



Broads Authority Local Plan
Assessment of residential moorings nominations
August 2017

1. Introduction

As part of the Issues and Options consultation, held in early 2016, stakeholders and the public were asked to nominate areas suitable for residential moorings. A further call for sites was held in June/July 2017. On this occasion, marinas and boatyards that meet the locational requirements of the policy (i.e. within or adjacent to development boundaries) were contacted.

Only two nominations were received at the Issues and options stage. These were from the same person/organisation and in the same general area. One representation to the Preferred Options Local Plan consultation suggested a site for allocation. Four nominations were received as a result of the July 2017 call for sites. This report assesses the nominations.

Please note that the Residential Boat Owners Association offered their assistance in assessing any nominations. Their thoughts on the nomination are included in this report.

A site visit was undertaken on 10 August 2016 to Hipperson's boatyard and 27 July 2017 to Loddon Marina, Greenway Marina and the Beauchamp Arms. Berney Arms was not visited as Officers are familiar with the site, although the nomination was discussed with the person who nominated the site.

This document also assesses allocating residential moorings at the Waveney River Centre. The Authority is familiar with the site and the site has an extant permission for 10 temporary residential moorings (5 years due to expire in January 2021). The owner of the Centre was contacted to ask for extra information to help assess the nomination.

2. Houseboat Need Assessment, RRR Consultancy, 2017¹

As required by the Housing and Planning Act 2016, the need for houseboats has been assessed. As houseboats need is more related to residential mooring need, the study concluded that 63 residential moorings are needed over the plan period. This figure needs to be interpreted with some caution as it is based on limited interviews with boat dwellers and is based on anecdotal estimates rather than a count or survey of the numbers of people who live on boats. Please note that no such count is taken regularly. Furthermore, the study does state that those living on boats do so by choice rather than from an ethnic background and its findings indicate that most are single people or childless couples.

¹ This report also assessed the need for Gypsy and Travellers, Travelling Show People and caravans.
<http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base>

That being said, the Authority acknowledges that the high environmental quality of the Broads and wide range of opportunities it offers for boating make the area a popular location. As a consequence there is a significant associated demand for residential moorings. The provision of residential moorings must, however, be carefully managed to ensure that the special qualities of the Broads and their enjoyment are protected.

3. Housing and Land Availability Assessment 2017

As well as this assessment against policy criteria, the sites were also assessed as part of the Housing and Economic Land Availability Assessment. This assessment assesses the suitability of sites against criteria that are not Local Plan policy related. The HELAA can be found here <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2>. The HELAA is effectively the first stage of the process with this assessment following on from it. This assessment in this document assesses the proposals against adopted policy criteria.

4. The nominations

Both original nominations are located at H E Hipperson boat yard, Beccles. One nomination is for one residential mooring and the other for 4 residential moorings. The July nominations were at Greenway Marina, Loddon (5 residential moorings), Loddon Marina (40 stern on residential moorings), Beauchamp Arms (20 stern on residential moorings) and Berney Arms (10 stern on residential moorings). The Waveney River Centre representation was in reference to a small number of residential dwellings (for the purposes of this assessment, we have presumed 10 as this is the number with temporary planning permission). See plans at Appendix C.

5. Residential moorings planning history

a) H E Hipperson boat yard.

Application for a residential mooring.

Received: 09.09.2014

Ref: BA/2014/0307/FUL²

Status: Approved with Conditions

Decision Date: 18.11.2014

b) Greenway Marina, Loddon.

No Planning history related to residential moorings.

c) Loddon Marina.

No Planning history related to residential moorings.

d) Beauchamp Arms.

No Planning history related to residential moorings.

e) Berney Arms.

² This is the original PP. It has been amended twice. Other two references: BA/2016/0064/COND and BA/2016/0356/COND. All expire on same date.

No Planning history related to residential moorings.

f) Waveney River Centre

Application for 10 residential moorings

Received: 17 July 2015

Ref: BA/2015/0251/FUL

Status: 10 temporary moorings approved with conditions

Decision Date: 22 January 2016. There have been two applications to make the permission permanent, both refused. One currently subject of an appeal.

6. Assessment of nominations

a) Hipperson's Boatyard

Green: Area 1: Relates to the nomination for 3 residential moorings

Blue: Area 2: Relates to the nomination for 1 residential mooring

Black: Relates to both nominations.

Criteria	Information provided	Broads Authority Assessment
1: How many residential moorings or what length of residential moorings is proposed?	<p>3 additional residential moorings. There is one residential mooring already.</p> <p>1 residential mooring.</p> <p>No specific lengths in mind, the vessel dimension byelaws already define the size of vessels that can use the various rivers, so we would reference those.</p>	Noted
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	H.E. Hipperson is located on the edge of Beccles, with the town being within easy walking or cycling distance. All the usual facilities of a small town are nearby, including schools, shops, churches, doctor and dentist surgeries.	Beccles was assessed as part of the Settlement Study and discussed in the Development Boundary Topic Paper. The town has a very good range of facilities and scores highly in the Settlement Study. Tescos for example is half a mile walk from the proposed site, with footways along the route.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	There are existing moorings already in use by the boatyard, we are proposing a change of status to an additional four, rather than the creation of new moorings.	The existing moorings are private and not visitor mooring.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No, the majority of moorings are off the river in a private basin. The riverfront moorings are on a relatively wide stretch of the river. The vessel dimension byelaws would preclude a vessel large enough to cause navigation issues.	There are moorings there already and a site visit has been undertaken by the Senior Waterways and Recreation Officer who concluded that there would not be any impact on

Criteria	Information provided	Broads Authority Assessment
	No, the proposed location is a private mooring basin off the main river.	navigation.
5: Is riverbank erosion an issue here? How would this be addressed?	No, the river frontage is piled and quay headed, as is the majority of the mooring basin.	Confirmed from site visit.
6: What are the adjacent buildings or land used for	Boat repairs and storage (including a wet shed). The surrounding land is farmland used for cattle grazing.	See photos
7: What is the character or appearance of the surrounding area?	Rural in appearance generally, a well-kept working boatyard adjacent to the moorings.	Confirmed from site visit.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes, there is safe access to the boats from the land, for all moorings.	Confirmed from site visit.
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Off street car parking is available on the site for a large number of cars.	Confirmed from site visit.
10: How can service and emergency vehicles access the area safely?	Via the main driveway	Confirmed from site visit.
11: How would waste and sewerage be disposed of?	There are waste and recycling bins provided at the yard. Sewage is disposed of via a pumpout point at the yard. Vessels (both residential and otherwise) can have their waste tanks emptied here.	Confirmed from site visit.
12: Is the area on mains sewerage?	Sewage from the site is pumped across the bridge to the Beccles sewerage system.	Confirmed from site visit. See also comments from Anglian Water Services.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No.	Confirmed from site visit.
14: Do you own the site? If not who does and have you told them about your proposal?	Yes, we own the business that owns the site.	Noted.
15: What is the current use of the site?	Boatyard. Amenity land and mooring	Confirmed from site visit.

In addition to the nomination form, additional information was provided as follows:

Question	Information provided	Broads Authority Assessment
Why have you marked such a large area for residential moorings on the plan when it is only four moorings that you wish to have?	Boats by their nature are movable and relatively self-contained. Therefore it may move to different spots in the yard depending on the size of the boat or other considerations. Depending on the size of boat, we may want it in a different location. There will be nothing about the moorings that makes them residential in terms of services etc. (compared to regular moorings). Whilst a larger area may be allocated as residential moorings, it will be for the planning application route to determine the exact location of the four residential moorings.	Noted that the detail will be for the planning application process.
Has the current residential mooring got planning permission?	Yes (BA 2014.0307.FUL)	Confirmed.
What facilities are there on site for those who live on boats to use? Electricity? Fresh water? Toilets? Showers? Anything else?	Toilets, water, electricity, parking, rubbish and sewage disposal.	Noted.

Beccles does not currently have a development boundary in the Broads Authority Executive Area and it is not proposed to introduce a development boundary as part of the Local Plan. Beccles does score well in the Settlement Study³ with a very good range of facilities. Indeed the nominated site is within a half a mile walk to the town centre. The Development Boundary Topic Paper⁴ notes that Beccles does will not have a development boundary because *'other development is likely to not be appropriate in the Broads Executive Area for reasons such as flood risk. Beccles is classed as a Market Town in the Waveney Core Strategy and is set to see some residential development within its built up area. Beccles does have physical limits as set out in the Waveney District Council Site Allocations document and has been allocated two sites totalling around 60 dwellings. The settlement as a whole is therefore accommodating some growth in a more appropriate location that the Broads part of the settlement'*.

There are sites allocated in the current Sites Specifics Local Plan that are intended to be rolled forward to the new Local Plan which are treated as being next to development boundaries because they have good access to services and facilities. In particular sites at Stalham and Brundall.

b) Greenway Marina, Chedgrave.

Criteria	Information provided	Broads Authority Assessment
1: How many residential	5	Noted. The proposal is to

³ http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf

⁴ <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

Criteria	Information provided	Broads Authority Assessment
moorings or what length of residential moorings is proposed?		allocate the entire length of moorings for residential mooring use, with a maximum of five at any time along the length of the moorings.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	All in village. Short walk.	Agreed.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	Yes, private rented.	Noted that these could be replaced by residential moorings as and when they become available.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No	Presuming the vessels are the same length as there now, no. They are moored stern on currently.
5: Is riverbank erosion an issue here? How would this be addressed?	No	Noted. Of relevance however is that it seems the quay heading may need some maintenance.
6: What are the adjacent buildings or land used for	Boatyard	Noted and agreed. Although nearby there is residential buildings and undeveloped countryside.
7: What is the character or appearance of the surrounding area?	Boatyard	
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes	Of relevance however is that it seems the quay heading may need some maintenance.
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Car park (hardstanding adjacent to moorings)	Confirmed from site visit.
10: How can service and emergency vehicles access the area safely?	Unrestricted access	Confirmed from site visit.
11: How would waste and sewerage be disposed of?	Bins supplied by boatyard. Pump out on site.	Noted.
12: Is the area on mains sewerage?	Septic tank	Noted.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or	No	Noted although near to working boatyards. That being said, those deciding to live in a working boatyard may expect

Criteria	Information provided	Broads Authority Assessment
buildings?		there to be noise associated with operations for example.
14: Do you own the site? If not who does and have you told then about your proposal?	Yes	Noted.
15: What is the current use of the site?	Boatyard and moorings	Confirmed from site visit.

In addition to the nomination form, additional information was provided as follows:

Question	Information provided	Broads Authority Assessment
What facilities are there on site for those who live on boats to use? Electricity? Fresh water? Toilets? Showers? Anything else?	The current toilet needs improvements and there are no showers. Plans to upgrade the toilet to include a shower. Water and electricity supply along the moorings so convenient.	Noted.

Chedgrave does not currently have a development boundary in the Broads Authority Executive Area and it is not proposed to introduce a development boundary as part of the Local Plan. Chedgrave does score well in the Settlement Study⁵ with a very good range of facilities. Indeed the nominated site is within a half a mile walk to the town centre. The Development Boundary Topic Paper⁶ notes that Chedgrave does will not have a development boundary because *'In the Site Allocations and Development Policies Local Plan, South Norfolk allocate a site in Loddon for around 200 dwellings and both Chedgrave and Loddon have development boundaries so the settlement as a whole is accommodating some growth in a more appropriate location that the Broads part of the settlement.'*

There are sites allocated in the current Sites Specifics Local Plan that are intended to be rolled forward to the new Local Plan which are treated as being next to development boundaries because they have good access to services and facilities. In particular sites at Stalham and Brundall.

c) Loddon Marina, Loddon

Criteria	Information provided	Broads Authority Assessment
1: How many residential moorings or what length of residential moorings is proposed?	40 stern on moorings within our basin and land	Noted although it seems this is all the moorings in the basin. Aware that this is the maximum and owner would accept less.
2: What services and facilities are nearby for people living on boats to use (for example	Full Village with everything required within walking distance	Agreed.

⁵ http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf

⁶ <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

Criteria	Information provided	Broads Authority Assessment
pharmacy, GP, school or shop)? Where are these facilities and how far are they?		
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	Yes Private Marina	Noted. It is not clear however what would happen to the current vessels that are displaced.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No not in main river	Noted and agreed if the format is maintained as it is and the vessels are the same size as the ones there now.
5: Is riverbank erosion an issue here? How would this be addressed?	No	Noted although we were warned to be careful walking on the quay heading implying this needs improving.
6: What are the adjacent buildings or land used for	Boat Yard offices storage caravan field	Noted and agreed. Although nearby there is residential buildings and undeveloped countryside.
7: What is the character or appearance of the surrounding area?	Boat Yard next to village and farmland with footpath to Pyes Mill	
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes	Noted although we were warned to be careful walking on the quay heading implying this needs improving.
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Full car Park for up to 100 vehicles	Noted and agreed that there are places to park although these were not counted.
10: How can service and emergency vehicles access the area safely?	By Road next to moorings	Confirmed from site visit.
11: How would waste and sewerage be disposed of?	Waste is by South Norfolk and sewerage on mains	Noted.
12: Is the area on mains sewerage?	Yes	Noted.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No	Noted although near to working boatyards. That being said, those deciding to live in a working boatyard may expect there to be noise associated with operations for example.
14: Do you own the site? If not who does and have you told them about your proposal?	Yes	Noted.
15: What is the current use of the site?	Boat Yard Offices repair shops for boats caravans cars etc , storage, caravan field	Confirmed from site visit.

In addition to the nomination form, additional information was provided as follows:

Question	Information provided	Broads Authority Assessment
What facilities are there on site for those who live on boats to use? Electricity? Fresh water? Toilets? Showers? Anything else?	Showers and toilets provided and facilities for electricity and freshwater.	Noted and agreed.

Loddon does not currently have a development boundary in the Broads Authority Executive Area and it is not proposed to introduce a development boundary as part of the Local Plan. Loddon does score well in the Settlement Study⁷ with a very good range of facilities. Indeed the nominated site is within a half a mile walk to the town centre. The Development Boundary Topic Paper⁸ notes that Loddon does will not have a development boundary because *'In the Site Allocations and Development Policies Local Plan, South Norfolk allocate a site in Loddon for around 200 dwellings and both Chedgrave and Loddon have development boundaries so the settlement as a whole is accommodating some growth in a more appropriate location that the Broads part of the settlement.'*

There are sites allocated in the current Sites Specifics Local Plan that are intended to be rolled forward to the new Local Plan which are treated as being next to development boundaries because they have good access to services and facilities. In particular sites at Stalham and Brundall.

d) Beauchamp Arms.

Criteria	Information provided	Broads Authority Assessment
1: How many residential moorings or what length of residential moorings is proposed?	10 stern on moorings	Noted, although some may be side on moorings.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	Full Village with everything required within 3 miles and on bus route	Facilities and services are over 1.2KM away so site not deemed suitable according to the HELAA.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	Yes Private Moorings	Noted. Also moorings to use the pub.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No very wide River will not restrict navigation	Tidal flow would make stern on mooring very difficult without supporting infrastructure, (pontoons) and

⁷ http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/764475/Broads-Authority-Settlement-Study-no-hierarchy-in.pdf

⁸ <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

Criteria	Information provided	Broads Authority Assessment
		this would impact into the navigation at Beauchamp Arms.
5: Is riverbank erosion an issue here? How would this be addressed?	No	Noted.
6: What are the adjacent buildings or land used for	Public House Restaurant Music Venue Boat Yard Sailing Club	Noted. The music venue could result in amenity concerns.
7: What is the character or appearance of the surrounding area?	Countryside with fishing	There are many land designations over the river.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes	Agreed.
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Full car Park for up to 100 vehicles	Noted and agreed that there are places to park although these were not counted.
10: How can service and emergency vehicles access the area safely?	By Road next to moorings	Confirmed from site visit.
11: How would waste and sewerage be disposed of?	Waste is by South Norfolk and sewerage on septic tank	Noted
12: Is the area on mains sewerage?	No	Noted
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No	Noted. The music venue could result in amenity concerns. There could be some concerns relating to the designated land. See comments later on from ecologists.
14: Do you own the site? If not who does and have you told then about your proposal?	Yes	Noted.
15: What is the current use of the site?	Boat Yard Offices repair shops for boats caravans cars etc , storage, caravan field. Public House and Restaurant	Confirmed from site visit.

In addition to the nomination form, additional information was provided as follows:

Question	Information provided	Broads Authority Assessment
What facilities are there on site for those who live on boats to use? Electricity? Fresh water?	Showers and toilets available as well as access to water and electricity.	Noted although did not see the showers.

Toilets? Showers? Anything else?		
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e) Berney Arms.

Criteria	Information provided	Broads Authority Assessment
1: How many residential moorings or what length of residential moorings is proposed?	20 stern on moorings	Noted. The proposal will need a small basin to be dredged. This is off the navigation channel.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	This is a very remote spot by road but all facilities could easily be reached by small boat as has happened the last 100 years.	Noted although no facilities within walking distance. Aware that journey by water to Great Yarmouth and Reedham is 45 mins. Burgh Castle is around 15 minutes but not many facilities available there.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	Yes Private Moorings	Noted although the basin is silted up at the moment, so not fully in use.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No private area off main river that would need additional dredging	Noted – see above re basin.
5: Is riverbank erosion an issue here? How would this be addressed?	No	Noted.
6: What are the adjacent buildings or land used for	Public House Restaurant (closed) café	Noted. Within open countryside which is SPA, SAC and Ramsar site.
7: What is the character or appearance of the surrounding area?	Countryside with bird sanctuary and footpaths	
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes	Noted.
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Full car Park for up to 100 vehicles	Aware there is space to park although did not count spaces.
10: How can service and emergency vehicles access the area safely?	By Road boat or Air Ambulance	Noted.
11: How would waste and sewerage be disposed of?	Waste is by waste company and sewerage on septic tank	Noted.
12: Is the area on mains	No	Noted.

Criteria	Information provided	Broads Authority Assessment
sewerage?		
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No	There could be some concerns relating to the designated land. See comments later on from ecologists.
14: Do you own the site? If not who does and have you told then about your proposal?	Yes	Noted.
15: What is the current use of the site?	Public House and Restaurant Closed Café just opened and struggling so needs major injection of people	Noted as well as with protected land.

In addition to the nomination form, additional information was provided as follows:

Question	Information provided	Broads Authority Assessment
What facilities are there on site for those who live on boats to use? Electricity? Fresh water? Toilets? Showers? Anything else?	These would be provided as part of other proposals being considered in the area such as Glamping.	Noted.

f) Waveney River Centre

Criteria	Information provided	Broads Authority Assessment
1: How many residential moorings or what length of residential moorings is proposed?	10 permanent residential moorings.	Noted. Aware site has permission for 10 temporary residential moorings.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	A shop, swimming pool and pub. The shop sells convenience foods, some fresh food (seasonally), milk, bread, newspapers, snacks, confectionery, clothes and gifts. It's open 9-5:30 most of time, extended hours in summer holidays and slightly reduced in winter (but still 7 days).	Noted. The site is isolated and away from other facilities and services that people use such as GPs and pharmacy.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	Yes - leisure moorings for mixed private and visitor use. Temporary planning consent for up to 10 residential moorings, expiring in Jan 2021. This has not yet been implemented.	Noted. Aware that there is an appeal lodged against the temporary permission.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No	Noted. They are within a basin off the river.
5: Is riverbank erosion an issue here? How would this be	No	Noted.

Criteria	Information provided	Broads Authority Assessment
addressed?		
6: What are the adjacent buildings or land used for	Holiday park and boatyard. The venue includes holiday lodges, glamping & camping facilities, touring caravan pitches, a pub/restaurant, shop, swimming pool, play areas, private & visitor moorings and boat hire.	Noted.
7: What is the character or appearance of the surrounding area?	The moorings are part of an established holiday destination and marina which accommodates up to 500 visitors at any time. The site extends to over 14 acres encompassing the facilities listed at question 6, beyond which the land is rural marshland and arable fields with scattered housing.	Noted.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes	Noted.
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Substantial car parking facilities for boat owners and visitors.	Noted.
10: How can service and emergency vehicles access the area safely?	Existing road infrastructure on the marina.	Noted.
11: How would waste and sewerage be disposed of?	Existing waste & recycling collections, existing pump out facility.	Noted.
12: Is the area on mains sewerage?	Private sewage treatment plant servicing entire park.	Noted.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No	Noted.
14: Do you own the site? If not who does and have you told then about your proposal?	Yes	Noted.
15: What is the current use of the site?	Leisure moorings, forming part of award winning holiday destination and boatyard, employing over 65 staff.	Noted.

In addition to the nomination form, additional information was provided as follows:

Question	Information provided	Broads Authority Assessment
What facilities are there on site for those who live on boats to use? Electricity? Fresh water? Toilets? Showers? Anything	Berth holders have access to fresh water, shower & WC facilities, electricity hookup, fast wifi, pump out, general waste and recycling	Noted.

else?	collections.	
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In relation to the Waveney River Centre, the analysis used to inform the temporary planning permission can be found here. To summarise, the proposals at Waveney River Centre seem to comply with most of the criteria as included above, but not the locational criteria as it is not within or adjacent to a development boundary. http://www.broads-authority.gov.uk/_data/assets/pdf_file/0010/659053/BA20150251FUL-Waveney-Inn-and-River-Centre-Staithe-Road-Burgh-St-Peter-pc041215.pdf.

7. Comments received from stakeholders

Please note that these are initial comments based on the information provided by those nominating sites and are at an Officer Level. These organisations would also comment on any future Planning Application.

	Hipperson's Boatyard	Greenway Marina, Loddon.	Loddon Marina	Beauchamp Arms.	Berney Arms.	Waveney River Centre
Anglian Water	AWS do not consider that the addition of 'dwellings' at the boatyard would adversely impact the network and therefore have no objection.	Reference is made to septic tank being used for disposal of foul flows from the proposed moorings. Environment Agency would comment on the suitability of any private method of foul disposal.	Reference is made to a connection being made to the existing public foul sewerage network. However no further details are provided. AWS would require further information relating to the existing boat yard and any existing connection(s) together with the proposed means of conveyance (pumped or gravity) in order to comment further on the available capacity within the foul sewerage network for the foul flows from this development.	Reference is made to septic tank being used for disposal of foul flows from the proposed moorings. The Environment Agency would comment on the suitability of any private method of foul disposal.	Reference is made to septic tank being used for disposal of foul flows from the proposed moorings. The Environment Agency would comment on the suitability of any private method of foul disposal.	My understanding is that moorings are expected to have a very limited impact on the existing water supply network. As such we would not expect there to be a requirement for either off-site reinforcement or contributions to be made to strategic schemes.
Suffolk and Norfolk County Council comments – impact on highways.	Suffolk County Council Highways Department do not consider that this would give rise to any Highway concerns; most residential moorings don't rely on vehicles for transport.	Proposal to introduce 5 residential moorings will increase vehicle movements. Likely to generate 3-4 vehicle movements per unit per day. Note there is access to local services suitable for day to day living but that a motor vehicle is still likely to be a primary mode of transport. There would appear to be ample room to provide dedicated parking associated with any residential moorings. It should be noted however, that the access with the highway, is restricted and that the Highway Authority have recently recommend refusal of a proposal for three residential properties accessed of the track leading to the boatyard due to restricted visibility. Accordingly unless visibility improvements can be secured, which given they cross third party land may be difficult and improvements are made to the access itself in terms of width and surface, Highways Authority may object in terms of highway safety.	This would result in a significant increase in traffic movements to and from the site. The access with the highway affords appropriate visibility and width to accommodate such movements but Loddon High Street does have some lengths over which the width is restricted. Aware there are already some issues with traffic flows at present without any increase in traffic despite it being classed as link road (serves as a link between the Primary and Secondary network). The main issues in terms of traffic movements relate to unrestricted parking on Church Plain (High Street) opposite the Church Plain car park and it would appear that this would need to be regulated. Whilst having some reservation, Appropriate mitigation measures would be required in the form of parking restrictions to address the issues discussed above.	Whilst there are existing private moorings adjacent to pub/restaurant, they are located some distance from the public highway network. Note that Ferry Road is a restricted bye-way (public right of way) and therefore only the land owner is able to grant rights of access by motor vehicle. The car park referred to appears to be shared at present with the pub and other buildings around. The site is remote from local service provision, schooling and employment and is therefore likely to be heavily reliant on the private motor vehicle as a primary mode of transport. Envisage vehicle associated with residential moorings in this location would be more akin to residential property, namely 6 vehicle movements per unit per day so could generate in the region of 60 vehicle movements per day. The access of Ferry Road with the main highway network is of restricted width and has poor visibility. Highways Authority may object in terms of highway safety and transport sustainability.	This site is very isolated from any transport links (other than river and extremely limited request stop by rail), local services, education and employment and is there likely to be totally reliant on the private motor vehicle or service deliveries for living needs. It is likely NCC would object on the grounds of transport sustainability. Highways England also contacted and they have concerns regarding the junction of the track from Berney Arms with the A47.	Location is remote from services and facilities. Traffic movements could be low and similar to a holiday home and could be mitigated (taken from planning application consultation summary).
Waterways and Recreation Officer comments – impact on navigation.	No impact on navigation.	Need to consider the number of moorings on the approach to the marina – it is quite cluttered.	Loddon Marina is quite full with private moorings. Also need to consider the number of moorings on the approach to the marina – it is quite cluttered.	Similar comments to others regarding impact on navigation.	Similar comments to others regarding impact on navigation.	No impact on navigation and no loss of visitor moorings.

	Hipperson's Boatyard	Greenway Marina, Loddon.	Loddon Marina	Beauchamp Arms.	Berney Arms.	Waveney River Centre
Environment Agency	In response to the planning application for a residential mooring at this site in 2014 (as detailed previously), the Environment Agency did not state any objections but stated conditions that the proposal would need to meet.	Please also see the generic information given below that is relevant to all residential moorings.				
Residential boat owners association comments	<p><i>'The boatyard is situated on a small arm off the main river with a basin at the end. Hipperson also have mooring rights to the main river which is why there are two planning applications as that land is leased.</i></p> <p><i>The boatyard seems to be extremely well run with an ongoing programme of improvements. The facilities are first class with water, electric points, pump out and Elsan disposal. There are rubbish and recycling bins. There is plenty of car parking and a busy 5 van caravan site.</i></p> <p><i>The boatyard is a ten minute walk from Beccles town centre, which we walked. There is a very good bus service to Norwich, Great Yarmouth and Lowestoft. There is also a main line train station.</i></p> <p><i>There is a nearby school. Therefore access to all services from shopping to medical, dental, education etc. is within easy reach.</i></p> <p><i>We felt it was a well situated place for residential moorings, and that the R.B.O.A. can firmly support this application for residential moorings.'</i></p>	<p><i>'RBOA has long advocated that, wherever practical, boat yards and/or marinas should all be permitted and encouraged to include a number of residential berths. Greenway Marina is a privately owned boatyard and moorings facility of long standing. Five residential moorings should have no adverse effect upon it. Resident boaters create added security of revenue for the operator. Road access and parking are adequate. Utilities are already catered for, although it is again noted that sewage disposal is via septic tank – see introductory note above. No unwelcome imposition is envisaged for the navigation. Loddon shopping and social facilities are all close at hand. Increased Council Tax collections benefit the local region. RBOA is fully in support of this nomination.'</i></p>	<p><i>'Loddon is a delightful and well known boating hub. This nomination would create a large live-aboard community within an existing boatyard and moorings location – the type of development that RBOA has advocated for many years and of which Central Government, subject to local opinions, is fully supportive. Road access and parking are adequate. All utilities are readily available, including mains sewage. The private operator is presumably prepared to fund the conversion, with the resultant much increased Council Tax streams going to benefit the Local Authority. All resident requirements are adequately provided for within the market town. There should be no adverse pressure on navigational issues. RBOA supports this nomination which it envisages could be a major asset to the local community.'</i></p>	<p><i>'The proposed location and number of residential berths look to fit well into the site and would complement the existing water and land based leisure facilities. Road access and parking appear well able to cope and there is no obvious detriment to navigation. Village facilities are close to hand to cater for residents. The site being privately owned, the development should occur at no cost to Local Authorities but, once complete, should contribute additional Authority revenues via Council Tax collections. It is noted that sewage will go to septic tank. RBOA sees no adverse impact should this proposal be included in The Broads Authority Local Plan. '</i></p>	<p><i>'The remote location of this proposal presents some concern when considered alongside the potential rise and fall of water levels, it being so close to Breydon Water. Nevertheless, there is much to support this nomination. There is an element within the live-aboard sector that purposely seeks to live in more remote areas – this could potentially cater very well for that element and RBOA predicts that take up of such moorings would be keen. Residential boating, by its very nature, tends to attract those who are self-sufficient; and live-aboard communities do tend to adequately look after themselves and one another. Road access and parking is sufficient. There would be no adverse effect to navigation. It is a recognised fact that visitors to countryside/waterway walks enjoy seeing boats, particularly those with people aboard. The local small business urgently needs customers if it is to avoid closure again - boats attract more walkers – the café needs those visitors if it is to survive and prosper. This proposal, with appropriate planning conditions, could help preserve Berney Arms' historic character. It is assumed that the private moorings operator would fund the development and normal Council Tax revenues would benefit the Local Authority. It is noted that sewage will go to septic tank, Taking all into account, RBOA supports this proposal to be included in The Broads Authority Local Plan.'</i></p>	<p><i>'The Waveney River Centre has developed steadily over many years to become a major leisure feature within the southern area of The Broads. Boaters are already well catered for, with all utilities available on site. In RBOA's opinion, the inclusion of a number of residential berths within the moorings facility would be a natural progression. Road access is via country lane but should easily cope. Parking on site is not an issue. The usual Council Tax contributions from residents would apply. RBOA sees no reason not to wholly support this nomination.'</i></p>
Head Ranger's	Important to not allow future	Important to not allow future use to	Important to not allow future use	Stern on moorings not likely to be	Stern on moorings not likely to be	No safety concerns if within basin.

	Hipperson's Boatyard	Greenway Marina, Loddon.	Loddon Marina	Beauchamp Arms.	Berney Arms.	Waveney River Centre
Comments	use to encroach further into the river than existing arrangements.	encroach further into the river than existing arrangements.	to encroach further into the river than existing arrangements.	permitted due to safety reasons. Important to not allow future use to encroach further into the river than existing arrangements.	permitted due to safety reasons. Important to not allow future use to encroach further into the river than existing arrangements. Concerns over strong flows and high levels of silting this area also regularly 'overtops' in the winter which could create a real hazard to any boats moored there permanently	Important to not allow future use to encroach further into the river than existing arrangements.
Ecologist's comments	Other than in a SSSI Impact Zone, no obvious concerns to prevent it from being allocated.	In the vicinity of Hardley Flood SSSI part of the Broadland SPA – Given the location, five moorings is unlikely to have an impact in relation to noise and disturbance in the area. However potential issues with the location of the moorings in terms of natural bank development and the presence of protected species.	Due to the high number proposed here, there could be impacts on designated sites nearby. In the vicinity of Hardley Flood SSSI – part of the Broadland SPA- This is a large number of moorings and could potentially change the area in terms of a significant increase in noise and disturbance to the area. The same applies in terms of concerns with natural bank development and presence of protected species.	There could be effects of these moorings on the designated sites nearby. Within Broadland SPA – Habitat Regulations Assessment maybe required for a significant number of moorings that may impact the designated site. Potential concerns with natural bank development and presence of protected species.	There could be effects of these moorings on the designated sites nearby. Within the Breydon Water SPA (as above). Habitat Regulations Assessment maybe required for a significant number of moorings that may impact the designated site. Potential concerns with natural bank development and presence of protected species.	In the vicinity of Barnby Broad & Marshes SSSI, Sprats Water & Marshes SSSI (Broadland SPA). Potential concerns over the presence of protected species and bank development, given the number of moorings and the location.
Landscape Consultant's comments	No landscape concerns	No landscape concerns, providing additional parking is not required.	caution around numbers and would be concerned over any proposed extension of the basin to the east,	Providing that no realignment of the bank is required, landscape impact is likely to be low. pontoons would create a more formalised frontage etc. but not necessarily uncharacteristic given the existing land uses. Concern in case a standalone building for shower and toilet facilities is required.	If pilling and pontoons is required this will also have an impact on the landscape and character of the riverbank. Concerned about where the arisings from clearing/dredging would go and if this could have a landscape impact. Concern in case a standalone building for shower and toilet facilities is required.	No landscape concerns as there would be little change.
Historic Environment Manager's comments	<i>No comment</i>	No comment	Located within and adjacent to the Loddon and Chedgrave conservation area. The likely impact from the conservation point of view is the introduction of domestic paraphernalia associated with the moorings – particularly storage and structures on the land, also the division of any plots on the land. These may impact visually. Again parking might be an issue in terms of visual impact but given the more urban location there are opportunities to park close by without impact and cars are more part of the character of the wider area.	No comment	Berney Arms mooring is within the Halvergate Marshes Conservation Area, It is also close to the Stracey arms Wind Mill a Scheduled ancient monument. The likely impact from the conservation point of view is the introduction of domestic paraphernalia associated with the moorings – particularly storage and structures on the land, also the division of any plots on the land. These may impact visually. Also given the remote setting here if there were to be a number of vehicles commensurate with the number of moorings this would have an adverse visual impact potentially in an otherwise open and agricultural landscape.	No comment
Development Management Officer's comments		Together, these sites propose 45 moorings which raises two issues - loss of existing moorings - where would these boats go? Would this cause demand for extensions to the basins or create new marinas? It would also create a pretty significant community - do the existing services and		Isolated from services and facilities. Are residential moorings requested to support viability of the pubs? What other options are there to do	Isolated from services and facilities. Are residential moorings requested to support viability of the pubs? What other options are there to do	Has temporary permission for 10 residential moorings.

	Hipperson's Boatyard	Greenway Marina, Loddon.	Loddon Marina	Beauchamp Arms.	Berney Arms.	Waveney River Centre
		facilities have capacity? How does this affect the overall balance of the community?		this?	this?	
Head of Safety Management	No safety concerns.	River width should not be compromised, suggest having a length restriction on the boats.	For forty moorings there must be a minimum no of toilets and showers required. Moorings on the river frontage will need a length restriction to avoid any reduction on the river width.	Tidal flow could make stern on mooring very difficult without supporting infrastructure, (pontoons) and this could impact into the navigation. Suggest installation of electric charging points. Important not to reduce the width of the river further as this is already a pinch point. Exactly how these boats are to be secured will need to be detailed as there is a strong current in this area and that combined with a strong wind may cause these residential boats to become detached if they are stern on.	Tidal flow could make stern on mooring very difficult without supporting infrastructure, (pontoons) and this could impact into the navigation. Moorings will continually silt up.	No safety concerns if within basin.

General comments from the Environment Agency:

Flood Risk

- The technique/method of mooring the vessel.
- A Flood Response Plan needs to be produced.
- Finally, the FRA should include consideration of how the boat moored at the residential mooring will be monitored at times of flood.

Ecology

- We would not want to see any derogation of existing angling access as a result of the provision of new moorings.
- Any impacts on SSSIs or European sites should be subject to a CRoW and/or Habitats Regulations Assessment.
- Any ecological impacts should be identified and appropriate mitigation agreed and implemented.
- Any construction activities associated with new moorings should take account of the need to prevent the spread of invasive non-native species.
- Adequate measures would be needed to ensure safe containment and treatment of sewage/foul water to prevent any pollution of watercourses.

Foul water

- The method of non-mains disposal should be the most appropriate to minimise the risk to the water environment.
- The first presumption should be to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works.
- Where a connection to a public sewage treatment plant is not feasible (in terms of cost and/or practicality) a package sewage treatment plant can be considered. Septic tanks should only be considered if it can be clearly demonstrated by the applicant that discharging into a public sewer to be treated at a public sewage treatment works or a package sewage treatment plant is not feasible.

Environmental Permitting Regulations

- Applicants proposing additional residential moorings may require a permit
- The applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8m of the river and of any flood defence structure or culvert.

8. Residential Moorings to be allocated

Following the above assessment, it is recommended that the following sites are allocated, the reasons for this is summarised below:

- Hipperson's Boatyard
- Greenway Marine
- Loddon Marina.

It is recommended that the following are not allocated, again for reasons explained below:

- Beauchamps Arms
- Berney Arms
- Waveney River Centre.

Location	Decision	Reason
Hipperson's Boatyard	Allocate for up to around 5 residential moorings.	The nomination passes all tests as set out in DP25 apart from being within or adjacent to a development boundary. Whilst Beccles will not have a development boundary within the Broads, the site has good access to a very good range of facilities in Beccles. No major concerns from the stakeholders. Note that the policy will need to include some criteria that proposals will need to address.
Greenway Marine	Allocate for no more than 5 residential moorings	The nomination passes all tests as set out in DP25 apart from being within or adjacent to a development boundary. Whilst Chedgrave will not have a development boundary within the Broads, the site has good access to a very good range of facilities in Loddon and Chedgrave. Note that the policy will need to include some criteria that proposals will need to address.
Loddon Marina	Allocate for no more than 10 residential moorings	The nomination passes all tests as set out in DP25 apart from being within or adjacent to a development boundary. Whilst Loddon will not have a development boundary within the Broads, the site has good access to a very good range of facilities in Loddon. Note that the policy will need to include some criteria that proposals will need to address.
Beauchamps Arms	Do not allocate for residential moorings	An isolated location, concerns regarding residential moorings impact on designated sites nearby and highway safety concerns.
Berney Arms	Do not allocate for residential moorings	An isolated location, concerns regarding residential moorings impact on designated sites nearby and highway safety concerns.
Waveney River Centre	Do not allocate for residential moorings	Site is not adjacent to or within a development boundary. An isolated location, away from many facilities and services that people tend to use.

Please note that Brundall Marina is not included in this assessment but the new Local Plan rolls forward the existing policy from the Sites Specifics Local Plan 2014. This table assesses those nominations received during the production of the new Local Plan.

9. Meeting the need/demand for Residential Moorings in the Broads Authority Executive Area.

The evidence (as discussed at section 2) indicated a need/demand for 63 residential moorings.

The allocations as discussed at section 8 as well as Brundall Gardens amount to allocations in the Local Plan for around 25 residential moorings.

One mooring has been permitted.

As such, there is a residual need/demand for 37 permanent residential moorings.

To date, the Authority has undertaken the following tasks in relation to residential moorings:

1. Since 2011, there has been a policy to guide planning applications for proposals for residential moorings.
2. During the Publication stage of the Sites Specifics Local Plan (2014), a proposal for residential moorings at Brundall Gardens was put forward and subsequently included in that Local Plan.
3. A call for residential moorings was undertaken as part of the Issues and Options consultation in 2016. One site was submitted for consideration – Hipperson’s Boatyard which is assessed within this document.
4. Temporary planning permission was granted for ten residential moorings at Waveney River Centre to reflect supporting the viability of the business.
5. A second call for residential moorings, targeted at boatyards and marinas located in line with the adopted policy’s location criteria was undertaken summer 2017. Nominations were received for residential moorings at Greenway Marine, Loddon Marina, Beauchamps Arms and Berney Arms⁹. These have all been assessed in this report.
6. The Authority also suggested, in the same letter, that those marinas or boatyards that do have people living on boats within them may wish to formalise this through the planning system. The Authority received one query with regards to information on how to receive planning permission for residential moorings in a boatyard.
7. The Development Management criteria based policy relating to residential moorings is to be rolled forward into the Local Plan.

By allocating sites for 25 residential moorings as well as undertaking a call for residential mooring sites on two occasions as well as having a criterion based policy to help determine applications the Authority has sought to meet its needs whilst ensuring the sites do not harm the special qualities of the Broads and are not in an isolated location.

⁹ Please note that Loddon Marina, Beauchamps Arms and Berney Arms are owned by the same person. They were contacted in relation to Loddon Marina but decided to nominate the two pubs as well.

Whilst the Waveney River Centre moorings proposals have not been allocated in this Local Plan and the temporary permission does not count towards the need/demand. Once this permission is developed on site, the owner may be able to prove that the moorings are essential to support the viability of the Centre and could seek permanent residential moorings permission. Supporting the viability of the facilities at the Centre was the reason given for approving permission for residential moorings for a temporary period in this location to allow the effect on viability to be assessed. This could conceivably be undertaken within the plan period. As such, there could be ten permanent residential moorings provided at River Waveney Centre in due course. This is not saying that these residential moorings are required to address the need as the isolated nature of the moorings is contrary to the policy; rather it is the case that if the benefit to the local business of supporting the viability of the facilities on site for the benefit of the community is proven and these moorings are permitted, it could then count towards the need/demand.

Appendix A: Photos from site visits

a) Hipperson's Boatyard, Beccles.



b) Greenway Marina, Loddon.



c) Loddon Marina.





d) Beauchamp Arms.





e) Berney Arms.

NOMINATIONS FOR RESIDENTIAL MOORINGS
Berney Arms



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f) Waveney River Centre

Source: Waveney River Centre



Appendix C: Plan of nominations

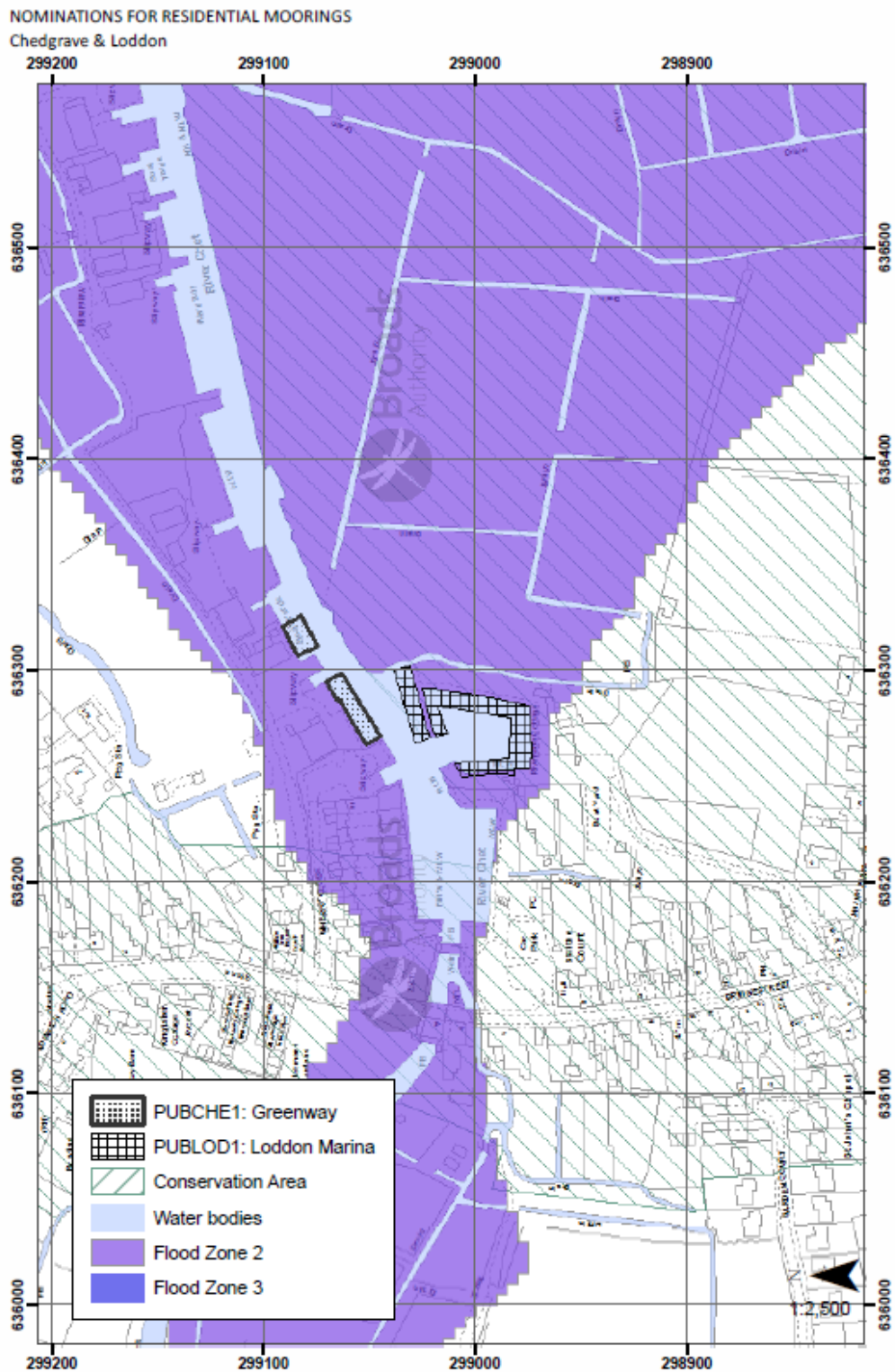
a) Hipperson's Boatyard.

NOMINATIONS FOR RESIDENTIAL MOORINGS



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The Broads Authority Boundary dataset is a representation indicating the location of the executive boundary at 1:10000. The definitive paper map is held by the Broads Authority which shows the legal boundary at 1:10000.

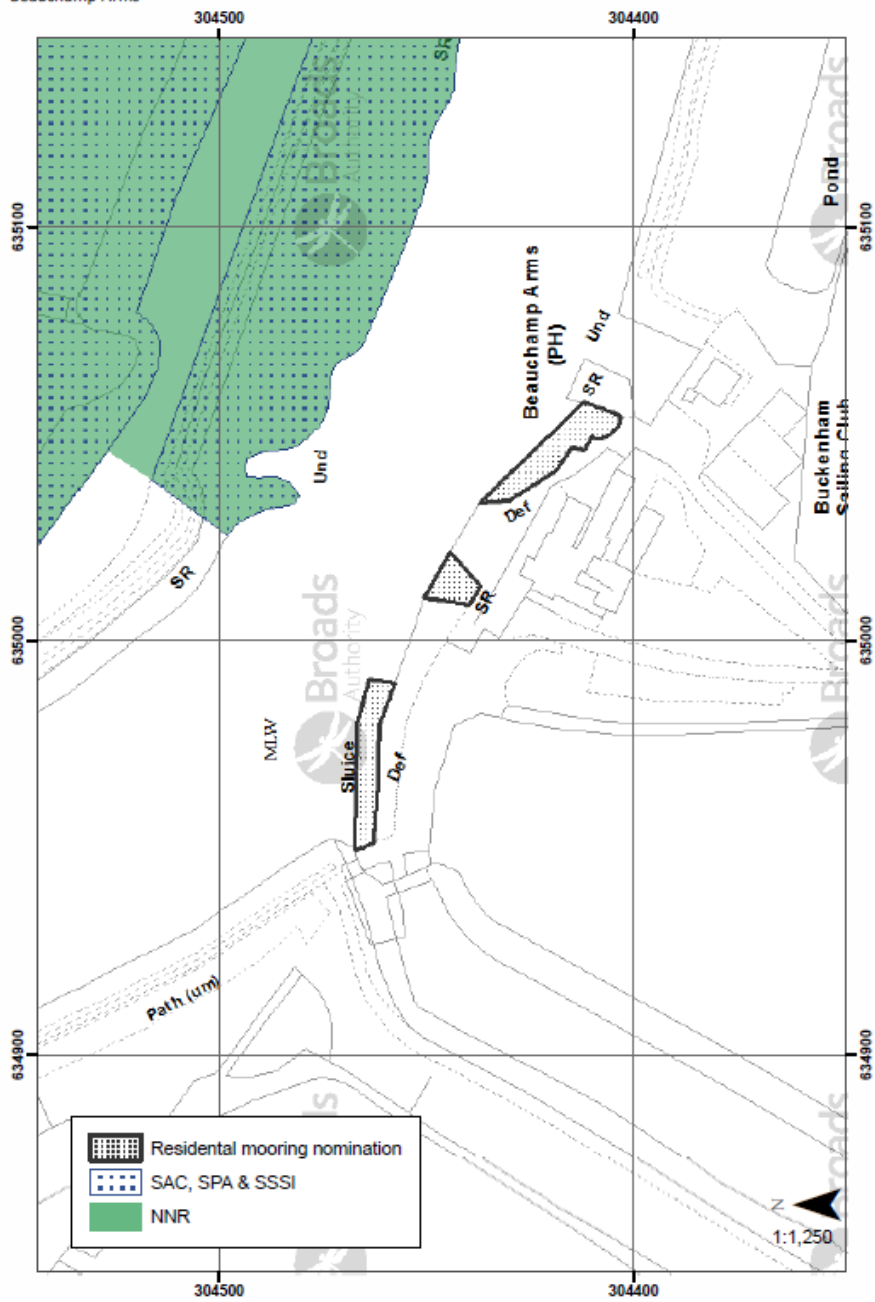
b) Greenway Marina, Loddon and Loddon Marina



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c) Beauchamp Arms.

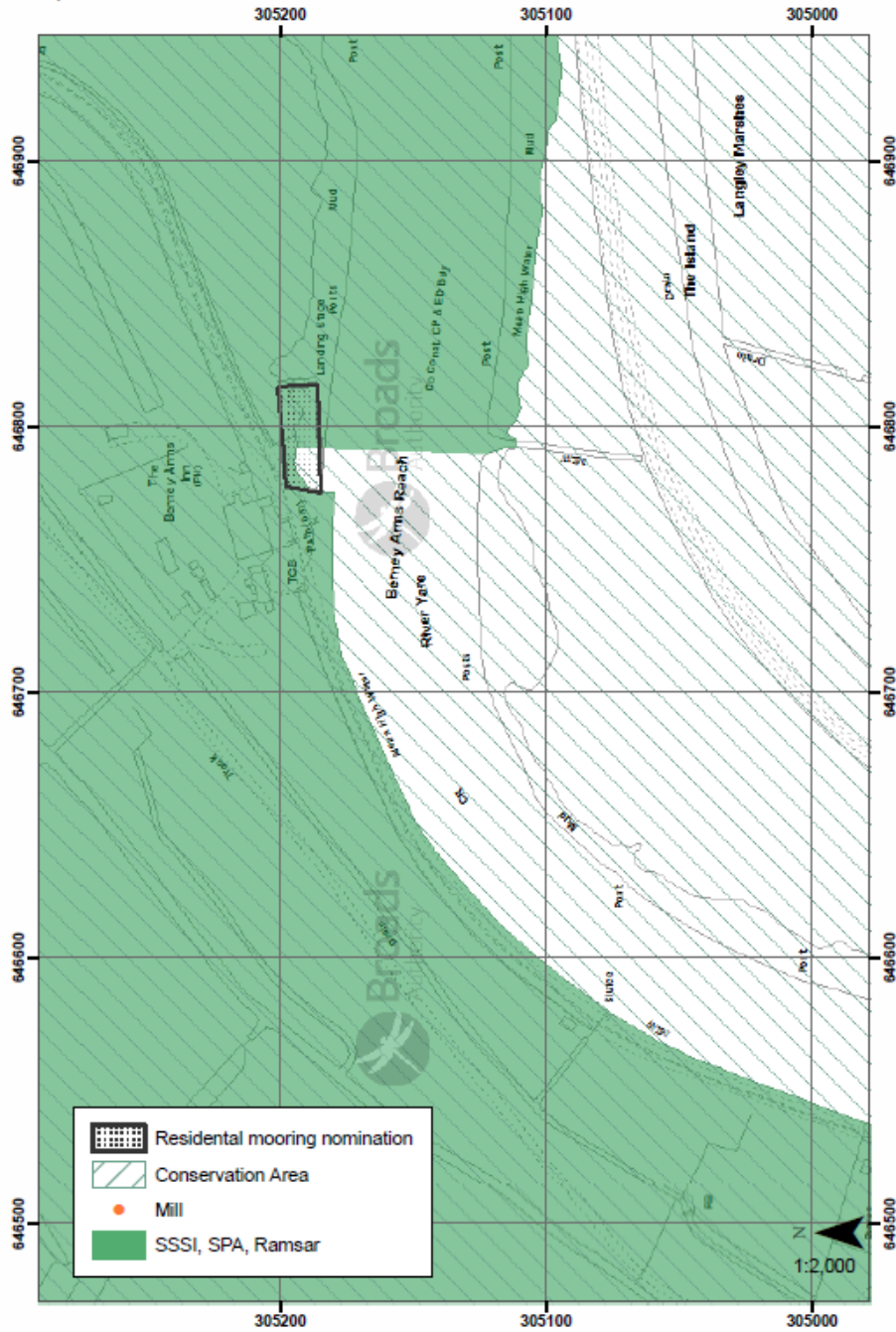
NOMINATIONS FOR RESIDENTIAL MOORINGS
Beauchamp Arms



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d) Berney Arms.

NOMINATIONS FOR RESIDENTIAL MOORINGS
Berney Arms



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e) Waveney River Centre

Source: provided by Waveney River Centre.

