

Broads Authority Local Plan public examination

Norwich City Council response to Matter 5 (k)

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?

1. Norwich City Council considers that currently policy PUBDM36 does not provide an effective framework for assessing proposals for permanent residential moorings in the City of Norwich. By restricting the provision of residential moorings to mooring basins, marinas or boatyards within / adjacent to defined development boundaries (criterion (a)), the policy effectively creates a policy presumption against the provision of residential moorings within Norwich as there are no mooring basins, marinas or boatyards within it despite there being some potential for residential moorings in the city.
2. The Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Show people (2017) identifies a need for 63 residential boat moorings within the study area (Norwich, Great Yarmouth, North Norfolk, South Norfolk and Broadland district council areas, including the BA area) over the period 2017-36, of which 51 moorings are required by 2022 (Table 10.3). All would be provided within the Broads Authority's area.
3. Residential moorings have a number of benefits. Provision of permanent houseboat sites within Norwich with proper on-site facilities would contribute to meeting the local housing need identified in the Central Norfolk SHMAA (2017). They could also add some greater element of diversity and choice in the local housing market, add vitality to riverside areas, and help to support the local economy.
4. The River Wensum Strategy has been produced by the River Wensum Strategy Partnership (RWSP) which is led by Norwich City Council working with partners including the Broads Authority, the Environment Agency, and Norfolk County Council. The strategy is going through the adoption process at the moment. It has already been adopted by the city council (on 13th June 2018), and is due to be adopted by the Broads Authority on 27th July 2018.
5. The River Wensum Strategy is the result of extensive public consultation and ongoing engagement with a range of river stakeholders. Its vision is to 'breathe new life into the river corridor by enhancing it for the benefit of all and increasing access to, and greater use of, this important asset'. No specific sites for residential moorings were proposed through the consultation process however the strategy aims to encourage residential moorings where appropriate on the Wensum. It has a 10 year timescale for delivery, to 2028, and during that time the action plan of projects will be updated as appropriate to reflect project implementation and also opportunities for beneficial

development, including permanent residential moorings, should opportunities arise.

6. The strategy makes reference to current Broads Local Plan policy for permanent residential moorings at paragraph 5.17, and notes that the RWSP will seek to influence the emerging plan policy to allow for residential moorings in locations other than basins, marinas or boatyards, so long as they meet the basic criteria for such provision.
7. At present, proposed policy PUBDM36 does not fit well with the aims and objectives of the River Wensum strategy. It is overly restrictive and does not complement the efforts of the partner authorities to regenerate the river corridor for the benefit of all – residents, businesses and tourism / leisure users.
8. The policy's failure to encourage residential moorings within locations such as Norwich, where they would be acceptable in principle and could contribute to meeting housing need, means that the policy as currently drafted is not positively prepared and therefore fails that test of soundness as set out in the NPPF.
9. The Broads Authority's response to Matter 5 in respect of Norwich City Council's representation (section A) suggests that although the proposed change to policy PUBDM36 could benefit Norwich, it may result in 'negative unforeseen consequences' when applied in the wider Broads context.
10. For this reason the city council wishes to suggest a revised change to criterion (a) of policy PUBDM36 as follows:
 - a. Is in **Norwich, or in** a mooring basin, marina or boatyard that is within or adjacent to a defined development boundary and, if more than one residential mooring is proposed, the proposal is commensurate with the scale of development proposed for that settlement (as a whole)....
11. Please note that the revised change no longer refers to impact on navigation as this duplicates existing criterion (c).
12. The proposed amendment to policy PUBDM36 would allow for greater flexibility about the locations where residential moorings would be acceptable, subject to the proposals also meeting the remaining criteria (b) to (i). This set of criteria addresses the BA's concerns, set out in its response to Matter 5, about potential impacts arising from residential moorings development. For example criterion (d) addresses impact on character or appearance of the surrounding area and the amenities of neighbouring occupiers; criterion (f) ensures that the mooring has adequate car parking and access; and (h) and (i) address provision of adequate services and infrastructure.
13. The reasoned justification to policy PUBDM36 also addresses the issue of management, stating that planning conditions and obligations will be used to secure management agreements for the mooring and surrounding land to

protect visual and residential amenity and make sure that the use of residential moorings does not compromise public safety. The final sentence of the policy and the reasoned justification also address the issue of 'paraphernalia', referred to in the BA's response to Matter 5(k), by requiring proposals to address areas for the drying of clothes and amenity space as well as any other related facilities for those living on boats.

14. In conclusion, the proposed revision to policy PUBDM36 as set out in paragraph 10 would result in a policy that is positively prepared, and would overcome Norwich City Council's objection.

Judith Davison, 10 July 2018

