Nutrient Pollution – draft Norfolk Environmental Delivery Plan consultation

26 Oct 2026

This response is on behalf of nature and animal welfare coalition Wildlife and Countryside Link (Link).

Wildlife and Countryside Link (Link) recognises that there is an environmental case for moving beyond offsetting to nature-restoration and moving from a site-by-site method of compensation to a more strategic, multi-benefit, landscape-scale approach. Environmental Delivery Plans (EDPs) aim to achieve those objectives and could, if done well, have potential to address particular threats or help recover some species, following the Lawton Principles to deliver more, bigger, better and joined up nature-recovery. However, the current draft Norfolk EDP does not satisfactorily demonstrate that it will prevent further harm to the River Wensum SAC, the Norfolk Broads SAC and the Broadland Ramsar site, or deliver the required ecological recovery. There remains important work for Government to do to ensure that delivery of conservation measures in this and any future EDPs is effective and underway quickly, and to ensure that EDPs are never rolled out to inappropriate habitats or species.

Our concerns include that the plan would currently enable up to 15,780 homes while allowing additional nitrogen and phosphorus loading before all conservation benefits are realised. The Overall Improvement Test (OIT) has no clear, quantified threshold, and the EDP does not transparently link each measure to nutrient reductions, delivery dates and ecological outcomes. In this already pressured catchment, further enrichment could trigger algal blooms, ecological tipping points and damage that may be difficult or impossible to reverse.

Habitat creation and river restoration can deliver important benefits, but they cannot be treated as equivalent to preventing nutrient pollution at source or used to bypass the mitigation hierarchy. The EDP should be strengthened by adding further measures to reduce pollution in addition to the positive conservation measures already in the plan. These should include:

- **Avoidance measures in line with the mitigation hierarchy:** Prioritising the avoidance of nutrient pollution at source before relying on mitigation or compensatory measures. This should include measures to prevent additional nutrient loading, including through the location, design and layout of development, with any residual impacts addressed through effective mitigation.
- **Enhanced SuDS and water efficiency:** Planning conditions requiring high-performance sustainable drainage systems (SuDS) that exceed standard planning expectations, alongside water-efficiency measures, to reduce pollution from new developments at source.

- **Additional nature-based water-quality solutions:** Interceptor wetlands within agricultural landscapes across the catchment to capture nutrient runoff, and filtering wetlands to improve the effectiveness of wastewater treatment and restoration of floodplain meadows.
- **Upgrades to off-mains wastewater systems:** Inspection and improvement of septic tanks and other off-mains sewage treatment systems to reduce nutrient discharges.
- **Whole-farm production system changes:** Measures to support transitions to extensive agroecological farming systems that reduce nutrient losses at source, for example low-input species-rich pastures and meadows, including reductions of nitrogen and phosphorus runoff and leaching.

These measures should be supported by clear delivery commitments, robust estimates of their expected nutrient reductions, and monitoring arrangements to demonstrate that they deliver additional, measurable improvements in water quality. As drafted, the current EDP does not provide sufficient assurances against additional, significant harm. It should be revised to ensure the first EDP sets a high standard for environmental integrity and public confidence.

In addition, we wish to restate that EDPs should not absorb or replace Biodiversity Net Gain (BNG), as the two mechanisms serve distinct purposes in delivering benefits for nature. Nor should EDPs be extended to other protected features, including species, without robust evidence that the approach is effective and can secure the necessary protection and recovery. EDPs should also not be deployed in areas where existing markets are functioning effectively and delivering for nature, as this risks undermining established mechanisms rather than delivering additional environmental benefits.

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? **Philip Box**
- Email address : Philip@wcl.org.uk

- Organisation : **Wildlife and Countryside Link**
- What is your role? **Senior Policy Officer**
- Where are you located? **London**

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) **Both**

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

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

Not answered

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

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)

The development area is mapped with reference to published nutrient-neutrality catchments, and we recognise the value of a defined geographic scope. However, the rationale for its boundaries and their relationship to the wider nutrient system requires clarification. In particular, the area where development can opt to use the EDP must be distinguished from the wider area over which its impacts must be assessed.

The plan covers the Bure and Yare SSSI catchments and River Wensum SAC, but excludes the Ant, Trinity and Upper Thurne SSSIs, despite their unfavourable condition for nitrogen and phosphorus. Their exclusion should not mean impacts are overlooked, nor necessarily that they must be brought within the EDP boundary. Development within the EDP area could affect protected sites beyond it, and these impacts must be properly assessed. Similarly, the Waveney valley, part of the Broadland Ramsar site, does not appear to be addressed consistently. Wastewater treatment catchments may also extend beyond surface-water catchments, creating uncertainty about impact attribution and whether measures delivered elsewhere benefit affected locations.

The boundaries appear driven primarily by expected development rather than the full system of nutrient inputs, contributors and sensitive ecological sites. Agriculture and wastewater are recognised as major contributors but largely treated as matters for other mechanisms. The EDP should quantify nutrient inputs across the relevant catchments, assess existing and planned measures, and forecast the net position against targets for each protected site. This is necessary to demonstrate that the geographic scope is adequate and that activity outside the development area will not undermine intended outcomes.

The mitigation hierarchy, including NPPF policy N2, must continue to apply. The EDP should not imply that development within the EDP area is automatically acceptable, and proposals must still be assessed and consented in accordance with relevant legal and policy requirements.

10. To what extent is the explanation and depiction of excluded areas sufficiently clear?
• Very clear • Clear • Not very clear • Not clear at all
Explain your choice (optional)

The EDP identifies designated sites and a 50-metre buffer as excluded areas, and we welcome the precaution reflected in ensuring any development affecting these areas goes through the Habitats Regulations Assessment process. However, further explanation is needed about the treatment of areas and relevant pollution outside these boundaries.

The Ant Broads, Trinity Broads and Upper Thurne SSSIs are discussed separately from the development area, while the Waveney valley within the Broadland Ramsar site is not clearly addressed. It is also unclear whether development in excluded areas counts towards the 15,780-dwelling maximum or how cumulative effects from such development will be monitored alongside development relying on the EDP.

A 50-metre buffer may address certain direct-discharge risks, however this does not by itself demonstrate that surface-water runoff, groundwater movement or other hydrological connections have all been sufficiently accounted for. Relevant input pathways can extend beyond a fixed buffer. The EDP should provide more evidence for the boundaries used, map the relevant connections and clarify how impacts will be attributed and managed. Exclusion from the EDP does not remove nutrient pressure from what is an already severely degraded site, with poor recruitment of characteristic sensitive species such as brown trout and grayling. The wider catchment assessment must show that development will not add to the risk of irreversible harm.

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)

The methodology refers to historic housing delivery, expected delivery rates and an assumed 80% uptake of the EDP. However, it is not clear whether, or how, the resulting figure of 15,780 dwellings reflects the environmental capacity of the catchment. It appears to be principally a forecast of housing demand rather than a limit derived from the nutrient loads that the protected sites can accommodate while recovering.

The assertion that there is sufficient opportunity to deliver conservation measures does not demonstrate that the measures can be delivered at the necessary scale, in the right locations and within the timescales required. The EDP does not yet provide a complete quantified account of development-related nitrogen and phosphorus inputs, secured reductions, or the forecast net position against site targets. Nor is there adequate evidence of land availability, completed feasibility work or landowner commitment for measures that depend on access to particular sites.

The 80% uptake assumption also needs justification, with clear explanation of what happens if uptake, development delivery or nutrient loading differs from the forecast. The EDP should explain how the cap will be enforced and reviewed, and how cumulative nutrient inputs from non-residential development and other sources will be accounted for, as this is critical since other sources have and will continue to cause significant pollution and are the reason the catchment currently does not have nutrient capacity to host housing development. The maximum should be informed by demonstrated ecological capacity and deliverability, not set in advance of these being established.

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)

The EDP refers to a range of national and local plans, but it should explain more clearly how they will shape the selected measures and the forecast environmental outcomes. Although it states that the Environmental Principles Policy Statement has been considered, the analysis, rationale and precautionary steps demonstrating how its principles have been applied are not evident. In particular, the plan should be integrated with existing catchment nutrient-management plans and opportunity mapping for the Broads and Wensum, as well as Diffuse Water Pollution Plans. These identify practical nutrient-reduction opportunities, some of which appear not to have been taken forward or adequately compared with the chosen measures.

The EDP should also better account for the Anglian River Basin Management Plan, Anglian Water drainage and wastewater management plans, and storm-overflow reduction plans. It should embed the relevant delivery dates, responsibilities and expected nitrogen and phosphorus reductions for relevant wastewater improvements, rather than assume their benefits will be achieved through separate mechanisms.

The EDP should also consider the UK Marine Strategy, Marine Policy Statement and East Marine Plan (currently under review). The absence of consideration of relevant marine strategies and plans is an omission, given that river water quality affects coastal waters, habitats and species, as well as coastal communities and businesses. The plan should demonstrate how these frameworks have informed its assessment and measures.

For agriculture, the EDP should consider whether existing regulation and agri-environment schemes are sufficient, whether contributors are compliant and where further incentives or farm-level action are needed. The Government's land-use framework should also inform where changes - and development - are most appropriate. A catchment Nutrient Management Board involving farmers, water companies, local authorities, environmental organisations and communities could coordinate these plans, set nutrient budgets and improve accountability.

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

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)

The EDP identifies a range of habitats, species and assemblages associated with the Bure and Yare Broads and Marshes SSSIs and the River Wensum. However, we are not confident that all relevant features and their exposure to nutrient pollution have been captured.

The Ant Broads, Trinity Broads and Upper Thurne SSSIs are omitted from the main development area despite their unfavourable status for nitrogen and phosphorus, and the Waveney valley within the Broadland Ramsar site and the associated Broadland SPA are not addressed sufficiently. These sites are part of a connected wetland system and should be considered in assessing the cumulative effects.

The approach also groups species by habitat and assigns them the same conservation status as the wider habitat group. This may obscure species-specific responses to nutrient pollution. A favourable assessment for a habitat group should not mask a continuing decline in a sensitive species, including where habitat restoration alone will not address the pressures affecting it.

The EDP only considers animal welfare impacts in the context of deer management. It does not include a systematic assessment of welfare implications for individual sentient animals - at development locations or mitigation sites. The EDP must identify negative effects on sentient animals in line with the Animal Welfare (Sentience) Act 2022, which places a duty on Ministers to have due regard to animal sentience when formulating and implementing policy.

Finally, the assessment focuses on new-dwelling wastewater and runoff despite the EDP identifying agriculture and existing point sources as the major contributors. It does not sufficiently quantify how the proposed measures will reduce the additional load on each feature or address the combined effects of existing pollution. The EDP should provide feature-specific, quantifiable evidence, considering all connected sites, species, and sources, and demonstrate that no vulnerable feature is left exposed to unacceptable risk.

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)

We are concerned the proposed approach does not yet provide a sufficiently transparent or measurable basis for determining whether the EDP will deliver overall improvement.

The red-amber-green assessment relies on expert judgement, without clearly showing how different components are weighted or how small changes in status are distinguished. It is therefore difficult to reproduce the assessment independently or to test whether the predicted improvement is proportionate to the additional nutrient load. The EDP quantifies some potential phosphorus reductions, but these are not consistently linked to measurable changes in status or to a forecast net position against protected-site targets.

Species are in some cases assigned the same status as their habitat group, and the assessment appears to treat range, area and population as unlikely to change unless a tipping point is reached. By the time a tipping point becomes evident, damage may be difficult or impossible to reverse. If at the end of the EDP period tipping points are reached, there is no capacity to restore the ecosystem to pre-development condition. The EDP should not rely on detecting such a point as the principal safeguard.

We recommend that qualitative expert judgement is supported by quantified, feature-specific indicators, a transparent scoring rationale and explicit thresholds linked to conservation objectives. Assessments should account for uncertainty, identify the contribution of EDP measures separately from benefits secured elsewhere, and draw on monitoring data from the wider catchment.

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)

The description recognises that additional nutrient loading can affect the protected sites, but it does not fully explore the scale of the risk when new inputs are added to an already severely degraded freshwater system.

The comparison with recent monitored concentrations can make the predicted increase appear modest. Yet against site targets, the consultation records a phosphorus increase of approximately 5.3% for the Bure and Yare, in catchments where reductions of up to 97% may be required. The analysis appears to rely on planned wastewater upgrades being delivered by 2030, which is not guaranteed.

Excess and continued nutrient enrichment can contribute to algal and bacterial blooms, reduce light penetration and dissolved oxygen, and create feedback loops through the release of phosphorus from sediments. These responses are not necessarily linear or readily predictable, and in rare chalk-stream ecosystems such as the Wensum, additional loading may interact with existing pressures to trigger ecological tipping points, causing severe and potentially irreversible harm to ecosystems and the individual animals that depend on them. The resulting impacts on animals may be both immediate and gradual, including direct impacts such as suffocation and later starvation, which are clear indicators of welfare harms and ecosystem deterioration. When considering overall improvement, EDPs should reflect how additional nutrient loading and terrestrial development could affect the welfare of individual sentient animals on both development sites and proposed mitigation sites, recognising that habitat restoration elsewhere is unlikely to prevent or reverse these harms.

The EDP should assess cumulative effects from all material pollution sources, publish uncertainty ranges and demonstrate how additional loading can be prevented from undermining the recovery of vulnerable features. A clear commitment to avoiding irreversible harm is needed.

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)

We do not think the approach is adequate in its current form. The assessment uses qualitative scoring of habitat groups and future prospects, while the conservation measures are often described in hectares and broad cost categories rather than in terms of quantified nitrogen and phosphorus reductions. This makes it difficult to determine how far the measures address the nutrient load associated with the maximum development capacity.

The assessment focuses on the additional effects attributed to EDP development and the benefits of the selected measures. However, the actual environmental outcomes depend on the combined nutrient burden, including agricultural pollution, existing wastewater discharges, storm overflows, private treatment systems and urban runoff. These pressures should be included in a whole-catchment assessment, while ensuring that benefits from actions secured elsewhere are not counted as if they were delivered by the EDP unless their timing, additionality and expected reductions are evidenced.

The measure selection process also appears to have discounted options that may deliver direct and measurable nutrient reductions, including farm-level source control, riparian buffers, constructed wetlands, sustainable drainage, wastewater upgrades and septic-tank improvements. Not every measure will be suitable in every location, but alternatives should be compared transparently for cost, effectiveness, time to benefit, permanence and ecological risk.

The EDP needs to demonstrate upfront that its package is sufficient, with consistent monitoring throughout, and back-up measures only as a last resort.

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 measures proposed could deliver valuable benefits for habitats and the wider landscape, but the EDP does not yet demonstrate that they will materially outweigh the additional nutrient pollution from up to 15,780 homes or prevent lasting or even irreversible ecological harm.

The plan identifies agriculture as a dominant nutrient source in the Bure and Wensum, and a major source in the Yare, but largely treats agricultural management and wastewater upgrades as activities to be delivered elsewhere. This leaves a gap between identifying the main sources of pollution and demonstrating when, by whom, and to what extent they will be reduced.

The quantified phosphorus benefits from fen and reedbed creation or restoration are estimated at around 37% of forecast additional loading in the Bure and 41% in the Yare. Further benefits for nitrogen are not comparably quantified. The EDP should set out the cumulative reductions expected from every measure, compare them with the additional development load and the reductions required to meet site targets, and explain the uncertainties associated with each estimate.

The plan moves too quickly to compensation without sufficiently encouraging avoidance or minimisation, in line with the mitigation hierarchy. Habitat creation and river restoration cannot automatically substitute for preventing pollution at source, particularly for rare chalk streams and other vulnerable freshwater habitats where nutrient enrichment could lead to ecological tipping points. The conservation package should be retained and strengthened, but additional source-control measures must be secured alongside it. Further independent scrutiny and transparent reporting are needed to demonstrate additionality and ecological equivalence.

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.

The EDP should give greater priority to measures that prevent or reduce nutrient pollution at source. The following measures should be assessed transparently and included where their effectiveness and deliverability can be demonstrated:

- Farm-level nutrient management plans, soil and manure testing, improved slurry and silage infrastructure, livestock exclusion from watercourses, pollution-compliance checks and targeted incentives for changes in farming practice.
- Verified wastewater-treatment improvements, storm-overflow reductions, water-efficiency measures for new development, and upgrades to septic tanks and package treatment plants where these contribute to nutrient loads.
- Riparian buffer strips, interceptor wetlands in farmland, polishing wetlands to improve wastewater treatment, constructed wetlands and high-performing sustainable drainage systems, restoring floodplain meadows.
- Whole-farm and land-use changes targeted to the most sensitive sub-catchments, coordinated through catchment nutrient budgets and the Government's land-use framework.

These measures should be additional to, and not substitutes for, the EDP's existing habitat creation, restoration and river-management measures. The latter can provide important benefits and should continue to be funded and delivered. Natural England should publish source-apportioned baselines, comparative whole-life costings, annual nitrogen and phosphorus reduction estimates, delivery dates and confidence ranges for both selected and rejected options. The comparison should consider cost, time to effect, permanence, deliverability and ecological risk.

The EDP should also explain how it will secure cooperation from landowners and farmers, and distinguish between measures that are committed, those with completed feasibility studies, and those that remain aspirational. A catchment Nutrient Management Board could coordinate delivery and public reporting, support farmer participation, and align existing funding and regulatory programmes.

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 welcome the principle of back-up measures, but the current proposals do not provide a sufficiently reliable safety net. The EDP does not give detailed costings or quantified nutrient reductions for all back-up interventions, so it is difficult to establish whether the proposed levy and contingency would cover the action required if primary measures underperform.

Issues around timing are particularly concerning, as some proposed conservation measures, and their benefits may take many years to become fully effective, while development-related pollution will begin earlier. If corrective action is considered only after monitoring detects a shortfall, the ecosystem may already have crossed a tipping point. Eutrophication-driven deoxygenation can lead to animal deaths and aquatic ecosystem collapse, at which point remedial or compensatory measures may be ineffective. This is especially concerning for rare chalk streams and lowland fen habitats, where damage may not be reversible through later intervention.

The triggers for back-up action rely on assessments of the OIT which are not yet supported by clear numerical thresholds, metrics, or independent scrutiny. We recommend that the EDP sets pre-agreed pass/fail thresholds and more consistent monitoring arrangements for nutrient reductions and ecological outcomes, publishes an adequately costed contingency plan, and requires early corrective action when performance falls behind forecast.

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.

We welcome the intention to secure measures for a period longer than the 30 years commonly used for biodiversity net gain. However, the EDP does not sufficiently demonstrate that the proposed measures can be funded and maintained reliably for that period.

Homes covered by the EDP will continue to generate wastewater and runoff for as long as they remain in use, which may extend beyond 100 years. The plan should explain who will be responsible for addressing any continuing effects after the funding and maintenance period ends. Measures should be secured for the lifetime of the impact and, where necessary, in perpetuity.

We are concerned that the levy is too low to adequately deliver measures and positive outcomes over this period. Long-term costs, management responsibilities, investment assumptions and delivery-body failure risks require further detail. Moreover, if nutrient pollution causes ecosystem collapse, it will not be sufficient to rely on measures that cannot reverse that collapse. The EDP must demonstrate that its proposed interventions can prevent such outcomes, rather than assuming that remedial action will remain possible if monitoring identifies a shortfall.

A low-lying coastal catchment also faces changing conditions, including rising temperatures and sea levels, which may affect the effectiveness of some wetland measures over time. The plan should provide long-term adaptation and maintenance arrangements, ring-fenced funding, transparent reporting and independent oversight.

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 EDP does not provide enough information to make a robust assessment of value for money. Costs are largely presented as indicative categories rather than intervention-specific estimates, while expected benefits are not consistently quantified as kilograms of nitrogen or phosphorus removed. Without unit costs, whole-life costings and clear ecological outcomes, it is not possible to compare the selected measures fairly with alternatives.

Several potentially effective options, including farm-level source control, constructed wetlands, riparian buffers, retrofit sustainable drainage, wastewater treatment improvements and private treatment-system upgrades, appear to have been discounted without a sufficiently transparent comparison of their nutrient-reduction potential, cost and time to effect. Value for money should mean achieving the intended ecological outcome, not simply selecting the lowest-cost intervention.

The proposed levy of £2,675 per dwelling is substantially below previously reported costs for nutrient mitigation, and that does not account for the fact that the levy will need to cover administration costs as well as mitigation work. The EDP does not explain the reduction through detailed evidence. The levy should be derived from the full cost of effective delivery, including long-term management, monitoring and contingency as well as administration costs. If additional source-control measures are required to prevent harm, the levy should rise accordingly. Independent review of the cost assumptions and the cost per unit of nutrient reduction would improve confidence in the programme.

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.

The EDP recognises that some measures need to begin early because they take longer to establish. However, its sequencing does not yet demonstrate that effective mitigation will be in place before the corresponding potentially harmful or even irreversible nutrient impacts occur.

Measures are grouped around development phases rather than a clear timetable tied to nutrient loads and verified environmental outcomes. The plan indicates that sequencing may change as funding becomes available, creating uncertainty about which interventions will be delivered first. Some benefits may only become fully effective towards the end of the ten-year EDP period, if at all, by which time additional pollution may already have affected the protected sites and the functioning of their ecosystems.

A more precautionary sequence should combine early habitat restoration with rapid, measurable reductions at source to be established in advance of development. Farm pollution controls, water-efficiency conditions, high-performing SuDS, wastewater and private-treatment improvements, riparian buffers and targeted wetlands should be considered for early delivery wherever they can reduce the load. These additional measures should sit alongside the proposed habitat and river restoration, not replace them.

The plan should set out, for each measure, a delivery date, expected date of ecological effect, dependencies, land availability, confidence rating and contingency. Monitoring should use pre-agreed thresholds and trigger action before a shortfall risks irreversible harm.

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 EDP's proposed mix of competitive procurement, justified direct awards, grants and legal agreements could offer flexibility. However, there is insufficient evidence that the measures are deliverable at the proposed scale, within the required timescales and at the costs assumed.

For measures requiring land, the EDP should set out what engagement has taken place with landowners and farmers, the degree of support secured, and whether feasibility studies have confirmed that suitable sites are available. Indicative maps should not be treated as evidence of deliverability. Each measure should have a clear implementation route, responsible party, necessary consents, timetable and plan for long-term management.

Procurement criteria should prioritise measurable ecological outcomes, additionality, permanence and resilience, not simply low cost. Decisions on direct awards and grants should be transparent and documented. The EDP should also identify how it will work with existing catchment partnerships and ensure that benefits secured through other public authorities are real, additional where claimed, and delivered to the expected timetable.

Natural England has several roles in designing the EDP, allocating the levy, securing measures and assessing outcomes. Clear separation of functions, independent review and public reporting would help maintain confidence.

Natural England must consider the potential direct and indirect impacts of development on the welfare of all sentient animals at development sites and mitigation sites. The EDP should set out how animal welfare will be protected in practice, including evidence-based measures, consideration of alternatives in line with ethical principles, and monitoring of welfare outcomes. Developers should be provided with guidance on reducing short- and long-term welfare risks.

The EDP should also explain how the quality of angling will be maintained and the interests of fishery owners and anglers protected, including avoiding adverse impacts on fishing and associated property rights, and potential reductions in Environment Agency fishing licence revenue.

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.

The proposed methodology does not yet provide a sufficiently transparent, quantitative or precautionary basis for demonstrating that the benefits of the conservation measures will materially outweigh the negative effects of development. The red-amber-green scoring approach relies significantly on expert judgement, with limited explanation of how components are weighted and no clear numerical threshold for a pass.

Without quantified nutrient inputs, expected reductions from each intervention and a forecast net position against protected-site targets, the assessment cannot be independently tested. A clear minimum percentage threshold for improvement should be set in advance, based on scientific evidence and the recovery requirements of the affected features. This should be accompanied by feature-specific indicators so improvement for one habitat or species cannot mask deterioration in another.

The methodology also needs to consider the connected catchment and explain how existing agricultural, wastewater and other nutrient pressures are accounted for. Benefits from measures secured through separate programmes should only be included where delivery, timing and contribution are evidenced. Natural England's combined responsibilities for preparing, funding and evaluating the EDP make independent scrutiny particularly important.

Addressing concerns over the timing of benefits and any lag-time should be central to the test. Predicted improvement at the end of the EDP period does not factor in the risk of irreversible damage occurring before then. The test should require evidence that additional pollution is avoided or controlled upfront, with independently verified forecasts, clear thresholds and enforceable corrective action.

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.

The methodology should establish a transparent, more quantitative base of evidence for assessing nutrient inputs, mitigation and ecological outcomes. For the relevant catchment and sub-catchments, the EDP should:

- Publish current nitrogen and phosphorus baselines, apportion the loads by source, quantify the additional load from the maximum development capacity and forecast the net position against site targets.
- Quantify each intervention's expected annual reduction in kilograms of nitrogen and phosphorus, delivery date, time to effect, confidence range, cost and contribution to feature-specific ecological targets and health.
- Define a clear pass/fail test with a science-based minimum percentage threshold for improvement, alongside separate indicators for sensitive habitats and species. The threshold should be justified against conservation objectives and should not permit gains for one feature to conceal harm to another.
- Require annual publication of results, independent technical review and pre-agreed triggers for additional action. Test scenarios in which land access, take-up, delivery times or intervention effectiveness are below forecast.
- Account for agriculture, wastewater treatment, storm overflows, private treatment systems and urban runoff, while demonstrating that measures are additional to existing legal duties and funded commitments.

These changes should be developed with farmers, water companies, local authorities, environmental organisations, ecological specialists and communities. Transparent costings and delivery evidence should demonstrate that the levy can fund implementation, management, monitoring and corrective action. The methodology must explicitly recognise that nutrient pollution could trigger ecological tipping points beyond which overall improvement may no longer be achievable. Ecosystem collapse would further reduce the structure and function of the river feature, by definition. The OIT should not be regarded as satisfied on the basis of predicted habitat benefits alone while additional nutrient pollution and the risk of irreversible ecological damage remain unresolved.

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 contains substantial supporting material, but does not adequately demonstrate how that evidence supports the conclusion that the measures will materially outweigh the effects of up to 15,780 homes. The rationale for individual scores, the weighting of ecological components and the treatment of uncertainty are not sufficiently transparent to make the outcome readily reproducible or independently testable.

There is no consistently quantified link between forecast nitrogen and phosphorus inputs, reductions attributable to individual interventions, and the predicted response of each protected feature. Agricultural source control and wastewater improvements are treated largely as external actions without a complete, accountable statement of their delivery and contribution. Nor is there adequate evidence that land availability, feasibility and landowner participation have been confirmed for every measure that depends on them. The decision to discontinue certain measures on grounds of achievability or reasonableness is also problematic. Measures such as sustainable drainage systems (SuDS) may be highly appropriate for specific developments, even where a blanket approach is not feasible. Without quantifying the contribution of individual interventions, the EDP risks excluding beneficial water-quality solutions without adequately assessing their potential value.

Grouping species within broader habitat categories will overlook species-specific effects, especially paired with the reduced level of site surveys. The assessment should show how sensitive features will respond where nutrient enrichment persists, and should make clear that a general improvement in habitat structure will not conceal continuing decline for an individual species sensitive to increased deoxygenation due to hypereutrophication.

We recommend a published evidence chain linking source-apportioned nutrient forecasts, intervention effectiveness, delivery schedules, ecological outcomes and confidence ranges. The assumptions should be independently peer reviewed, alternative scenarios tested and the conclusions updated as new monitoring data become available.

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

The EDP provides a high-level allocation of levy income, including 57% for conservation-measure delivery, 20% for maintenance, 17% for apportioned administration and 6% for EDP-specific costs and monitoring. However, the published percentages do not provide an itemised account of expected spending. Management costs are not separately identified, while monitoring is grouped with other EDP-specific costs, making it difficult to judge whether the provision for each task is adequate.

The proposed £2,675 per dwelling appears substantially below previously reported costs for nutrient mitigation, but the EDP does not provide sufficient intervention-specific costings to explain how the rate will fund implementation, long-term management, maintenance, monitoring and remedial action, through a detailed breakdown of anticipated costs. It also does not account for potential litigation or other legal costs if concerns arise that the delivery of conservation measures under the EDP is inconsistent with Natural England's statutory duties. Nor is there a clear comparison between whole-life cost and expected ecological benefit.

The plan should publish more itemised and detailed costing, assumptions for inflation and investment returns, and clearer sensitivity analysis for lower-than-expected uptake, higher implementation costs or intervention failure. The contingency should be justified against realistic risks. The levy should reflect the ecological costs of achieving the required outcomes, rather than be constrained by development viability.

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

Not answered

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

A plan-level levy could simplify delivery, but an equal charge per dwelling does not by itself demonstrate that the cost allocation is proportionate to ecological impact or sufficient to fund the required outcomes. The EDP should explain how the uniform rate reflects differences in nutrient loading by development type and location, and why this is a fair and ecologically robust approach.

The proposed £2,675 per dwelling is calculated by spreading the total conservation-measure price across anticipated development. The EDP does not adequately demonstrate that this amount reflects the full costs of effective interventions, including management, monitoring, maintenance and contingency. It also does not clearly quantify how the assumptions respond to changes in uptake, implementation costs or the availability of land.

The rate appears low compared with previously reported nutrient-mitigation costs. The Government should publish transparent intervention-level costings and show how the levy is linked to expected nutrient reductions and ecological outcomes. Where additional source-control measures are needed to prevent further harm, these should be funded in addition to the existing conservation package, with the levy increased as necessary. Further sensitivity analysis should show that the funding remains adequate under realistic delivery scenarios.

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 themes provide a starting point, but the monitoring arrangements are not yet sufficiently detailed or frequent enough to demonstrate that the EDP will identify deterioration and prompt corrective action in time. The plan anticipates more frequent monitoring during the initial establishment period, such as the first five years, followed by periodic monitoring and reduced monitoring after 50 years. It does not set a sufficiently clear minimum frequency across measures or commit to regular, comprehensive monitoring of the catchment's nutrient status.

Monitoring must measure environmental outcomes, not simply whether interventions have been delivered or appear to be functioning, as this risks a significant equivalence deficit. It should track annual nitrogen and phosphorus loads by source and sub-catchment, river nutrient concentrations, progress against protected-site targets and the response of individual sensitive habitats and species. Agriculture, wastewater discharges, storm overflows, private treatment systems and urban runoff should be included, rather than focusing mainly on EDP interventions.

A five-year midpoint review is not a substitute for ongoing monitoring and early action. Where nutrient reductions or ecological responses fall behind forecast, the plan should require pre-agreed corrective measures without waiting for the next formal review. Clear baselines, sampling protocols, locations, minimum frequencies and public reporting requirements should be set before approval, with independent scrutiny of the results.

Any monitoring framework should state how animal welfare will be considered, including the localised impacts of developments on individual animals and how evidence from existing catchment initiatives and local environmental records will be incorporated. Animal welfare harms will be both immediate and gradual, and the monitoring framework must include short- and long-term review points, with clearly identified measures to prevent welfare harms and associated ecological tipping points. These could be addressed through Welfare Impact Assessments and in developer guidance on how to reduce welfare risks.

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

We recognise that EDPs could help coordinate action and fund strategic nature recovery. For this first EDP, it is imperative that the evidence and safeguards are robust enough to demonstrate and secure high-integrity delivery, and establish a clear and credible template for future EDPs. The Norfolk plan does not yet provide sufficient confidence that it will avoid harm and secure the recovery of the affected protected sites.

Our main concern is the gap between permitted additional pollution and uncertain benefits expected to offset it. Nutrient inputs can rise immediately, while restoration takes time and may be constrained by background pollution. In a catchment containing rare chalk streams and valuable fen habitats, further enrichment risks eutrophication, ecological tipping points and potentially irreversible damage. Assessments of 'Overall Improvement' must demonstrate how aquatic ecosystem function and animal health will be maintained despite any increase in nutrient loading. This includes demonstrating how eutrophication symptoms, such as changes in species composition resulting in phytoplankton dominance, algal blooms, oxygen depletion and, in extreme cases, fish kills, will be avoided. The methodology must explicitly recognise that ecosystem collapse at a tipping point could make overall improvement impossible. The EDP must also show how its measures will contribute to sustained water quality improvement in accordance with applicable water quality legislation. Restoration efforts elsewhere may not prevent or mitigate welfare harms, whereby sharp spikes of pollution will cause starvation, suffocation, and displacement, long before replacement wetland habitats are ready.

The first priority should therefore be to avoid and minimise pollution at source, in line with the mitigation hierarchy. The EDP should require or secure, as appropriate:

- Farm-specific nutrient plans, strengthened compliance and pollution prevention, improved slurry and silage infrastructure, livestock exclusion and targeted incentives for lower-nutrient, high-welfare farming systems that support the transition toward sustainable agriculture.
- Verified wastewater-treatment improvements, storm-overflow reductions, private treatment-system upgrades, water-efficiency standards for new development and high-performing sustainable drainage.
- Targeted riparian buffer strips, interceptor and polishing wetlands, and other nature-based water-quality measures where feasibility assessments demonstrate their effectiveness.
- A whole-catchment and sub-catchment nutrient budget, setting out inputs by source, ecological targets, planned reductions and the contribution of each measure.
- Welfare Impact Assessments (WIAs) and guidance for developers on how to reduce short- and long-term welfare risks to all sentient animals.

These source-control actions must be delivered in addition to the EDP's existing habitat creation, fen and reedbed restoration, river restoration and other conservation measures. Those measures can support nature recovery but must not substitute for preventing pollution. The plan should demonstrate additionality and distinguish EDP benefits from those expected through other public programmes.

The OIT needs a clear, reproducible evidence base, including quantified nutrient forecasts, measure-specific nitrogen and phosphorus reductions, delivery dates, confidence ranges and feature-specific indicators. A science-based minimum percentage improvement threshold should be published in advance, with safeguards against gains for one feature concealing decline in another. Independent peer review is essential given Natural England's roles in designing, funding and assessing the EDP.

To build greater confidence, the EDP must seek to directly address the significant delivery risks for its associated measures and promised benefits. For each land-dependent measure, Natural England should report feasibility work, land requirements, landowner and farmer engagement, access arrangements, necessary consents and the delivery timetable. Untested measures or those reliant on unconfirmed cooperation should not be treated as certain benefits. The 15,780-home capacity and 80% uptake assumption should be tested against realistic delivery scenarios and environmental limits.

The £2,675-per-dwelling levy is not supported by transparent evidence of full implementation, management, maintenance, monitoring and contingency costs. It should reflect the catchment's ecological requirements, not a preference to minimise development costs. Any necessary source-control measures must be additional to the existing package and funded through a revised levy. Procurement should prioritise ecological integrity and measurable outcomes, not lowest upfront cost.

Monitoring should be frequent and outcome-focused. Annual public reports should track source-specific nutrient loads, water quality, ecological responses and progress against protected-site targets. Pre-agreed thresholds should prompt corrective action without waiting for the five-year review. Independent scrutiny should draw on catchment partnerships and local environmental records. Funding and responsibility must last for the duration of development impacts, with arrangements for continuity beyond 100 years where necessary.

EDPs must remain a targeted mechanism rather than a substitute for existing nature-recovery tools. Biodiversity Net Gain (BNG) serves a distinct purpose and should not be absorbed into EDPs or treated as interchangeable with their mitigation measures. EDPs should not be extended to other protected features, including species, without robust evidence that the approach can deliver effective and legally compliant outcomes. Nor should they be deployed where existing markets are functioning and demonstrably delivering for nature: intervention should address genuine gaps in delivery rather than displace effective mechanisms.

Any wildlife management programme and proposed development must assess the negative impacts on individual animal welfare, and adopt humane methods in line with international ethical principles; using competent operators; considering suitable alternatives; and ensuring transparent monitoring of welfare outcomes in line with Welfare Impact Assessments (WIAs). Detrimental impacts to fishing and associated property rights must be assessed and discussed in the plan.

The EDP must form part of a whole-catchment response. A Nutrient Management Board could bring together farmers, water companies, local authorities, environmental organisations and communities to coordinate funding and maintain public nutrient budgets. The Government's land-use framework should help steer development away from areas where it would create unacceptable ecological risk, while directing investment towards nature recovery, water quality improvement and sustainable, high welfare farming.

In conclusion, we recommend the EDP: (1) reduce pollution at source; (2) deliver additional source-control measures alongside the existing conservation package; (3) set a levy that covers the full cost of effective recovery; (4) use a quantified, independently scrutinised OIT, with clear percentage thresholds, feature-specific targets, following best practice with regard to avoiding / minimising harm to sentient animals and species; (5) establish whole-catchment nutrient budgets, monitoring and accountability. Without these changes, the EDP does not provide sufficient certainty to protect Norfolk's sensitive freshwater ecosystems or maintain public confidence.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 90 organisations to use their joint voice for the protection of the natural world and animals.

The following organisations have contributed to, and endorse, this response:

The Woodland Trust
PTES
IFM
WWT
Angling Trust
RSPCA
Better Planning Coalition
CPRE – The Countryside Charity
FHT
ARC
Compassion in World Farming
CIEEM
The Mammal Society
The Wildlife Trusts
Butterfly Conservation
River Action UK
RSPB
The Rivers Trust

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