

## **Comments on the Norfolk Structure Plan Review Issues Report - 'Looking towards 2025'**

1. We welcome the recognition in this Report of 'Climate Change' as one of the chief driving forces to be taken into account in respect of the development and use of land in Norfolk in the first part of the 21 St Century. This phenomenon has major implications for the county generally, and the Broads region in particular and we therefore strongly endorse the sentiments expressed in para. 2.26 of the Report to the effect that the Structure Plan should..... "continue to provide for a land use pattern than can contribute to reduced emissions and avoids development on flood plains and in undeveloped coastal areas".

2. We endorse the comments made in para. 2.24 about the role of carbon dioxide in regard to Climate Change, and the need, recognised by Government, to reduce the emissions of this gas over the coming decades. However, no mention is made in the Issues Report to the role of methane, which, on a volume to volume basis, has a much greater 'global warming' effect than carbon dioxide. Given the fact that land fill sites generate significant quantities of methane, we would like to see a reference in the Structure Plan to the need to arrange for methane collecting equipment to be installed in all new land fill sites from the outset, and not, as at Strumpshaw, only after it became clear that methane generation was becoming a problem from the public safety point of view. We would take the opportunity to put in a strong plea that the methane generated from land fill sites in the county should be used to power small generators, and not, as at Strumpshaw, simply burnt off.

3. We welcome the acceptance in para. 3.11 of the key role of tourism in regard to the economy of the county, although we would have preferred, given the major inputs to the economy of the Broads and coastal regions by activities such as angling and sailing, to have seen this section headed 'Tourism and Recreation', rather than 'Tourism'. - As far as Question 5 is concerned, we would draw attention to the decline of the boat hire industry which has occurred in Broadland over the past 20 years or so, and the steps being taken by a consortium of interested parties, (including the Norfolk CC) to reverse this trend. We were surprised that this is not mentioned in the Issues Report.

4. The future well-being of the Broads region is wholly dependent on, it continuing to receive a sufficiency of good quality freshwater; indeed, water is the very life blood of the region. In the circumstances, we would dissent from the view expressed in para. 4.2 to the effect that only three out of the 8 factors quoted in the previous paragraph as the reasons for biodiversity decline can be influenced by the Structure Plan. We believe that a fourth factor, namely the 'Decline in Water Quality' can and should be addressed by the policies set out in the Plan. For instance, the demand for water from new commercial and housing developments in the catchments of the Broadland rivers could lead to a reduction in the flow rates of the latter during the summer months, a consequential rise in the concentration of pollutants carried by these rivers, and a reduction in the rate at which broads associated with

them are flushed by 'new' water derived from the catchment. The reduced flushing rate, together with the large nutrient load carried by the rivers, already results in some of the broads, particularly those associated with the R. Bure becoming dominated by blue-green algae during the summer months, the result being that the clarity of the water is reduced to the detriment of other forms of plant and animal life. This of itself would suggest that flow rates in the Broadland rivers are, from the ecological point-of-view, already less than they should be during the summer months, and historical evidence strongly supports this hypothesis. But the problem of low fluvial flows in the rivers will almost certainly be exacerbated by the effects of Climate Change. In this respect, there is increasing evidence that this phenomenon will lead to summers in Eastern England becoming both warmer and drier over the coming 'decades. In the circumstances, it would seem that unless remedial action is taken, fluvial flow rates in the Broadland rivers during the summer could, in future be even lower than they are today. This in turn could have very deleterious effects on the region's biodiversity and future well-being. Given the fact that the Broads region is widely regarded as one of Britain's most important wetland systems, we would wish to see a recognition in the Structure Plan that the water resources on which its future sustainability largely depends must not be overexploited as a result of a wish to accommodate new 'developments' in the county. Furthermore, we think that the Plan should indicate that Climate Change may, in combination with an increasing demand for water from new housing and commercial developments, as well as from farmers, make it necessary to augment from other quarters the supply of freshwater reaching the Broads region.

5. We were pleased to see the references in the Issues Report to the need to safeguard the county's biodiversity, but surprised that no mention is made in it of the county and national Action Plan targets which have been set to achieve this objective. We were also taken aback to note that the Report does not, as an illustration of the county's ecological richness, mention the fact that over 150 Sites of Special Scientific Interest (SSSIs) have been scheduled in it. Few other counties in England and Wales have anywhere near as many SSSIs as this. Furthermore some of the sites in Norfolk have been afforded international as well as national recognition by being designated under the Ramsar Convention, or as Special Protection Areas or candidate Special Areas for Conservation. The county council is, in common with other official bodies, statutorily obliged to take account of the existence of these SSSIs and internationally designated sites when formulating its plans and policies, and we believe that this point should be taken up in the Structure Plan.

6. As far as Question 11 is concerned, 'managed retreat' is not a realistic option for the Broads region, although we recognise that different circumstances apply in respect of the county's northern and north-western coasts. Whilst on the subject of flooding, we would make the point that the multi-million pound Flood Alleviation Scheme now in progress in Broadland will not, of itself, secure the region against future surge-induced flooding. The only realistic, long-term solution to this will be to construct a surge barrier at

Yarmouth, and we would like to see a reference to the eventual need for this included in the Structure Plan.

7. We welcome the comment implicit in para. 4.10 to the effect that the revised Structure Plan could and should be more specific about the need to safeguard the county's water resources. These are, as was pointed out in para. 4 above, already under considerable pressure, a fact which those of us having a special interest in Broadland are only too well aware. In the circumstances, we were surprised that the desirability of extending the metering of water to all houses in the county, instead of just to new ones - a potentially contentious policy issue - is not discussed in the Report. Nor does it mention the Environment Agency's Catchment Management Plans, or the regulations shortly to be promulgated in respect of the Water Framework Directive (WFD). The WFD, in particular, will almost certainly affect future 'developments' in the county, and its implications should certainly be addressed in the Structure Plan.

8. While on the subject of water, we believe that this 'resource' is still grossly undervalued by many consumers. In the circumstances, there would seem to us to be a strong case for increasing the price charged for the water used, not only by householders, but by farmers and by commercial and industrial concerns. Such a step would almost certainly lead to a reduction in consumption, and thus have beneficial environmental effects, particularly in ecologically sensitive wetland areas such as the Broads. We are aware that our views on this issue run counter to those expressed by OFWAT, which is concerned to bring about a reduction, rather than an increase, in the price which consumers are charged for water. It would appear that OFWAT is unaware that its policies could, as far as the Broads region is concerned, have undesirable environmental consequences.

9. Still on the subject of water resources, and in answer to question 15, we would strenuously oppose any new scheme involving the transfer of water out of the county, particularly those parts of it drained by the three main Broadland rivers. If development pressures in Essex or Cambridgeshire are such that these counties need additional water, they should be looking to obtain this from the Fl. Trent and not from Norfolk.

10. We are concerned that the runoff from the roofs of new commercial and housing developments -is all too often directed to the sewerage system, rather than to soak-aways. The Structure Plan should, in our view, refer to the desirability of the latter being employed whenever ground conditions permit. (Question 16 refers).

11. In answer to Question 17, we would certainly like to see the Structure Plan do more to promote efficient energy use, and the exploitation of renewable energy sources. Specifically, we think that it should:

(a) encourage planners and developers to provide- new houses and commercial premises with far better insulation against heat loss than is the norm at present,

(b) express its 'in principle' support for householders wishing to carry out such work themselves, or who want to install solar panels or other energy-saving devices. In this respect, we consider it most unfortunate that planning officials sometimes give the impression of being averse to the installation of solar panels on roofs; the Structure Plan should make it clear that these will only be deemed unacceptable in exceptional circumstances,

(c) refer to the innovative experiments currently being undertaken by the Broads Authority to use fen produce as a source of fuel for use in mini-power stations, and indicate that these and other measures to utilise 'green' energy sources will be supported. We would point out in respect of Question 19 that the costs involved in transporting material for burning in a mini-power station are so high that it would be essential for the latter to be based locally, and thus within easy reach of the source of supply. This factor should be recognised in the Structure Plan

12. Like many other environmentally-conscious organisations, our membership has divided opinions: regarding the merits and de-merits of wind turbines. (Question 18). In general, we would prefer these to be located out to sea, rather than on land, and we therefore welcome the intention to site a wind farm on Scroby Sands, off Gt. Yarmouth. We have also been pleased to note that the Government has indicated that no wind turbines should be located within a national park (or the Broads, which has equivalent status). However, many of our members are familiar with those located at Somerton, just outside the boundary of the Broads Authority's Executive Area, and there seems to be a general consensus amongst us that the ten small generators installed in this area some 10 years or more ago have a more deleterious impact on the landscape, as viewed from within the region, than the single, much larger, 1.5 mW turbine installed at Somerton more recently. This can be attributed to the fact that the blades of the latter machine turn very slowly and are thus relatively unobtrusive visually, whereas those of the smaller, older generators rotate relatively quickly, and thus tend to produce a more conspicuous 'flickering' effect when viewed from a distance.

13. We were interested in the key principles for future development in the county which are enumerated in para. 7.2 of the Issues Report. But in answer to question 31, and without wishing to duplicate the points we have already made in para. 4 above, we think there is one glaring omission from this list, namely the need to ensure that the increased demand for water which will result from any proposed new developments does not result in reduced flow rates in the county's rivers, particularly during the summer months. The Water Framework Directive (to which we made reference in par. 7 above) will also be relevant here. We might perhaps add as an aside that water companies have a vested (ie commercial) interest in seeing more water used in the county, and

that their 'agenda' is not necessarily compatible with ours, which is concerned, inter alia, with ensuring that each of the Broadland rivers carries as much water as possible during the summer months.

14. Finally, and in answer to question 12, we feel obliged to express keen disappointment at the dearth of references to the Broads in the Issues Report. The authors of this seem to regard the region as being of no more, and no less, interest than other parts of the Norfolk countryside. In so doing, they have overlooked the fact that Broadland is the only region in eastern England which has the status equivalent to a national park. Moreover, as will have become apparent from the comments made in the foregoing paragraphs, the region still supports a major tourist industry (which the Broads Authority has estimated to generate in excess of E30 M in direct revenue to the county each year), and is visited by nearly a million persons a year seeking relaxation or wishing to participate in various, water-based recreational pursuits. And yet, despite the pressures to which it is subject, Broadland remains one of Britain's most important and best known wetland complexes. Given the multitude of threats to which the region is subject (only some of which are covered in this submission) and the complexities involved in managing it in a sustainable manner, we believe that a special section of the Issues Report should have been devoted to the Broads region. This would have been along the same lines, and of similar length, to that devoted to Norwich. We would strongly urge that this deficiency be rectified when the Structure Plan is being revised. This is particularly important given the likelihood that increased emphasis will be placed in future on regional, as distinct from county-based, planning. It is vital that the Structure Plan is worded in such a way as to ensure that those concerned with regional planning can use it to familiarise themselves with Broadland's very special attributes and needs, and the multiplicity of threats to which it is subject.

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