Planning Committee

6 November 2026
Agenda item number 9

Norfolk Environmental Delivery Plan

Report by Environment Policy Adviser

Summary

Natural England's proposed Norfolk Environmental Delivery Plan (EDP) would provide a strategic mechanism for addressing nutrient pollution associated with up to 15,780 new homes in the Yare, Bure and Wensum catchments. The mapped area takes in Norwich and parts of central and eastern Norfolk. Developers could voluntarily pay an index-linked Nature Restoration Levy of £2,675 per dwelling to fund conservation measures and their long-term maintenance. The Broads Authority supports the EDP in principle as a groundbreaking strategic approach, and is seeking some further details on transparent prioritisation, and effective monitoring to secure long-term delivery. Areas for greater understanding and discussion relate to the Overall Improvement Test, the additionality and placement of conservation measures and arrangements for remedial action.

Recommendation

(i) Note the Norfolk Broads Environmental Delivery Plan and the Nature Restoration Levy; and

(ii) Note the Broads Authority's consultation response, including its support in principle for a strategic EDP subject to transparent prioritisation, robust evidence and effective monitoring of material improvement.

1. Introduction

1.1. Natural England is consulting on a ten-year Environmental Delivery Plan (EDP) for nutrient pollution affecting the Broads Special Area of Conservation, Broadland Ramsar site and River Wensum SAC. The EDP could support up to 15,780 new homes in parts of Norfolk. Participating developers would pay an index-linked Nature Restoration Levy of £2,675 per dwelling, enabling Natural England to deliver and maintain strategic conservation measures for 100 years.

1.2. The EDP is a new strategic mechanism under the Planning and Infrastructure Act 2025. It is intended to address the additional nutrient pollution arising from eligible housing development within the defined Yare, Bure and Wensum catchments. Developers could participate voluntarily by paying the levy, thereby discharging the specific environmental obligation covered by the EDP; all other planning and environmental

requirements would continue to apply. New requests to use the levy would close after year six of the ten-year plan.

1.3. Natural England proposes a phased programme linked to three tranches of approximately 5,000 homes. Measures include fen creation, restoration and management; conversion to semi-natural habitat; catch-dyke and river restoration; removal of river structures; deer management; and a planning condition for non-mains drainage. No avoidance measures are identified, and most measures are categorised as compensation, although some of the compensation measures will offer mitigation.

1.4. Before the EDP can be made, the Secretary of State must be satisfied that the package passes the Overall Improvement Test: by the end of the plan, its benefits must materially outweigh the development's negative effects on each identified habitat and species feature. Natural England would monitor development, levy income, delivery and ecological effectiveness, with formal reports at years five and ten and back-up measures available if required.

2. Broads Authority response

Strategic approach and environmental safeguards

2.1. The Authority supports the EDPs strategic, catchment-scale approach to nutrient mitigation, recognising the potential to facilitate development while delivering environmental improvements. Given the ecological importance and complexity of the Broads, the EDP should provide robust evidence for the Overall Improvement Test, address uncertainty and demonstrate that conservation measures deliver measurable, additional benefits.

Governance and local delivery

2.2. The Authority recommends a Local Delivery Model, supported by appropriate governance. A local approach could separate strategic oversight from operational delivery. Measures should align with existing Broads management programmes, the Local Nature Recovery Strategy and wider catchment priorities.

Conservation measures and location

2.3. The Authority recommends a flexible, evidence-led approach to identifying sites for conservation measures, including larger hydrologically suitable sites near, adjacent to or downstream of designated sites where these offer better connectivity, resilience, deliverability and value for money. Measures should complement existing environmental programmes and demonstrate clear additionality.

Financial sustainability and wider benefits

2.4. Greater transparency is needed around whole-life costs, levy assumptions and long-term financial viability, including the potential impact of changing nutrient treatment standards on developer uptake. Opportunities to combine developer contributions with public, private and water-sector investment, including complementary funding such as

Defra's peatland grants, should be explored. Future EDPs could also address wider environmental obligations, including recreational impacts and protected species.

Implementation and future development

2.5. As one of the first EDPs, Norfolk has an opportunity to establish a credible and replicable model that supports housing delivery alongside nature recovery. The Authority considers that further development of the safeguards, monitoring and governance arrangements is necessary to ensure that the EDP delivers its intended environmental improvements and maintains stakeholder confidence.

Development management

2.6. The introduction of the EDP will provide another means for developers to mitigate nutrient impacts within the Broads Authority Executive Area alongside existing nutrient credit providers. Initially the scheme has the potential to facilitate development for new dwellings only (including flats), therefore it is likely that some development within the Broads could respond to the EDP and use the associated Nature Restoration Levy to mitigate relevant development. The mechanisms to do this are primarily administered by Natural England with Local Planning Authorities (LPAs) becoming involved once a developer has purchased the relevant mitigation certificate from Natural England and provided the evidence as part of a planning application. Discussions are continuing with Natural England in terms of how the levy process will operate in practice with LPAs.

3. Financial implications

3.1 No direct Broads Authority expenditure is identified at this consultation stage.

3.2 Any future officer input, partnership working or land-management commitments may have resource implications and should be assessed before any agreement is made.

4. Risk implications

4.1 There are no risk implications for the Broads Authority that arise from the EDP. Should the Broads Authority tender for delivery of Broads Authority approved conservation measure/s, the risk register would need review at that point.

5. Conclusion

5.1. The Committee is invited to note the EDP and the Authority's consultation response. The Authority supports the principle of a strategic approach to nutrient mitigation, subject to greater clarity on financial resilience, transparent prioritisation of conservation measures, robust and clearly defined remedial triggers where delivery, environmental outcomes or underlying assumptions fall short of expectations. These safeguards are essential to ensure that the EDP delivers demonstrable and lasting environmental improvements that outweigh the adverse effects of development and protect the integrity of designated sites.

Author: Andrea Kelly

Date of report: 15 October 2026

Background papers: Nutrient Pollution – draft Norfolk Environmental Delivery Plan consultation - Defra Consultations

Broads Plan strategic objectives: Theme B

Appendix 1 – Norfolk EDP Consultation full response to questions

Appendix 2 – Norfolk EDP Consultation response summary

Consultation questions on draft Environmental Delivery Plan

Nutrient Pollution

Norfolk: Broads Special Area of Conservation (SAC) (Yare and Bure), Broadland Ramsar and River Wensum SAC

Consultation questions

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Consultation questions

The consultation questions are set out below. While you may wish to review all questions in advance, we prefer that you submit your responses via Smart Survey.

Please note only the first 300 words of your answer to each question (apart from Q35 and Q36) will be taken into consideration.

Confidentiality

1. Would you like your response to be confidential?

- Yes
- No

If you answered Yes to this question, please give your reason(s), in no more than 300 words.

About you

These questions are designed to develop an understanding of the breadth of respondents interested in the Environmental Delivery Plan (EDP) and the wider Nature Restoration Fund (NRF)

2. Key information

- What is your name?
- Email address
- Organisation
- What is your role?
- Where are you located?

3. What best describes your interest in this consultation?

- I am mainly interested in the Norfolk Environmental Delivery Plan
- I am interested in Environmental Delivery Plans more widely
- Other — please specify (no more than 50 words)

The Broads Authority, as the statutory authority responsible for conservation, planning and navigation in the Broads, has a strong interest in the Norfolk EDP. It helps convene local policy through the Broads Plan and brings practical experience of delivering wetland restoration and management measures across the area at scale.

4. **Which of the following best describes you or the capacity in which you are responding? You may select more than one:**
   - a resident in Norfolk
   - a resident outside of Norfolk
   - landowner in Norfolk
   - landowner outside of Norfolk
   - interested party
   - Environmental Non-Government Organisation member/employee
   - central government employee
   - local government employee
   - representative of an organisation
   - nature market provider
   - developer
   - consultant
   - academic
   - lawyer
   - other
     National Park

5. **If you are a developer how likely is your organisation to be proposing a development within the development area of the Norfolk EDP?**
   - Very unlikely
   - Unlikely
   - Neutral (or Undecided)
   - Likely
   - Very likely

N/A

The following questions relate directly to the Draft Environmental Delivery Plan (EDP) for public consultation, which can be found on Smart Survey. Title: 'Nutrient Pollution, Norfolk: Broads Special Area of Conservation (SAC), Yare & Bure, Broadland Ramsar & River Wensum SAC'.

Please read this document in conjunction with responding to the following consultation questions. We have provided a summary of each chapter below.

Chapter 1 - Executive summary

This chapter provides a high-level overview of the Norfolk EDP, the environmental issues it is intended to address, and how the EDP will operate in practice. It is intended to provide readers with a concise overview before moving into the detailed chapters that follow. It summarises the environmental challenges affecting the protected sites, the amount of development covered by the EDP, the conservation measures proposed, and how developers can participate.

It also introduces the central concept that conservation measures funded through the Nature Restoration Levy are intended not simply to address development impacts, but to contribute to an overall improvement in the conservation status of the identified environmental features.

Key messages

- The Broads Special Area of Conservation (SAC), Broadland Ramsar and River Wensum SAC are affected by nutrient pollution and other environmental pressures
- Up to 15,780 homes may use the EDP over a ten-year period
- Developers may pay the Nature Restoration Levy to discharge their relevant environmental obligations on a voluntary basis
- The levy rate is £2,675 per house or flat, plus indexation
- Natural England will use levy funding to deliver a strategic programme of conservation measures
- All conservation measures will be maintained for 100 years
- Natural England considers the package of measures will materially outweigh the negative effect of the EDP development on the conservation status of the environmental features.

EDP reference pages
Refer to chapter 1 pages 3 to 8

Chapter 2 - Introduction

This chapter explains the context for the EDP. It describes the protected sites involved, explains nutrient pollution and its ecological consequences, describes the policy context and sets out the structure of the EDP.

Key messages

- Nutrient pollution affects water quality, habitats and species across the protected sites
- Nutrient inputs come from several sources including agriculture, wastewater treatment works, urban runoff and non-mains drainage systems
- The EDP will address the negative effect of nutrient pollution from the EDP development only. The EDP introduces a strategic catchment-scale approach funded through the Nature Restoration Levy
- The Planning and Infrastructure Act introduces a new and more ambitious test (the Overall Improvement Test) than that applied under the Habitats Regulations.

EDP reference pages
Refer to chapter 2 pages 9 to 14
Refer to annex 2A page 113

Questions – chapter 1 and 2

6. **To what extent do you think the overall purpose of the EDP is sufficiently clear?**
    - Very clear
    - Clear
    - Not very clear
    - Not clear at all

7. **To what extent does the Executive summary and the Introduction (chapters 1 and 2) clearly set out the approach the EDP will take to deliver a material improvement that outweighs the negative effect of development?**
    - Very clear
    - Clear
    - Not very clear
    - Not clear at all

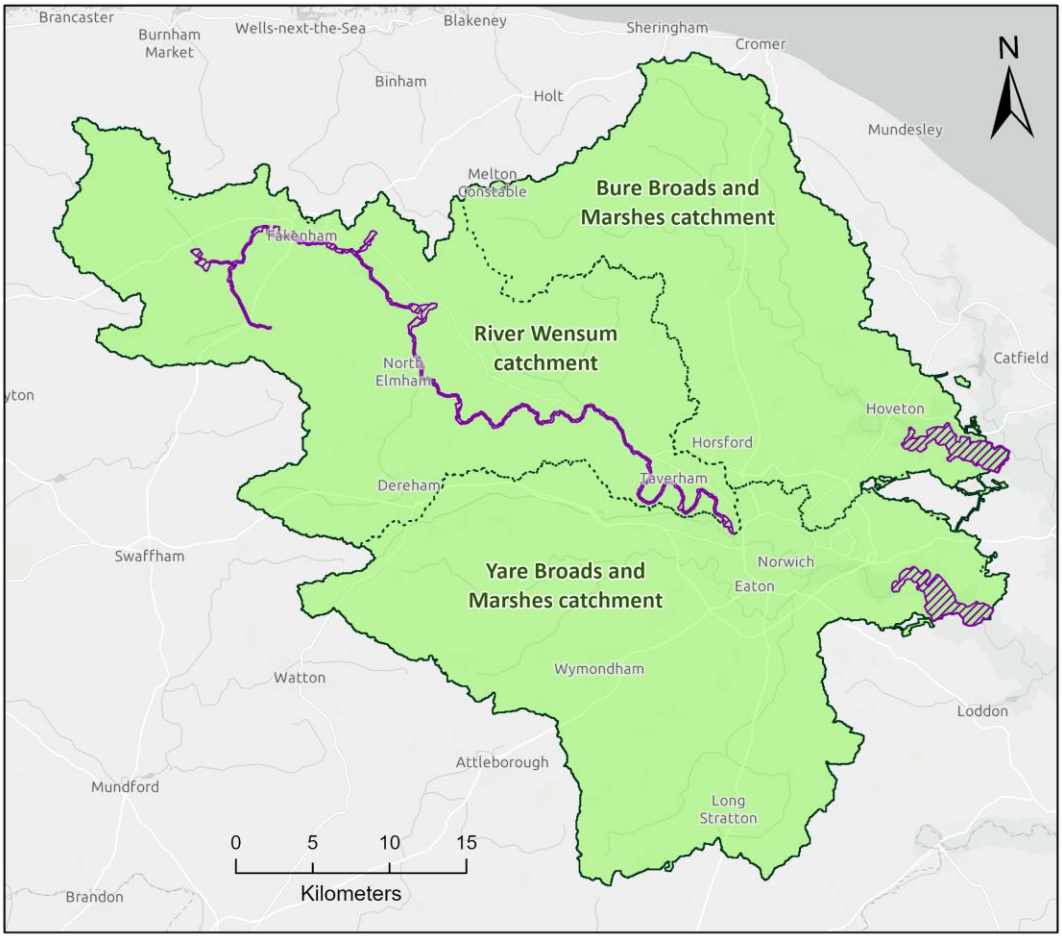
Chapter 3 – Scope of the EDP

This chapter defines the geographic area of the EDP, the environmental obligation discharged by this EDP, the kind of development that may use it, the time period of the EDP and the maximum amount of development enabled by the EDP.

Key messages

- The development area predominantly comprises surface water catchments associated with the Broads Special Area of Conservation (SAC) (Yare and Bure), Broadland Ramsar and River Wensum SAC protected sites.
- Certain locations, including the protected sites themselves and surrounding buffer zones, are excluded from this EDP.
- The EDP time period is ten years.
- The kind of development that can use the EDP is new dwellinghouses including flats, up to a maximum amount of development of 15,780 units.
- Development using the EDP can only discharge environmental obligations as set out in the EDP and will remain subject to all other existing environmental obligations. See Figure 4 below for a map of the EDP development area.

EDP reference pages
Refer to chapter 3 pages 15 to 19
Refer to annex 3A pages 114 to 115





Environmental Delivery Plan (EDP) Development Area

Nutrient Pollution - Norfolk

Development area

Catchment boundaries

Excluded areas

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Wastewater Treatment Works data derived from Hoffman et al. (2022) © Till Hoffman

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Questions – chapter 3

8. **Is the EDP period clearly set out?**
   - Yes
   - No
   - Somewhat
   - Maybe
   - Unsure

9. **To what extent do you agree that the geographic scope of the EDP has been clearly defined?**
   - Very clear
   - Clear
   - Not very clear
   - Not clear at all

Explain your choice (optional), in no more than 300 words.

The developer eligibility area is clearly defined at the strategic level, but the sub-catchments of the Bure Ant, Thurne and Trinity Broads are excluded and thus development within these parts of Norfolk will not be able to utilise the EDP.

The geographic area for conservation measures is not specified beyond the Lawton principles of “bigger, better and joined”. For fen creation, restoration and management, areas close to the Broads SAC should be prioritised because they are more likely to have comparable soils, hydrology and other supporting conditions.

Water availability and management are fundamental to successful fen and “Broads-type mosaic” measures. In the upper Bure and Yare, normal river levels are often substantially below adjoining land, making it difficult to create and maintain summer-wet habitats with suitable Wetland Water Supply Mechanisms. Potential sites are also often small, fragmented, confined to parts of fields or constrained by roads and properties. They may therefore be technically challenging, deliver limited ecological benefit and offer poorer value for money than larger sites adjacent to, or slightly downstream of, the Broads SAC.

Natural England should adopt a flexible, evidence-led approach to locating compensation measures. The search area should include larger, hydrologically suitable sites close to existing SACs, including downstream locations outside the tightly defined consultation-map boundary. Sites should be prioritised according to hydrological feasibility, ecological connectivity, scale, deliverability, long-term resilience and value for money. This would increase the likelihood of achieving the intended conservation outcomes and ensure effective, sustainable use of Nature Restoration Levy funding.

REPEATED QUESTION

10. To what extent do you agree that the geographic scope of the EDP has been clearly defined

- Very clear
- Clear
- Not very clear
- Not clear at all

Explain your choice (optional), in no more than 300 words.

REPEATED QUESTION

11. To what extent is the methodology used to define the maximum development capacity (15,780 dwellings) under this Norfolk EDP clearly set out?

- Very clear
- Clear
- Not very clear
- Not clear at all

Explain your choice (optional), in no more than 300 words.

Chapter 4 - Plans and strategies considered during EDP preparation

The Planning and Infrastructure Act requires EDPs to identify the strategies and plans considered by Natural England in their preparation, and to provide an overview of measures being taken or likely to be taken by Natural England or other public authorities.

The EDP is not intended to operate in isolation. This chapter demonstrates how conservation measures align with wider environmental objectives and helps ensure that activities funded through the EDP are genuinely additional rather than duplicating work already required through other mechanisms.

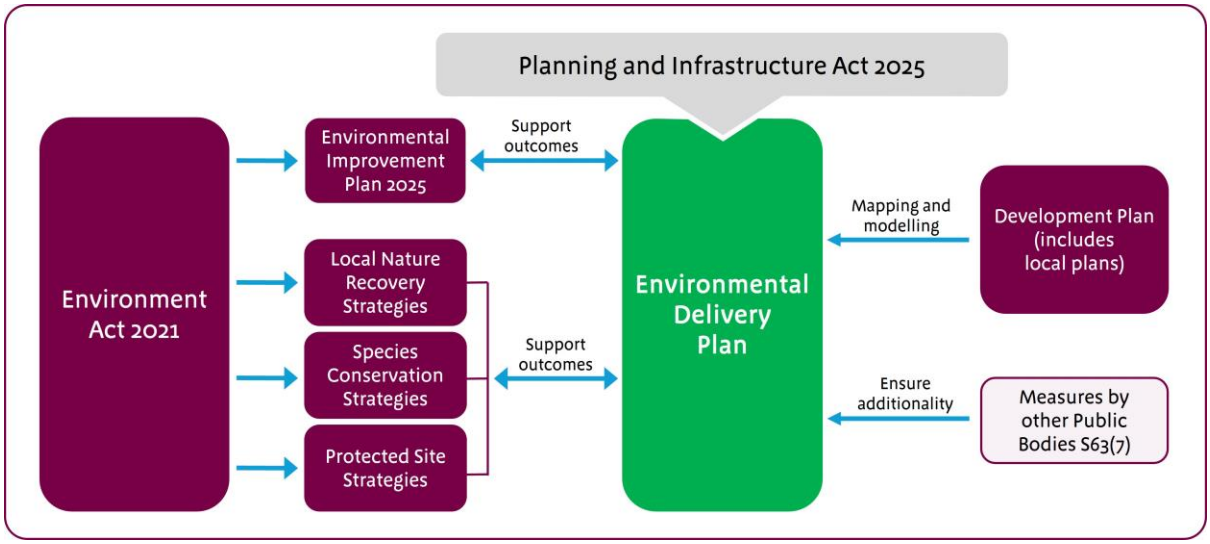


Figure 5: Summary of main interactions between the Environmental Delivery Plan and other strategies and plans

Key messages

- The EDP has been prepared with reference to local plans, the current Environmental Improvement Plan, the Norfolk Local Nature Recovery Strategy and other relevant environmental strategies or plans
- The EDP provides an overview of any other measures (in addition to the conservation measures set out in the EDP) that are being taken or are likely to be taken by Natural England or another public authority with the aim of improving the conservation status of each identified environmental feature. This is to avoid double counting, duplicate funding, or reliance on actions that would occur regardless of the EDP
- Wastewater treatment upgrades required through other legislation and agri-environment schemes are recognised but are not counted as EDP conservation measures

- The Local Nutrient Mitigation Fund is active in this area. Natural England will seek opportunities, where appropriate, to incorporate these measures into EDP conservation measure delivery
- Conservation measures are intended to complement wider nature recovery efforts across Norfolk.

EDP reference pages
Refer to chapter 4 pages 20 to 28

Questions – chapter 4

12. Are there any other relevant plans and strategies you think this EDP should take into account?

- Yes
- No
- Somewhat
- Maybe
- Unsure

Explain your choice (optional), in no more than 300 words.

The EDP should take account of several related initiatives to support a coordinated, strategic approach and avoid missed opportunities or duplication.

The Broads Peat Partnership Discovery Project is identifying potential sites for peatland restoration that could contribute to the programme of conservation measures, although most opportunities currently volunteered by landowners and farmers are downstream of the target areas. The EDP should consider how these opportunities could complement measures within the target catchments.

The EDP should also align with the Broadland Futures Initiative, particularly where flood alleviation objectives could support or enable hydrological and fen restoration. Coordination could help identify opportunities for joint delivery and funding while ensuring that benefits are additional and appropriately attributed.

There may also be relevant overlap with Water Resources East's water-resource mapping. This evidence should be reviewed to inform the spatial targeting and prioritisation of measures and to ensure consistency with wider water-resource and flood alleviation planning.

13. To what extent has the EDP provided a clear overview of the measures currently being taken or likely to be taken by other public authorities?

- Very clear
- Clear
- Not very clear
- Not clear at all

Chapter 5 - Environmental features: Conservation status and negative effect

This chapter identifies the environmental features (habitats and species of the protected sites) relevant to this EDP, how conservation status is defined, the conservation status of each environmental feature at the EDP start date and how nutrient pollution from EDP development negatively affects the environmental features.

Key messages

- The environmental features likely to be negatively affected by development to which the EDP applies are listed in Table 4 – page 33 of the EDP
- The conservation status, at the EDP start date, of all identified environmental features (habitats and species) is assessed as being in deteriorating condition
- Additional housing development will contribute further nutrient pollution and if no intervention took place, this would increase pressure on deteriorating environmental features.

EDP reference pages
Refer to chapter 5 pages 29 to 34
Refer to annex 5A pages 116 to 156
Refer to annex 5B pages 157 to 170

Questions – chapter 5

14. To what extent do you agree that all environmental features (habitats and species designated under The Broads SAC, Broadland Ramsar, and River Wensum SAC) likely to be negatively affected by nutrient pollution from development have been identified in the EDP?

- Very clear
- Clear
- Not very clear
- Not clear at all

Explain your choice (optional), in no more than 300 words.

The environmental features likely to be negatively affected by nutrient pollution from development appear to have been comprehensively identified with the exception of:

The Ramsar Wetland invertebrate assemblage in the Yare Broads and Marshes. Please clarify why it has not been identified as an environmental feature potentially affected by nutrient pollution.

Although the precise, feature-specific effects of additional nutrient loading are not described in detail, establishing these impacts would require a substantial body of further work. The Broads Authority considers that the evidence presented is sound and proportionate for the purpose of identifying the relevant features and provides a sufficiently robust baseline for the EDP.

15. To what extent do you agree with the approach of defining current conservation status of environmental features using habitat structure and function and their future prospects?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

We support this approach because it considers the biological, chemical, physical and hydrological factors that determine how habitats function. It also appropriately uses the best available evidence to assess habitat structure, function and future prospects, rather than relying on subjective judgement.

Where recent survey results or data are unavailable, the assessment should clearly state the level of confidence and whether its conclusions are supported by robust evidence or reflect an appropriately precautionary approach. Uncertainty should also be treated consistently when assessing the scale and certainty of improvements expected from conservation measures through the Overall Improvement Test.

The assessment should also distinguish more clearly between the condition of river and lake features. The Rivers Yare and Bure are generally in better condition for nutrients than the lakes. For example, the relevant reach of the River Bure achieves high ecological status for phosphorus under the Water Framework Directive classification. Reflecting this variation would provide a more accurate and transparent account of current conservation status. It would also ensure that the baseline and assessment of future prospects are sufficiently specific to each feature.

16. To what extent do you agree with the description of how the negative effect of additional nutrient loading from new development impacts the environmental features of the protected sites?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

This is a high level and accurate assessment.

The overall impact of further housing development and associated nutrient pollution appears relatively small compared with other nutrient sources. However, the Nature Restoration Fund requires environmental features to be left in a better state.

Recently published Environment Agency catchment statistics suggest that nutrient-reduction measures alone, such as package treatment plants, are unlikely to deliver material improvements to the designated features. This is particularly relevant to the Broads SAC, where many features lie outside the main river channels. For the Bure and Yare catchments, the Environment Agency estimates that point sources account for 26% and 46% of phosphate inputs respectively, while diffuse sources account for 74% and 41% under the 2014–2020 “Actual” scenario. Wastewater also contributes relatively little nitrate compared with rural land use.

The assessment would be strengthened by quantifying wider nutrient mitigation measures, including wastewater treatment upgrades, agricultural interventions and measures delivered through the Water Industry National Environment Programme. Greater transparency about the contribution, timing and certainty of these measures would help demonstrate how effectively they will address the wider nutrient pressures affecting the protected sites.

17. Do you think the approach used to assess the environmental impacts of additional nutrient loading from EDP development on the conservation status of the environmental features is appropriate and proportionate?

- Yes
- No
- Somewhat
- Maybe
- Unsure

Explain your choice (optional), in no more than 300 words.

The assessment is through and precautionary and covers the likely effects on the features of the Broads SAC.

Greater clarity would make the assessment more transparent and easier to scrutinise. In particular, it should explain how the modelled increase in nutrients, the existing condition of each feature, ecological sensitivity and uncertainty are brought together to produce the final negative-effect score. Grouping habitats is a reasonable and proportionate approach, provided the assessment demonstrates that it reflects differences in the location, condition and sensitivity of individual features.

The timing of effects should also be examined more fully. Although scenarios have been modelled for the periods before and after 2030, the assessment is largely based on the post-2030 position. An additional transition scenario should reflect the gradual delivery of new housing alongside the timing and demonstrated performance of Water Recycling Centre upgrades up to 2030. This would provide greater confidence that the assessment captures the greatest environmental effect likely to arise during the EDP period, rather than focusing only on the eventual position.

The assessment should also take account of wider changes that may occur during the lifetime of the EDP. Climate change, variations in rainfall, flows, and changing catchment conditions could affect the condition and resilience of environmental features and alter their sensitivity to additional nutrient inputs. A clearer account of how these pressures and associated uncertainties have been considered would strengthen confidence that the assessment remains robust throughout the EDP period.

Chapter 6 - Conservation measures

The chapter sets out the conservation measures to be taken by, or on behalf of, Natural England. It explains how Natural England has identified selected and sequenced these measures. This has been done in accordance with the Environmental Delivery Plans (Appropriate Prioritisation) Regulations 2026. These regulations define the terms avoidance measures, mitigation measures and compensation measures. This chapter also explains how much the conservation measures are expected to cost and how they will be delivered and maintained. See Figure 6, below, to see the process for conservation measure selection.

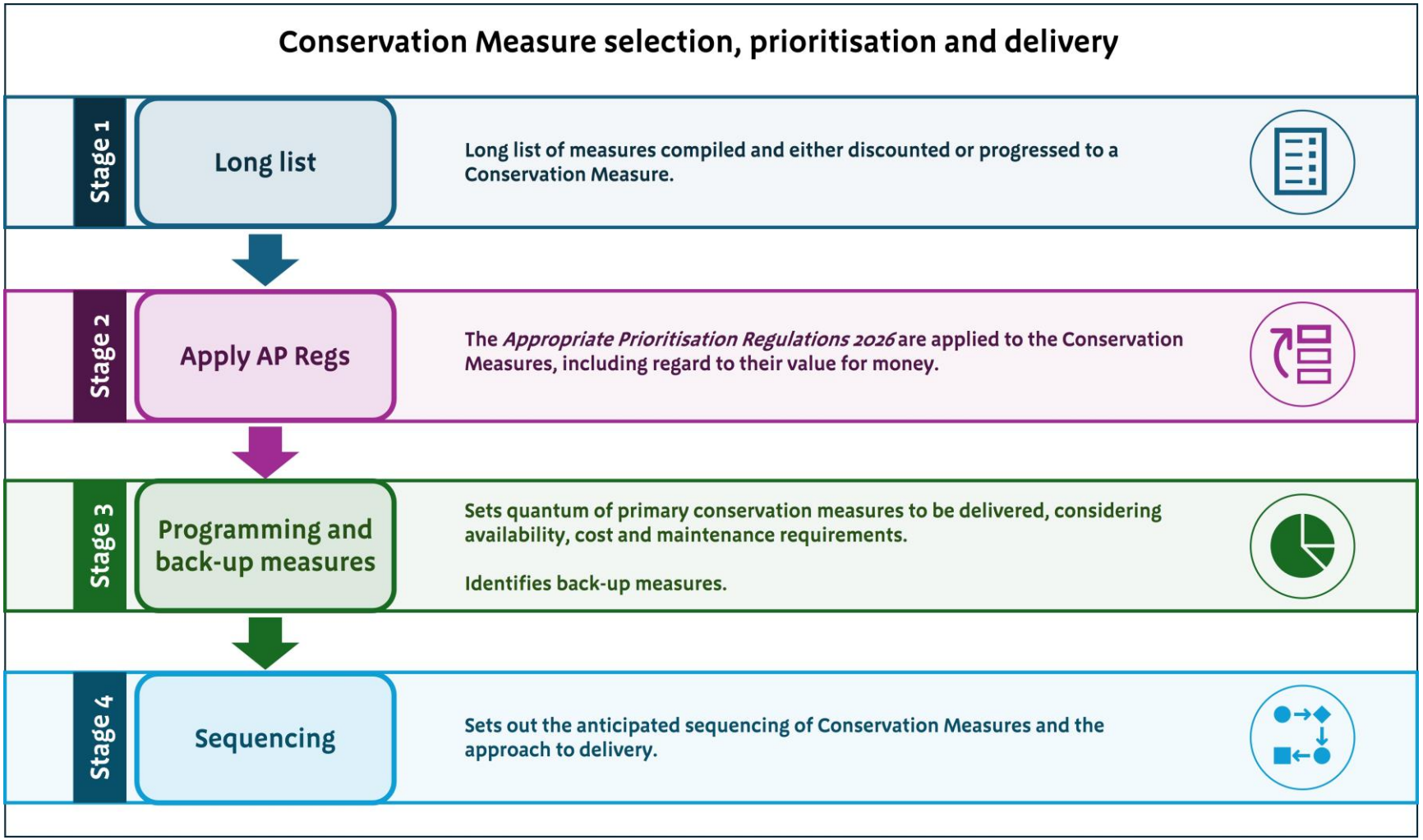


Figure 6: Diagram showing the process for conservation measure selection, prioritisation and deliver

Key messages

- A wide range of possible measures was considered against the criteria set out in this chapter. Measures that did not perform sufficiently against these criteria were discounted
- The remaining conservation measures were categorised as avoidance measures, mitigation measures and compensation measures and their value for money was assessed.
- No avoidance measures have been identified. One mitigation measure in the form of a planning condition was chosen. The remaining conservation measures have been categorised as compensation measures, but may take the form of mitigation depending on their timing of delivery relative to when the environmental impact of development occurs
- Table 9, page 63, of the EDP sets out the programme of conservation measures. These include fen creation and restoration, fen management, land use change to semi-natural habitat, catch-dyke restoration, deer management, river restoration, removal of structures in rivers, and a planning condition securing non-mains drainage standards
- Table 10, page 70, of the EDP sets out the sequencing of conservation measures equating to three phases of 5,000 homes per phase
- Conservation measures will be maintained for 100 years
- The expected cost of each type of conservation measures is set out in Table 9, page 63, of the EDP
- Procurement of conservation measures will be in line with public procurement regulations, creating opportunities for local and national partners and suppliers
- The backup conservation measures are identified, should they be required.

EDP reference pages
Refer to chapter 6 pages 35 to 74
Refer to annexes 6A to 6C pages 171 to 217

Questions – chapter 6

18. To what extent do you agree that the proposed programme of conservation measures is appropriate to outweigh the negative effect of development?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

The proposed programme presents a credible ecosystem-based approach that goes beyond simply offsetting additional nutrient loads. Measures aimed at improving environmental function could strengthen ecosystem resilience, support nature recovery and deliver wider landscape-scale benefits consistent with the Lawton principles. Land-use change, fen creation and restoration, biomass removal and catch-dyke restoration may also directly reduce nutrients.

However, apart from controls on non-mains drainage, the measures are classified as compensation. Although the EDP applies a precautionary approach, the Appropriate Prioritisation Regulations require avoidance and mitigation to be prioritised where appropriate. A programme consisting almost entirely of compensation could create an unintended precedent and weaken confidence that EDPs will deliver genuine nature recovery, particularly where future EDPs address impacts with a more direct relationship between development and environmental harm.

Greater emphasis should therefore be placed on measures that directly intercept or permanently reduce nutrient inputs, alongside habitat improvements. The EDP should qualify the expected nutrient reduction from each measure and explain what proportion of development-related loads will be addressed directly, compared with benefits arising from broader ecosystem improvements.

The distribution of benefits across environmental features also requires further consideration. The assessment should demonstrate that the programme will materially improve each feature, rather than relying on broad habitat-level assumptions.

Finally, the Overall Improvement Test remains predictive and dependent on expert judgement. Greater transparency is needed on evidence, confidence, uncertainty and the margin by which each feature is expected to pass. Clear delivery milestones, monitoring triggers and contingency measures should show how underperformance would be identified and corrected. This would provide greater assurance that improvements will be timely, durable, feature-specific and sufficient to materially outweigh the effects of development.

19. Do you have any comments on the conservation measures that were considered by Natural England but not included within the programme of conservation measures, or are there any additional measures that should have been considered?

Please add your answer, in no more than 300 words.

No additional measures are proposed at this stage.

There is no assessment that has been shared of what measures landowners are willing to deliver and secure for 100 years, however this is sensitive information and I understand that landowner discussions have underpinned the confidence that the measures will be tendered in the Broads.

We consider that Natural England has selected the most appropriate measures on the basis of the available evidence and has provided a reasonable justification for excluding the alternatives considered. However, the development of these measures feels rushed. In addition, the programme should retain sufficient flexibility to incorporate other measures if monitoring, site-specific evidence or changes in delivery circumstances indicate that they would provide greater or more durable benefits for the affected habitats and species. Any such measures should be additional, deliverable and clearly linked to the identified effects of the development.

The Authority supports the use of landscape-scale measures, but considers that the effectiveness of those measures will depend substantially on their location, connectivity, hydrological context and relationship with existing high-value habitats of the Norfolk Broads SAC. The Broads Authority would like to be part of a panel that assesses the selected conservation measures in the Broads.

The EDP should therefore provide greater clarity on the spatial principles that will govern site selection and prioritisation. Opportunities should be prioritised where intervention can restore ecological processes, improve habitat connectivity and strengthen the resilience of existing protected habitats, rather than simply meeting an area-based quantum.

Where a measure is delivered in partnership with an existing programme, the EDP should clearly identify which element represents additional delivery attributable to the NRF.

20. To what extent do you agree that the EDP clearly sets out the role of back-up conservation measures and the circumstances in which they will be implemented?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

21. To what extent do you agree with the proposed back up conservation measures?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

We agree that back up conservation measures may be required if the primary measures underperform or the Overall Improvement Test is at risk.

We consider that Natural England has selected the most appropriate measures based on the available evidence. However, further information on the trigger points and governance including the timings for the back up measures being used.

Over time it is possible that novel measures may arise that could improve practices or replace the existing measures. We recommend that a process for including such measures is considered. The programme should retain sufficient flexibility to incorporate other measures if monitoring, site-specific evidence or changes in delivery circumstances indicate that they would provide greater or more durable benefits for the affected habitats and species. Any such measures should be additional, deliverable and clearly linked to the identified effects of the development.

The 5% financial contingency for back-up measures appears modest given the programme's scale and duration. Further assurance is needed that adequate funding and delivery capacity will be available to implement alternative measures quickly and at sufficient scale if the primary measures significantly underperform.

22. To what extent do you agree that 100 years is the appropriate period to secure and maintain conservation measures?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

Securing permanent, 100-year measures for habitat creation, such as fen creation, creates a fundamental tension. Although long-term legal and structural commitments can safeguard enduring environmental benefits, overly restrictive terms may deter landowners from participating.

We are aware that the Local Nutrient Mitigation Fund (LNMF) to establish mitigation within affected catchments, including Norfolk has established and secured solutions for at least 80 years as being appropriate and deliverable. We recommend that Natural England consider this scheme and it transition to the EDP to avoid duplication and allowing the EDP to benefit from existing solutions as appropriate.

23. To what extent do you agree that Natural England has adequately considered the value for money offered by the conservation measures that have been selected?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

The proposed levy is £2,675 per dwelling, plus indexation, with the EDP covering up to 15,780 homes. Greater transparency on how the levy has been calculated, and how any surplus or underspend will be managed, would be welcomed.

The anticipated cost range per hectare for fen-type management appears low overall. However, restoration costs will depend on each site's starting condition, which will vary. Costs per hectare will also be influenced by site size; for example, a small fen site may still incur substantial preparatory costs, including approvals for protected species licences and water abstraction.

Notwithstanding concerns about the anticipated cost range, the value-for-money assessment appears sound and evidence-based in relation to delivering the compensation required by the EDP.

There is concern that the EDP's lower levy could undercut existing Nutrient Neutrality credit prices, creating a two-tier market. Although we are aware that the LURA duty on water companies places a statutory requirement to treat to Technically Achievable Limit and once this investment is complete in the coming years, the cost of nutrient neutrality credits from development may be difficult for developers to justify in terms of viability. The point is that these markets are not fixed and the EDP levy price is based purely on the delivery of the conservation measures and associated administration.

24. To what extent do you agree with the proposed approach to sequencing of conservation measures?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

Given the well-documented complexities of working in wetland environments, we agree that a measured approach, phasing habitat creation over time, is sensible.

There may be sensitivities with the actual housing delivery that might effect the sequencing. The EDP could be strengthened with triggers for altering measures to keep aligned with the development and minimise any lag between impact and the environmental benefits.

It is essential that the preparatory costs associated with habitat creation and restoration sites are adequately funded and eligible for tendering. This support will be critical to securing the best sites to deliver the material improvement of the features in the Broads via their location, it will also ensure participation of private landowners and identifying sufficient land to meet the EDP's projected habitat targets. Considerable preparatory work will be needed to develop robust project plans and obtain all relevant approvals ahead of the delivery windows, providing the assurance required for timely and effective implementation.

25. To what extent do you agree with the proposed approach for the delivery (including procurement) of conservation measures?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

The Environmental Delivery Plan (EDP) should make greater use of locally based organisations to coordinate and commission conservation measures, drawing on existing expertise, established partnerships and knowledge of local environmental priorities.

Natural England should continue to set the strategic direction, establish environmental standards and provide regulatory oversight. However, responsibility for commissioning and implementing projects could be undertaken by appropriate local delivery organisations, operating within a national framework. This would create a clearer distinction between those delivering conservation measures and those responsible for assessing their outcomes, strengthening transparency and accountability.

Norfolk Environmental Credits (NEC) provides an example of how this approach could work in practice. NEC is a not-for-profit company owned by five Norfolk local authorities. It has developed established governance and procurement arrangements, works collaboratively with a range of delivery partners and has a pipeline of nutrient mitigation projects. With over £23 million invested in environmental projects to date, NEC demonstrates the potential for existing local organisations to facilitate environmental investment and coordinate delivery without the need to create entirely new structures.

Building on this type of model could enable the EDP to draw together landowners, environmental organisations, private sector providers, water companies and other stakeholders through transparent commissioning arrangements. It could also help ensure that funded measures complement Norfolk's Local Nature Recovery Strategy, wider catchment priorities and other environmental initiatives. Opportunities to combine EDP funding with other investment sources and environmental markets could further increase the benefits achieved.

We recommend that the EDP considers enabling established local organisations, such as NEC, to commission and coordinate conservation measures on Natural England's behalf, subject to appropriate governance, reporting and assurance. This would make better use of existing capacity and investment, support more efficient delivery and strengthen local ownership of nature recovery, while ensuring that national environmental standards and oversight remain in place.

Chapter 7 – Overall Improvement Test

This chapter explains the Overall Improvement Test (OIT) and sets out how Natural England has assessed whether, by the EDP end date, the effect of the conservation measures will materially outweigh the negative effect of the EDP development on the conservation status of each identified environmental feature.

The Secretary of State can only make an EDP if satisfied that it passes the Overall Improvement Test.

Key messages

- Natural England recommends that this EDP passes the Overall Improvement Test
- The test has been applied individually to each identified environmental feature
- The evidence and expert judgement that has been used to inform Natural England's conclusions has been set out in this chapter and related annexes.

EDP reference pages
Refer to chapter 7 pages 75 to 95
Refer to annex 5B pages 157 to 170
Refer to annex 6C pages 192 to 217
Refer to annex 7A pages 218 to 221
Refer to annex 7B pages 222 to 244

Questions – chapter 7

26. To what extent do you agree with the methodology for assessing the Overall Improvement Test?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

We are confident that the conservation status of identified environmental features that could be assessed for overall improvement can be assessed. However, we recommend the EDP makes clearer how background pressures, including agricultural nutrient inputs, abstraction, hydrological modification, INNS species (including deer), climate change and other pressures, have been incorporated into assumptions about the effectiveness and timescale of conservation measures.

NE have worked with highly experienced organisations and their data to assess the negative effects of the EDP development on the Broads. In addition, NE have worked with local and national specialists who have deep understanding of the Broads wetlands to identify measures capable of addressing the negative effect on the conservation status of the identified environmental features. However, due to the short timescale has not secured the confidence of stakeholders due to the complexity of the scheme and the lack of shared understanding.

We recommend that further time and resource be set aside to review and validate the Overall Improvement Test against the monitored outcomes, allowing the assumptions, scoring and measures to be refined during the 10 years of the EDP development.

27. Would you suggest any improvements that can we made to strengthen the methodology for assessing the Overall Improvement Test?

Please add your answer, in no more than 300 words.

More time for through review and further consultation to help the understanding of this approach would be beneficial.

The strategic catchment approach is groundbreaking within ecosystem assessment and financial investment. Normally measures are directed to achieving single or focused benefit, such as nutrient, and additional benefits are noted as a bonus. Here the additional benefits are the focus.

The Overall Improvement Test approach could be strengthened by:

Defining the threshold for “materially outweigh”: Currently the methodology does not specify the minimum ecological margin, ratio or confidence level needed for benefits to materially exceed harm. This makes the conclusion heavily dependent on expert judgement alone.

Greater transparency of evidence: The EDP states that expert judgement and annex evidence support the conclusions, but the audit trail is difficult to follow. Each environmental feature could have a clear table showing predicted harm, expected benefit, assumptions, evidence quality and residual risk.

Impacts and benefits are different: Nutrient loading may be quantified, while benefits from fen creation, deer management or river restoration are less directly measurable. The methodology needs to clearly explain how these different effects are compared within this new legislation that focuses on material improvement.

28. To what extent does the EDP clearly set out the evidence that underpins Natural England’s assessment of the Overall Improvement Test?

- Very clear
- Clear
- Not very clear
- Not clear at all

Explain your choice (optional), in no more than 300 words

The EDP draws on a broad range of evidence and supporting research to inform the Overall Improvement Test. This includes information on existing conservation status, the effects of development, the anticipated effectiveness of proposed measures and relevant published literature. The incorporation of a modified Delphi process adds a valuable layer of expert scrutiny, helping to test assumptions and improve confidence in an assessment that inevitably involves a degree of uncertainty about future outcomes.

The weight of evidence approach for the measures is a sound way to judge the measures in their own right, however does not assess the contribution to an overall improvement in the conservation status of the identified environmental features. We suggest that to determine each feature a clear table showing predicted harm, expected benefit, assumptions, evidence quality and residual risk could support this test.

Chapter 8 – Nature Restoration Levy

This chapter explains how the Nature Restoration Levy is set, the components of the levy and the planning condition(s) necessary to use the levy.

Key messages

- The components of the levy include conservation measure delivery, conservation measure maintenance, monitoring, and administration
- A proportion of the funds will be invested to support future ongoing monitoring and maintenance of the conservation measures
- The levy rate is £2,675 per dwelling (index linked)
- New requests to pay the levy will not be possible after the end of the 6th year after the EDP start date.

EDP reference pages
Refer to chapter 8 pages 96 to 100 (includes the charging schedule).

Questions – chapter 8

29. To what extent do you agree that the allocation between (i) administration, (ii) delivery of conservation measure and (iii) long-term maintenance, (iv) management and (v) monitoring costs have been clearly set out?

- Very clear
- Clear
- Not very clear
- Not clear at all

Please explain your answer, in no more than 300 words

While Figure 6 provides an overview of costs across the programme, further detail is needed to understand the financial commitments associated with individual conservation measures.

Table 9 outlines estimated costs and maintenance requirements, but does not clearly distinguish initial expenditure, such as land acquisition and implementation, from ongoing management, maintenance and monitoring costs over the 100-year period.

This distinction is particularly important because future costs are expected to be funded through investment returns on levy income, with expenditure discounted to present value at the proposed rate of 2.05%. Greater clarity is needed to demonstrate that sufficient funding will be available to establish each conservation measure and sustain it throughout its required lifetime.

We recommend that the EDP provides a more detailed whole-life cost breakdown for each conservation measure, separating upfront costs from ongoing financial obligations. These figures should be clearly reconciled with the programme-level estimates in Figure 6 and the resulting charging schedule, enabling the assumptions underpinning the levy to be properly scrutinised.

Sensitivity analysis should also be undertaken to assess the implications of changes in key cost assumptions, particularly land acquisition and other significant upfront expenditure. This would help demonstrate whether the programme remains financially viable if costs increase and whether the levy provides sufficient resilience to accommodate unforeseen pressures.

Finally, projections of levy income over the programme period would help clarify the anticipated delivery timetable and identify any funding gap between initial implementation costs and the receipt of levy revenues. This would establish whether upfront or bridging finance is required and the potential costs involved, providing greater confidence in the programme's long-term financial sustainability.

30. Based upon the cost alone how likely are you to use or supply services to the EDP compared to other available mechanisms, for example, local private providers, local planning authority schemes, bespoke mitigation etc?

- Extremely likely
- Somewhat likely

- Neutral / Neither likely nor unlikely
- Somewhat unlikely
- Extremely unlikely

31.To what extent do you agree that the proposed EDP will accelerate decision making and delivery timescales compared with alternative nutrient mitigation approaches?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

32. Do you agree with the approach taken to aggregating the costs of conservation measures at plan level and then apportioning these evenly across all development?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words

We consider that this is the best approach to take for this strategic EDP.

Chapter 9 - Monitoring and reporting

This chapter explains how Natural England will monitor the EDP, options for corrective action (including the circumstances in which back-up measures need to be deployed or if an amendment of an EDP is required), and describes how progress will be reported throughout the lifetime of the EDP.

Key messages

- We will monitor development uptake, levy income and expenditure, the implementation of conservation measures, the ongoing effectiveness of conservation measures and validation of forecasts used in the EDP
- EDP monitoring will confirm if backup conservation measures or any amendments to an EDP are required
- Midpoint (year 5) and endpoint (year 10) reports will be published to assess whether the EDP remains on track to pass, or has passed, the Overall Improvement Test
- These reports will assess whether the EDP remains on track to satisfy, or has satisfied, the Overall Improvement Test.

EDP reference pages

Refer to chapter 9 pages 101 to 107

Refer to annex 9A pages 245 to 247

Questions – chapter 9

33. To what extent do you agree with the proposed monitoring themes as set out in chapter 9 of the EDP?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words

The proposed monitoring themes cover the main areas required to assess delivery and effectiveness. However, some further detail would benefit understanding of how each theme will be implemented, including the indicators and the detail in the baselines to be used, monitoring frequency, responsibilities, governance and oversight arrangements, and the thresholds that would trigger corrective action or the deployment of back-up measures. Without this information, it is difficult to assess whether the monitoring framework will provide timely and robust evidence that the EDP remains on track to pass the Overall Improvement Test.

34. To what extent does the EDP clearly set out how the reporting requirements will be met?

- Very clear
- Clear
- Not very clear
- Not clear at all

General

35. Do you have any additional comments from the chapters above?

Please add your answer, in no more than 1,000 words

1. The Broads Authority welcomes the opportunity to comment on the draft Environmental Delivery Plan and strongly supports the principle of a strategic, catchment-scale approach to addressing the impacts of nutrient pollution associated with new development. The Authority considers that a strategic approach has considerable potential advantages over a purely site-by-site approach, particularly within the Broads, where nutrient input from relevant new development is relatively minor and ecological processes operate across interconnected wetlands, waterbodies, rivers, fens and catchments.

2. The Norfolk EDP has the potential to establish an effective model for reconciling housing delivery with meaningful environmental improvements. Given its position among the first EDPs to be developed, the lessons learned from its implementation are likely to shape future schemes elsewhere. Ensuring that Norfolk's approach is robust, transparent and capable of being replicated will therefore be essential to its long-term success and wider influence.

3. The Authority knows that the EDP sits alongside a wider range of existing measures and projects. An explicit demonstration that NRF-funded measures are additional, rather than funding work that would otherwise have happened through existing environmental programmes is missing from the EDP.

4. The impact of nutrient from EDP development is relatively minor compared to other sources and compared to other catchments. Each EDP will be different based on the baseline condition of features and the evidence. For example, the maximum amount of development to be addressed by the Environmental Delivery Plan is predicted to generate a maximum of 0.4% increase in phosphorus concentration in the River Wensum, a maximum increase of 2.4% in the Bure, and a maximum of 0.7% in the Yare. Nutrient pollution is itself one of many pressures on protected sites.

5. The EDP's long-term success will depend on financial sustainability and continued developer participation. Greater clarity is needed on the whole-life costs of conservation measures and how these inform the levy. Changes to nutrient treatment standards after 2030 could change the cost of mitigation, making the EDP less attractive and potentially reducing uptake and income. Regular monitoring of costs, developer participation and financial assumptions, alongside flexibility to respond to changing circumstances, will be essential to maintaining the programme's viability.

6. EDPs could offer wider benefits by addressing multiple environmental requirements rather than focusing solely on nutrients. Subject to confidence in their environmental outcomes, future plans could incorporate recreational impacts and relevant protected-species obligations. A more integrated approach would simplify the planning process, reduce duplication and provide developers with greater certainty, making EDPs a more attractive alternative to project-level mitigation.

7. Given the international importance and ecological complexity of the Broads, the Authority considers that the EDP has selected the well understood local measures that provide a high degree of confidence that the proposed conservation measures will deliver genuine, measurable and additional environmental improvement. However, the Authority recommends strengthening the EDP in relation to further detail on Overall Improvement Test. The Broads Authority consider that this could be supported by a local panel that supports Natural England with the assessment of the selected conservation measures in the Broads.

8. EDP delivery should be linked with wider nature recovery initiatives and environmental markets, including carbon, water, flood management and species protection. Aligning with future water reforms could also create opportunities for coordinated regional investment. Combining developer contributions with public, private and water-sector funding could reduce project risks, improve financial viability and deliver multiple environmental benefits.

9. The Broads Authority supports the Norfolk EDP and emphasises the need for robust ecological safeguards, clear accountability and effective monitoring to demonstrate additionality. We recommend a Local Delivery Model that separates strategic oversight from operational delivery, strengthens stakeholder confidence and aligns conservation measures with the Local Nature Recovery Strategy, Broadland catchment priorities and complementary funding opportunities, including Defra's peatland grants. Delivery should also integrate with existing Broads management and monitoring programmes, with appropriate governance and assurance arrangements, supporting both ecological outcomes and the Government's ambition to devolve decision-making locally.

10. The Government's stated intention is that EDPs should both deliver environmental improvement and unlock development. The EDP offers a ground breaking opportunity, but given the Norfolk Plan is leading the way, it needs more time to develop the safeguards and governance to make the promised win-win work.

1. Public Sector Equality Duty

We would like to hear about any potential impacts of any of the above proposals on businesses, or of any differential impact on persons with a relevant protected characteristic as defined by the Equality Act 2010 compared to persons without that protected characteristic, together with any appropriate mitigation measures, which may assist in deciding final policy approaches in due course. Is there anything that could be done to mitigate any impact identified?

Please add your answer, in no more than 1,000 words

DRAFT Consultation Response (v02)
Environmental Delivery Plan
Nutrient Pollution

Broads National Park

Norfolk: Broads Special Area of Conservation (SAC) (Yare and Bure), Broadland Ramsar and River Wensum SAC



Broads National Park Summary Information

RESPONSE SUMMARY

Q1 **Would you like your response to be confidential?** No

Q2 **Key information**

What is your name?	Andrea Kelly
Email address	Andrea.Kelly@broads-authority.gov.uk
Organisation	Broads Authority
What is your role?	Environment Policy Adviser
Where are you located?	Norwich, Norfolk

Q3 **What best describes your interest in this consultation?** The Broads Authority, as the statutory authority responsible for conservation, planning and navigation in the Broads, has a strong interest in the Norfolk EDP. It helps convene local policy through the Broads Plan and brings practical experience of delivering wetland restoration and management measures across the area at scale.**Q4** **Which of the following best describes you or the capacity in which you are responding?**

a landowner in Norfolk ; interested party ; representative of an organisation ; other (National Park Authority)

Q5 **If you are a developer how likely is your organisation to be proposing a development within the development area of the Norfolk EDP?**

N/A

Introduction; Scope of EDP; Plans and strategies

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
6	To what extent do you think the overall purpose of the EDP is sufficiently clear?				
7	To what extent does the Executive summary and the Introduction clearly set out the approach the EDP will take to deliver a material improvement that outweighs the negative effect of development?				
9&10	To what extent do you agree that the geographic scope of the EDP has been clearly defined?				
11	To what extent is the methodology used to define the maximum development capacity (15,780 dwellings) under this Norfolk EDP clearly set out?				
13	To what extent has the EDP provided a clear overview of the measures currently being taken or likely to be taken by other public authorities?				

Number	Question	Yes	No	Somewhat	Maybe	Unsure
8	Is the EDP period clearly set out?					
12	Are there any other relevant plans and strategies you think this EDP should take into account?					

RESPONSE SUMMARY

Q9 The developer eligibility area is clearly defined at the strategic level, but the sub-catchments of the Bure Ant, Thurne and Trinity Broads are excluded and thus development within these parts of Norfolk will not be able to utilise the EDP.

Q12 The EDP should take account of several related initiatives to support a coordinated, strategic approach and avoid missed opportunities or duplication. For example The EDP should also align with the Broadland Futures Initiative, and the Broads Peat Partnership Discovery Project. There may also be relevant overlap with Water Resources East's water-resource mapping

Broads National Park Environmental features and conservation status

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
14	To what extent do you agree that all environmental features (habitats and species designated under The Broads SAC, Broadland Ramsar, and River Wensum SAC) likely to be negatively affected by nutrient pollution from development have been identified in the EDP?				

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
15	To what extent do you agree with the approach of defining current conservation status of environmental features using habitat structure and function and their future prospects?					
16	To what extent do you agree with the description of how the negative effect of additional nutrient loading from new development impacts the environmental features of the protected sites?					

Number	Question	Yes	No	Somewhat	Maybe	Unsure
17	Do you think the approach used to assess the environmental impacts of additional nutrient loading from EDP development on the conservation status of the environmental features is appropriate and proportionate?					

RESPONSE SUMMARY

Q14 The apparent omission of The Ramsar Wetland invertebrate assemblage in the Yare Broads and Marshes. should be addressed.

Q15 We are supportive of the overall approach of defining conservation status habitat structure and function. Greater transparency is required around evidence gaps, confidence levels and the treatment of uncertainty and species-specific considerations when assessing conservation status.

Q16 The overall impact of further housing development and associated nutrient pollution appears relatively small compared with other nutrient sources. However, the NRF requires environmental features to be left in a better state. Greater transparency about the contribution, timing and certainty of these measures would demonstrate how effectiveness for the protected sites.

Q17 The methodology is broadly supported, but greater assurance is required around feature-specific sensitivities, timing of effects and the treatment of wider environmental pressures and uncertainty over the EDP period.

Broads National Park Conservation Measures

Number	Question
19	Do you have any comments on the conservation measures that were considered by Natural England but not included within the programme of conservation measures, or are there any additional measures that should have been considered?

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
18	To what extent do you agree that the proposed programme of conservation measures is appropriate to outweigh the negative effect of development?					
20	To what extent do you agree that the EDP clearly sets out the role of back-up conservation measures and the circumstances in which they will be implemented?					
21	To what extent do you agree with the proposed back up conservation measures?					
22	To what extent do you agree that 100 years is the appropriate period to secure and maintain conservation measures?					
23	To what extent do you agree that Natural England has adequately considered the value for money offered by the conservation measures that have been selected?					
24	To what extent do you agree with the proposed approach to sequencing of conservation measures?					
25	To what extent do you agree with the proposed approach for the delivery (including procurement) of conservation measures?					

RESPONSE SUMMARY

Q18 The programme could outweigh development impacts but its reliance on compensation rather than mitigation needs to be clearly set out for the Broads.

Q19 The Authority supports the use of landscape-scale measures, but effectiveness will depend substantially on a number of factors that need to be controlled including landowner participation; greater flexibility would improve resilience.

Q21 Further information on the trigger points and governance including the timings for the back up measures being used.

Q22 A rigid 100-year requirement could be overly restrictive terms may deter landowners from participating.

Q23 Greater transparency on how the levy has been calculated, and how any surplus or underspend will be managed, would be welcomed.

Q24 There may be sensitivities with the actual housing delivery that might effect the sequencing. The EDP could be strengthened with triggers for altering measures.

Q25 A Local Delivery Model should use established, locally accountable bodies to deliver conservation measures within NEs strategic and regulatory framework, building on existing local partnerships, capability and investment.

Broads National Park Overall Improvement Test (OIT)

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
26	To what extent do you agree with the methodology for assessing the Overall Improvement Test?					

Number	Question
27	Would you suggest any improvements that can we made to strengthen the methodology for assessing the Overall Improvement Test?

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
28	To what extent does the EDP clearly set out the evidence that underpins Natural England's assessment of the Overall Improvement Test?				

RESPONSE SUMMARY

Q26 We are confident that conservation status of identified environmental features that could be assessed for OIT can be assessed. However, we recommend the EDP makes clearer how background pressures, have been incorporated into assumptions about the effectiveness and timescale of conservation measures.

Q27 The OIT methodology would be strengthened by clearer causal links between measures and outcomes, greater transparency around uncertainty and the margin of improvement, and translating theoretical triggers into practical, observable indicators and thresholds to demonstrate that predicted benefits are being achieved and maintained over time.

Q28 The weight of evidence approach for the measures is a sound way to judge the measures in their own right, however does not assess the contribution to an overall improvement in the conservation status of the identified environmental features. We suggest that to determine each feature a clear table showing predicted harm, expected benefit, assumptions, evidence quality and residual risk could support this test.

Broads National Park Nature Restoration Levy

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
29	To what extent do you agree that the allocation between (i) administration, (ii) delivery of conservation measure and (iii) long-term maintenance, (iv) management and (v) monitoring costs have been clearly set out?				

Number	Question	Extremely Likely	Somewhat Likely	Neutral	Somewhat Unlikely	Extremely Unlikely
30	Based upon the cost alone how likely are you to use or supply services to the EDP compared to other available mechanisms, for example, local private providers, local planning authority schemes, bespoke mitigation etc?					

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
31	To what extent do you agree that the proposed EDP will accelerate decision making and delivery timescales compared with alternative nutrient mitigation approaches?					
32	Do you agree with the approach taken to aggregating the costs of conservation measures at plan level and then apportioning these evenly across all development?					

RESPONSE SUMMARY

Q29 The EDP should provide a detailed whole-life cost breakdown for each conservation measure, separating upfront expenditure from ongoing management, maintenance and monitoring costs over the 100-year period. Costs should be reconciled with programme estimates and the levy, supported by sensitivity analysis of key assumptions and projections of levy income to identify potential funding gaps, bridging finance requirements and risks to long-term financial sustainability.

Q32 We support plan-level aggregation and a common levy, recognising the benefits of consistency and certainty ans the We consider that this is the best approach to take for this strategic EDP.

Monitoring and Reporting

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
33	To what extent do you agree with the proposed monitoring themes as set out in chapter 9 of the EDP?					

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
34	To what extent does the EDP clearly set out how the reporting requirements will be met?				

RESPONSE SUMMARY

Q33 The monitoring themes cover the main areas required, but further detail is needed on indicators, baselines, monitoring frequency, responsibilities, oversight and thresholds for corrective action. This would help demonstrate that the framework can provide timely, robust evidence that the EDP remains on track to pass the OIT.

Broads National Park Additional Comments

- **Strategic, catchment-scale approach**: The Broads Authority supports the EDP's strategic approach to nutrient pollution, recognising its advantages over site-by-site mitigation, particularly in the Broads, where development-related nutrient inputs are relatively minor and ecological processes operate across interconnected wetlands, rivers, fens and catchments.

- **Environmental improvement and additionality**: The EDP must demonstrate that NRF-funded measures deliver genuine, measurable and additional environmental benefits beyond existing programmes. The Overall Improvement Test should be strengthened, with a potential local panel supporting Natural England's assessment of conservation measures affecting the Broads.

- **Financial sustainability and developer participation**: Greater transparency is needed around whole-life costs, levy assumptions and long-term funding. Changes to nutrient treatment standards after 2030 could affect mitigation costs, developer uptake and levy income, requiring regular review and flexibility.

- **Governance, monitoring and accountability**: Establish a Local Delivery Model separating strategic oversight from operational delivery, with clear responsibilities, effective monitoring and appropriate assurance arrangements to maintain stakeholder confidence and demonstrate ecological outcomes.

- **Integration with wider environmental priorities**: Align conservation measures with the Local Nature Recovery Strategy, Broadland catchment priorities, existing Broads management and monitoring programmes, and complementary funding, including Defra's peatland grants. Future EDPs could also address recreational impacts and protected-species obligations where robust environmental outcomes can be demonstrated.

- **Partnership funding and nature recovery**: Link EDP delivery with wider initiatives and environmental markets covering carbon, water, flood management and species protection. Coordination with future water reforms and combined developer, public, private and water-sector funding could reduce risks and deliver multiple environmental benefits.

- **A pioneering model requiring further development**: As one of the first EDPs, Norfolk could establish a replicable model for reconciling housing delivery with nature recovery. However, sufficient time is needed to establish robust safeguards, transparent governance and effective delivery arrangements to ensure the promised environmental and development benefits are realised.