



Local Plan for the Broads

Statement of Common Ground

Between the Broads Authority & Norfolk Coast Partnership

In relation to comments made as part of the first Regulation 19 consultation

November 2025

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1. Introduction

The first Regulation 19 consultation on the Local Plan for the Broads was held over the summer in 2025. This is one of a series of Statements of Common Ground that relate to comments made as part of that consultation. The comments are included, as well as response from the Broads Authority. If a change is proposed, that is also included.

There is a section relating to areas of agreement and areas of disagreement.

2. Areas of agreement

Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
Policy PUBSP7: Tranquillity in the Broads	Yes	Yes	-	Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBSP7: Tranquillity in the Broads. The Policy seeks to conserve the tranquillity of the area and states all development proposals will need to protect the dark skies and nocturnal character of the Broads in accordance with the dark skies policy. NCP supports this policy but suggests that a reference to the Norfolk Coast National Landscape is added to the policy to ensure that its significance is recognised in this context.	NCP believe the Plan is legally compliant and sound. Minor amendments to include reference to the Norfolk Coast National Landscape would be welcome.	Support noted. Agree with proposed change.	Add new part 4 to policy as follows: <u>Proposals will also need to consider and address impacts on dark skies, tranquillity and amenity of areas outside of the Broads as relevant. Then in supporting text, refer to the Norfolk Coast National Landscape as an area of dark skies and tranquillity.</u>
Policy PUBDM28: Light Pollution, Dark Skies and Nocturnal Character	Yes	Yes	-	Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBDM28: Light pollution, dark skies and nocturnal character. This Policy looks to conserve and enhance the tranquillity, nocturnal character and dark sky experience of the Broads. The Policy designates two Dark Sky Zones of which the Norfolk Coast National Landscape falls within Dark Sky Zone category 1 which is protected from permanent illumination. NCP supports this policy but suggests that a reference to the Norfolk Coast National Landscape is added to the policy to ensure that its significance is recognised in this context.	NCP believe the Plan is legally compliant and sound. Minor amendments to include reference to the Norfolk Coast National Landscape would be welcome.	Support noted. Agree with proposed change.	Add new part 4 to policy as follows: <u>Proposals will also need to consider and address impacts on dark skies of areas outside of the Broads as relevant. Then in supporting text, refer to the Norfolk Coast National Landscape as an area of dark skies.</u>
PUBSSCOAST: The Coast	Yes	Yes	-	Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBSSCOAST: The Coast. Specifically, we support how the policy highlights the special nature, character and tranquillity of the area of coast defined on the Adopted Policies Map and seeks to conserve the area for low-key quiet recreation and as a wild bird and seal refuge. NCP also supports the policy's promotion of appropriate small-scale development, such as footpath bridges, bird-watching hides and seal viewing platforms, which facilitates low level recreation and the policy's ban on other forms of operational development in the Coastal Area.	NCP believe the Plan is legally compliant and sound.	Support noted.	No change proposed.

3. Areas of disagreement

None.

4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 12 November 2025

For Norfolk Coast Partnership: Katy Owen, Protected Landscapes Manager, 17 November 2025