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**From:** Tanya Rowlandson [REDACTED]  
**Sent:** 24 September 2025 21:27  
**To:** Natalie Beal <[Natalie.Beal@broads-authority.gov.uk](mailto:Natalie.Beal@broads-authority.gov.uk)>  
**Subject:** Re Consultation open - Local Plan for the Broads - Regulation 19 version

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Dear Natalie

Thank you for your emails of 28 July and 4 Sept re: the consultation on the latest version of the Local Plan for the Broads, which is open until 26 September 2025. Councillors have written the following response on behalf of Strumpshaw Parish Council:

*"While we have no major issues that merit formal submission using one or more of your Representation Forms regarding legal compliance, soundness etc of specific policies, we would like to share a few observations and thoughts with you.*

- 1. 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!*
- 2. 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 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.*
- 3. 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 site<sup>70</sup>... [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.*

4. *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.*

5. *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 designate 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, 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.*

*Food for thought while awaiting your Local Broads Plan and our Strumpshaw Neighbourhood Plan to be approved and in place?"*

Kind regards,  
Tanya

Tanya Rowlandson  
Parish Clerk



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----- On Thu, 04 Sep 2025 10:10:04 +0100 **Natalie Beal** <[Natalie.Beal@broads-authority.gov.uk](mailto:Natalie.Beal@broads-authority.gov.uk)> wrote -----

Just a reminder about the consultation.

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**From:** Natalie Beal  
**Sent:** 28 July 2025 09:00  
**Subject:** Consultation open - Local Plan for the Broads - Regulation 19 version

Dear Stakeholder

The consultation on the latest version of the Local Plan for the Broads is open and will end 26 September 2025 at 4pm.

The Local Plan, Sustainability Appraisal and Habitats Regulation Assessment can be found here: [Consultations \(broads-authority.gov.uk\)](#). There is also an [interactive map](#) available.

This is the last round of consultation before we submit the Local Plan to the Planning Inspector for examination.

For this consultation, if you wish to comment, you need to fill out a form. The [form can be found here](#) and there is also [guidance for filling out the form](#).

Please find attached a poster – if you are able to print this off and place on notice boards or use it or the details to advertise the consultation on your social media, that would be welcomed.

We are holding three drop-in events, where you can come and talk to Broads Authority staff. Locations, dates and times of drop in events are as follows:

- Saturday 6 September, 1pm to 4pm, Acle Recreation Centre.
- Monday 8 September, 5pm to 8:30pm, Blyburgate Hall, Beccles.
- Tuesday 9 September, 5pm to 8:30pm, New Victory Hall, Neatishead.

We will place hard copies of the Publication version of the Local Plan in libraries and Council offices as follows; we recommend that you check with the venues about opening times. Please note that these will be in the venues around 31 July/1 August as they are being printed and we wanted to start the consultation as soon as possible.

- Libraries: Acle, Beccles, Brundall, Bungay, Cromer, Great Yarmouth, Loddon, Lowestoft, Oulton Broad, Norwich Millennium, Stalham and Wroxham.
- Council Offices: Broadland and South Norfolk, North Norfolk, and Norfolk County.

A hard copy of the Publication version of the Local Plan will also be available at Yare House in Norwich.

**Consultation on this document ends 4pm 26 September 2025.**

We will then read and respond to all comments received.

Regards

Natalie

**The Planning Team has an agile working pattern so are not present in the office at all times. We would recommend that you contact us by email and phone for correspondence as this will enable your enquiry to be dealt with more quickly.**

**Natalie Beal MRTPI**  
Planning Policy Officer  
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