

Planning Policy Team
The Broads Authority,
Yare House,
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NR1 1RY

Our ref: E374.C1.BroadsRep.Let01A
16th January 2026

Dear Sir / Madam,

Broads Local Plan Review

This letter supports the online representations submitted on the 16th January 2026 and is a complete copy of the text of the representations.

These representations are an objection to the supporting text of policy PUBDBM46 New Residential Moorings.

The representations are made by the Trustees of the Somerleyton Estate. The Trustees own the Somerleyton Marina which has been proposed in the emerging Local Plan for an allocation for 15 residential moorings. The allocation is increasing from 10 moorings in the 2019 Local Plan, to 15 moorings in the emerging Local Plan, and this increase is supported by the Trustees.

The Somerleyton Estate owns the Somerleyton Marina and the adjacent boatyard. Both are longstanding local businesses. The Marina was bought by the Estate around 14 years ago from the holiday company TUI who had planned to use it to support their holiday camps near Gt Yarmouth. Their plan was not successful so the Marina was put up for sale and bought by the Estate to so support the boatyard which they owned, and other village facilities. The Estate has now paid off the borrowing it incurred when buying the Marina and would like to invest in new facilities and create residential moorings.

The Estate has submitted a planning application for a first phase of 9 residential moorings which at the time of writing has not been decided pending discussions with the planning authority.

Research has shown that none of the other 5 residential mooring's allocations in the 2019 Local Plan have seen planning applications come forward to date. The Somerleyton Estate is the only organization actively trying to deliver residential moorings who has got as far as submitting a planning application. The 2019 Local Plan had predicted that aside from the Somerleyton allocation that 23 residential moorings would have been applied for by this point. The 2019 Local Plan suggested that 41 residential moorings would be applied for between 2019 and 2030, so delivery is significantly behind what was planned.

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The Estate has recently found delivering the residential moorings more complex as the application has progressed. This is because of the local planning authority's interpretation of the supporting text of the residential moorings policy which is making it more difficult to deliver residential moorings. This text is similar in the existing and proposed Local Plans, hence the need for these representations in order to provide clarity. In the supporting text of the emerging Local Plan under the sub heading 'Definition of a Residential Mooring and what can moor there,' it states that the vessel will be used as the 'main residence.' This is a significant restriction on the property rights of those using residential moorings as it prevents letting or other such activities which are commonly allowed for other homes unless there are exceptional circumstances. This creates problems for the Estate Trustees finding people to occupy the moorings as it imposes a significant restriction on the homes.

This is not a type of restriction proposed on bricks and mortar homes which may be built in the Broads area. It is not a restriction proposed by East Suffolk on homes allowed in Somerleyton village. There is no justification given in the Local Plan why this significant restriction is required. If it is intended to help deliver moorings as the Council has suggested in discussions on the planning application, then it has the opposite effect.

The Estates aim is that the residential moorings will bring people to live in the area. They hope that active boat owners will support the boatyard more effectively than the current marina users, many of whom are not active boat users. The hope is that the new residents will support the nearby pub which is owned and supported by the Estate to ensure that it remains a village amenity.

The Estate has an extensive database of people who have visited Somerleyton Hall or other Estate facilities and attractions as well as Marina users. From this database It has sought expressions of interest from people who would be interested in residential moorings. They have had several sensible expressions of interest which is considered a good start to a project which is likely to take several years to deliver all the moorings.

As noted in the emerging Local Plan supporting text, the Council has found that most people interested in residential moorings would be single people or childless couples. The Estate agrees with this view.

The Estates research has found that the people choosing residential moorings over bricks and mortar want a more flexible way of living. While people are interested in living on the moorings, some want flexibility as they will work away for periods of time, or if they are retired want to travel and whilst not using the boat would rent their boat. This flexibility would be prevented by the Councils strict interpretation of the supporting text.

When planning to live on a residential mooring, residents also want security so will take a long lease from the Estate to give them security of where they will live. It is difficult for people to commit to long term arrangements with the Estate if they do not have flexibility, for example if they have to live elsewhere or want to rent the boats to others for any reason.

Discussions with the first interested parties about residential moorings in Somerleyton Marina have shown that the restrictions proposed by the Broads Authority will make it less likely that they will use the moorings.

The Broads Authority Boat Dwellers Accommodation Assessment Final Report August 2022 (BDAA) is part of the evidence base for the new Local Plan. This shows that the definition of a boat dweller is someone who uses the boat as a main residence. This should not be taken to mean that the boats in the allocations should only be main residences. When other types of homes are developed for main residences, it is accepted that to function effectively that flexibility is needed so that sometimes they will not be main residences.

Section 2 headed Consultation in the BDAA report sets out issues delivering residential moorings.

Paragraph 2.2 states: *'the main reasons why people choose to reside on boats were lifestyle choice, a lack of affordable or alternative housing, local connections, to be outdoors, to be mobile, for cultural reasons, and to escape mainstream society. Both boat dwellers and stakeholders commented on the main issues facing boat dwellers. Boat dwellers appreciate the sense of belonging fostered by the community and stated that this way of life may suit people who may not want to reside in one place or require a semi-permanent residence.'*

Paragraph 2.5 states: *'as well as those living on boats for 12 months of the year, it was highlighted that there is a growing demand for semi-permanent use. For example, there is a growth in the use of boats by students who live on boats whilst they study at the local university or college, and people who work in the area during the week but have an alternative address for the rest of the time.'*

Paragraph 2.6 states: *'it was acknowledged that there are very few permanent residential moorings in the Broads Authority area, compared to there being about 200 boat dwellers living on boats all year in the area.'*

Paragraph .8 states: *'some commented on how not all people want permanent residential moorings, but more flexibility. The cost and requirements placed on providers of permanent residential moorings often put potential providers off from having such provision. They prefer to have non-permanent residential provision, allowing people to stay at the mooring for up to 10 out of 12 months. It was suggested that if the process and requirements to provide permanent residential moorings were more flexible, marinas and boat yards would be more inclined to provide them.'*

These comments reflect the flexibility that potential boat residents have made about the Somerleyton residential moorings. It highlights that providers can be put off delivering residential moorings which is supported by the evidence that none of the Local Plan allocations for residential moorings have been delivered. It highlights the lack of residential moorings in the Broads which further illustrates the difficulties of providing this type of accommodation. Section 2 of the BDAA report sets out that people often use boats or areas without permission for residential purposes which will deliver poorer quality accommodation compared to sites with planning permission.

Imposing such a significant restriction on the use of a home, requires a clear justification and a clear Local Plan policy.

The delivery of residential moorings will be improved and the Plan will be made sound if the supporting text is made clear that the residential mooring does not have to be a main residence. It is not possible for owners of residential moorings to know if boats have been moored in one place for over 28 days a year.

This will make the Local Plan sound by meaning that it will be supported by the plans evidence base. It will be Positively Prepared as the strategy which will meet the need for residential moorings. It will be Justified by being a strategy based on reasonable evidence.

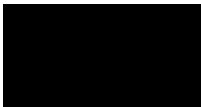
The second point of objection is the supporting text which states that: *'the Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.'* This is unsound and cannot be done as at the point a planning application is submitted it is impossible to know what the boats who will use the mooring over its lifetime will look like.

The change to the text on page 241 of the draft Local Plan should be:

Definition of a residential mooring and what can moor there.

For the purposes of this policy, a 'residential mooring' is a mooring where someone lives aboard a vessel, the vessel is capable of navigation, ~~where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year.~~ The vessel may occasionally/periodically go cruising and return to base. For the purposes of this policy, it should be noted that there is an expectation that the moorings will be occupied by a vessel of standard construction and appearance, and which is conventionally understood to be a boat. The residential mooring relates to how the land is used and not necessarily to a specific boat. ~~The Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.~~

Yours Faithfully



David Barker MRICS MRTPI
Director