



**THE NORFOLK & SUFFOLK
BOATING ASSOCIATION**



Local Plan for the Broads

Statement of Common Ground

**Between the Broads Authority & Norfolk and Suffolk Boating
Association**

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

February 2026

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1. Introduction

The second Regulation 19 consultation on the Local Plan for the Broads was held over December and January 2025/26. 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.
Sustainability Appraisal	Not stated	Not stated	<p><i>In response to the second Regulation 19 consultation. We failed to find any reference in the Sustainability Assessment, to the most sustainable form of transport on the Broads, and the most sustainable form of tourism, which is transport by engineless boat propelled by the harnessing of wind and tide. We consider that this ought to feature in your SA, because:</i></p> <ul style="list-style-type: none"> • Sailing is one of the most important elements of the cultural heritage of the Broads, as set out in sections 7.10 and 7.11 of the Local Plan. • The Navigation, and Boating on the Broads is why there is special legislation for the Broads – The National Parks Act could not apply to the Broads because of the Navigation. • Boating is a very major consideration – Toll income from boat owners amounts to well over half of the Broads Authority’s regular annual income. • Encouragement of sailing, making passage under sail, and sail training, appear to be appropriate to policies SOC1, SOC3, ENV7, ENV11 and ENV12? 	No change proposed.	This is noted, but sailing itself is not a land use. The Local Plan relates to land use. There are policies that the Local Plan gives general support to use of the water by all types of boats. So the general thrust of the comment is addressed. No specific wording is provided.	No change proposed.
Section 9 of Local Plan	Not stated	Not stated	<p><i>In response to the second Regulation 19 consultation. We suggest amending, under Strengths, page 31 Item n), “Substantial engaged community of private boat owners”</i></p>	Amend to “Substantial engaged community of private boat owners, <u>many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors</u> ”.	Agree.	Amend to “Substantial engaged community of private boat owners, <u>many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors</u> ”.

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Policy PUBSP13: Navigable water space	Not stated	Not stated	<i>In response to the second Regulation 19 consultation. We endorse the draft policies PUBSP13: 'Navigable water space' and PUBDM38: 'Access to the water'.</i>	Not seeking changes	Support noted.	No change proposed.
PUBDM38: Access to the water	Not stated	Not stated	<i>In response to the second Regulation 19 consultation. We endorse the draft policies PUBSP13: 'Navigable water space' and PUBDM38: 'Access to the water'.</i>	Not seeking changes	Support noted.	No change proposed.
PUBDM41: The impact of replacement quay heading on navigation.	Not stated	Not stated	<i>In response to the second Regulation 19 consultation. We strongly endorse the content, as proposed, of policy DM41, 'The Impact of replacement quay headings on the Navigation', to prevent extensions of the shoreline from extending into the waterspace, adverse to the Navigation.</i>	Not seeking changes	Support noted.	No change proposed.
Policy PUBDM40: Moorings, mooring basins and marinas	Not stated	Not stated	<i>In response to the second Regulation 19 consultation. Whilst the NSBA agrees with most of the content of Policy DM40, we are concerned that it fails to establish that existing moorings may be refurbished without challenge when the existing piling or other components are at end-of life. Quay headings that have been in regular use for fifty years or more require replacement of pilings when they have succumbed to corrosion or decay in the wet marine environment, especially if previously constructed in short-life treated softwood. Recent negotiations at Hickling, and perhaps elsewhere, suggest that additional clarity is required. We believe this is important because quay headings are essential for access onto the water, and that the best way to appreciate the special qualities of the Broads is from a boat.</i> NSBA further comment: However any refusal of like for like	No change proposed.	Local Plan policies are relevant to proposals that need Planning Permission. Like for like replacements are generally acceptable. And under 25m we don't seek planning applications. Maintenance is likely to not need planning permission. It is not clear what changes are proposed. The policy is clear that navigation must be protected.	No change proposed.

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			replacement for whatever reason is potentially of great concern. We refer specifically to the refusal of permission to re-pile at Pleasure Boat Dyke, ref BA/2025/0158/FUL. We suggest that such cases should to be the subject of a formal consultation of both the planning Committee and the Navigation committee.			
PUBDM28: Light pollution and dark skies and nocturnal character	Not stated	Not stated	<i>In response to the second Regulation 19 consultation.</i> One additional point we would raise is the need for planning control of bright waterside lighting at night (the examples on Horning Racing Reach and at Great Yarmouth are typical). The lights interfere with helms' night vision and have an impact on marine safety. They tend to provoke retaliation in the form of the use of searchlights on boats – which should be discouraged on the Broads.	Not seeking changes	Agreed. We do have a policy relating to light pollution. And you can report specific lights to us for us to investigate either through planning or through our navigation role.	No change proposed.
PUBSP14: Mooring provision	Not stated	Not stated	<i>In response to the second Regulation 19 consultation.</i> Regarding the provision of electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case. {Reference policies PUBSP14 (4) and DM28).	Not seeking changes	Support noted.	No change proposed.
PUBDM28: Light pollution and dark skies and nocturnal character	Not stated	Not stated	<i>In response to the second Regulation 19 consultation.</i> Regarding the provision of electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should	Not seeking changes	Support noted.	No change proposed.

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			<p>be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case. {Reference policies PUBSP14 (4) and DM28).</p>			

3. Areas of disagreement

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.
<p>PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks as well as piling</p>			<p><i>In response to the second Regulation 19 consultation.</i> Turning to Policy DM42, we believe the Authority is misguided in recommending at Item 3 that the Authority’s preference is timber for the piled components of quay heading and landing stagings. Whilst treated softwood is very appropriate for cappings and walings, it has such a short life in the wet/dry intertidal zone even if pressure treated with preservative. Timber compares very poorly with lightweight galvanised steel sheet piling and with the longevity of proprietary recycled plastic piling sections. The policy is correct to say that each has its merits, but the need to re-pile in timber at intervals of ten to fifteen years is irresponsible and a flagrant waste of the owners or Toll-payers money when there are proven alternative options that can be expected to last four times as long. It is very apparent that the draft policy has not been guided by appropriate engineering expertise. This should be sought at the first opportunity, and the whole life cost of maintaining quay headings given much greater priority over appearance. It is also apparent that the policy is over-preoccupied by the colour of the material used for piling in quay headings -The colour is irrelevant – nearly all of the piling is below water and ground level, and the small amount above average water level quickly weathers to a dull/matt green or grey, with the effects of tidal waters, detritus and marine growth.</p> <p>NSBA further comment: The policy is misguided. Further investigations including the research done at Cranfield University suggest that the alternatives to treated softwood for piled quay headings typically last five times longer, or more. Ten year for timber, fifty for galvanised steel and seventy five years for engineered recycled plastic. Replacing a quay heading is a costly project, requiring specialist marine contractors and involves many months of disruptive site works. Additionally, and importantly for policy makers, a sustainability assessment should include the frequency with which the environmental impacts of sourcing raw materials, manufacturing,</p>	<p>No change proposed.</p>	<p>The entire policy needs to be read together. Points 1 and 2 are general principles. Then there is point 3 which relates to timber. And then after that point 4 which clearly talks about other materials. This policy was compiled with assistance from the Head of Construction and the Rivers Engineer.</p>	<p>No change proposed.</p>

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			transportation, installation and end-of-life-disposal are incurred. We have consulted the Environment Agency: they re-pile in steel for its strength integrity and longevity. Better engineering and sustainability advice should be sought.			

4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 3 February 2026

For Norfolk and Suffolk Boating Association: Brian Wilkins, Planning consultation coordinator, 6th February 2026