



## **Local Plan for the Broads**

### **Statement of Common Ground**

#### **Between the Broads Authority & Natural England**

#### **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	We consider that The Local Plan for the Broads: Review Plan Period 2021 to 2042 (Broads Authority, July 2025) is sound with regard to the aspects relevant to our natural environment remit. The plan is positively prepared as demonstrated by policies protecting the Broads National Landscape, conserving and protecting both statutory and non-statutory designated sites, habitats and species; and supporting green infrastructure and preventing fragmentation of habitats. The plan is justified, the evidence base appears to be robust as far as Natural England's remit is concerned, and alternatives have been taken into consideration throughout the plan stages. Natural England considers the policies within the plan are deliverable and flexible and therefore the plan should be effective, and the plan is consistent with national policy with regard to those within Natural England's remit. However, we have suggested some additional wording amendments which do not fundamentally alter our conclusions on the tests of soundness (additions in bold text and deletions crossed through).	-	Noted.	No change proposed.
Policy PUBSP1: Responding to the Climate Emergency	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM4: Climate change adaption and resilience checklist	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM5: Water quality and foul drainage	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM10 Open space on land, play space, sports fields and allotments	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.

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Policy PUBDM11: Green and blue infrastructure and Public Rights of Way	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBSP3: Soils	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM12: Peat soils	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBSP5: Biodiversity	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM15: Natural Environment	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM16: Biodiversity Net Gain	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM17: Mitigating Recreational Impacts	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.

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Policy PUBSP6: Landscape character	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBSP7: Tranquillity in the Broads	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM28: Light pollution, dark skies and nocturnal character	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM22: Development and landscape	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBSP9: Recreational access around the Broads area	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
Policy PUBSP5: Biodiversity	We welcome the inclusion of the point which states that development 'will contribute to the delivery of the Local Nature Recovery Strategies (Norfolk and Suffolk) and the Broads Nature Recovery Strategy 2024-29 (or successor documents)'.	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM15: Natural Environment	We welcome the inclusion of this policy. The term 'Local Nature Recovery Network' is not one that is used in the Norfolk and Suffolk Local Nature Recovery Strategies, and it might be misleading to use it in the policy.	'13. Where development is sited within or adjacent to an area <del>the</del> identified in the Local <del>Nature Recovery Network</del> <u>Habitats Maps of the Local Nature Recovery Strategies as an 'Area that Could Become of Particular Importance for Biodiversity'</u> and/or <u>has a Potential Measure mapped to it</u> , it will demonstrate how the proposal will <del>maintain and enhance the ability of the network</del> <u>to restore and enhance habitats and provide <del>eco-system</del> ecosystem services</u> in line with the Local Nature Recovery Strategy.'	In liaison with the Environment Advisor, we agree with the proposed changes.	13. Where development is sited within or adjacent to an area <del>the</del> identified in the Local <del>Nature Recovery Network</del> <u>Habitats Maps of the Local Nature Recovery Strategies as an 'Area that Could Become of Particular Importance for Biodiversity'</u> and/or <u>has a Potential Measure mapped to it</u> , it will demonstrate how the proposal will <del>maintain and enhance the ability of the network</del> <u>to restore and enhance habitats and provide <del>eco-system</del> ecosystem services</u> in line with the Local Nature Recovery Strategy.'

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Policy PUBDM15: Natural Environment	Protected sites and species - supporting text (page 113) We welcome the inclusion of the sentence 'In particular, proposals should take opportunities for the restoration and enhancement of the core opportunity areas for nature areas and priority habitats and species identified in the Local Nature Recovery Strategy and incorporate appropriate beneficial biodiversity conservation features'.	An alternative form of words that aligns more closely with the terminology used in the Local Nature Recovery Strategies would be: '.....the core opportunity areas for potential measures that will deliver the priorities for habitats and species identified in the Local Nature Recovery Strategy.....'.	In liaison with the Environment Advisor, we agree with the proposed changes.	In particular, proposals should take opportunities for the restoration and enhancement of the core opportunity areas for nature areas <u>that will deliver the priorities for and priority</u> habitats and species identified in the Local Nature Recovery Strategy and incorporate appropriate beneficial biodiversity conservation features'
Policy PUBDM15: Natural Environment	Protected sites and surveys - supporting text, 3rd paragraph (page 115) We welcome the reference to species that are prioritised in the Local Nature Recovery Strategies being included in surveys where relevant and being given particular regard in the context of their conservation objectives.	It would be advisable to specify whether this just refers to Key Species, Key Species and Flagship Species or to Key Species and all of the species included in habitat species assemblages (which include Flagship Species but also contain many more).	This needs to be inclusive so 'Key Species and all of the species included in habitat species assemblages. Also remove reference to Norfolk Biodiversity action Plan as it is no longer being maintained and could be out of date.	Species prioritised <del>Norfolk Biodiversity Action Plan</del> in the Norfolk or Suffolk Local Nature Recovery Strategies, should be included in the surveys where relevant, even if not legally protected, and will be given particular regard in the context of their conservation objectives. <u>This includes Key Species and all of the species included in habitat species assemblages.</u>
Policy PUBDM15: Natural Environment	Wildlife Sites and Habitats, other than 'Habitats Sites' - supporting text (page 115) We welcome the requirement that development that may have a damaging or negative impact on a habitat prioritised by the Norfolk and Suffolk Local Nature Recovery Strategies must be accompanied by a suitable environmental assessment.	However, clarification is required, as the Local Nature Recovery Strategies 'prioritise' all habitats, with the prioritisation coming from targeting the best locations for their enlargement, creation or enhancement. An alternative form of wording that would reflect this would be (for the 5th bullet point):  'Development that may have a damaging or negative impact upon a... •site identified as a priority area within the Local Nature Recovery Strategy by being mapped as an 'Area that Could Become of Particular Importance for Biodiversity' and/or has a potential measure relating to the habitat mapped to it, ...must be accompanied by a suitable environmental assessment that...".	Agree.	• <u>site identified as a priority area within the Local Nature Recovery Strategy by being mapped as an 'Area that Could Become of Particular Importance for Biodiversity' and/or has a potential measure relating to the habitat mapped to it, habitat prioritised by the Norfolk or Suffolk Nature Local Nature Recovery Strategies</u>
Policy PUBDM15: Natural Environment - supporting text	Local Nature Recovery Strategy - supporting text, 1st paragraph, last sentence (page 116) We welcome the reference to Local Nature Recovery Strategies, stating that planning applications 'will be required to address the requirement of the Local Nature Recovery Strategy.'	Not seeking changes	Support noted.	No change proposed as a result of this comment, although see comment BLP266 (copied below for information).
Policy PUBDM16: Biodiversity Net Gain	Natural England welcomes the 20% minimum target in the policy, and the supporting justification (on page 119) for the target made in More than 10% Biodiversity Net Gain for the Local Plan for the Broads - Topic Paper (Broads Authority, February 2025). Section 6a). We welcome the policy that off-site delivery should prioritise contributing to nearby habitat recovery and creation strategies, with the Local Nature Recovery Strategy named as one of the strategies that could be contributed to. Delivery and Implementation of the policy – supporting text, 2nd paragraph (page 120) We welcome the reference to Local Nature Recovery Strategies, which	Not seeking changes	Support noted.	No change proposed.

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	states that 'A positive proportionate contribution should be made to the ecological network and priorities as outlined within the Local Nature Recovery Strategy and regional Nature Recovery Network'.			
Policy PUBDM17: Mitigating Recreational Impacts	We welcome this policy and are pleased to see the policy requirements to assess and address increased recreational disturbance on designated sites.	We advise that it is revised to strengthen it, provide better clarity, and to ensure that mitigation measures are agreed with the Broads Authority, acting as the competent authority, rather than with Natural England, as follows: '1. Any development which results in a net increase in residential development and / or overnight tourism accommodation will need to put in place adequate measures to avoid and mitigate potential adverse recreational impacts on the integrity of Habitats Sites which are identified within the following strategies and Zones of Influence (ZOI): a) Norfolk Recreational disturbance Avoidance and Mitigation Strategy (Norfolk RAMS) (and any successors) – covers the whole of Norfolk. b) Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (Suffolk RAMS) (and any successors) - 13 km ZOI around the relevant Habitats Sites in the Suffolk Coast area.	Agree.	'1. ... a) <del>Norfolk Recreational disturbance Avoidance and Mitigation Strategy (Norfolk RAMS)</del> <u>Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (' Norfolk GIRAMS' for short) (and any successors)</u> – covers the whole of Norfolk. b) Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (Suffolk RAMS) (and any successors) - 13 km ZOI around the relevant Habitats Sites in the Suffolk Coast area.
Policy PUBDM17: Mitigating Recreational Impacts	We welcome this policy and are pleased to see the policy requirements to assess and address increased recreational disturbance on designated sites.	We advise that it is revised to strengthen it, provide better clarity, and to ensure that mitigation measures are agreed with the Broads Authority, acting as the competent authority, rather than with Natural England, as follows: <del>2. Planning permission will be granted subject to demonstrating no adverse effect on the integrity of Habitats Sites from recreational disturbance when considered alone or in combination. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitats Regulations at application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the application will be refused unless it passes the tests set out in Regulation 62, and any necessary compensatory measures will need to be secured.</del>	Agree.	<del>2. Planning permission will be granted subject to demonstrating no adverse effect on the integrity of Habitats Sites from recreational disturbance when considered alone or in combination. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitats Regulations at application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the application will be refused unless it passes the tests set out in Regulation 62, and any necessary compensatory measures will need to be secured.</del>
Policy PUBDM17: Mitigating Recreational Impacts	We welcome this policy and are pleased to see the policy requirements to assess and address increased recreational disturbance on designated sites.	We advise that it is revised to strengthen it, provide better clarity, and to ensure that mitigation measures are agreed with the Broads Authority, acting as the competent authority, rather than with Natural England, as follows: 3. Proposed adequate measures must be delivered prior to occupation of development, in perpetuity and agreed with <del>Natural England</del> <u>the Broads Authority. This will include the payment of a contribution towards the cost of mitigation measures at the protected sites, in line with 1a) and 1b) above.</u>	Agree. We note that Great Yarmouth Local Plan includes reference to paying the RAMS payment.	3. Proposed adequate measures must be delivered prior to occupation of development, in perpetuity and agreed with <del>Natural England</del> <u>the Broads Authority. This will include the payment of a contribution towards the cost of mitigation measures at the protected sites, in line with 1a) and 1b) above.</u>

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Policy PUBDM17: Mitigating Recreational Impacts	We welcome this policy and are pleased to see the policy requirements to assess and address increased recreational disturbance on designated sites.	<p>We advise that it is revised to strengthen it, provide better clarity, and to ensure that mitigation measures are agreed with the Broads Authority, acting as the competent authority, rather than with Natural England, as follows:</p> <p>4. For development over 50 units, the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of residents as an alternative to visiting the habitats sites is required. <u>This will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England’s Accessible Natural Greenspace Standard*</u>.</p> <p>(*It may be more appropriate to refer to another standard specific to the Broads, or cross reference to another policy in the Local Plan).</p> <p>Follow up: As there is not a specific standard for the Broads Executive Area, then we recommend that Natural England’s Green Infrastructure Standards are considered, which define what good GI ‘looks like’ and how to plan GI strategically to deliver multiple benefits for people and nature.</p>	Agree.	For development over 50 units, the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of residents as an alternative to visiting the habitats sites is required. <u>This will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England’s Accessible Natural Greenspace Standard.</u>
Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	We welcome the policy which identifies the need for mitigation measures, to address the nutrient impacts of nitrogen and phosphate from new development, within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site.	<p>We recommend the policy wording is amended as follows (which would also ensure consistency with the nutrient neutrality policies in neighbouring authorities' adopted local plans):</p> <p><u>‘1. Within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site:</u></p> <ul style="list-style-type: none"> <li>•<u>Any residential development proposal for that results in an increase in the level of overnight accommodation stays; and</u></li> <li>•<u>any non-residential development that by virtue of its scale and type may draw people from outside the above catchments;</u></li> <li>•<u>and/or may generate unusual quantities of surface water;</u></li> <li>•<u>and/or, by virtue of the processes undertaken, may contain unusual pollutants within surface water run-off;</u></li> </ul> <p><del>which is located within the catchments of Tthe Broads Special Area of Conservation (SAC) and Broadland Ramsar site, must provide evidence to enable the Authority to conclude through a Habitats Regulations Assessment that the proposal will not have an adverse effect increase nutrient loads, such that it will have likely significant effects on the integrity of sites in an unfavourable condition. This can be demonstrated through nutrient neutrality.</del></p>	Agree.	<p><u>‘1. Within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site:</u></p> <ul style="list-style-type: none"> <li>•<u>Any residential development proposal for that results in an increase in the level of overnight accommodation stays; and</u></li> <li>•<u>any non-residential development that by virtue of its scale and type may draw people from outside the above catchments;</u></li> <li>•<u>and/or may generate unusual quantities of surface water;</u></li> <li>•<u>and/or, by virtue of the processes undertaken, may contain unusual pollutants within surface water run-off;</u></li> </ul> <p><del>which is located within the catchments of Tthe Broads Special Area of Conservation (SAC) and Broadland Ramsar site, must provide evidence to enable the Authority to conclude through a Habitats Regulations Assessment that the proposal will not have an adverse effect increase nutrient loads, such that it will have likely significant effects on the integrity of sites. This can be demonstrated through nutrient neutrality.</del></p>
Policy PUBDM18: Mitigating Nutrient	We welcome the policy which identifies the need for mitigation measures, to address the nutrient impacts of nitrogen and phosphate from new development, within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site.	<p>We recommend the policy wording is amended as follows (which would also ensure consistency with the nutrient neutrality policies in neighbouring authorities' adopted local plans):</p> <p>2. Planning permission will be granted subject to demonstrating no adverse effects on the integrity of <u>the above named</u> habitats</p>	Agree.	2. Planning permission will be granted subject to demonstrating no adverse effects on the integrity of <u>the above named</u> habitats sites from nutrient enrichment when considered alone or in combination.

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Enrichment Impacts		sites from nutrient enrichment when considered alone or in combination.		
Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	We welcome the policy which identifies the need for mitigation measures, to address the nutrient impacts of nitrogen and phosphate from new development, within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site.	We recommend the policy wording is amended as follows (which would also ensure consistency with the nutrient neutrality policies in neighbouring authorities' adopted local plans): 3. The Norfolk Nutrient Calculator <del>or the</del> Natural England Nutrient Calculator will need to be completed <u>for all qualifying development proposals</u> . If the calculator concludes an impact from nutrients, these impacts will need to be mitigated using appropriate mitigation, likely secured through a local or national mitigation scheme. The Authority <del>may</del> <u>will</u> use legal agreements to ensure this mitigation is secured and in place and will be delivered.'	Agree.	3. The Norfolk Nutrient Calculator <del>or the</del> Natural England Nutrient Calculator will need to be completed <u>for all qualifying development proposals</u> . If the calculator concludes an impact from nutrients, these impacts will need to be mitigated using appropriate mitigation, likely secured through a local or national mitigation scheme. The Authority <del>may</del> <u>will</u> use legal agreements to ensure this mitigation is secured and in place and will be delivered.'
Sustainability Appraisal	We are satisfied that the methodology and baseline information used to inform the appraisal appears to meet the requirements of the Strategic Environmental Assessment (SEA) Directive [2001/42/EC] and associated guidance. The environmental interest within our remit is covered within the Sustainability Appraisal (SA) objectives, and the SA appears to adequately assess the environmental, social and economic effects in accordance with legal and national policy requirements.	Not seeking changes	Support noted.	No change proposed.
HRA	Natural England is satisfied that Habitats Regulations Assessment (HRA) has identified and screened in the correct habitats sites. It provides a detailed and comprehensive assessment of the likely significant effects of the relevant Local Plan policies (see Table 4.1: Policies and allocations of the Local Plan screened into the HRA process (summarised from Appendix C), on pages 37-38), acting alone or in combination, on European sites and meets the requirements of the Conservation (Habitats & Species) Regulations 2017 (as amended). We agree with the conclusions reached in the Appropriate Assessments for air quality (see 5.4, page 42), water (see 6.3, page 48), and recreation and urbanisation (see 7.3, page 54), respectively. Although, we recommend that the suggested amendments to some wording in a few policies and supporting text, as described in the previous section above, is incorporated to ensure they are robust and clear.	Not seeking changes	Support noted.	No change proposed.

Comment BLP266:

Policy PUBDM15: Natural Environment and supporting paragraph	Amend 1 e) as follows: e) <del>Assist in the delivery of</del> <u>Take account of the</u> Local Nature Recovery Strategies (Norfolk and Suffolk) Amend supporting text to say: Applications will be required to <del>address the requirements</del> <u>take account of the</u> Local Nature Recovery Strategy.
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### 3. Areas of disagreement

None.

### 4. Signed

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

For Natural England: Emma Hurrell, Senior Officer, 4 December 2025