



STRUMPSHAW PARISH COUNCIL

Local Plan for the Broads

Statement of Common Ground

Between the Broads Authority & Strumpshaw Parish Council

**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	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	First and foremost, we congratulate you and your team on the Local Plan for the Broads. It is a major undertaking and clearly very comprehensive, thorough and well structured. Having recently 'reviewed' our Neighbourhood Plan, with consultants to facilitate and support the drafting, we are at least somewhat aware of the magnitude of your task!	Not seeking changes	Support noted.	No change proposed.
The whole plan - SuDS	SuDS (e.g. p. 72) are generally considered to be a positive intervention, as in the Broads Local Plan. However, not highlighted is the fact that they can have negative impacts on surrounding vegetation and habitats for wildlife. For instance, an old farm pond within our Parish no longer has water year-round because, based on a planning condition, surface run-off water from a small adjacent development (10 properties) was contained on site using SuDS. Also, two mature ornamental trees (10+ metres height) between the development and the pond died within 2 years of the SuDS intervention.	Consider highlighting the potential for negative effects from SuDS.	This issue is addressed at point 4b and 4c. The impact will be assessed on a case-by-case basis with a view to not having a negative impact on existing features, habitat or wildlife.	No change proposed.
PUBDM18: Mitigating Nutrient Enrichment Impacts	Nutrient enrichment and other potential negative impacts on designated protected areas are considered throughout the Local Plan, for example Policy PUBDM18 states that "Any development proposal for overnight accommodation which is located within the catchments of the Broads Special Area of Conservation (SAC) and Broadland Ramsar site70... [must] not increase nutrient loads." In this instance no mention is made of Broadland Special Protection Area (SPA), which may be an oversight given that elsewhere (e.g. pp 304, 385, 411) in the Local Plan it is frequently mentioned that XXXX "... is a component SSSI of Broadland SPA and Ramsar site and The Broads SAC." Perhaps more surprising is the absence of any mention of Breydon Water SPA and Ramsar site with specific regard to Policy PUBDM18.	Check if DM18 needs to also refer to Broadland SPA, Breydon Water SPA and Ramsar Site; and elsewhere in cases where only the Broads SAC and Ramsar site are mentioned.	Comment noted. The letter from Natural England, March 2022, referred to the following areas which is reflected in the policy: The Broads SAC/Ramsar (only the following are included): <ul style="list-style-type: none"> • Bure Broads and Marshes SSSI • Trinity Broads SSSI • Yare Broads and Marshes SSSI • Ant Broads and Marshes SSSI • Upper Thurne Broads and Marshes SSSI) https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/ne-water-quality-and-nutrient-neutrality-advice-16-03-2022-issue-1-final.pdf	No change proposed.
Mapping	Understanding the relationships between nationally and internationally designated protected areas within the Broads National Park (and other UK national parks) can be challenging for planners and developers, let alone members of the general public! There can be considerable overlap between them and across the different international designations. For example: * Breydon Water SPA (1,203 ha) is also a Ramsar site (1,203 ha), comprising Breydon Water SSSI (513 ha) and part (690 ha) of the adjacent Halvergate Marshes SSSI. i.e. The SPA and Ramsar site occupy the same area, which is all under SSSI status, albeit two different SSSIs. * More complex is the Broads SAC (5,889.43 ha), which overlaps considerably with Broadland SPA (5,509 ha) and Broadland Ramsar site (4,623 ha). Clearly, not all of the Broads SAC meets Ramsar Convention criteria as being internationally important wetland, especially for waterfowl. In the case of the Broads SAC, which is habitat-oriented at a European scale, it comprises 28 adjacent or overlapping SSSIs; whereas the European birds-oriented Broadland SPA comprises 26 adjacent or overlapping SSSIs. Damgate Marshes, Acle and the Trinity Broads SSSIs are not included in the SPA. * Both Broadland SPA and the Broads SAC include the same set of 8 National Nature Reserves (NNRs). The point to be made here is that a glance at a map can communicate information so much more quickly than reading the text. A few A4-4 size maps illustrating the different layers of protection afforded to the landscape, habitats and bird species at national, European and global levels could be very helpful to examiners, planners, developers and other stakeholders in assimilating the natural (and cultural) context within which they need to work. Much, if not all, of this information is available from the impressive interactive map provided by the Broads Authority as part of the Local Plan for the Broads. However, it is not intuitive to the lay person as to how to generate such maps and best left with a GIS technician to provide a clear, succinct set of maps of NNRs and SSSIs overlaid with SPAs, SACs and Ramsar sites for incorporating into the Local Plan.	Provide a succinct set of pdf maps showing the extent to which nationally designated protected areas (SSSIs and NNRs) are also designated as SACs and SPAs at European level and as Ramsar sites at global level. This can be achieved, for example, by means of 3 overlays: national, European and global. Each type of protected area (5 types) and type of overlay (3) should be distinguishable. Each SSSI and NNR should be numbered and their name listed in a legend.	Support of interactive map noted and welcomed. We will explore the idea of PDF maps showing the constraints suggested. These could be included in the policies maps section when the Local Plan is adopted.	No change proposed. Provide PDF maps of some wildlife constraints.

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.
The whole plan	<p>Our final observation concerns the juxtaposition of Strumpshaw Parish, with approximately half of the Parish lying inside the National Park and benefiting from greater levels of heritage protection, both natural and cultural, demanded by the Broads Local Plan; and the other half potentially buffering the core values of the National Park within the framework of Strumpshaw's Neighbourhood Plan. Tranquillity is a prominent element of our Neighbourhood Plan, along with areas of high landscape value (woodlands, marshes, fens, green space and local heritage) that will be protected to complement the designated reserves. Thus, in the Broads Local Plan, it is particularly noteworthy that tranquillity in the Broads (PUBSP7) will be supported by some key policies, including protection and enhancement of settlement fringe landscape character (PUBDM26) and light pollution, dark skies and nocturnal character (PUBDM28). Alongside tranquillity are opportunities to explore sustainable tourism (PUBSP12), potentially supported by accessibility and transport (PUBSP8), recreational access around the Broads area (PUBSP9), recreation facilities and parking areas (PUBDM30) and other policies that sustain and enhance a prosperous local economy (PUBSP10). Key assets within the parish include: 2 pubs, 3 churches (one near-derelict), garage, recycling centre, Steam Museum at Strumpshaw Hall, Buckenham Railway Station, regular bus service, RSPB's Strumpshaw Fen, Buckenham Ancient Woodland, NCC's former landfill site (open to public), and historical and archaeological features (including meteorite sites), many of which would benefit from applying some of the policies in our respective Plans. This suggests that the Parish Council might do well to pilot some joint action planning with the Broads Authority and other partners, as appropriate. Working together to buffer the core values of the National Park, we can also enhance tranquillity in the parish through an array of distinctive sustainable initiatives aligned with our respective Plans.</p>	<p>Not seeking changes. Rather, looking to the future and how best Strumpshaw Parish Council and the B.A. can work together to apply their respective policies in ways that re-enforce each other's agendas ... working in partnership on initiatives of mutual interest/importance.</p>	<p>Response noted. Offer of joint working noted. This will be passed on to other Officers in the Broads Authority.</p>	<p>No change proposed.</p>

3. Areas of disagreement

None.

4. Signed

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

For Strumpshaw Parish Council: Tanya Rowlandson, Parish Clerk, 28 November 2025