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Broads Authority

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Dear Ms Long

### **Draft Broads Plan 2011 – 2016**

Thank you for the opportunity to comment on the proposed strategic management plan for the Broads. As the organisation representing farmers and growers in the area, we will primarily comment below on section 4.3 of the draft document that covers agriculture and land management.

An open question to be posed in all aspects of the draft plan is the ability of the Broads Authority to deliver its objectives in light of the emerging implications of major budgetary cuts demanded by the coalition government. We anticipate that this may lead to further revision of the draft proposals before the publication of a final plan.

The NFU has a very clear position on farming's contribution to the Broads set out in our campaign document 'Why farming matters to the Broads' which usefully addresses a number of issues raised in the draft plan. The report can be found at <http://www.nfuonline.com/Regions/East-Anglia/News/Why-Farming-Matters-to-the-Broads/>

To paraphrase our 'Why farming matters to the Broads' document, we would like to see reference to the following in the Broads Plan:

- A thriving farming sector in and around the Broads, one that produces more while impacting less on the environment, and that makes a major contribution to food and fuel security (consistent with Defra's Food 2030 agenda).
- Transfer of all land that is currently part of the Broads Environmentally Sensitive Area into environmental stewardship schemes designed to meet the needs of lowland graziers. This can only be achieved by introducing creative ELS/HLS prescriptions that recognise the economics of farming on the grazing marshes and which offer worthwhile payment rates; provide sufficiently flexible options; and encourage the direct participation of graziers as short term occupiers of land rather than their landlords.
- Committed long-term investment in the maintenance of existing sea and river defences, particularly those that protect the best quality agricultural land that is so abundant around the Broads.
- Funding for technical innovation to increase the sustainable use of water on farms, complete with training programmes to help farmers adopt techniques that maximise their efficient use of water.

- Continued emphasis on industry-led initiatives to improve water quality such as the Campaign for the Farmed Environment, Tried and Tested nutrient management planning and the pesticides Voluntary Initiative. Measures to address water quality must be based on scientific evidence; be carefully targeted; and enthuse and engage farmers. The costs to farm businesses of implementing measures must not outweigh the environmental benefits of the improvements.
- Protection of our best and most versatile land in and around the Broads, for its own sake as a national asset and for its productive capacity in providing food and fuel to the nation.
- Carefully targeted advice and information to help farmers improve their soil management techniques, thereby conserving the long-term fertility and productivity of this precious resource.
- An energetic programme for de-silting water courses to improve water flow and increase flood resilience.
- An innovative approach to flood protection, such as a scoping study into the construction of a barrier across the River Yare.
- Analysis of the full impact of dredging operations around our ports, resulting in the development of a coastal management plan that fully reflects those impacts.
- More procurement of local food by public bodies in Norfolk and Suffolk, especially in local schools and hospitals, with an emphasis on food produced to British farm assurance standards.
- Flexible planning policies that allow diversified farm businesses to flourish.
- Greater simplicity and flexibility in the delivery of rural development schemes to support farm modernisation and diversification.

### **Section 4.3 Agriculture and land management**

We have some suggestions to improve the long term aim for agriculture as follows:

Sustainable land management and agri-environmental practices support viable agriculture and a healthy and quality environment. Good practice and buffer areas stop nutrients and sediment polluting the water. Careful management of water also enables dykes rich in wildlife, marshes with diverse plant communities, a wealth of waders and wildfowl and a healthy livestock industry. The importance of good soil management is recognised as vital for agriculture and reducing carbon dioxide emissions. Arable production on the valley sides seeks to include biodiversity needs through positive action. Agri-environment support is actively and carefully targeted to bring the best public and business benefits. The importance of the food supply chain is embraced and where beneficial localised, helping to create a buoyant agricultural sector.

In terms of outcomes, I would suggest:

- The renewal of ES agreements and the transfer of expiring ESA and CSS agreements into ES is really important
- What are the 'sustainable practices' that farmers should adopt? A definition is needed.

We broadly support objectives AL1 – AL6, but in view of future budgetary pressures it is clear that environmental stewardship is not the universal answer. Much prioritisation will no doubt be necessary. Terminology is also important. We can happily support the concept of AL1, for example, but whose environmental limits should farmers operate within? You may care to say that the objective will be to ‘*encourage and support* a viable and profitable agricultural industry that produces more while impacting less on the environment’.

In AL2 we are not clear what is meant by “Prioritise protection of peat areas to preserve carbon storage and seek to include such protection within agri-environment criteria”. What are the peat areas are currently used for?

In AL5, the Authority could lend its support to the national Greenhouse Gas (GHG) Action Plan. The use of the term “carbon emissions” is a little confusing in this context – are you only concerned about carbon loss from soil and vegetation? The text of the ‘draft objective’ and ‘means to achieve’ do not exactly tally, and why will only BA + EA lead on this objective?

We would also like to see some sense of context and proportionality in the plan as a whole. Farming is a modest user of water compared to abstraction for domestic and business use, for example. Furthermore farming has a role to play in improving water quality alongside other sources of diffuse pollution such as highways and septic tanks which tend to be ignored.

The NFU would like to see inclusion of a new objective, AL7, seeking a commitment to long term investment in the maintenance of existing sea and river defences, particularly those that protect the best agricultural land that is so abundant around the Broads.

### **Section 3 – Response to climate change**

We are broadly content with the proposed objectives and outcomes.

The plan could usefully highlight, for example, the Defra funded Farming Futures project that is already working ‘with land managers to aid understanding of impacts of climate change on their businesses’. We would like to avoid duplication of effort.

We would also like to see reference to opportunities for farmers in renewable energy generation.

### **Section 4.4 – Management of the navigation area**

We would like to see policy outcomes and objectives that deliver those proposed in ‘Why farming matters to the Broads’ and set out above (and reproduced here for the avoidance of doubt), namely:

- Committed long-term investment in the maintenance of existing sea and river defences, particularly those that protect the best quality agricultural land that is so abundant around the Broads.
- An energetic programme for de-silting water courses to improve water flow and increase flood resilience.
- An innovative approach to flood protection, such as a scoping study into the construction of a barrier across the River Yare.
- The long-term productive capacity of agricultural land (rather than its current market value) used to assess the costs and benefits of flood protection decisions.
- Analysis of the full impact of dredging operations around our ports, resulting in the development of a coastal management plan that fully reflects those impacts.

- Coastal and fluvial habitat creation schemes introduced as a *consequence* of flood protection policies, rather than a driver for them. Habitat creation has its place in coastal policy but it should not be the over-riding consideration.
- Recognition of the work done by IDBs, and close co-operative working between the Broads Authority, Environment Agency, IDBs and all other deliverers of flood protection.

Yours sincerely

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