

The Local Plan for the Broads: Review Plan period 2021 to 2042

Response of the Norfolk and Suffolk Boating Association, 16th January 2026.

The NSBA is grateful for an opportunity to comment on **Local Plan for the Broads** the under the Regulation 19 re-consultation.

We understand that this re-consultation is primarily about the amended Sustainability Assessment, and our first comment is about sustainability, however we have some additional comments on the main body of the proposed Local Plan too.

1. We failed to find any reference in the Sustainability Assessment, to **the most sustainable form of transport** on the Broads, and the most sustainable form of tourism, which is **transport by engineless boat propelled by the harnessing of wind and tide**. We consider that this ought to feature in your SA, because:
 - Sailing is one of the most important elements of the cultural heritage of the Broads, as set out in sections 7.10 and 7.11 of the Local Plan.
 - The Navigation, and Boating on the Broads is why there is special legislation for the Broads – The National Parks Act could not apply to the Broads because of the Navigation.
 - Boating is a very major consideration – Toll income from boat owners amounts to well over half of the Broads Authority's regular annual income.
 - Encouragement of sailing, making passage under sail, and sail training, appear to be appropriate to policies SOC1, SOC3, ENV7, ENV11 and ENV12?

2. **Section 9 of the Local Plan, Challenges and Opportunities**
 - We suggest amending, under **Strengths, page 31 Item n)**, "Substantial engaged community of private boat owners" to "Substantial engaged community of private boat owners, many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors".

3. We endorse the draft policies **PUBSP13: 'Navigable water space'** and **PUBDM38: 'Access to the water'**.

Moorings, Local Plan

4. We strongly endorse the content, as proposed, of policy **DM41, 'The Impact of replacement quay headings on the Navigation'**, to prevent extensions of the shoreline from extending into the waterspace, adverse to the Navigation.

5. However we are concerned that Policies **DM40 and DM41** fail to establish that existing moorings may be refurbished without challenge when the existing piling or other components are at end-of life. Not infrequently, quay headings that have been in use for fifty years or more require replacement of pilings that have succumbed to corrosion or decay in the wet marine environment, especially if previously constructed in short-life

treated softwood. Recent negotiations at Hickling, and perhaps elsewhere, suggest that additional clarity is required. We believe this is important because quay headings are essential for access onto the water, and that the best way to appreciate the special qualities of the Broads is from a boat.

6. Turning to Policy **DM42**, we believe the Authority is misguided in recommending at Item 3 that the Authority's preference is timber for the piled components of quay heading and landing stagings. Whilst treated softwood is very appropriate for cappings and walings, it has such a short life in the wet/dry intertidal zone even if pressure treated with preservative. Timber compares very poorly with lightweight galvanised steel sheet piling and with the longevity of proprietary recycled plastic piling sections. The policy is correct to say that each has its merits, but the need to re-pile in timber at intervals of ten to fifteen years is irresponsible and a flagrant waste of the owners or Toll-payers money when there are proven alternative options that can be expected to last four times as long.

It is very apparent that the draft policy has not been guided by appropriate engineering expertise. This should be sought at the first opportunity, and the whole life cost of maintaining quay headings given much greater priority over appearance.

It is also apparent that the policy is over-preoccupied by the colour of the material used for piling in quay headings -The colour is irrelevant – nearly all of the piling is below water and ground level, and the small amount above average water level quickly weathers to a dull/matt green or grey, with the effects of tidal waters, detritus and marine growth.

7. One additional point we would raise is the need for planning control of **bright waterside lighting** at night (the examples on Horning Racing Reach and at Great Yarmouth are typical). The lights interfere with helms' night vision and have an impact on marine safety. They tend to provoke retaliation in the form of the use of searchlights on boats – which should be discouraged on the Broads.
8. Regarding the provision of **electric charging points**, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case. {Reference policies PUBSP14 (4) and DM28}.

In conclusion, we trust the above comments will be taken into account and added to the emerging Local Plan.

Kind regards

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Norfolk and Suffolk Boating Association.