Comment
26	Theme A: Responding to climate change and flood risk	Norfolk Wildlife Trust	The main themes that relate to NWT or at least the Nature conservation team at NWT are A and B. Work has been achieved for theme A most notably through BFI but priorities remain: • Changes in water levels, flows and patterns • Saline intrusion – perhaps this needs to feature more heavily in the next plan as it isn't fully covered by BFI which focusses on flooding. Saline ingress is expected to increase though and can have as big an impact on the ecology of the broads as winter flooding. • Continued work on Invasive non-native species. Floating Pennywort, Crassula etc. Mentioned in the current plan but I would say a patchy level of success has been achieved in physically dealing with it or prioritising monitoring, knowledge sharing etc. • Water quality including ensuring monitoring is continued and ideally expanded. Huge impact. • Linked to the above, broad/ shallow lake restoration work and aquatic plant growth. This will be affected by water levels, changes of flows and saline ingress. It has been demonstrated to be key to aquatics system health and BA needs to ensure this features heavily. This is and will continue to be pushed back against by certain parts of the navigation minded organisations. It is important that response is equally robust.
27	Theme A: Responding to climate change and flood risk	RSPB	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 is developing, and outputs could be useful in informing future land use and management requirements. Stakeholders are being engaged. The effectiveness of the development phase will be in the final plan and its delivery. It will be important the future flood risk strategy makes it clear that there is change coming and identifies what can be managed and what can't. Clarity is needed on areas

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			that will be defended (and why) and areas that will need to adapt. Support will also be required to support any transition around land use. Integration between upstream and lower down river catchment will be critical to ensure flood risk and water management are addressed holistically and not in isolation. With respect to managing flood risk, a spatial approach could be helpful in identifying water needs in the future. This may require a fundamental change to the current flood management units to ensure water volumes are managed effectively and that this also enables water storage to support habitats during dry conditions. A2 - Work towards making all Broads Authority operations carbon neutral by 2030 and carbon zero by 2040. It is unclear what progress has been made. Whilst actions are being taken, greater transparency may be required to assess progress. A3 - Agree carbon reduction targets for the Broads National Park and promote action to reduce emissions. Different organisations will have their own carbon targets and will be making efforts to reduce emissions across The Broads area. It is not clear what data gathering is undertaken to assess wider action to achieve carbon reduction targets within The Broads. Whilst action to re-wet peat is being considered, it would be helpful to know how much has been delivered and align this with potential progress against carbon targets.

Ref	Plan page or paragraph	Respondent	Comment
			It is important to know if the Broads are on target or, if not, the additional action needed. This will be important to identify resource needs.
28	Theme A: Responding to Climate Change and Flood risk	Environment Agency	Our comments relate to Theme A: Responding to climate change and flood risk and aim 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. • We very much welcome the close working relationship between the EA and the BA that's been in place since the start of the BFI (2019). The BA's technical input, involvement in our Elected Members Forum, and supporting governance and secretariat activities for our officers' group is helping to ensure we continue progress to towards a strategy that all partners support. • Noting in the 2022-27 Broads Plan that the BA will lead on communications activities for BFI, a challenge that has arisen as BA resources have reduced in recent years, BA have much less capacity to lead on some areas of the BFI work, with the communications work now sitting with the EA team. • The BFI Plan is due for completion in early 2028 – the next Broads Plan is a great opportunity to ensure there are measures that support and enable the delivery of the actions in the BFI Plan. More detail on those actions will emerge over the next year and we are keen to work with BA colleagues to incorporate them into the Broads Plan as appropriate. Areas are likely to include incorporating the BFI Plan into local planning; securing funding, finance, and other contributions (including land). • Whilst the current Broads Plan has 'Responding to climate change and flood risk' as its own theme, we would welcome seeing this as a more cross-cutting element and with a greater emphasis on adaptation to climate change. The way that flood and water is

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			managed in the Broads underpins many of the BA's delivery priorities, including protecting navigation, biodiversity, and the historic landscape. Through our development of the BFI, we know that current flood risk management approaches are unsustainable and very much under-funded. We are keen to see that the language and terminology used in the next Broads Plan reflects the approach of planning early for adapting to climate change impacts. Flood management and resilience is also key to supporting other critical infrastructure and growth ambitions for this area. With the next Broads Plan beginning as Local Government Reorganisation and Devolution take shape, we would be keen to see the links made within the Broads Plan between flood resilience and sustainable economic growth.
29	Theme A: Responding to climate change and flood risk	Broads Society	The multi-agency BFI was recognised as central to future flood risk management and adaptation planning. Discussion highlighted concerns about the poor timing of BFI outputs relative to the Broads Plan consultation process and questioned whether the current BFI planning framework adequately addresses the challenge of saline flooding and the imperative to conserve freshwater ecosystems. Members recognized the potential for washlands and new connections between the Bure and Yare in the lower reaches, such as at Scare Gap, to mitigate sea flooding impacts. Feasibility studies should be undertaken. In the upper reaches, more information is needed about saltwater ingress under the seawalls, the viability of the flood defences post-2055, and the possibility of additional inland defences.

Ref	Plan page or paragraph	Respondent	Comment
			Questions remain regarding the Hundred Stream and its potential value in alleviating flooding by pumping to the sea. Members noted the need for flexible and transparent approaches to investigation and planning to support future relocation or adaptation of infrastructure, businesses, and communities.
30	Theme B: Improving landscapes for biodiversity and agriculture	RSPB	The focus of this theme is biodiversity and nature recovery; there is no specific mention of the link to agriculture. There is a need to integrate both areas to support a thriving landscape for nature and people, and this theme should be reviewed to clarify how these interests will be joined up. The RSPB works with landowners across the Broads and through Landscape Recovery Schemes across the country. The key thing is not to exclude agriculture from the nature recovery work, but ensure that biodiversity ambitions are not watered down by discussing agricultural needs. We support land sharing, with farmed operations coexisting with biodiversity, and this would be very evident in our work with grazing marsh managers. But there are places where "land sparing" will be required across the Broads to meet its biodiversity targets and adapt to become a climate resilient landscape. This discussion is developing through the BFI work, but there is a role for the Broads Plan to provide guidance and support this conversation. B1 - Restore, maintain and enhance lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques Some progress has been made on restoration of Broads. It would be useful to know the

Ref	Plan page or paragraph	Respondent	Comment
			number of projects undertaken and the benefits that have been achieved through this work. The RSPB has data to show that salinity within Strumpshaw Broad has improved through flushing. However, water quality remains a concern, especially with respect to the freshwater sources needed to maintain water targets. 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 There has been some work to look at water storage and make better use of higher winter water levels. We recognise the benefits of retaining water on sites for as long as possible given Spring and Summer drawdowns. More clarity is needed on the volume of water that could be stored when balanced against maintain river flows. Where fluvial flows are higher these have a big impact on limiting the intrusion of saline water and even surface water abstraction will need to ensure that flow levels are not reduced such that this causes hydrological impacts. There has been and continues to be considerable work to assess water needs within The Broads. There needs to be appropriate join up between different projects to give clarity on the water budget for The Broads, how this fits with environmental destination work being undertaken by the Environment Agency and what the implications are for flood and drought management in light of the BFI work. Work is happening on point and diffuse pollution, but how can this be delivered to make a meaningful difference to water quality within the Broads?

Ref	Plan page or paragraph	Respondent	Comment
			B3 - Seek biodiversity net gain and enhance areas of fen, reed bed, grazing marsh and wet woodland, to protect peatlands as carbon sinks Biodiversity Net Gain is most attractive to developers when the change is from land use such as arable to land of high biodiversity value. Finding approaches that support enhancements to existing wetland habitats will continue to require support and funding. If the term "biodiversity net gain" is being used here in a way which is separate to the planning regulations (i.e. this term is simply being used to communicate ambitions for more biodiversity in the Broads), then the thinking behind this should be developed into a concrete narrative of what this really means in practice. Total biodiversity is too broad a concept to be meaningful – what really matters is the abundance and distribution of individual habitats and species, and the ability of the landscape to cater to their needs at each stage of their life cycle. We agree with the ambition to protect peatlands as carbon sinks, but in the case of grazing marsh, there is a potential nuance around this being considered in the same category as the other habitats when it comes to carbon sinks. Grazing marsh is of most biodiversity value when seasonally flooded: the ideal hydrology is a large quantity of surface flooding in the winter months and gradual drawdown in spring/summer, with some degree of surface water retained until the end of the wader breeding season around midsummer. These are conditions which would be quite natural on a functioning floodplain with poor drainage and low-lying topography, and to which wading birds and wildfowl have adapted. A certain degree of drawdown is an important component of the ideal grazing marsh hydrology – grassland communities cannot survive permanently waterlogged conditions.

Ref	Plan page or paragraph	Respondent	Comment
			A serious challenge for grazing marsh biodiversity is the ability to retain enough surface water in spring/summer, as rates of evapotranspiration increase, so discussions around the appropriate water tables and how landowners can raise them is still very valuable. B4 - Define, implement and monitor management regimes for priority species and invasive non-native species It is good that a Broads priority species list has been identified within the Broads Nature Recovery Strategy, but are these the focus for action? There seem a number of species listed where little or no work is happening, and also a suite of species not listed as a priority but where work is being progressed. It is not clear how the current strategy and delivery work relate to one another. We have particular concerns that the monitoring of SPA features is inadequate. There is a reliance of Wetland Bird Survey data, this will not give a complete picture of where features are across the landscape and how areas of importance may have changed over time, especially due to habitat restoration and creation. B5 - Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to the National Biodiversity Network This appears to be good, with multiple partnership groups meeting. The challenge, as always, is ensuring the partnerships act as delivery groups to ensure progress is made on achieving the Broads Plan targets.

Ref	Plan page or paragraph	Respondent	Comment
			Are these groups set up effectively to not just update on projects but act as sounding boards to address issues and also promote project collaboration. This would be a good reflection to assess how effective this action has been.
31	Theme B: Improving landscapes for biodiversity and agriculture	Norfolk Wildlife Trust	• Priority species management and monitoring. More important in times of change. • Deer management isn't mentioned as much in the original I don't think but is an increasingly important topic and is likely having a big impact on wetland habitats. • Land use within the executive area and wider catchment. Again, with changes in water levels and flow, this remains incredibly important. This can include abstraction etc. • Encouraging more sustainable recreational water use (boating etc). I won't go into access to much but sustainable water use impacts much of the above.
32	Theme B: Improving landscapes for biodiversity and agriculture	Freethorpe Parish Council	Whilst the public are always encouraged to enjoy them, the damage caused to ground nesting birds by dogs off the lead is very significant either through general disturbance or the taking of chicks/nestlings or eggs. A fairly quick win is to ask all dog owners to keep dogs on a lead during the ground bird nesting season, perhaps supported with educational materials and initial guidance and enforcement.
33	Theme B: Improving landscapes for biodiversity and agriculture	Freethorpe Parish Council	The other obvious win is to stop over-zealous farmers and local authorities from cutting the edges of the bridleways, and for them to be treated like a Roadside Nature Reserve

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34	Theme B: Improving landscapes for Biodiversity and Agriculture	Broads Society	There was considerable discussion about the framing of agriculture within the Plan. Participants agreed that agriculture is an issue that needs to be addressed in the context of the wider Special Area of Conservation as well as the narrow boundaries of the National Park. Agriculture should be treated as a distinct theme rather than being combined under biodiversity objectives. Inside the Park, the agriculture focus should be on appropriate land use, improved nutrient management, wet landscape farming (paludiculture), and carbon sequestration in peat soils. Whilst appreciating that many other more precise strategies and plans flow from the Broads Plan, participants found that vague terms such as 'restore', 'maintain', and 'enhance' are overused and lack the precision required for SMART objectives.
35	Theme C: Maintaining and enhancing the navigation	Broads Society	The steady decline in the quality of the navigation formed a substantial part of the discussion. Access to the Broads for toll-payers has significantly reduced in recent years. Raised water levels make bridges difficult or impossible to navigate, and high temperatures prevent proper bridge movements. Bankside ecological succession is uncontrolled, not only destroying biodiverse reedbeds, but also preventing longstanding sailing regattas. No attempts have been made by the Authority to use partnerships with landowners to reverse this trend, or to deploy funding mechanisms such as FIPL to ameliorate the problems. Concerns were raised about narrowing waterways, reduced dredging leading to loss of navigable width, and the progressive loss or restriction of mooring opportunities. Participants also discussed tensions between different water users, including sailing craft, paddle boarders, canoes, swimmers, and increasingly large motorboats. The importance of balancing navigation, safety, environmental protection, and public access was emphasised.

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			The Authority appears to believe that small-boat navigation can harm freshwater biota, for example at Hickling Broad, but fails to present meaningful supporting data. Information and appeals from the navigation community and civil society have been dismissed out of hand, despite a more understanding attitude from Natural England. There is growing concern that a lack of appreciation for sailing and its cultural heritage in the Broads is embedded in the Authority's planning and management processes. Such pursuits should be actively encouraged in the Broads Plans to strengthen public engagement and attract more financial resources.
36	Theme C: Maintaining and enhancing the navigation.	RSPB	C1 - Maintain navigation water depths to defined specifications, reduce sediment input. and dispose of dredged material in sustainable and beneficial ways. We understand that this work is happening. Any works must be underpinned by strong. ecological evidence and support conservation delivery. C2 - Maintain existing navigation water space and develop appropriate opportunities to extend access for various types of craft. We are not aware that there have been issues with the speed testing area on the Yare. However, this does need clear policing and the impact of wash from the vessels remains a concern with respect to bank erosion. We are not aware that water ski zones are being used in all areas. We consider now to be a good time to review and, as a minimum, we suggest removal of the zone on Breydon Water given the safety concerns and lack of use. C3 - Manage water plants and riverside trees and scrub, and seek resources to increase

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			operational targets Tree management is undertaken by the RSPB, and we are actively assessing tree thinning along the riverbank at Strumpshaw Fen. We recognise that some areas of the Broads continue to have significant tree cover. Whilst wet woodland does have a role as an important habitat in the Broads, restoration of former fen areas could be valuable. We have seen the benefits that scrub removal can have at Sutton Fen. The Broads Plan should provide clarity on scrub levels within the Broads landscape. C4 - Maintain and improve safety and security standards and user behaviour on the waterways Continued challenges in some areas where boats are moored on our boundaries and have barbeques etc.
37	Theme D: Protecting Landscape Character and the historic environment	Historic England	Thank you for consulting Historic England on the review of the Broads Plan 2027–2032. As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy, and that policy documents make appropriate provision for a positive strategy for the preservation and enjoyment of the historic environment. We understand that you are seeking feedback on the effectiveness of the current Plan, including which aspects have worked well, where it has been less effective, and any thoughts on issues, priorities and opportunities to inform the next Plan period.

Ref	Plan page or paragraph	Respondent	Comment
			The Broads are a unique landscape shaped through a long-standing interaction between natural processes and human activity. The area supports a distinctive, water-focused environment, with an historic environment that spans early human activity in the Mesolithic period through to the continued contemporary use of village greens, staithes and waterways by local communities and visitors. This historic character is reflected in a rich range of heritage assets, including Roman roads, village staithes and greens originating in Saxon riverside settlements, the man-made broads themselves, ecclesiastical buildings such as listed medieval churches, scheduled ruins, and structures associated with agricultural and water-based activity, including barns, mills and pumping stations. Many of these areas are designated as part of the Broads' twenty-five conservation areas, and numerous structures are either nationally listed or included within the Authority's comprehensive list of local heritage assets. Having discussed the review with colleagues, we welcome and support the existing Plan and consider that it provides a clear and helpful strategic framework, particularly through the objectives and key actions set out under Theme D (D1–D4). While the Plan has not routinely informed our day-to-day work to date, we consider that the priorities it establishes for the protection and enhancement of the historic environment remain relevant. Notwithstanding this, as an organisation we have had a number of discussions over the years regarding mills within the Broads and have been involved in several applications for their repair and maintenance. These assets make an important contribution to the historic character of the area, and consider there may be an opportunity for this distinctive aspect of the Broads' historic environment to be more clearly reflected in the Plan, for example through an amendment or addition to Policy D1 (Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including 'at risk' assets).

Ref	Plan page or paragraph	Respondent	Comment
			Finally, we suggest that greater awareness of the purpose and practical application of the Plan, alongside proportionate engagement or training for partner organisations, could help improve understanding and support more consistent and effective use of the Plan going forward. We would welcome further discussions with the Broads Authority about how we might better use the Plan going forward.
38	Theme D: Protecting landscape character and the historic environment	Broads Society	The meeting considered the management of cultural and historic assets, including conservation areas and historic windmills. Whilst there have been some successes (Muttons Mill, Turf Fen Mill), concern was expressed about reduced engagement between the Broads Authority and cultural heritage conservation organisations, such as the Norfolk Windmills Trust. Participants recognised that although some heritage projects had been successful, there was a perception of reduced institutional involvement in heritage coordination, for example, through the closure of the Heritage Asset Review Group (HARG).
39	Theme D: Protecting landscape character and the historic environment	RSPB	D1 - Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including 'at risk' assets. The RSPB has completed the Strumpshaw pumphouse restoration since the start of the Plan.

Ref	Plan page or paragraph	Respondent	Comment
40	Public Access, Inclusion, and Sustainable Tourism	Broads Society	Attendees discussed the need to improve integration across waterways, walking routes, cycling infrastructure, public transport, and visitor facilities. Concerns were raised about accessibility and wellbeing facilities for wheelchair users, the condition of long-distance public paths, and reductions in rural transport services. Members also reflected on shifting tourism expectations and the need to support more diverse and flexible visitor experiences.
41	Theme E: Promoting understanding and enjoyment.	RSPB	E1 - Improve the integrated network of access routes and points (with easier access for people with mobility and sensory needs), linked to visitor facilities. We are working with the Broads Authority to support access improvements, specifically the Landscape Connections bid. E2 - Offer a coordinated and year-round programme of visitor activities that promote a 'Broads' experience', taking measures to prevent any adverse environmental impacts. The RSPB provides activities year-round to engage visitors within the mid-Yare valley. We also host targeted events at sites such as Sutton Fen to allow a few individuals annually to see species such as Fen Orchid. These events provide a platform to inform visitors about the Broads habitats and species. We will hold data on the number of events and attendee numbers. We also record visitor numbers year-round. E4 - Strengthen the quality and distinctiveness of the local tourism offer, including careers and skills training The volunteering opportunities available at our reserves include 6-month placements that allow individuals seeking career development to gain new skills and qualifications. This has proved highly effective with many of our interns securing jobs across the

Ref	Plan page or paragraph	Respondent	Comment
			country. We also have significant numbers of volunteers supporting our work on beach nesting birds around coastal areas that border the Broads.
42	Theme F: Connecting and Inspiring Communities	East Suffolk Council	In relation to Theme F (connecting and inspiring communities) we recognise the importance of “F1 Increase and promote accessible and ‘taster’ activities that foster physical and mental health and wellbeing for all, including a particular focus on under-represented groups and those facing inequalities.” This aligns with our Marmot Place ambitions around proportionate universalism – ‘something for everyone and more for some’. We have partnered with our two Integrated Care Boards and Suffolk County Council to implement this transformative programme which involves a huge range of partners working together to embed a new way of working that focuses on working together to systematically tackle inequality. The work is guided by the Institute of Health Equity at University College London which aims to address health inequalities by tackling their root causes, guided by eight Marmot Principles. More information on this initiative can be found here and if Andrea would find it useful to speak with Nicole Rickard, our Head of Communities and Leisure, she can be contacted at nicole.rickard@eastsuffolk.gov.uk. We all need to work harder to enable access for some groups, but the benefits could be huge.
43	Theme F: Connecting and Inspiring Communities	East Suffolk Council	At F2 Offer varied, flexible and sustainable volunteering opportunities and skills training to suit diverse audiences, we would advocate adding more about working with local employers

Ref	Plan page or paragraph	Respondent	Comment
			and Voluntary, Community and Faith Sector Enterprises to understand skills gaps and then gearing volunteering opportunities to meet those gaps.
44	Theme F: Connecting and Inspiring Communities	RSPB	F1 - Increase and promote accessible and 'taster' activities that foster physical and mental health and wellbeing for all, including under-represented groups. The RSPB is supporting this working with a range of groups to enable access to our reserves, such as the Greenlight Trust. These support wellbeing and can form part of nature prescribing. We have a key partnership at Strumpshaw Fen that has been established for many years. How is this being captured with other partners? F2 - Offer varied, flexible and sustainable volunteering opportunities and skills training to suit diverse audiences A range of volunteering opportunities are being offered by the RSPB. This includes roles supporting reserve management, visitor engagement and outreach through schools and youth groups. This provides a valuable opportunity for students through to retired individuals. Our volunteers are also a diverse group. Our volunteering offer has developed over time with an increasing number of specialist roles being developed. These opportunities are invaluable to support individuals to secure jobs and also provide significant wellbeing benefits. F3 - Provide and expand schools-based and outreach environmental education opportunities for young people, using the Broads as a learning resource We support environmental visits at Strumpshaw Fen. More detail on this can be provided if helpful.

Ref	Plan page or paragraph	Respondent	Comment
			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 How are responses monitored and outcomes recorded? F5 – Increase income generation to support Broads-themed projects Is this specific to the Broads Authority or is the aspiration that this takes into account fundraising activities carried out by partners? Clearly partners will be bringing in funding and helping to deliver “Broads-themed” projects. Clarity on what this means and how this relates to the full suite of work being delivered by partners would be helpful.
45	Theme F: Connecting and Inspiring Communities	East Suffolk Council	On F3 Provide and expand schools-based and outreach environmental education opportunities for young people from all backgrounds, using the Broads as a learning resource there is potential to include something about wider youth settings e.g. youth clubs/outreach. In particular, coverage of matters of water safety would be welcomed. Following the tragic death of a teenager in Beccles last year, we have embarked on a campaign encouraging young people to learn to swim as early as possible. We have also provided specific sessions on safe swimming in open water drawing on messages like the RNLI ‘Float to Live’ campaign. We have also provided additional signage and lifesaving equipment in key locations working in partnership with our Town and Parish Councils.

Ref	Plan page or paragraph	Respondent	Comment
46	Access	Postwick with Witton Parish Council	Postwick Grove, made famous by the Crome school of painters is also not easily accessible by residents of the village and the footpath is not well maintained. This footpath if made more accessible and managed better could be a real asset to the Broads, particularly as it is close to Norwich and could connect with Whitlingham Country Park.
47	Access	Postwick with Witton Parish Council	We understand that the Environment Agency may be disposing of the fishing pegs in Postwick which is adjacent to the Broads wharf. This provides a lovely riverside walk for visitors and parishioners though it suffers from littering and anti-social behaviour during certain times of the year. There is great potential here to improve access and amenity value, perhaps the Broads Authority might consider taking this land on. At the very least we hope you will help ensure public access is maintained at all times in the future, should the land be sold.
49	General	Norwich City Council	Thank you for notifying us of the Broads Plan Review. We have no specific comments at this time.

Appendix 2: High Level summary of content issues raised to date

General

- Potential for some spatial delineation in the plan e.g. a stronger recognition that different areas of the Broads are very different in character
- Support for the tone and style of the vision and its broad direction – it paints a picture and is flexible enough to accommodate future change
- Acknowledgement that the current themes do cover most of the important issues going forward however some themes require more review than others to best reflect the current and expected future position with a number of elements at work in the Broads
- General agreement that access in all forms e.g. by water, by land and to information needs to be more strongly reflected in the new Plan.
- Impacts of projected (housing and employment) growth on the Broads system
- Preparation for significant environmental change

1. Impacts of climate change and flood risk on the Broads System

- Potential synergies with Broadland Futures Initiative and its strategic planning options
- Saline incursion into the freshwater system – challenges and impacts
- Implications for existing flood defences and how they are managed
- Potential for and location of water storage areas
- Opportunities for shared data, communication and consultation
- Carbon reduction

2. Landscape, biodiversity and agriculture

- Local Nature Recovery Strategies/Networks and how their impacts on the Broads
- Issues of fluctuations of water supply/quantity
- Changes in water quality and impacts on biodiversity; habitats/species, landscape and agriculture
- Nutrient management
- Opportunities for Biodiversity Net Gain
- Future management of habitats and species
- Paludiculture and carbon sequestration

3. Managing the navigation and waterways

- Sediment, water-plant and tree management
- Availability/quality of navigation infrastructure e.g. moorings, slipways, bridges
- Concerns over 'navigation decline'
- Promotion of entry level forms of access to the water e.g. kayak, canoe, paddleboarding, small boat sailing
- Importance of water safety

4. *Cultural heritage/historic environment*

- Enhancement of Heritage Assets (including non-designated heritage assets) and archaeology
- Raising the profile of the historic landscape
- Cultural importance and significance of sailing and boating
- Significance of heritage skills – boat building, millwrighting, reed and sedge cutting etc
- Potential for further skills training opportunities

5. *Access*

- Improving land access for all – including those with mobility and sensory needs, residents and visitors
- Promoting sustainable transport opportunities e.g. focus on walking and cycling, linking these with public transport
- Addressing the 'last mile' – the difficulties/barriers from transport points e.g. footpaths, bus stops, etc to the water's edge
- Improving access to information
- Developing visitor opportunities and attractions to widen the appeal

6. *Well-being, volunteering and education*

- Broadening volunteering opportunities
- Increasing profile of what the Broads is and can be e.g. through taster days/sessions
- Expand schools' outreach and promotion of the Broads as an educational resource

Appendix 3: High level summary of process comments received to date

- Recognition that the Plan is being produced against a backdrop of local government reorganisation and devolution which will affect many of the partners and the Authority itself
- Acknowledgement that that Plan needs to easily reflect the PLTOF targets/measures
- Acknowledgement that the Plan will need to reflect any DEFRA funding outcomes requirements
- The Plan needs to reflect the views of partners and the local community
- The Plan content should reflect the local 'Broads evidence'.
- The Plan must be a genuine partnership plan with partners embedded in its content and in its delivery
- The Plan should be realistic but also ambitious
- The strategic actions in the Plan must be easily monitored
- A clear robust monitoring framework needs to be in place which requires commitment from partners
- Consultation on the plan content needs to be clear and its importance easily understood
- Consultation needs to be meaningful, engaging and go beyond 'the usual suspects'
- The Plan should reflect clear commitments to funding activity but flexible and agile enough to capture additional funding