



## **Local Plan for the Broads**

### **Assessment of some site specific policies for suitability for residential moorings.**

**September 2018**

## **1. Introduction**

### **1.1 Scope**

This paper assesses the policies in the Local Plan that relate to sites that are treated as if they are adjacent to or within a development boundary for the purposes of PUBDM36 which relates to residential moorings. That is to say that, if the landowner wishes for residential moorings in the future, the Authority considers them in principle suitable at those locations, subject to other requirements of the policy PUBDM36. These policies are:

- BRU2 – Brundall riverside estate boatyards
- BRU4 – Brundall Marina
- HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View
- STA1 – Richardson's at Stalham Staithe

The policy for each of the 4 sites includes some text along the lines of "PUDDM36 will apply as the area will be treated as if it were adjacent to a development boundary".

TSA2 policy is not included in the list because it is no longer relevant (proposed change 175).

### **1.2 The Authority's approach**

The approach was rolled forward from the Sites Specifics Local Plan 2014. The idea is to enable potential residential moorings to be developed as windfall. Even if there is no development boundary covering these sites, officer knowledge concluded that residential mooring could be suitable on those sites. The site owners were contacted to see if they were interested in proposing residential moorings on their sites, but nominations did not come forward. Given that we had no certainty of delivery on these sites, no allocation was made and the mooring numbers are not included in the supply figures. These policies allow the opportunity for residential moorings, probably as part of diversification of the marina/boatyard.

The Housing and Planning Act 2016 requires the Authority to better consider the need for houseboats (residential moorings) as well as the changing nature of boatyards. By stating that residential moorings are generally acceptable in this location, it is envisaged that if boatyards wish to diversify to residential moorings, they can do so and therefore contribute to the need.

To be clear, these sites are not allocated for residential moorings; their policies in the Local Plan seek to guide what happens on these sites. Residential moorings are one such development or change that could be acceptable subject to details.

The boatyards and marinas were contacted as part of the second call for sites for residential moorings during the summer 2017 to see if they wanted to have an allocation for residential moorings, but they did not respond to the call.

### 1.3 Request from the Inspector

The Planning Inspector appointed to examine the Local Plan asked for an assessment of the suitability of these sites for residential moorings as their status is elevated in the Local Plan in relation to suitability for residential moorings.

To respond to the request, an assessment has been carried out for the 4 sites. The assessment is in three parts:

- stakeholder comments (section 2);
- assessment against the Housing and Economic Land Availability Assessment criteria (section 3); and
- assessment against the criteria of PUBDM36 (section 4).

It is important to note that in completing this assessment:

- no site visits were undertaken because officers had recent knowledge of the sites
- the landowners were not contacted because they are not promoting the sites
- the neighbours were not contacted because there are already functioning boatyards there, and this has not brought significant planning issues arising from the neighbours

The conclusions are presented in section 5, and as a result we propose some additional changes to the Local Plan (section 6).

## 2. Stakeholder comments

| Stakeholder                                    | BRU2 – Brundall riverside estate boatyards  | BRU4 – Brundall Marina  | HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View  | STA1 – Richardson’s at Stalham Staithe   |
|--|---|---|---|--|
| <b>Landscape architect</b>                     | Within the curtilage of an existing boat yard, many facilities/infrastructure which would otherwise cause disruption to the landscape are already in place. Boat yard and large number of moorings relatively self-contained, with waterside properties with associated moorings lining the perimeter of the site at the main river’s edge. Acceptable in principle although residential moorings should be to the inside of the perimeter development, retaining the green edge to the riverbank (BRU1). Any additional structures and / infrastructure would be required to be suitably placed and appropriate mitigation provided where necessary.   | Some potential to northern extent of area. South of area remote from main settlement and boatyard facilities; would not want to see increase in infrastructure and sense of permanence to southern extent where landscape generally more open. Generally north of the adjoining e/w Bradeston Marsh ditch could be acceptable due to greater tree cover and proximity to existing on site built environment, infrastructure and settlement of Brundall. This is consistent with the policy approach to structures on this site. | Potential for residential moorings within site although should be kept within existing perimeter development and within northern half of site so more closely associated with Horning settlement and amenities. Landscape in this area is susceptible to change as quickly reverts to a rural isolated and inaccessible landscape of carr woodland and fen. Longer ranging views into the site are generally restricted due to carr woodland. The river however is an intensively used movement corridor for boats due to the large hire marinas at Wroxham/Hoveton and the opposite (west) bank of the river is part of the Bure Marshes National Nature Reserve also attracting a number of visitors; effects on landscape tranquillity would therefore be a key consideration should any residential mooring proposals come forward, and would look to concentrate within existing marina. | Potential for residential moorings within area although as policy sets out careful consideration of mitigation planting and positioning of infrastructure/buildings. Landscape Character Assessment seeks opportunities to better integrate this commercial area at Stalham more effectively with the open countryside. Views into site from main A149 and public right of way passing through south of site. Public rights of way exist across the A149 to link into the main settlement although there are no pedestrian/cycle crossing facilities at present, improvements may therefore be required. |
| <b>Senior Waterways and Recreation Officer</b> | In my view all these sites do have the potential for residential mooring development. They are already heavily used for permanent mooring, all have road access (of varying quality) and are reasonably close to shops and local facilities and have/could have additional facilities on site. And they are in basins or marinas. Flooding has been a problem on the roadway at Brundall but this is not an insurmountable problem as it doesn’t happen all the time. I think there have been more frequent flooding problems on the roadway to Horning Ferry. I wouldn’t therefore have any issues with them being allocated in principle but the question is to what scale would be permissible. I think any residential mooring should definitely not compromise the holiday use or business viability of anything else taking place in these areas and this would be a matter that would need to be considered on a site by site basis. |   |   |  |
| <b>Parish Council</b>                          | <p>It is the view of Brundall Parish Council that decisions considering application for residential moorings in Brundall and Brundall Gardens should be based upon the following principle: 'Applications for residential moorings should be taken on a case by case approach, whilst ensuring a relative balance of needs are met between sustainable development, ecosystem services, biodiversity, the economy of the Broads, local infrastructure, access and recreation'.</p> <p>When asked for clarification, they said that Brundall Parish council is not against residential moorings but would not support all moorings at Brundall Riverside going to residential use and would scrutinise future planning applications. That is to say that they would like the opportunity to judge proposals on a case by case basis rather than a blanket yes or no.</p>   |   | <p>As this doesn’t appertain to an actual application for residential moorings, more looking for outline views it’s difficult to be specific in our response.</p> <p>However it’s probably worth noting that there is already a history of a few boats on Ferry Marina, Woods Dyke and Ferry View Road moorings being used for residential purposes, and have been for some time.</p> <p>Given there would have to be a specific application if anyone wanted to add to the existing ones, on which we would have an opportunity to comment, we should express an outline support, subject to being satisfied with any future application.</p>  | No comment.  |

| Stakeholder   | BRU2 – Brundall riverside estate boatyards  | BRU4 – Brundall Marina  | HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View  | STA1 – Richardson’s at Stalham Staithe   |
|---|---|---|---|--|
|   |   |   | <p>At first sight the reasoned justification for HOR6 seems contradictory: the land is subject to policies in the economy section of the Local Plan; and the policy is designed to strengthen industrial and boatyard policies applicable to the area. Given that this is recognised as the character of the area, it seems odd to state that residential boat moorings may be appropriate when there must be limited scope on the site for further housing development. When the wording of the justification refers to the ‘availability of nearby services’, it is presumably talking about boating and ancillary services, and not general services (e.g. food, catering, financial etc.), as the policy recognises that the site is separate from the heart of the village.</p> <p>As a general observation, the wording of the policy seems relaxed given the context of high flood risk in the area.</p> |  |
| <b>Head of Safety Management</b>  | No comment  | No comment  | No comment  | No comment   |
| <b>Anglia Water Services</b><br>*further information provided at the end of this table. | Water resource – green.<br>Supply network – green.<br>WRC capacity – green<br>Used Water Network capacity – red - Not currently connected to sewerage. Limited network capacity for FW. Substantial new infrastructure required to connect FW - may not be practicable  | Water resource – green.<br>Supply network – amber - No water infrastructure in the area. Ground conditions may make new mains difficult to install.<br>WRC capacity – green<br>Used Water Network capacity – red - Not currently connected to sewerage. Limited network capacity for FW. Substantial new infrastructure required to connect FW - may not be practicable | Assets – amber - Foul sewers and pumping station within boundary of site.<br>Water resource – green.<br>Supply network - There are known issues with connecting to mains in this location.<br>WRC capacity – red - Horning WRC<br>Used Water Network capacity – amber - Limited treatment and network capacity for FW   | Water resource – green.<br>Supply network – green.<br>WRC capacity – green<br>Used Water Network capacity – amber - Limited network capacity for FW. Substantial new infrastructure required to connect FW - may not be practicable  |
| <b>Ecologist</b>  | <ul style="list-style-type: none"> <li>The adjacent fen is part of the Yare Broads and Marshes SSSI and Broads SAC and SPA, Ramsar. In this context I would recommend refusal of any moorings against the true right bank and any natural banks in this area.</li> <li>Lighting can be particularly harmful if it illuminates important foraging habitats such as river corridors. The impact of any additional, permanently illuminated vessels on the bat use over the river corridor needs investigation by an expert ecologists and an existing baseline of lighting and bat usage would need to be considered. The lighting plan, controls and enforcement needs careful consideration at the design stage.</li> </ul> |   | <ul style="list-style-type: none"> <li>The adjacent fen is part of the Bure Broads and Marshes SSSI and Broads SAC and SPA, Ramsar. In this context I would recommend refusal of any moorings against these protected site, including Horning Marsh SSSI and any natural banks in this area.</li> <li>Lighting can be particularly harmful if it illuminates important foraging habitats such as river corridors. The impact of additional, permanently illuminated</li> </ul>  | <ul style="list-style-type: none"> <li>The downstream rivers, broad wetland are part of the Ant Broads and Marshes SSSI and Broads SAC and SPA, Ramsar. I would recommend refusal of any new moorings against any natural banks in this area.</li> <li>Lighting can be particularly harmful if it illuminates important foraging habitats such as river corridors. The impact of additional, permanently illuminated vessels on the bat use over the river corridor needs investigation by an expert ecologists and an existing baseline of</li> </ul> |

| Stakeholder                            | BRU2 – Brundall riverside estate boatyards  | BRU4 – Brundall Marina | HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View   | STA1 – Richardson’s at Stalham Staithe  |
|--|---|------------------------|--|---|
|  |   |                        | vessels on the bat use over the river corridor needs investigation by an expert ecologists and an existing baseline of lighting and bat usage would need to be considered. The lighting plan, controls and enforcement needs careful consideration at the design stage   | lighting and bat usage would need to be considered. The lighting plan, controls and enforcement needs careful consideration at the design stage.  |
| <b>Historic Environment Manager</b>    | From a heritage and design perspective I would have no objection to the potential use of the sites at Brundall for residential moorings.  |                        | As regards the Site at Horning given the (relative) proximity to the conservation area, the number of locally listed waterside chalets defining the character of the conservation area running from Deersfoot to Ferry road and the listed Mills It would be preferable for residential moorings to be contained within the existing marina. It should also be noted that the adjacent marina accessed from Ferry view road represents the transition from the settlement to the open countryside and again therefore residential moorings would be best kept within the existing basin. | The site at Stalham is immediately adjacent to the Stalham Staithe conservation area and therefore any proposal for residential mooring within the Richardson’s site would need to preserve and enhance the character of the adjacent Conservation area. It is acknowledged that the existing moorings on the site do form part of the waterside character of the wider settlement. Nonetheless any proposal should not adversely impact on the character and appearance (significance) of the designated heritage asset “the Stalham Staithe Conservation Area”. |
| <b>Development Management Officer</b>  | <p>Considering specifically PUBDM36 it would appear that all 4 areas accord would meet most of the policy (leaving the development boundary criteria aside), the areas worth considering are:</p> <p>b) Would not result in the loss of moorings available to visitors/short stay use. They would need to demonstrate what the proposed areas are currently used for.</p> <p>d iii) the amenities of neighbouring occupiers. This only seems to apply to Horning which has residential properties in fairly close proximity.</p> <p>f) Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians. My concern here is for emergency vehicles accessing Brundall, I assume given the amount of residential development that this has been considered previously, but it certainly to be a constraint given the access over the railway line.</p> <p>h) Makes adequate provision for waste, sewage disposal and the prevention of pollution. I assume the boatyard would have facilities for this.</p> <p>i) Provides for the installation of pump-out facilities (where on mains sewer) unless there are adequate facilities in the vicinity. I assume the boatyard would have facilities for this.</p> <p>The other elements could be considered on a proposal specific basis and mitigated where necessary such as siting in specific parts of marinas. I do not see that these would be insurmountable issues.</p> |                        |  |   |
| <b>Norfolk County Council Highways</b> | <p>The present sites have a mixed use, residential, residential moorings, private, leisure mooring, boat and boat building and maintenance activities, which are a matter of fact.</p> <p>However it is currently an expansive site, but as you will be aware the only vehicular highway access to the site via Station Road. Station Road is not ideal given it has restrictions in width for a significant length and lack of continuous pedestrian provision. Certainly it is far from ideal for large vehicle use and as LHA we have previously expressed concerns in this respect, but given the existing operations we have had to reluctantly accept this as the only/and or most acceptable access route; however the cumulative effects need to be considered.</p> <p>Whilst I could not begin to estimate possible numbers, undoubtedly any proposal would in my</p>  |                        | Again, whilst the direct highway access is better than the Brundall site, the immediate surrounding highway network is restricted in terms of width and lack of pedestrian provision. In terms of transport sustainably the site is in my option totally reliant of the private motor vehicle as a primary mode of transport and local service provision is limited. In this respect even daily needs of living/employment are likely to require the use of the private motor vehicle. Whilst  | In highway terms, subject to numbers proposed, etc., given the direct access to the principal highway networks and local service provision, for which there are acceptable pedestrian links, albeit subject to some improvements and together with provision/improvement of cycle links, I consider that it in highway terms it would be difficult to sustain an objection to residential moorings at this site.  |

| Stakeholder                                       | BRU2 – Brundall riverside estate boatyards   | BRU4 – Brundall Marina | HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View  | STA1 – Richardson’s at Stalham Staithe |
|---|--|------------------------|---|--|
|   | <p>opinion give rise to a material increase in traffic movements to and from the site, not only associated with the residential moorings themselves, but also with the associated service provision for such development. Residential moorings are not necessarily likely to be orientated towards the use of the Broads per se and notwithstanding the sites location to Brundall rail station and local bus services, I am of the opinion that journeys to and from the site likely to be primarily car based. Furthermore, local services in the main village are limited and in this respect the site is highly dependent on the private motor vehicle.</p> <p>Not only do I have concerns regarding the cumulative effect of traffic movements on Station Road, I also have concerns regarding safe and suitable access for pedestrians etc., as a result of further development and given that there is little scope for mitigation. Any proposal would need to consider these factors in detail and demonstrate beyond any doubt that safe and suitable access can be provided to all users in accordance with Para 32 of the NPPF and that the residual cumulative effects of the development would not be severe. Appropriate mitigation measures will also need to be considered.</p> <p>In light of the present enquiry I am minded that in highway terms only these sites are not suitable for what could be a reasonable number of residential mooring and I am at present minded to resist such development accordingly on highway safety grounds.</p> |                        | <p>appreciating the demographic using residential moorings may not be the same that of a standard residential unit and that traffic movements may not necessarily be the same level, living requirements and servicing of residential moorings is unlikely to be significantly different.</p> <p>Whilst noting your policy, it is likely the possible scale of any residential moorings would be restricted and significantly less than the Brundall sites, again without proposed numbers and mitigation proposals, I would have reservations on the use of this site for any significant numbers of residential moorings on transport sustainability grounds alone.</p> <p><i>The Authority then asked about the potential for a cap on the number of residential moorings that could be allowed in this area.</i></p> <p>Norfolk County Council response: I have noted that the enquiry is not for allocation of residential moorings and taking all matters into account, I consider the potential of a maximum of 10 residential moorings would be acceptable if located within the existing marina, i.e. no new cut/headings.</p> |  |
| <b>Residential Boat Owners Association (RBOA)</b> | In each case we have considered access to shopping, leisure facilities, GP medical centres, schooling provisions and transport routes. Subject to the specifics of any individual, forthcoming nominations, RBOA would be happy to support proposals for small numbers of residential moorings at each of the mentioned locations, provided that those moorings did not impede navigation in any way.  |                        |   |  |

**\*Anglian Water – further information**

Water Supply Network

The enclosed spreadsheet identifies that a number sites are expected to be a need for improvements to the existing water supply network to enable development of the sites which have been proposed.

Water Recycling Centre capacity

Anglian Water has made an assessment of the available capacity at the relevant Water Recycling Centre (formerly known as sewage treatment works) to accommodate the introduction of additional foul flows from the proposed sites. As you will be aware there are existing issues at Horning WRC as highlighted in Anglian Water’s written statement which outlines the current position on this matter.

It is important to note that this assessment does not take account of the cumulative impact of these sites and any other sites which have been proposed for inclusion in the Local Plan.

#### Foul sewerage network

The foul infrastructure requirements will be dependent on the location, size and phasing of the development. All sites will require a local connection to the existing sewerage network which may include network upgrades.

The enclosed spreadsheet identifies that there is expected to be a need for improvements to the existing networks to enable development of all of the sites which have been proposed assuming a connection to the public sewerage network is required. As highlighted in the attached response for a number of sites a connection to the public sewerage network may not be financially viable due to the distance from the existing sewerage network.

#### Asset encroachment

An existing sewage pumping station is located within the boundary of Site HOR6. Development located within 15m of the pumping station would place them at risk of nuisance in the form of noise, odour or the general disruption from maintenance work caused by the normal operation of the pumping station. Therefore it is suggested that the Broads Authority should consider the potential risk of amenity impacts from pumping stations where relevant.

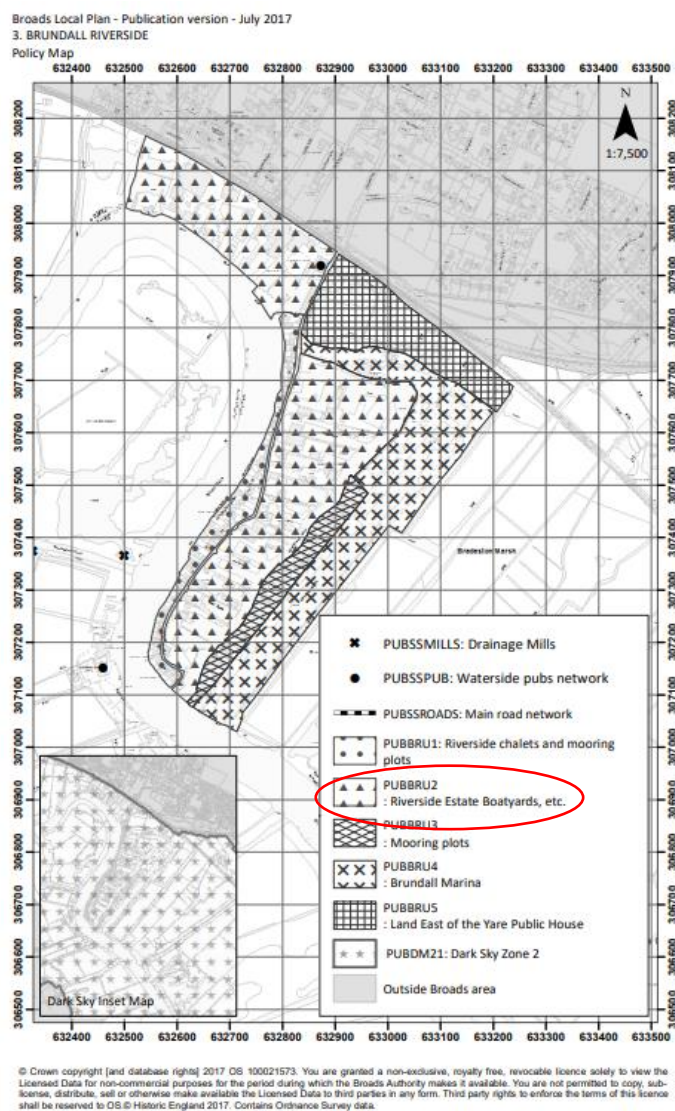
Therefore we would ask that the layout of this site is adjusted so as not to encroach on the protection zone. Development should be located a minimum of 15 metres from Pumping Stations.

Where there are sewers crossing the site, the site layout should be designed to take these into account; this existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The sewers should be located in highways or public open space. If it is not possible to accommodate the existing sewers within the design then diversion may be possible under section 185 of the Water Industry Act 1991 or entering into a build over/near agreement may be considered.

### 3. Housing and Economic Land Availability Assessment

**a) Site address: BRU2 – Brundall riverside estate boatyards**

- Land use being assessed – residential moorings
- Go here for map bundle which also shows constraints: [http://www.broads-authority.gov.uk/data/assets/pdf\\_file/0005/995540/3\\_BRUNDALL\\_RIVERSIDE-new.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0005/995540/3_BRUNDALL_RIVERSIDE-new.pdf)



| Site address: BRU2 – Brundall riverside estate boatyards   |  |
|--|--|
| <b>Current planning status</b><br>e.g. with permission, allocated, suggested through the Call for Sites etc. | <b>Authority considers site location acceptable for residential moorings subject to details.</b> |
| <b>Site Size (hectares)</b>  | <b>Numerous boatyards of varying sizes. Total area is 14.2 Ha.</b>                               |
| <b>Greenfield / Brownfield</b>   | <b>Brownfield/water.</b>   |
| <b>Ownership (if known)</b><br>(private/public etc.)   | <b>Private.</b>  |
| <b>Absolute Constraints Check</b>  |  |



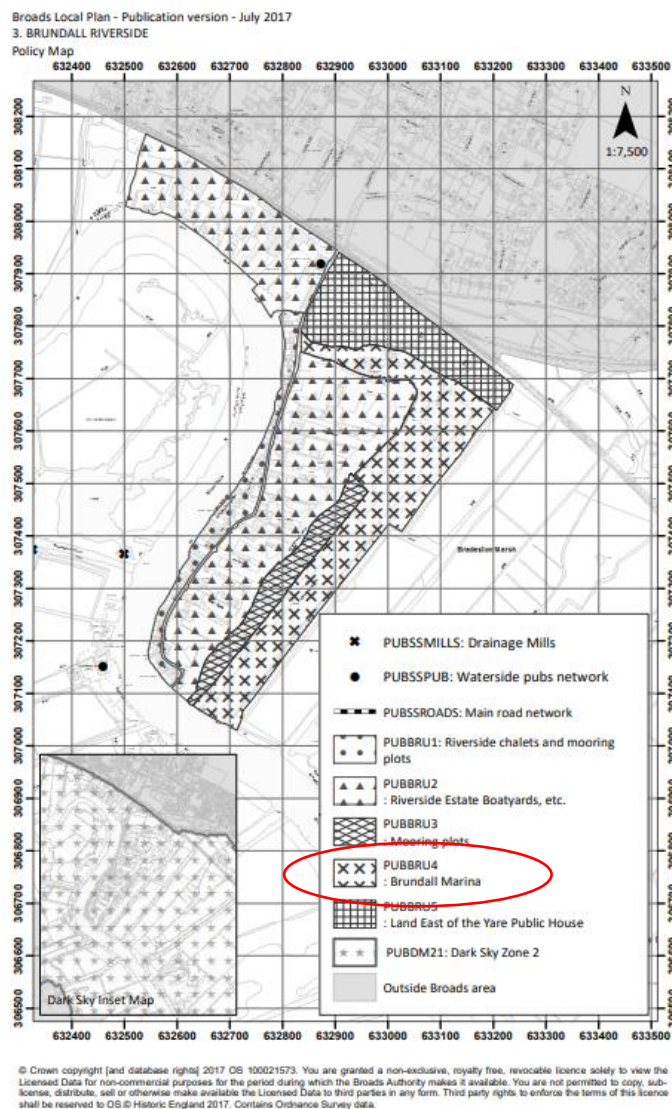
| Is the site in a ...  |                            |  |
|---|----------------------------|--|
| SPA, SAC, SSSI or Ramsar  |                            | No   |
| National Nature Reserve   |                            | No   |
| Ancient Woodland  |                            | No   |
| Flood risk zone 3b  |                            | Yes – but proposal is for residential mooring.   |
| Scheduled Ancient Monument  |                            | No   |
| Statutory Allotments  |                            | No   |
| Locally Designated Green Space  |                            | No   |
| At risk from Coastal Erosion  |                            | No   |
| <i>If yes to any of the above, site will be excluded from further assessment.</i>   |                            |  |
| <b>Development Potential</b><br>(number of dwellings, hectares of employment land or town centre use floor space):<br><b>Not likely support entire boatyard changing to residential moorings. Policy says proportionate to the amount of development planned for the area. Perhaps around 10 residential moorings, but depends on aspirations and proposals from landowner.</b> |                            |  |
| Density calculator  |                            | n/a  |
| Suitability Assessment  |                            |  |
| Constraint  | Score<br>(red/amber/green) | Comments   |
| Access to site  |                            | Highways Authority: In light of the present enquiry I am minded that in highway terms only these sites are not suitable for what could be a reasonable number of residential mooring and I am at present minded to resist such development accordingly on highway safety grounds.  |
| Accessibility to local services and facilities  |                            | Range from closest part of allocation to furthest part<br>Train station: 0.03km - 0.75km<br>Primary school: 0.5km - 1.3km<br>Health Centre: 0.22km - 1.1km<br>Shop: 0.56km - 1.7km<br><br>Note that Brundall is a village so the HELAA methodology requires three of the key services within 1.2km of the site.                                      |
| Utilities Capacity  |                            | Water resource – green.<br>Supply network – green.<br>WRC capacity – green<br>Used Water Network capacity – red - Not currently connected to sewerage. Limited network capacity for FW. Substantial new infrastructure required to connect FW - may not be practicable.<br>Amber as other solutions to sewerage could potentially be put into place. |
| Utilities   |                            | Whilst no site visit undertaken, this assessment   |

|  |                                |   |
|--|--------------------------------|---|
| Infrastructure   |                                | presumes existing moorings changed to residential moorings. If those moorings are currently acceptable, no reason to suspect residential moorings not acceptable in this regard.  |
| Contamination and ground stability                             | ?                              | No site visit undertaken to check the quay heading condition.   |
| Flood Risk   | n/a                            | Flood zone 3b – but is a residential mooring.   |
| Coastal Change   | n/a                            |   |
| Market Attractiveness  |                                | On train route to Norwich, Brundall has good range of facilities, opportunities to live in the Broads tend to be popular so consider if residential moorings provided here they will be taken up.   |
| <b>Impact</b>  | <b>Score (red/amber/green)</b> | <b>Comments</b>   |
| Nationally and Locally Significant Landscapes                  |                                | In the Broads, but would not necessarily change the character of the boatyard that is already in place.   |
| Townscape  |                                |   |
| Biodiversity and Geodiversity                                  |                                | SAC/SPA over the river from the wider riverside area. Would recommend refusal of any moorings against the true right bank and any natural banks in this area. Lighting could be an issue, but light pollution policy can guide what is allowed here. Amber as this can be mitigated through ensuring no moorings in the locations discussed and lighting addressed. |
| Historic Environment   |                                |   |
| Open Space   |                                |   |
| Transport and Roads  |                                | Highways Authority: In light of the present enquiry I am minded that in highway terms only these sites are not suitable for what could be a reasonable number of residential mooring and I am at present minded to resist such development accordingly on highway safety grounds.   |
| Compatibility with neighbouring / adjoining uses               |                                | The sites are boatyards and marinas. The occupiers of residential moorings will be aware of this. No evidence to indicate those living on residential moorings will cause any more of an amenity issue than those living in land dwellings.   |
| <b>Local Plan Designations (add further lines as required)</b> |                                |   |
| <b>Designation</b>   | <b>Policy reference</b>        | <b>Comments</b>   |
| Boatyard uses and residential moorings potentially suitable.   | BRU2                           |   |

| Availability Assessment (will require liaison with landowners)   |   |   |
|--|---|---|
| Is the site being marketed?<br>Add any detail as necessary (e.g. where, by whom, how much for etc.)                                  | Not aware it is being marketed for residential moorings.                                  |   |
| When might the site be available for development (tick as appropriate)   | Immediately   | ? |
|  | Within 5 years  |   |
|  | 5-10 years  |   |
|  | 10-15 years   |   |
|  | 15-20 years   |   |
|  | Comments: Depends on landowners aspirations.  |   |
| Estimated annual build out rate (including justification):   | ?   |   |
| Comments   | Depends on landowners aspirations.  |   |
| Achievability (including viability)  |   |   |
| Comments   | Highways concerns likely to prevent residential moorings coming forward in this location. |   |
| Overcoming Constraints   |   |   |
| Comments   | Highways concerns likely to prevent residential moorings coming forward in this location. |   |
| Trajectory of development  |   |   |
| Comments   | Depends on landowners aspirations, but highways concerns are the key barriers.            |   |
| Barriers to Delivery   |   |   |
| Comments   | Highways concerns are the key barriers.   |   |
| Conclusion (e.g. is included in the theoretical capacity)  |   |   |
| Due to highways constraints, the policy will be amended to remove reference to residential moorings being potentially suitable here. |   |   |

**b) Site address: BRU4 – Brundall Marina**

- Land use being assessed – residential moorings
- Go here for map bundle which also shows constraints: [http://www.broads-authority.gov.uk/data/assets/pdf\\_file/0005/995540/3\\_BRUNDALL\\_RIVERSIDE-new.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0005/995540/3_BRUNDALL_RIVERSIDE-new.pdf)



| Site address: BRU4 – Brundall Marina   |  |
|--|--|
| <b>Current planning status</b><br>e.g. with permission, allocated, suggested through the Call for Sites etc. | <b>Authority considers site location acceptable for residential moorings subject to details.</b> |
| <b>Site Size (hectares)</b>  | <b>7.5Ha</b>   |
| <b>Greenfield / Brownfield</b>   | <b>Brownfield/water.</b>   |
| <b>Ownership (if known)</b><br>(private/public etc.)   | <b>Private.</b>  |
| <b>Absolute Constraints Check</b>  |  |
| <b>Is the site in a ...</b>  |  |
| <b>SPA, SAC, SSSI or Ramsar</b>  | <b>No</b>  |

|   |  |   |
|---|--|---|
| National Nature Reserve   | No   |   |
| Ancient Woodland  | No   |   |
| Flood risk zone 3b  | Yes – but proposal is for residential mooring. |   |
| Scheduled Ancient Monument  | No   |   |
| Statutory Allotments  | No   |   |
| Locally Designated Green Space  | No   |   |
| At risk from Coastal Erosion  | No   |   |
| If yes to any of the above, site will be excluded from further assessment.  |  |   |
| <b>Development Potential</b><br>(number of dwellings, hectares of employment land or town centre use floor space):<br><b>Not likely support entire boatyard changing to residential moorings. Policy says proportionate to the amount of development planned for the area. Perhaps around 10 residential moorings, but depends on aspirations and proposals from landowner.</b> |  |   |
| Density calculator  | n/a  |   |
| <b>Suitability Assessment</b>   |  |   |
| <b>Constraint</b>   | <b>Score<br/>(red/amber/green)</b>             | <b>Comments</b>   |
| Access to site  |  | Highways Authority: In light of the present enquiry I am minded that in highway terms only these sites are not suitable for what could be a reasonable number of residential mooring and I am at present minded to resist such development accordingly on highway safety grounds.   |
| Accessibility to local services and facilities  |  | Range from site entrance to furthest point from site entrance:<br>Train station: 0.22km to 1.24km<br>Primary school: 0.66km to 1.8km<br>Health Centre: 0.72km to 1.78km<br>Shop: 1.07km to 2km<br><br>Rated as green as site is elongated in nature and whilst the distance depends on exact location of any residential moorings, we intend to amend the policy to direct residential moorings to the northern most part of the site.<br><br>Note that Brundall is a village so the HELAA methodology requires three of the key services within 1.2km of the site. |
| Utilities Capacity  |  | Water resource – green.<br>Supply network – green.<br>WRC capacity – green<br>Used Water Network capacity – red - Not currently connected to sewerage. Limited network capacity for   |

|  |                                |   |
|--|--------------------------------|---|
|  |                                | FW. Substantial new infrastructure required to connect FW - may not be practicable.<br>Amber as other solutions to sewerage could be potentially put into place.  |
| Utilities Infrastructure                         |                                | Whilst no site visit undertaken, this assessment presumes existing moorings changed to residential moorings. If those moorings are currently acceptable, no reason to suspect residential moorings not acceptable in this regard.   |
| Contamination and ground stability               | ?                              | No site visit undertaken to check the quay heading condition.   |
| Flood Risk                                       | n/a                            | Flood zone 3b – but is a residential mooring.   |
| Coastal Change                                   | n/a                            |   |
| Market Attractiveness                            |                                | On train route to Norwich, Brundall has good range of facilities, opportunities to live in the Broads tend to be popular so consider if residential moorings provided here they will be taken up.   |
| <b>Impact</b>                                    | <b>Score (red/amber/green)</b> | <b>Comments</b>   |
| Nationally and Locally Significant Landscapes    |                                | In the Broads, but would not necessarily change the character of the boatyard that is already in place.   |
| Townscape  |                                |   |
| Biodiversity and Geodiversity                    |                                | SAC/SPA over the river from the wider riverside area.<br>Would recommend refusal of any moorings against the true right bank and any natural banks in this area.<br>Lighting could be an issue, but light pollution policy can guide what is allowed here. Amber as this can be mitigated through ensuring no moorings in the locations discussed and lighting addressed. |
| Historic Environment                             |                                |   |
| Open Space                                       |                                |   |
| Transport and Roads                              |                                | Highways Authority: In light of the present enquiry I am minded that in highway terms only these sites are not suitable for what could be a reasonable number of residential mooring and I am at present minded to resist such development accordingly on highway safety grounds.   |
| Compatibility with neighbouring / adjoining uses |                                | The sites are boatyards and marinas. The occupiers of residential moorings will be aware of this. No evidence to indicate those living on residential moorings will cause any more of an amenity issue than those living in land dwellings.   |

| Local Plan Designations (add further lines as required)  |   |          |
|--|---|----------|
| Designation  | Policy reference  | Comments |
| Boatyard uses and residential moorings potentially suitable.   | BRU4  |          |
| <b>Availability Assessment (will require liaison with landowners)</b>  |   |          |
| Is the site being marketed?<br>Add any detail as necessary (e.g. where, by whom, how much for etc.)                                  | Not aware it is being marketed for residential moorings.                                  |          |
| When might the site be available for development (tick as appropriate)   | Immediately   | ?        |
|  | Within 5 years  |          |
|  | 5-10 years  |          |
|  | 10-15 years   |          |
|  | 15-20 years   |          |
| Comments: Depends on landowners aspirations.   |   |          |
| Estimated annual build out rate (including justification):   | ?   |          |
| Comments   | Depends on landowners aspirations.  |          |
| <b>Achievability (including viability)</b>   |   |          |
| Comments   | Highways concerns likely to prevent residential moorings coming forward in this location. |          |
| <b>Overcoming Constraints</b>  |   |          |
| Comments   | Highways concerns likely to prevent residential moorings coming forward in this location. |          |
| <b>Trajectory of development</b>   |   |          |
| Comments   | Depends on landowners aspirations, but highways concerns are the key barriers.            |          |
| <b>Barriers to Delivery</b>  |   |          |
| Comments   | Highways concerns are the key barriers.   |          |
| <b>Conclusion (e.g. is included in the theoretical capacity)</b>   |   |          |
| Due to highways constraints, the policy will be amended to remove reference to residential moorings being potentially suitable here. |   |          |

**c) Site Address: HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View**

- Land use being assessed – residential moorings
- Go here for map bundle which also shows constraints: [http://www.broads-authority.gov.uk/data/assets/pdf\\_file/0004/995548/10\\_HORNING-new.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0004/995548/10_HORNING-new.pdf)



| Site address: HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View                                       |  |
|--|--|
| <b>Current planning status</b><br>e.g. with permission, allocated, suggested through the Call for Sites etc. | <b>Authority considers site location acceptable for residential moorings subject to details.</b> |
| <b>Site Size (hectares)</b>  | <b>7.5Ha</b>   |
| <b>Greenfield / Brownfield</b>   | <b>Brownfield/water.</b>   |
| <b>Ownership (if known)</b><br>(private/public etc.)   | <b>Private.</b>  |
| <b>Absolute Constraints Check</b>  |  |
| <b>Is the site in a ...</b>  |  |
| <b>SPA, SAC, SSSI or Ramsar</b>  | <b>No</b>  |



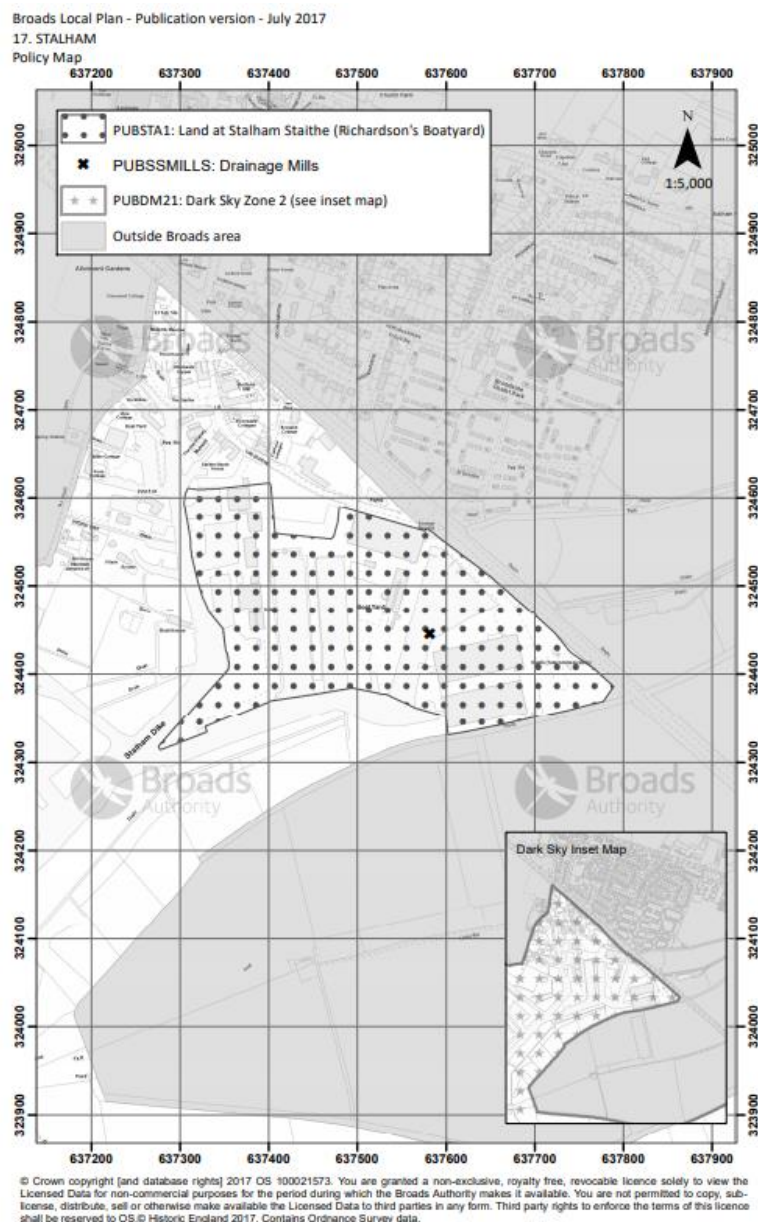
|   |  |  |
|---|--|--|
| National Nature Reserve   | No   |  |
| Ancient Woodland  | No   |  |
| Flood risk zone 3b  | Yes – but proposal is for residential mooring. |  |
| Scheduled Ancient Monument  | No   |  |
| Statutory Allotments  | No   |  |
| Locally Designated Green Space  | No   |  |
| At risk from Coastal Erosion  | No   |  |
| If yes to any of the above, site will be excluded from further assessment.  |  |  |
| <b>Development Potential</b><br>(number of dwellings, hectares of employment land or town centre use floor space):<br><b>Not likely support entire boatyard changing to residential moorings. Policy says proportionate to the amount of development planned for the area. Perhaps around 10 residential moorings, but depends on aspirations and proposals from landowner.</b> |  |  |
| Density calculator  | n/a  |  |
| Suitability Assessment  |  |  |
| Constraint  | Score<br>(red/amber/green)                     | Comments   |
| Access to site  |  | Highways Authority: reservations on the use of this site for any significant numbers of residential moorings on transport sustainability grounds alone. Consider the potential of a maximum of 10 residential moorings would be acceptable if located within the existing marina, i.e. no new cut/headings.  |
| Accessibility to local services and facilities  |  | From site entrance<br>Primary school: 0.55km<br>Shop: 1.08km<br>Bus stop: 1.37km - service 5B has services in peak hour.<br><br>Note that Horning is a village so the HELAA methodology requires three of the key services within 1.2km of the site.   |
| Utilities Capacity  |  | Assets – amber - Foul sewers and pumping station within boundary of site.<br>Water resource – green.<br>Supply network - There are known issues with connecting to mains in this location.<br>WRC capacity – red - Horning WRC<br>Used Water Network capacity – amber - Limited treatment and network capacity for FW.<br>Amber as issues could be addressed such as siting the moorings 15m from the pumping station. |
| Utilities   |  | Whilst no site visit undertaken, this assessment   |

|  |                                |   |
|--|--------------------------------|---|
| Infrastructure   |                                | presumes existing moorings changed to residential moorings. If those moorings are currently acceptable, no reason to suspect residential moorings not acceptable in this regard.  |
| Contamination and ground stability                             | ?                              | No site visit undertaken to check the quay heading condition.   |
| Flood Risk   | n/a                            | Flood zone 3b – but is a residential mooring.   |
| Coastal Change   | n/a                            |   |
| Market Attractiveness  |                                | Opportunities to live in the Broads tend to be popular so consider if residential moorings provided here they will be taken up.   |
| <b>Impact</b>  | <b>Score (red/amber/green)</b> | <b>Comments</b>   |
| Nationally and Locally Significant Landscapes                  |                                | In the Broads, but would not necessarily change the character of the boatyard that is already in place.   |
| Townscape  |                                |   |
| Biodiversity and Geodiversity                                  |                                | SAC/SPA over the river from the wider riverside area. Would recommend refusal of any moorings against the true right bank and any natural banks in this area. Lighting could be an issue, but light pollution policy can guide what is allowed here. Amber as this can be mitigated through ensuring no moorings in the locations discussed and lighting addressed. |
| Historic Environment   |                                |   |
| Open Space   |                                |   |
| Transport and Roads  |                                | Highways Authority: reservations on the use of this site for any significant numbers of residential moorings on transport sustainability grounds alone. Consider the potential of a maximum of 10 residential moorings would be acceptable if located within the existing marina, i.e. no new cut/headings.   |
| Compatibility with neighbouring / adjoining uses               |                                | The sites are boatyards and marinas. The occupiers of residential moorings will be aware of this. No evidence to indicate those living on residential moorings will cause any more of an amenity issue than those living in land dwellings.   |
| <b>Local Plan Designations (add further lines as required)</b> |                                |   |
| <b>Designation</b>   | <b>Policy reference</b>        | <b>Comments</b>   |
| Boatyard uses and residential moorings potentially suitable.   | HOR6                           |   |

|   |  |   |
|---|--|---|
| <b>Availability Assessment (will require liaison with landowners)</b>   |  |   |
| Is the site being marketed?<br>Add any detail as necessary (e.g. where, by whom, how much for etc.)   | Not aware it is being marketed for residential moorings.   |   |
| When might the site be available for development (tick as appropriate)  | Immediately  | ? |
|   | Within 5 years   |   |
|   | 5-10 years   |   |
|   | 10-15 years  |   |
|   | 15-20 years  |   |
|   | Comments: Depends on landowners aspirations.   |   |
| Estimated annual build out rate (including justification):  | ?  |   |
| Comments  | Depends on landowners aspirations.   |   |
| <b>Achievability (including viability)</b>  |  |   |
| Comments  | Nothing to indicate this is not achievable if permission sought by landowner.                    |   |
| <b>Overcoming Constraints</b>   |  |   |
| Comments  | None to overcome.  |   |
| <b>Trajectory of development</b>  |  |   |
| Comments  | Depends on landowners aspirations.   |   |
| <b>Barriers to Delivery</b>   |  |   |
| Comments  | Location of moorings and lighting impacts associated with residential moorings can be addressed. |   |
| <b>Conclusion (e.g. is included in the theoretical capacity)</b>  |  |   |
| Continue with wording in policy that indicates residential moorings suitable in this area but add a cap of 10 residential mooring to reflect highways concerns. |  |   |

**d) Site address: STA1 – Richardson’s at Stalham Staithe**

- Land use being assessed – residential moorings
- Go here for map bundle which also shows constraints: [http://www.broads-authority.gov.uk/data/assets/pdf\\_file/0008/995597/17\\_STALHAM-new.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0008/995597/17_STALHAM-new.pdf)



| Site address: STA1 – Richardson’s at Stalham Staithe   |  |
|--|--|
| <b>Current planning status</b><br>e.g. with permission, allocated, suggested through the Call for Sites etc. | <b>Authority considers site location acceptable for residential moorings subject to details.</b> |
| <b>Site Size (hectares)</b>  | <b>7.42Ha</b>  |
| <b>Greenfield / Brownfield</b>   | <b>Brownfield/water.</b>   |
| <b>Ownership (if known)</b><br>(private/public etc.)   | <b>Private.</b>  |

| Absolute Constraints Check  |  |  |
|---|--|--|
| Is the site in a ...  |  |  |
| SPA, SAC, SSSI or Ramsar  | No   |  |
| National Nature Reserve   | No   |  |
| Ancient Woodland  | No   |  |
| Flood risk zone 3b  | Yes – but proposal is for residential mooring. |  |
| Scheduled Ancient Monument  | No   |  |
| Statutory Allotments  | No   |  |
| Locally Designated Green Space  | No   |  |
| At risk from Coastal Erosion  | No   |  |
| If yes to any of the above, site will be excluded from further assessment.  |  |  |
| <b>Development Potential</b><br>(number of dwellings, hectares of employment land or town centre use floor space):<br><b>Not likely support entire boatyard changing to residential moorings. Policy says proportionate to the amount of development planned for the area. Perhaps around 10 residential moorings, but depends on aspirations and proposals from landowner.</b> |  |  |
| Density calculator  | n/a  |  |
| Suitability Assessment  |  |  |
| Constraint  | Score<br>(red/amber/green)                     | Comments   |
| Access to site  |  | In highway terms, subject to numbers proposed, etc., given the direct access to the principal highway networks and local service provision, for which there are acceptable pedestrian links, albeit subject to some improvements and together with provision/improvement of cycle links, I consider that it in highway terms it would be difficult to sustain an objection to residential moorings at this site. |
| Accessibility to local services and facilities  |  | From site entrance<br>Secondary school: 0.7km<br>Primary school: 0.8km<br>Shop: 0.47KM to Tesco and 0.55km to town centre<br>Bus stop: 0.54km – service number 6 has peak hour services.<br>GP: 0.56km<br><br>Note that Stalham is a town so the HELAA methodology requires three of the key services within 0.8km of the site.  |
| Utilities Capacity  |  | Water resource – green.<br>Supply network – green.<br>WRC capacity – green<br>Used Water Network capacity – amber - Limited network capacity for FW. Substantial new   |

|  |                                |  |
|--|--------------------------------|--|
|  |                                | infrastructure required to connect FW - may not be practicable<br>Amber as issues could potentially be mitigated.  |
| Utilities Infrastructure                         |                                | Whilst no site visit undertaken, this assessment presumes existing moorings changed to residential moorings. If those moorings are currently acceptable, no reason to suspect residential moorings not acceptable in this regard.  |
| Contamination and ground stability               | ?                              | No site visit undertaken to check the quay heading condition.  |
| Flood Risk                                       | n/a                            | Flood zone 3b – but is a residential mooring.  |
| Coastal Change                                   | n/a                            |  |
| Market Attractiveness                            |                                | Opportunities to live in the Broads tend to be popular so consider if residential moorings provided here they will be taken up.  |
| <b>Impact</b>                                    | <b>Score (red/amber/green)</b> | <b>Comments</b>  |
| Nationally and Locally Significant Landscapes    |                                | In the Broads, but would not necessarily change the character of the boatyard that is already in place.  |
| Townscape  |                                |  |
| Biodiversity and Geodiversity                    |                                | SAC/SPA over the river from the wider riverside area. Would recommend refusal of any moorings against the true right bank and any natural banks in this area. Lighting could be an issue, but light pollution policy can guide what is allowed here. Amber as this can be mitigated through ensuring no moorings in the locations discussed and lighting addressed.  |
| Historic Environment                             |                                |  |
| Open Space                                       |                                |  |
| Transport and Roads                              |                                | In highway terms, subject to numbers proposed, etc., given the direct access to the principal highway networks and local service provision, for which there are acceptable pedestrian links, albeit subject to some improvements and together with provision/improvement of cycle links, I consider that it in highway terms it would be difficult to sustain an objection to residential moorings at this site. |
| Compatibility with neighbouring / adjoining uses |                                | The sites are boatyards and marinas. The occupiers of residential moorings will be aware of this. No evidence to indicate those living on residential moorings will cause any more of an amenity issue than those living in land dwellings.  |

| Local Plan Designations (add further lines as required)   |  |          |
|---|--|----------|
| Designation   | Policy reference   | Comments |
| Boatyard uses and residential moorings potentially suitable.  | STA1   |          |
| <b>Availability Assessment (will require liaison with landowners)</b>                               |  |          |
| Is the site being marketed?<br>Add any detail as necessary (e.g. where, by whom, how much for etc.) | Not aware it is being marketed for residential moorings.   |          |
| When might the site be available for development (tick as appropriate)                              | Immediately  | ?        |
|   | Within 5 years   |          |
|   | 5-10 years   |          |
|   | 10-15 years  |          |
|   | 15-20 years  |          |
| Comments: Depends on landowners aspirations.  |  |          |
| Estimated annual build out rate (including justification):  | ?  |          |
| Comments  | Depends on landowners aspirations.   |          |
| <b>Achievability (including viability)</b>  |  |          |
| Comments  | Nothing to indicate this is not achievable if permission sought by landowner.                    |          |
| <b>Overcoming Constraints</b>   |  |          |
| Comments  | None to overcome   |          |
| <b>Trajectory of development</b>  |  |          |
| Comments  | Depends on landowners aspirations.   |          |
| <b>Barriers to Delivery</b>   |  |          |
| Comments  | Location of moorings and lighting impacts associated with residential moorings can be addressed. |          |
| <b>Conclusion (e.g. is included in the theoretical capacity)</b>                                    |  |          |
| Continue with wording in policy that indicates residential moorings acceptable in this location.    |  |          |

#### 4. Assessment against PUBDM36 criteria

|  | <b>BRU2 – Brundall riverside estate boatyards</b>  | <b>BRU4 – Brundall Marina</b>  | <b>HOR6 – Horning, Boatyards etc. at Ferry Rd. &amp; Ferry View</b>  | <b>STA1 – Richardson’s at Stalham Staithe</b>   |
|--|--|--|--|---|
| <b>in a mooring basin, marina or boatyard</b>  | Yes  | Yes  | Yes  | Yes   |
| <b>within or adjacent to a defined development boundary</b>  | <p>No BA development Boundary.</p> <p>Broadland District Council has a development boundary up to north side of rail track.</p> <p>This boatyard not adjacent to or within.</p>                    | <p>No BA development Boundary.</p> <p>Broadland District Council has a development boundary up to north side of rail track.</p> <p>This boatyard not adjacent to or within.</p>                    | <p>No BA development Boundary.</p> <p>North Norfolk District Council has a development boundary up to east side of Lower Street.</p> <p>This boatyard not adjacent to or within.</p> | <p>No BA development Boundary.</p> <p>North Norfolk District Council has a development boundary up to the A149.</p> <p>This boatyard not adjacent to or within.</p>                               |
| <b>if more than one residential mooring is proposed, the proposal is commensurate with the scale of development proposed for that settlement (as a whole).</b> | <p>Brundall likely to see development of 150 dwellings. No proposal to assess, but the Authority would not expect residential moorings proposals of anywhere near that scale at this location.</p> | <p>Brundall likely to see development of 150 dwellings. No proposal to assess, but the Authority would not expect residential moorings proposals of anywhere near that scale at this location.</p> | <p>Horning like to see development of 26 dwellings. So potentially up to 10 residential moorings at this location could be acceptable subject to details.</p>                        | <p>Stalham likely to see development of 160 dwellings. No proposal to assess, but the Authority would not expect residential moorings proposals of anywhere near that scale at this location.</p> |
| <b>the mooring basin, marina or boatyard provides an adequate and appropriate</b>  | <p>Site will have electricity and drinking water. May require to provide access to those living on boats, but these is likely to be achievable.</p>  |  |  |   |



|  | BRU2 – Brundall riverside estate boatyards  | BRU4 – Brundall Marina   | HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View   | STA1 – Richardson’s at Stalham Staithe   |
|--|---|--|--|--|
| range of services and ancillary facilities to meet the needs of the occupier of the residential moorings (for example potable water and electricity) or provides adequate access to local facilities in the vicinity |   |  |  |  |
| Would not result in the loss of moorings available to visitors/short stay use  | Depends on the type of moorings available at that site and where the proposed residential moorings will be placed, but permission will not be granted if there is a loss of these moorings. Moorings in these locations tend to be private rented moorings and residential moorings likely to replace those moorings. |  |  |  |
| Would not impede the use of the waterway   | Will not be on a waterway but located within a boatyard/marina/basin.   |  |  |  |
| Would not have an adverse impact upon the character or appearance of the surrounding area from the use of adjacent land incidental to the mooring  | Depends on the precise proposals and whether provision will be made for storage or agreements relating to residential paraphernalia in place. Often there are buildings that can be used for storage or storage lockers may be acceptable.  |  |  |  |
| Would not have an adverse impact upon protected species, priority habitats and designated wildlife sites   | Proposals may be subject to project level HRA depending on details of proposal such as quantity.  |  |  |  |
|  | SAC/SPA on other side of the river, but the site is already a working boatyard with boats travelling up and down this stretch of  | SAC/SPA on other side of the river, but the site is already a working boatyard with boats travelling up and down this stretch of river. Moorings | SAC/SPA on other side of the river, but the site is already a working boatyard with boats travelling up and down this stretch of river. Moorings would | Around 0.25km from a SPA/SAC, but the site is already a working boatyard with boats travelling up and down this stretch of river. Moorings would need to |

|  | <b>BRU2 – Brundall riverside estate boatyards</b>   | <b>BRU4 – Brundall Marina</b>   | <b>HOR6 – Horning, Boatyards etc. at Ferry Rd. &amp; Ferry View</b>                 | <b>STA1 – Richardson’s at Stalham Staithe</b>                               |
|--|---|---|---|---|
|  | river. Moorings would need to not be located on natural riverbanks. Lighting would need to be considered.   | would need to not be located on natural riverbanks. Lighting would need to be considered.                 | need to not be located on natural riverbanks. Lighting would need to be considered. | not be located on natural riverbanks. Lighting would need to be considered. |
| <b>Would not have an adverse impact upon the amenities of neighbouring occupiers</b>                                   | Immediate neighbours will be other boats moored in the basin. There is some residential perhaps tens of metres away (depending where in the basin the residential moorings are located) but nothing to indicate that occupiers of residential moorings will cause amenity issues any more than immediate neighbours in land based dwellings. The site is a working boatyard, but occupiers will take up a residential mooring in the knowledge of the activities that go on at this site. |   |   |   |
| <b>Would not have an adverse impact upon bank erosion</b>  | Residential moorings likely to replace other types of moorings rather than require a new area for moorings, so quay heading likely to be already in place. The quay heading may need to be improved on occasions, but that will be on a case by case basis and form part of the detailed assessment of the site.  |   |   |   |
| <b>Provides safe access between vessels and the land without interfering with or endangering those using walkways</b>  | Nothing to indicate that this is not possible at these sites. These boatyards tend to provide private rented moorings so the owners’ need to get on and off the vessel, so this should not be an issue at these boatyards. Note also above regarding quay heading.  |   |   |   |
| <b>Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians</b> | Aerial images show numerous parking areas with some of the boat yards having dedicated car parking areas.   | Aerial images show numerous parking areas with some of the boat yards having dedicated car parking areas. | Aerial images show numerous parking areas.  | Aerial images show numerous parking areas including a car park.             |
| <b>Would not prejudice the current or future use of adjoining land or buildings</b>                                    | Current private residential moorings will be replaced with residential moorings. Occupiers will know they are in working boatyards before deciding to live on their boats there. Not obvious how residential moorings here will prejudice.  |   |   |   |
| <b>Makes adequate provision</b>  | Residential moorings tend to have access to electricity thus reducing need to have engines running. Boatyards that hire boats tend  |   |   |   |

|   | <b>BRU2 – Brundall riverside<br/>estate boatyards</b>  | <b>BRU4 – Brundall Marina</b> | <b>HOR6 – Horning, Boatyards etc.<br/>at Ferry Rd. &amp; Ferry View</b> | <b>STA1 – Richardson’s at Stalham<br/>Staithe</b> |
|---|--|-------------------------------|---|---|
| <b>for waste, sewage disposal<br/>and the prevention of<br/>pollution</b>   | to have provision for sewage pump out. Residential moorings pay council tax so will have access to a bin that will be emptied; if not by the Council, and then the landowner as their boatyard will have waste collection and disposal practices in place. |                               |   |   |
| <b>Provides for the<br/>installation of pump-out<br/>facilities (where on mains<br/>sewer) unless there are<br/>adequate facilities in the<br/>vicinity</b>   |  |                               |   |   |
| <b>Proposals need to set out<br/>how provisions will be<br/>made for facilities<br/>associated with residential<br/>uses (such as rubbish,<br/>amenity space, external<br/>storage and clothes drying<br/>for example).</b> | This will be down to the management and running of the site and any agreement in place. Unlikely to prevent residential moorings in this location.   |                               |   |   |
| <b>All such development will<br/>meet the requirements of<br/>the Water Framework<br/>Directive.</b>  | This will be down to the management and running of the site and any agreement in place. Unlikely to prevent residential moorings in this location.   |                               |   |   |

## 5. Conclusion

Following this assessment, the following is proposed:

| BRU2 – Brundall riverside estate boatyards   | BRU4 – Brundall Marina  | HOR6 – Horning, Boatyards etc. at Ferry Rd. & Ferry View   | STA1 – Richardson’s at Stalham Staithe   |
|--|---|--|--|
| Remove the wording from the policy that indicates residential moorings are suitable here because of highway access concerns. | Remove the wording from the policy that indicates residential moorings are suitable here because of highway access concerns | <p>Continue with policy wording indicating residential moorings potentially suitable in this location, but add a cap in the policy and supporting text of up to ten residential moorings. See below for proposed changes.</p> <p>Regarding the Water Recycling Centre constraints, these are well known and referred to in other policies. That being said, it seems prudent to refer to this issue in the supporting text.</p> <p>In relation to the location of moorings, add some text to prevent moorings on the banks of the SAC/SPA.</p> | Continue with policy wording as written. |

## 6. Proposed changes to the Local Plan

| Proposed Change document reference | Page No. (From Broads Local Plan Pre-Submission) | Policy/ Para. No. (From Broads Local Plan Pre-Submission) | Proposed Change   | Reason for change   |
|------------------------------------|--|---|---|---|
| i                                  | 142  | PUBBRU2   | <del>Policy PUBDM36 on new residential moorings will apply as the area will be treated as if it were adjacent to a development boundary. Proposals for residential moorings will be permitted in this area if they are at a scale which would not compromise existing business on the site and would meet the criteria in Broads Local Plan policies on general employment and boatyards.</del>   | To reflect concerns of Highways Authority.  |
| ii                                 | 142  | PUBBRU2 supporting text                                   | <del>The Authority would support perhaps one or two of the moorings at a boatyard being converted to residential moorings. The benefits of a regular income, as well as passive security that residential moorings can bring, are acknowledged. However, in accordance with policy PUBDM36, conversion of an entire business to residential moorings would not be supported. These sites have good access by foot to every day services and facilities in Brundall (such as a supermarket, pharmacy, school and post office). Bus stops and railway stations to wider destinations are also within walking distance from these areas.</del><br><br><u>Norfolk County Council as Highways Authority has indicated that because of the access constraints (the road and level crossing) they would not support residential moorings at this site.</u> | To indicate the stance of Norfolk County Council regarding residential moorings in this area. |
| iii                                | 143  | PUBBRU4   | <del>Policy PUBDM36 (New residential moorings) will apply, as the marina will be treated as if it were adjacent to a development boundary.</del>  | To reflect concerns of Highways Authority.  |
| iv                                 | 144  | PUBBRU4 supporting  | <del>Policy PUBDM36 provides potential for residential moorings in certain circumstances in locations adjacent to development</del>   | To indicate the stance of Norfolk County Council  |

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|------------------------------------|--|---|---|--|
|                                    |  | text  | <p><del>boundaries. Given the scale of the marina, and its close proximity to the public transport connections and extensive facilities of Brundall, it is considered that this marina should be specifically included within those provisions, even though there is no development boundary immediately adjacent.</del></p> <p><u>Norfolk County Council as Highways Authority has indicated that because of the access constraints (the road and level crossing) they would not support residential moorings at this site.</u></p>  | regarding residential moorings in this area.                         |
| v                                  | 157  | PUBHOR6   | <p>The land identified on the Adopted Policies Map will be subject to policies in the economy section of the Local Plan, and for the purposes of PUBDM36 (New residential moorings) will be treated as if adjacent to a development boundary <u>to enable the delivery of a cumulative maximum of 10 residential moorings in this area through the use of existing private mooring spaces. Any residential moorings should be located a minimum of 15 metres from the sewage pumping station.</u></p>   | To reflect concerns of Highways Authority and Anglian Water Services |
| vi                                 | 157  | PUBHOR6 supporting text                                   | <p>The policy gives certainty to the application of industrial and boatyard policies to the area. It has been further considered that it may be appropriate to permit residential boat moorings here, given the scale and character of the area and the availability of nearby services. Even though the area does not abut a development boundary, the relevant policy is applied to it (and to a limited number of boatyards elsewhere). <u>To reflect highways access concerns of Norfolk County Council, a cap of a maximum of ten residential moorings is applied to the entire area covered by this policy – that is to say that the cumulative total of residential moorings in this area will be ten (not ten per boatyard/operator).</u></p> | To reflect concerns of Highways Authority                            |

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|------------------------------------|--|---|---|--|
|                                    |  |   | Of particular importance to this area is the policy on surface water (PUBDM5) <a href="#">and PUBDM1 in relation to Horning Knackers Wood Water Recycling Centre capacity issues.</a> |  |
| vii                                | 157  | PUBHOR6   | No moorings <a href="#">on the banks of the SPA/SAC site over the river from PUBHOR6 will be allowed.</a>   | To reflect concerns of Senior Ecologist.                   |
| viii                               | 157  | Constraints and features                                  | <ul style="list-style-type: none"> <li><a href="#">Sewage pumping station in this area.</a></li> </ul>  | To reflect information provided by Anglian Water Services. |