

## **Examination of the Broads Local Plan**

### **Matter 5 – Housing Needs**

#### **Boat Dwellers**

#### **Written Statement on Behalf of Mr Chris Bromley of St Olaves Marina**

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## 1. Introduction

- 1.1 This statement has been prepared in response to The Inspector's published "Matters Issues and Questions" for Discussion at the Examination Hearings.
- 1.2 Mr Bromley has decided not to pursue residential moorings on the New Cut but to seek to transfer them to his marina.

## 2. Boat Dwellers

**2.1 Question h):** *How were potential residential mooring sites identified? Were proposed sites subject to a robust assessment of site suitability and sustainability appraisal? Does the evidence show clear reasons for accepting certain sites and rejecting others? How was capacity determined?*

2.2. In my submission the content of the reports submitted to and subsequently accepted by the Broads Planning Committee demonstrate that a robust assessment of site suitability was not made and the reasons for accepting the Somerleyton site and rejecting the St Olaves site were not made from an assessment based on a "level playing field". I evidence my criticisms in the following paragraphs.

2.3. In the "Assessment of Residential Nominations, Appendix A" report to the Broads Planning Committee on 2 March 2018 a series of comparisons are made between the two sites some of which I highlight below:

- 1 Page 5 "Access to site"; Somerleyton is given an amber light with comments about the access width. The reality is that the access is relatively long, single track and unsurfaced. Should this have not been scored red?
- 2 Page 6 "Accessibility to local services and facilities"; at Somerleyton only a primary school is referred to, with no reference to any other services and facilities, and yet it is scored amber. However, on page 8 St Olaves is given a red score and reference is made to bus services, remoteness from employment and local services being extremely limited. Surely these services and facilities, or lack of, should also have been referred to in the assessment for Somerleyton which in my assessment should also be scored red?

2.4 In the "Assessment of Residential Moorings" report to the Broads planning committee on 2 March 2018 a series of comparisons are made between the two sites some of which I highlight below.

- 1 Page 18 sets out the comments of Suffolk County Highways on the Somerleyton site and Norfolk County Highways on the St Olaves site. It is immediately apparent that the two highway authorities have approached the two sites from very different perspectives. Surprisingly, the Suffolk comments do not mention either bus or train services, whilst Norfolk comment only on the bus service. Both Somerleyton and St Olaves via Haddiscoe have rail stations that are served by 14 trains each way Monday to Saturday, an exceptionally good service for a rural area. I would have expected the highway authorities to refer to the train services and the Broads Authority to have sought to rationalise the comments of the two highway authorities to assist them in making a fair comparison between the sites, but this has clearly not been done. The St Olaves Marina has a good, direct access from the A143 with good parking and toilet and shower facilities on site. The

Somerleyton Marina has a rough and somewhat tortuous single-track access from narrow country lanes and does not have good on-site parking, toilet and shower facilities.

- 2 Page 27 contains part of the sustainability appraisal, but that also does not fairly compare the Somerleyton and St Olaves sites. The essential difference between the two sites is that Somerleyton has a village school, village hall, a cycle business and pub that serves food at restricted times whilst St Olaves has a repair, MOT and car sales garage, village hall, lawnmower sales and landscaping business, a restaurant, a large public house and day time bus service, 7 buses per weekday towards Gt Yarmouth and 8 buses per weekday towards Beccles. All the other facility deficiencies attributed to St Olaves apply equally to Somerleyton, but why are they not mentioned? Undue weight is being given to the apparently extant planning permission for a shop in Somerleyton. The actuality is that most of the former shop has been converted to residential use leaving only a small retail space now used as a cycle shop. There is a small, kiosk on the now closed petrol station that had a restrictive retail planning consent but it has been closed for some time and is, I suggest, unlikely ever to be re-opened as a shop. Two years ago the owner indicated that the future of the former shop was being considered and that still seems to be the position today. In any event, I suggest that it is unrealistic to make planning decisions on the basis of the possibility of a shop being re-opened in a village of only some 400 people at a time when the retail industry in the UK generally, and rural shops in particular, are undergoing massive retrenchment caused, inter alia, by the growth of internet shopping.
- 3 Page 28 contains an assessment of the other effects of the alternative options. In the case of St Olaves reference is made to the potential reliance on car usage, but this applies equally to the Somerleyton site but is not mentioned and the omission is repeated on page 30.

**2.5 Question k)** *Does Policy PUBDM36 provide an effective framework for assessing proposals for permanent residential moorings? Does criterion a) provide sufficient flexibility/ scope to facilitate windfall development? How does the policy fit with the emerging River Wensum Strategy?*

2.6 Criterion a) does seem to be unduly restrictive and inflexible and is apparently based on an assumption that a development boundary equates with proximity to services when the reality is that many rural development boundaries are drawn round existing groups of houses without any facilities – such as is the position with the emerging development boundary for Somerleyton.

### **3. Conclusion**

- 3.1. The Inspector is asked to make a fair comparison between the St Olaves and Somerleyton sites and recommend that the St Olaves Marina be included as a site for 10 residential moorings.