



**Local Plan for the Broads**

**Broads Authority**

**Note on provision of moorings in line with PUBDM32 part m.**

**October 2018**

**1. Introduction**

1.1. This paper is related to Matter 7 on water, flooding and navigation. It follows a request from the Inspector during the hearings to provide more information on criterion m of PUBDM32: Moorings, mooring basins and marinas.

1.2. PUBDM32 seeks the provision of visitor moorings as part of commercial basin development. The policy seeks 10% or a minimum of 2 of new moorings to be managed and set aside for visitor moorings. The supporting text allows some flexibility to enable the Authority to consider seasonal usage of visitor mooring. The relevant sections of PUBDM32 are copied below for reference.

Policy

- i) *PUBDM32 'm) Provide and maintain new short stay moorings (visitor, tidal, or de-masting as appropriate) at not less than 10% of total new moorings provided, with a minimum provision of two berths provided at nil cost to the Broads Authority. These moorings shall be provided on-site, but in exceptional circumstances the Authority may consider off-site contributions to any type of mooring'*

Reasoned Justification

*'With regards to the requirement for 10% or two short stay mooring berths (whichever is greater), the preference is to deliver these short stay moorings on site. 'On site' does not have to be part of the development site; it could be elsewhere in an appropriately accessible and suitable part of the marina or boatyard. Indeed, the applicant may wish to provide these moorings in a location easily accessible by novice helms to minimise the potential for accidental damage. It is expected that these moorings will be appropriately advertised, perhaps on websites or signed on the river (in accordance with policy PUBDM48').*

*'In exceptional circumstances, the Authority may accept off-site contributions towards mooring provision. The contribution would be calculated to reflect the cost of delivering the moorings on site. That is to say that the contribution of 10% or two mooring berths would be equal to the cost of delivering the same amount of moorings as part of that scheme. This reflects that it would cost the Broads Authority this amount to deliver an equivalent provision in the same location'.*

*'To support the delivery of the mooring berths contributions, the Authority is willing to consider seasonal usage of moorings. A boatyard or marina may have moorings they only need for their own use in the off peak season (November to March) and could therefore allow to be used for short stay moorings, as per the policy requirements, in the peak season only (April to October). If this is the case, the Authority would expect a provision of 15%/three mooring berths contributions in the peak season'.*

1.3. During the hearing the Inspector requested some background information to justify the approach and asked the Authority to consider these thresholds with regard to any impact on the viability or deliverability of schemes, in particular smaller schemes.

## 2. Justification of the approach

2.1. This policy approach was first introduced as part of the Development Management DPD (2011). Policy DP16 of that document seeks 2 or 10% short term visitor mooring provision.

2.2. The policy was developed in recognition of the fact that any development which increases boat numbers (such as an extension to a mooring basin) will increase the demand for visitor moorings because the users of the vessels will want to stop and moor up when they are out and about on the boat. Historically the Broads Authority has provided visitor moorings (and will continue to do so), however the purpose of this policy is to seek to spread the responsibility for the provision of visitor moorings and to ensure that those who benefit in economic terms from the new moorings make a contribution to the facilities required by those additional boaters.

2.3. As an approach this has proved effective in the past. The following visitor moorings have been delivered as a result of policy DP16. The marinas are willing to cooperate and there has been no opposition to the policy.

Application number	Location	Detail	Application details
BA/2012/0121/FUL	Brundall Church Fen	25m provided.	Extension of basin. Net gain of 14 dwellings.
BA/2013/0163/FUL	Pyes Mill, Loddon	2 visitor moorings to be provided.	2 public and 7 private moorings.
BA/2014/0426/FUL	Sutton Staithe	2 visitor moorings provided.	20 new moorings.
BA/2014/0010/FUL	Eastwood Marine, Brundall	2 visitor moorings provided.	Net gain of 4 moorings.
BA/2015/0244/COND	Barnes Brinkcraft, Hoveton	6 moorings now available.	Re-alignment of moorings.
BA/2015/0172/FUL	Swancraft,	2 visitor moorings provided	8 new moorings.

2.4. Regarding smaller schemes, there has been one example where the requirement of 2 moorings minimum has prevented a small scheme coming forward (it was for a scheme of 5 moorings).

### 3. Proposed Thresholds

3.1. It is recognised that the thresholds as originally proposed are a disincentive to small schemes, as a minimum of 2 moorings does not make a scheme of less than 5 attractive. The following thresholds are proposed as a change to PUBDM32. The Authority considers this a more reasonable approach as well as making the policy clearer to understand and use.

3.2. Regarding the potential for seasonal moorings, the general thrust of the draft approach is to make it possible to accept seasonal moorings. Indeed there is potential for the seasonal approach to be applicable when it suits the needs of the scheme promoter, although this will be subject to agreeing an approach to operating, managing and advertising the seasonal moorings. The Authority would expect additional provision of short stay seasonal visitor moorings above the requirement for permanent moorings which are set out in the table below.

Size of scheme – no. of moorings proposed	Number/% provided and managed for short stay visitor moorings	Reason
2-9	1 permanent mooring	<ul style="list-style-type: none"> <li>This approach seems more reasonable than the current DP16 approach which requires a minimum of 2.</li> <li>This approach seeks to deter artificially breaking up schemes at the same place so they are delivered in smaller quantities to avoid triggering the requirement.</li> </ul>
10-19	2 permanent moorings	<ul style="list-style-type: none"> <li>Stepped increase in line with the number of moorings provided.</li> </ul>

Size of scheme – no. of moorings proposed	Number/% provided and managed for short stay visitor moorings	Reason
20-29	3 permanent moorings	
30 or more	15% permanent moorings, rounded to the nearest whole number (less than 0.5, round down, more than or equal to 0.5, rounded up.	<ul style="list-style-type: none"> <li>A larger proportion is applied to larger schemes to reflect economies of scale and that such schemes will result in many more boats on the system with greater demand on moorings.</li> <li>Rounding approach clarified in policy to avoid debate.</li> </ul>

4. Proposed changes to policy PUBDM32 part m.

The following changes are proposed:

Policy	Proposed change										
PUBDM32 part m	<p>Provide, manage, <u>maintain and advertise</u> <del>and maintain</del> new short stay moorings (visitor, tidal, or de-masting <u>moorings</u> as appropriate) <del>at not less than 10% of total new moorings provided, with a minimum provision of two berths provided</del> at nil cost to the Broads Authority <u>as follows</u>. These moorings shall be provided on-site, but in exceptional circumstances the Authority may consider off-site contributions to any type of mooring.</p> <table> <tr> <th><u>Size of scheme – no. of moorings proposed</u></th><th><u>Number/% provided and managed for short stay visitor moorings</u></th></tr> <tr> <td><u>2-9</u></td><td><u>1 permanent mooring</u></td></tr> <tr> <td><u>10-19</u></td><td><u>2 permanent moorings</u></td></tr> <tr> <td><u>20-29</u></td><td><u>3 permanent moorings</u></td></tr> <tr> <td><u>30 or more</u></td><td><u>15% permanent moorings, rounded to the nearest whole number (less than 0.5, round down, more than or equal to 0.5, rounded up.</u></td></tr> </table>	<u>Size of scheme – no. of moorings proposed</u>	<u>Number/% provided and managed for short stay visitor moorings</u>	<u>2-9</u>	<u>1 permanent mooring</u>	<u>10-19</u>	<u>2 permanent moorings</u>	<u>20-29</u>	<u>3 permanent moorings</u>	<u>30 or more</u>	<u>15% permanent moorings, rounded to the nearest whole number (less than 0.5, round down, more than or equal to 0.5, rounded up.</u>
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Policy	Proposed change
PUBDM32 supporting text	<p>With regards to the requirement <u>to provide short stay visitor moorings as set out in part m of the policy</u><del>for 10% or two short stay mooring berths (whichever is greater)</del>, the preference is to deliver these short stay moorings on site. 'On site' does not have to be part of the development site; it could be elsewhere in an appropriately accessible and suitable part of the marina or boatyard. Indeed, the applicant may wish to provide these moorings in a location easily accessible by novice helms to minimise the potential for accidental damage. It is expected that these moorings will be appropriately advertised, perhaps on websites or signed on the river (in accordance with policy PUBDM48).</p> <p>In exceptional circumstances, the Authority may accept off-site contributions towards mooring provision. The contribution would be calculated to reflect the cost of delivering the moorings on site. That is to say that the contribution <u>in line with the standards set out in the policy</u><del>of 10% or two mooring berths</del> would be equal to the cost of delivering the same amount of moorings as part of that scheme. This reflects that it would cost the Broads Authority this amount to deliver an equivalent provision in the same location.</p> <p>To support the delivery of the mooring berths contributions, the Authority is willing to consider seasonal usage of moorings. A boatyard or marina may have moorings they only need for their own use in the off peak season (November to March) and could therefore allow to be used for short stay moorings, as per the policy requirements, in the peak season only (April to October). If this is the case, the Authority would <u>consider this approach subject to agreeing an appropriate and deliverable approach to operating, monitoring, managing and advertising the seasonal moorings and would expect more short stay moorings than set out in part m to be provided</u><del>provision of 15%/three mooring berths contributions</del> in the peak season'.</p>