



Local Plan for the Broads

Statement of Common Ground

Between the Broads Authority & North Norfolk District Council

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

January 2026

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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	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.
<p>PUBDM56 - Electric Vehicle Charging Points</p>	<p>NNDC welcomes the inclusion of a dedicated policy on EV charging points, including the associated design, safety and location considerations. However, the policy lacks clarity on the fundamental requirement for provision. By contrast NNDC's emerging Local Plan Policy CC8 requires all new residential development (including changes of use) to provide EV charging points. As NNDC is the local housing authority, a consistent approach would provide greater clarity and benefit for applicants, residents and decision makers across the district.</p> <p>BA asked NNDC for clarification: Yes - our comment relates to residential development (including conversions/ changes of use). The point is that PUBDM56 currently "welcomes" provision, whereas NNDC's emerging Policy CC8 "requires" it, and NNDC is the Local Housing Authority. Clarifying a requirement for new residential development would help avoid inconsistent outcomes between the two LPA's operating within the same district.</p>	<p>Amend PUBDM56 to align more closely with NNDC's Policy CC8 by requiring new residential development (including changes of use) to provide EV charging points, with clear thresholds and criteria. This would ensure the policy is effective and consistent across the district.</p>	<p>For residential dwellings, we note that policy CC8 of the emerging NNDC Local Plan points to the building regulations. We therefore do not consider we need to talk about thresholds and standards in the policy. We could refer to the building regulations in the supporting text. We do note that there is some useful wording in the NNDC policy about the design of EV charging points which we will use.</p> <p>In terms of non-residential development, Suffolk County Council have detailed requirements in their current Guidance: Suffolk Guidance for Parking 2023, Section 8, page 64. Development in Suffolk is therefore covered in terms of EV charging points.</p> <p>As for Norfolk County Council, the current guidance was produced in 2022 and has some standards: norfolk-parking-guidelines-2022_1 (3).pdf 2022, Page 44.</p> <p>Generally, throughout the Local plan, we do refer to Norfolk and Suffolk parking standards and we also say that some districts set their own standards. As such, we will amend part 7 of DM29 to say that some of our districts set their own standards for electric vehicle charging and we will consider those as we assess applications. This is consistent with the text on page 167 under 'parking standards'.</p>	<p>Amend PUBDM56 to include wording as follows:</p> <ul style="list-style-type: none"> • <u>Proposals where vehicle parking is incorporated will include appropriate provision for electric vehicle charging points, taking account of the development type and size, the level of parking provision and its context and location. Electric vehicle parking spaces should be counted as part of the total parking provision, and bays should be clearly marked on a layout plan. The delivery of chargepoints should include parking space provision for people with disabilities. Proposals should specify the type of chargepoints to be installed.</u> • <u>For developments of over 10 dwellings or larger than 0.5 hectares, details of how the required electric vehicle charging points will be allocated, located and managed, including the mechanism/procedure for taking payments, will be detailed in the relevant Transport Assessment or Transport Statement.</u> • <u>Developments with dedicated electricity sub-stations should specify the sub-station to a sufficient capacity to fully cater for all electric vehicle charging requirements.</u> <p>Refer to building regulation requirements for ev charging in supporting text to PUBDM56.</p> <p>Amend part 7 of DM29 to say that <u>some of our districts set their own standards for electric vehicle charging and we will consider those as we assess applications.</u></p>

Part of Local Plan	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.
PUBDM5 - water quality and foul drainage	NNDC supports PUBDM5, and in particular clause 6, and recognises the importance of managing foul drainage capacity. NNDC are signatories to the joint position statement mentioned in relation to Horning Knackers Wood Water Recycling Centre. However, the Plan would benefit from acknowledging that Horning is split with NNDC and is identified as a Small Growth Village in NNDC's emerging Local Plan, even if the village is constrained and no residential requirement is expected in the Plan period.	Retain Policy PUBDM5 as drafted, but add recognition of Horning's cross-boundary status and NNDC's joint role with Anglian Water, to aid clarity and ensure effective delivery.	This is not needed in the policy, but agree to amend the supporting text.	Amend Horning Knackers Wood Water Recycling Centre supporting text as follows: Anglian Water Services (AWS) have investigated why the WRC is receiving excessive flows, and there is a Joint Position Statement <u>(written and endorsed by the Broads Authority, North Norfolk District Council and the Environment Agency)</u> setting out more detail including actions undertaken and proposed to address the issue. The Authority will keep itself informed of progress on this issue. <u>Horning is a small growth village in the North Norfolk Local Plan.</u>
Section 8 - Duty to Cooperate (p30)	NNDC supports the recognition of cross-boundary issues in Section 8 and the ongoing work under the Duty to Cooperate. Given the importance of cross-boundary coordination at Hoveton/Wroxham, NNDC wishes to emphasise that retail and town centre planning must remain a key focus of future joint working.	Strengthen Section 8 by acknowledging retail/town centre coordination at Hoveton/Wroxham as an example of cross-boundary issues that require ongoing joint working.	It is presumed this refers to section 8.2. As per the text, the list is not exhaustive. What is already written are strong examples. However, we will add this as another one of the examples.	To 8.2 add: <u>Working with District Councils on bespoke, location specific cross-boundary issues, such as retail/village/district centre coordination where a centre spans the Broads Authority Executive Area and a neighbouring local planning authority (for example Hoveton Village Centre across the Broads Authority and North Norfolk District Council areas and Oulton Broad District Centre across the Broads Authority and East Suffolk Council), so that retail policy, including sequential and impact considerations, is applied to the centre as a whole rather than separately within each administrative area.</u>
Section 6.10 Neighbourhood Plans (p20)	The list of Neighbourhood Plans omits Hoveton Neighbourhood Plan. This is a factual error. Stalham NP is correctly included.	Update Section 6.10 to add Hoveton Neighbourhood Plan to the list of Neighbourhood Plans in preparation.	Noted. The list was correct at the time of writing and will be updated on adoption.	Update the list of Neighbourhood Plans at the time of the adoption of the Local Plan.
PUBHOV5 Hoveton Village Centre and areas adjacent to the Village Centre	NNDC welcomes the recognition in PUBHOV5 that Hoveton Town Centre should be considered as a whole, across local authority boundaries, and in coordination with NNDC's Development Plan. This reflects the established joint approach. NNDC wishes to ensure that the wording remains fully consistent with its emerging Local Plan and that monitoring continues to maintain alignment.	Ensure that PUBHOV5 wording is aligned with NNDC's emerging Local Plan retail/town centre policy for Hoveton/Wroxham and consider minor amendments to reinforce the shared approach. This will ensure the plan is effective in addressing cross-boundary retail issues and consistent with the agreed joint approach already in place. This could be achieved either by a small addition to the policy wording itself or, alternatively, by a short line in the supporting text confirming that decisions and monitoring will continue to be coordinated across BA/NNDC, so the shared approach is maintained.	Agree.	Add text to HOV5 that refers to decisions and monitoring will continue to be coordinated across BA/NNDC.

Part of Local Plan	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.
PUBDM35 Retail development in the Broads	<p>NNDC notes that PUBDM35 sets criteria for retail development in the Broads but does not reference the cross-boundary issues at Hoveton/Wroxham. This omission weakens the effectiveness of the policy, as it risks decisions being made without recognition of the joint town centre approach that has been consistently agreed between the Broads Authority and NNDC and is included in our Local Plan and Duty to Co-operate documents.</p> <p>BA asked NNDC for clarification: On cross-boundary retail issues, our representation was focused on the need for PUBDM35 (Retail Development in the Broads) to include an explicit reference to Hoveton/Wroxham and the joint/whole settlement approach. While PUBHOV 5 (the site-specific policy) does already refer to NNDC and the shared approach, PUBDM35 currently does not. Our concern is that without this, developers and decision makers may rely on PUBDM35 alone and overlook the fact that Hoveton/Wroxham is a joint town centre spanning both authorities. The aim is to ensure the joint approach is signalled in both the overarching retail policy and the site-specific policy, so there is no scope for uncertainty.</p>	<p>Insert an explicit reference in PUBDM35 to the need to consider cross-boundary retail issues at Hoveton/Wroxham, to align with NNDC’s emerging Local Plan and ensure the shared approach is clear across both generic and site-specific policies. The clarity does already appear in PUBHOV5, but not until later in the plan. Our suggestion was, therefore, for a small addition in DM35, not to change the policy’s intent, but to flag earlier on that Hoveton/Wroxham is addressed through a joint approach across the NNDC and BA plans. This would strengthen the overarching retail policy by making the cross-boundary approach clearer and more user friendly for applicants and decision makers. By way of example only, this could be achieved through a short line such as: “Proposals for retail and main town centre uses in Hoveton/Wroxham should be considered in the context of the joint approach established across both the Broads Authority and NNDC Local Plans.”</p>	<p>Agree.</p>	<p><u>Proposals for retail and main town centre uses should be considered in the context of the joint approach established across both the Broads Authority and relevant district council Local Plans.</u></p>

3. Areas of disagreement

None.

4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 30 December 2025

For North Norfolk District Council: Sarah Tudhope, Senior Planning Officer, 22 January 2026