



Local Plan for the Broads

Statement of Common Ground

Between the Broads Authority & Broads Society

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?	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 PUBDM2: Embodied Carbon	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Section 13 Climate Change	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Section 14 Water Use and Quality	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Section 15 Flooding	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Section 17 Blue and Green Infrastructure	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Section 19 Heritage and Historic Assets	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Section 20 Natural Environment	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM21: Renewable and low carbon energy	Yes	No	Feel that there is no justification for onshore wind turbines in the Broads given the local offshore capacity and potential	Insert clear policy against any wind turbines in the Broads	Noted. Prior to July 2024, areas for onshore wind turbines had to be identified in the Local Plan. We did not identify anywhere. That test was removed by the new Labour Government. The proposed policy does not promote wind turbines; it is a criteria-based policy for any schemes that come forward. It should be noted that the Landscape Sensitivity Study finds that turbines will impact the character of the entire Broads. The area where the impact is least, but still a moderate impact, is around Whitlingham. But there are broads there as well as areas of trees and a registered park and garden. So it is very unlikely turbines would be supported there. It should also be noted that smaller, domestic turbines are different to larger turbines. On occasion, landowners apply to put in wind pumps which are used to move water, tending to use an Archimedes Screw and the policy would help assess those applications.	No change proposed.
Section 22 Landscape Character	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Section 24 Tranquillity and Light Pollution	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Policy PUBSP9: Recreational access around the Broads area	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.

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Section 26 Broads Economy	Yes	No	Have concerns about the Marketing Guides 12 month marketing period requirement	Reduce marketing requirement to 6 months to reduce the possibility of stagnation	<p>Comment noted. Looking at some recently adopted Local Plans in the area:</p> <p>West Suffolk Local Plan - 12 months King's Lynn and West Norfolk Local plan - 12 months Greater Norwich Local Plan - 12 months for self/custom build North Norfolk - 12 months for Employment</p> <p>As such, the 12-month period is in keeping with other recently adopted Local Plans.</p>	No change proposed.
Section 28 Sustainable Tourism	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Policy PUBSP13: Navigable water space part 4	Yes	No	No baseline data provided to clarify what 'adequate water depths' may be	Qualify how adequate water depths are assessed	The depths of the Waterways Specifications (the target depth to which we plan and carry out our dredging) is detailed in the https://www.broads-authority.gov.uk/__data/assets/pdf_file/0020/132923/Waterways-Management-Strategy-Action-Plan-2022-27.pdf . In the strategy we set out the scope and frequency of surveys which tell us what the current water depths are and to identify those areas in need of dredging; how we prioritise dredging to meet the Waterways Specification targets; and the options for managing the dredged material for beneficial re-use and to ensure environmental compliance.	Include reference to the Waterways Management Strategy Action Plan (or successor document)
Policy PUBSP15: Residential development	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM46: New residential moorings	Yes	No	The Society still feels that there is a clear difference between 'residential moorings' and 'liveaboards' and there is still concern that the issue of 'liveaboards' is not dealt with adequately. In fact, the Local Plan fails to identify any difference between the two types of residential mooring. Liveaboards by their nature represent a more transient residential use of the waterways (beyond the use of short-term moorings and not as permanent as residential moorings).	New Policy	The Authority has identified the need for residential moorings and sought to meet the need as it is required to do in the Planning and Housing Act 2016. As stated in the comment, those who are transient in nature can stay at short stay moorings and then move on. If they overstay, and the Authority is made aware, the Ranger team has powers. If there is a planning issue that needs to be addressed and the Team is made aware, then the Planning team have powers. It is not clear what the Local Plan for the Broads can do in terms of those who live on their boats and are transient in nature; indeed, it is not clear if there is anything that the Local Plan <i>needs</i> to do in this regard.	No change proposed.
Section 31 Design	Yes	No	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.

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38 Brundall Riverside	Yes	No	The Society still has concerns about the potential stagnation and degradation of the area that is likely to occur if the current highway situation is not addressed. The problem of access via Station Road has inhibited the development potential of the area for decades – a situation which Norfolk County Council has failed to address. Given that the carriageway is unlikely to be widened, the Society would encourage the Broads Authority to enter into dialogue with Norfolk County Council to try and put in place a traffic management scheme which would allow more diversification within the estate, subject to other criteria in the plan. Without this, a number of boatyards are likely to fail and the area is likely to gradually degrade. Given the proximity of Brundall railway station and nearby bus routes into the city, the area could be a focus for sustainable tourism opportunities.	Address the highway issues	Comment is noted. The comment has been passed on to Norfolk County Council as Highways Authority.	No change to Local Plan.
OBJ14	Yes	Yes	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.

3. Areas of disagreement

None.

4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 11 November 2025

For Broads Society: Martin Thirkettle, Broads Society Planning Consultations Committee, 11 November 2025