



Local Plan for the Broads

Statement of Common Ground

Between the Broads Authority & East Suffolk Council

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

January 2026

Contents

1. Introduction.....	1
2. Areas of agreement	2
3. Areas of disagreement.....	4
4. Signed.....	4

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.
The whole plan	-	-	-	Thank you for providing East Suffolk Council with the opportunity to submit representations on the Regulation 19 Broads Authority Local Plan (July 2025). East Suffolk Council supports this plan and is committed to continue working collaboratively with the Broads Authority to deliver on strategic planning matters. We have identified some areas of the plan which, in our view, would benefit from improved clarity or accuracy. As such, we have made detailed comments on some matters via your consultation portal.	-	Support noted and welcomed.	See detailed comments that follow.
Policy PUBDM1: Major Development in the Broads	Yes	No	Consistent with national policy	Minor change proposed to para 1 as: All sites over 10 dwellings or 0.5ha will definitely be major dev. Para 1 should be amended to reflect this, in line with national policy.	Amend para 1 to say: 'Major development' may include the development of sites over 10 dwellings or larger than 0.5 hectares but is not restricted to that...'	This is in relation to major development in terms of Para 190 of the NPPF. And whether the scheme is major development, in terms of that defined in the glossary of the NPPF, is a consideration. It is confusing, but those are two different 'major development' terms.	No change proposed.
Policy PUBDM20: Energy demand and performance of new buildings (including extensions)	Yes	No	Consistent with national policy	the Written Ministerial Statement of 13 December 2023 requires energy efficiency standards to be an uplift of dwelling target emission rate (TER). Point 5 of the proposed policy uses the term "predicted energy requirements". This should be amended to reflect national policy.	That Target Emission Rates should be specified in accordance with the Written Ministerial Statement.	PUBDM20 is written to not go beyond the Future Homes Standard. As such, there is no need to specify a TER as that only applies if the policy goes beyond it.	No change proposed.
Policy PUBSP2: Strategic flood risk policy	Yes	No	Consistent with national policy	It is not entirely clear what is meant, in criterion 3, by 'adverse impacts on flood risk management'. Is this a reference to existing flood risk defences? This should be re-worded to remove ambiguity.	These part of the policy should be re-worded to provide clarity over the meaning of 'adverse impacts on flood risk management'.	The policy goes on to say '(including flood management structures and Government Flood Risk Plans)' and so is already explained.	No change proposed.
Policy PUBDM17: Mitigating Recreational Impacts	Yes	No	Consistent with national policy	The current Suffolk Coast RAMS highlights the need to keep the strategy under regular review. To improve accuracy, the text should clarify that the requirement will apply under future iterations of the strategy.	The following text is added to the end of the final sentence ".....which are identified within the following strategies and Zones of Influence (ZOI) (or subsequent iterations):"	The comment seems to relate to the first sentence rather than the final one but agree.	Amend as follows: '...which are identified within the following strategies and Zones of Influence (ZOI) <u>(or successor documents or subsequent iterations)</u> ...
Policy PUBDM16:	Yes	No	Consistent with national policy	Part 5 (requirement for BNG to be onsite) appears to conflict with part 6 (delivery of offsite BNG). This should be resolved to remove ambiguity.	The criteria 5 and/or 6 are re-worded to clarify the position on off-site provision of BNG	The policy needs to be read as a whole. Part 5 and then part 6 and part 6 says '...it is proven the required net gain cannot be achieved onsite within	Combine points 5 and 6.

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Biodiversity Net Gain						the site boundary...' but this could be clarified.	
Policy PUBDM43: Affordable housing	Yes	No	Consistent with national policy	There does not appear to be any mention of the East Suffolk Council Affordable Housing Supplementary Planning Document. This should be referenced to improve accuracy.	Add reference to the East Suffolk Council Affordable Housing Supplementary Planning Document.	It is mentioned at 6.7 but we will refer to it in the supporting text of PUBDM43	Amend 'East Suffolk Affordable Healthy Environments Supplementary Planning Document (SPD)' in 6.7 Refer to East Suffolk Affordable Housing Supplementary Planning Document (SPD) in the supporting text to DM43.
Policy PUBDM15: Natural Environment	Yes	No	Consistent with national policy	The overall approach set out in this policy is supported. However, we provide comments on some of the detailed points to improve accuracy and comply with national policy.	Reference is made to a Local Nature Recovery Network within the Local Nature Recovery Strategies. Within the strategy for Suffolk, this 'network' is not mentioned. What exactly is this policy referring too? This should be clarified.	In response to a comment from Natural England, we propose to change wording.	13. Where development is sited within or adjacent to an area the identified in the Local Nature Recovery Network <u>Habitats Maps of the Local Nature Recovery Strategies as an 'Area that Could Become of Particular Importance for Biodiversity' and/or has a Potential Measure mapped to it</u> , it will demonstrate how the proposal will maintain and enhance the ability of the network to restore and enhance habitats and provide eco-system <u>ecosystem</u> services in line with the Local Nature Recovery Strategy.'
Policy PUBDM15: Natural Environment	Yes	No	Consistent with national policy	The overall approach set out in this policy is supported. However, we provide comments on some of the detailed points to improve accuracy and comply with national policy.	We recommend removing the text in brackets in part 7 "(which is not also subject to an international designation)", as even where a SSSI wholly overlaps a Habitats Site it can have different reasons for designation which would not be specifically picked up in a Habitats Regulations Assessment (which would specifically focus on assessing impacts on Habitats Sites features).	Agree.	Remove brackets of "(which is not also subject to an international designation)".
Policy PUBDM15: Natural Environment	Yes	No	Consistent with national policy	The overall approach set out in this policy is supported. However, we provide comments on some of the detailed points to improve accuracy and comply with national policy.	Not all Brownfield Sites meet the criteria to be considered as 'open mosaic habitat on previously developed	Noted. Part 10 says there may be a need to determine if the site has open mosaic habitat and then part 11 says what to do if there is the habitat.	No change proposed.

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					land'. This paragraph should be amended to clarify this.		
Section 30.1	Yes	No	Consistent with national policy	East Suffolk Council confirms that the position with respect to housing need remains the same as we set out in our letter to the Broads Authority dated 20th May 2025. With respect to the plan itself, in our view, it is not sufficiently clear that the former Pegasus site (PUBOUL2) is excluded from the housing need figure. Furthermore, it is not sufficiently clear that sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers.	Add text to provide clarity that Pegasus site (PUBOUL2) is excluded from the housing need figure. Add text to clarify that sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers set out in the plan to be planned for over the plan period but will nevertheless make a contribution to housing supply. 3rd paragraph: add the site names to the reference numbers to improve the clarity of the plan.	Footnote 126, and bullet point i) on page 218 refer to OUL2 allocations already having permission. Agree re site names and reference to permissions pre-2021.	Add site names to para 3 of section 30.1. And in section 30.1 para 2 add reference to sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers set out in the plan to be planned for over the plan period but will nevertheless make a contribution to housing supply
Policy PUBSP5: Biodiversity	Yes	No	Consistent with national policy	Protected species should be referenced in criterion 2 b) for completeness and to comply with national policy	Criterion 2 b) should include reference to protected species	Agree. The term 'protected species' does not appear in the NPPF. There is reference to 'priority species' and 'threatened species'. PUBSP5 specifically references Section 41 species and while these are 'protected' there are others that are also protected by law but are not Section 41. The section 41 group are 'of principal importance' for conserving biodiversity in England, whereas 'protected species' covers a broader classification.	2b) protect against the loss of <u>protected Section 41</u> habitats and species

3. Areas of disagreement

None.

4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 7 January 2026

For East Suffolk Council: Ben Woolnough, Head of Planning and Building Control, 7 January 2026