

| Ref | Name          | Organisation        | Comment  | BA response  | Amendments  |
|-----|---------------|---------------------|--|--|---|
| #1  | Trevor Warren | -                   | In the Draft, there are references to preserving/enhancing the local area amenity and character; e.g., lines 312 - 314 in Appendix A. I wonder if noise and light pollution have been sufficiently stressed. Section 6, line 127, refers to noise from generators; there are plenty of other source such as boat maintenance and normal social life. Similarly,  | Comment noted. The Local Plan for the Broads has a policy on amenity which would be used to determine applications, but agree that there needs to be better mention of other sources of noise.   | This could cover aspects such as generators, when engines will run and generally any noise that could be considered a nuisance <a href="#">such as boat maintenance and generally socialising at unsociable hours.</a>  |
| #2  | Trevor Warren | -                   | Section 9.1, line 178, mentions light pollution from generators. More significant might be general safety lighting required in a quayside setting. Both these conditions are made more conspicuous in a peaceful broads location.  | Comment noted. The Local Plan for the Broads has a policy on dark skies which would be used to determine applications, but agree that there needs to be better mention of light pollution.   | <a href="#">9.1.8 Light pollution</a><br><a href="#">Schemes for residential mooring may include lighting. But sites for residential moorings may be on the fringe of settlements, where there is a transition from urban to rural and so the impact of lighting may be significant. The Authority also seeks dark waterways to protect the wildlife in the area. The need for such lighting needs to be justified in line with Local Plan for the Broads policy DM22. If lighting is justified and agreed, then the design needs to ensure no impact on the dark skies of the Broads. The Authority plans to produce light pollution guidance, but in the meantime, the policy requirements of the Local Plan will guide how applications are determined and assessed.</a><br><a href="#">Q: How does your scheme address light pollution? How does your scheme maintain dark skies?</a> |
| #3  | Alistair Lipp | -                   | I am actually not in favour of residential moorings, but considering it is in the plan to have 63, then the proposals suggested seem to be a reasonable way of creating quality moorings.  | Response noted.  | No change to document.  |
| #4  | B J Du Brow   | -                   | In these constrained times we are unable to give any useful comments.  | Response noted.  | No change to document.  |
| #5  | Jeremy Burton | Bungay Town Council | I confirm that the members of Bungay Town Council Planning, Environment and Highways Committee have considered these Documents and have no additional comments to make.  | Response noted.  | No change to document.  |
| #6  | Shamsul Hoque | Highways England    | No comment   | Response noted.  | No change to document.  |
| #7  | Penny Turner  | Norfolk Police      | My main concern for residential moorings is potential vulnerability of uninvited access: (The lack, or reduction in perimeter security of a residence (mooring) due to nature of the site (i.e. open access of quay side) may make it vulnerable to 'attack' from would be offenders).   | See following comments.  | See following comments.   |
| #8  | Penny Turner  | Norfolk Police      | The location of residential moorings next to defined a defined development boundary for support of key services, together with the potential lack of 'usual' residential perimeter boundaries may open up access opportunities for uninvited visitors – being able to move along the same access routes as genuine users. Therefore it is essential to acknowledge what can be done to prevent would-be offenders entering residential boats. Proposed solutions would be individual to a site and its layout, but I recommend if possible that boatyards/Marinas control access to these moorings via a lockable gate (with resident access only) to the particular quay/boardwalk involved; and that individual boat owners also be aware of further protection/security products designed for boats to increase 'home' security. That this information be linked to 'Helpful links/advice (Section 11). | Comment noted. Security should be considered on a site by site basis. Sites in the Broads tend to be relatively small and many of them are adjacent to other facilities so there tends to be a high level of surveillance. We don't consider that there is a need for the guide to promote this level of security, but we will make reference to security. | New sub section in section 9: <a href="#">You should ensure you consider security at your site. This may already adequately be in place.</a>  |
| #9  | Penny Turner  | Norfolk Police      | Also, the proposed walking route of 800m/10 mins (usable all year round) should were possible be straight and a width of 3m wide, with vegetation maintained to prevent fear of crime (removal of potential hiding places), and to consider lighting if appropriate.   | Agreed. Text to be added.  | Add this text to the end of section 4: <a href="#">Norfolk Police recommend that the route to the site should, where possible, be straight and have a width of 3m wide, with vegetation maintained to prevent fear of crime (removal of potential hiding places), and to consider lighting if appropriate (taking into account the dark skies policy of the Local Plan and the location of residential moorings).</a>   |
| #10 | Penny Turner  | Norfolk Police      | I support management of sites with rules/terms of conditions, this together with the potential presence of staff would increase guardianship/ownership of area.  | Support noted.   | No change to document.  |
| #11 | Penny Turner  | Norfolk Police      | Again I support the proposal to provide parking and storage facilities to prevent moorings becoming cluttered.   | Support noted.   | No change to document.  |
| #12 | Penny Turner  | Norfolk Police      | I recommend that parking spaces be marked to help with correct usage (assists with rule setting) – consider collapsible bollards/chain & lock , and where possible have some capability of surveillance over the area.   | Agreed. Text to be added.  | Add to 9.5: <a href="#">Norfolk Police recommend that parking spaces be marked to help with correct usage (assists with rule setting) – consider collapsible bollards/chain &amp; lock , and where possible have some capability of surveillance over the area.</a>   |

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| #13 | Penny Turner | Norfolk Police | With regards external storage facilities, I recommend they are of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender).   | Agreed. Text to be added.  | Add to 9.7: <a href="#">Norfolk Police recommend that storage is of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender).</a>  |
| #14 | Penny Turner | Norfolk Police | Post-boxes – there is an increasing rise in crime associated with post delivery so post boxes should be of robust construction with max aperture size of 260mmx40mm and have anti-fishing properties (the examples pictured look good, Secured by Design recommends letter boxes certificated to TS 009).   | Agreed. Text to be added.  | Will add this wording to section 9.8 in relation to extra facilities: <a href="#">There is an increasing rise in crime associated with post delivery so post boxes should be of robust construction with max aperture size of 260mmx40mm and have anti-fishing properties (Secured by Design recommends letter boxes certificated to TS 009).</a>  |
| #15 | Penny Turner | Norfolk Police | As mentioned above, I would like links to boat security to be included, but would wish to consult with my police colleagues on BroadBeat as to which should be included. (1st Principles boat security; BoatShield and Aweigh).<br><br>LINK FOR BOATSHIELD (& Outboard Engine Cover)<br>This weblink from Norfolk & Suffolk Police offers advice on boat safety and security, also information about the Boatshield Scheme.<br><a href="https://www.norfolk.police.uk/advice/roads-and-vehicles/boats">https://www.norfolk.police.uk/advice/roads-and-vehicles/boats</a><br><br>AWEIGH App<br>Thousands of people enjoy the Broads throughout the year and the AWEIGH app has been designed to help those on and around the waterways.<br><a href="https://apps.apple.com/app/aweigh">apps.apple.com&gt;app&gt;aweigh</a><br><a href="https://play.google.com/store/apps/details?id=com.aweigh">play.google.com&gt;store&gt;apps&gt;details?id=com.aweigh</a><br><br>BOAT SECURITY ADVICE - NORFOLK & SUFFOLK POLICE<br>Norfolk & Suffolk Police advice on water safety and boat security:<br><a href="https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf">https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf</a> | Agreed. Text to be added.  | Add these links to guide.  |
| #16 | David Broad  | -              | Section 3. – I think that continuing to make a distinction between boats suitable for residential moorings and houseboats might become somewhat artificial and unnecessary with the passage of time. (a bit like mobile homes and caravans where the former have residual wheels and tow bar stored underneath but are still classed the same for The Caravan Act/ planning purposes). The BA hung on to this motor and moving thing when the working party initially considered the issue, but I would suggest it is now unnecessary and that it is the matters of controlling the use and appearance which is common and important to both.   | We consider houseboats to be floating caravans or floating sheds on a pontoon and these will be dealt with on a case by case basis. We do not promote or expect these at residential moorings around the Broads. This is set out in the Local Plan.  | No change to document.   |
| #17 | David Broad  | -              | Item 7 – Register – It might be helpful and save unnecessary administration and enforcement if the policy stating that guests staying less than, say, 30days, were exempt   | It does not seem onerous to write down the details of the person visiting or staying in a register.  | No change to document.   |
| #18 | David Broad  | -              | Item 9.3 Pump Out and Sewerage – It could be inviting non-compliance by allowing holding tanks and pump-outs as an alternative to mains drainage. History and experience shows that valves are often used for illegal discharge. There could be a strong planning policy preference for the latter and the register extended for logging genuine pump out occurrences.  | Noted. Whilst areas of residential moorings may provide toilets and shower blocks, the boats themselves are probably going to have toilets on them. It is not clear how we can stop that from happening through planning. Because they will have toilets on them, the sewerage and foul water need to go somewhere and that is what we are referring to - the provision on site of somewhere to dispose of foul water. We do have policies that promote the connection to the public sewer network as the preference, as set out in that policy, that the facilities provided for pump out to be connected to the public sewer network. If this is not possible, then we set out a hierarchy for disposal methods and seek thorough justification for the method used. If Mr Broad is suggesting that there should be some kind of mechanism that attaches to the on-board toilets and the like and connects to the public sewer network, then that would be something for the management to address as they plan the scheme. We could add some text to raise the issue of valves and illegal discharge and cross refer to the policy that seeks connection to the public network. | Add this to section 9.3: Toilets on boats may require pumping out or somewhere to empty cassettes. Your marina or boatyard may have a system or process to deal with this already. <a href="#">We would assess this part of the application against policy DM2 and as set out in that policy, attachment to the public sewer network is the preferred approach. When considering how to address foul water, you will need to consider the potential for boats to release foul water directly to the waterbody. The Environment Agency also highlight that there is a byelaw that is relevant to the disposal of sewage from boats within the Broads which makes it illegal for boats to discharge their sewage straight to the rivers.</a> |
| #19 | David Broad  | -              | Notwithstanding the above, you are to be congratulated in producing such a comprehensive and thoughtful draft policy and I look forward to hearing of its progress.   | Support noted.   | No change to document.   |

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| #20 | Judith Davidson | Norwich City Council | I just have one comment / suggested change to make in relation to lines 81-84 of the document:<br>• I would suggest deleting the words “ in theory” from this sentence, and adding to the end “and is consistent with the policies of the River Wensum Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners).”   | Agreed. Text to be added.  | <ul style="list-style-type: none"> <li>• ‘...or is in Norwich City Council’s Administrative Area’</li> </ul> Norwich City Council requested this addition as there are no mooring basins, marinas or boatyards in Norwich; this change now, <del>in theory</del> , allows for residential moorings in the City <a href="#">(subject to the normal planning application process)</a> and is consistent with the <a href="#">policies of the River Wensum Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners).</a>  |
| #21 | Liam Robson     | Environment Agency   | We agree that all residential boats must be capable of navigation and so function as a boat, in order for residential moorings to be classed as ‘water compatible’ development. If the boat is non-navigable, such as a houseboat, then they would be classed as ‘more vulnerable’ residential development, and therefore Table 3 of the NPPF PPG would class them as inappropriate to be located in boatyards or mooring basins, as these areas are usually classed as Flood Zone 3b Functional Floodplain. It may be beneficial to include this reason within the explanation as to why the boats on the residential moorings need to be navigable.  | Agreed. Text to be added.  | Section 3. Add this as last paragraph: <a href="#">The Environment Agency agree that all residential boats must be capable of navigation and so function as a boat, in order for residential moorings to be classed as ‘water compatible’ development. If the boat is non-navigable, such as a houseboat, the Environment Agency state that they would be classed as ‘more vulnerable’ residential development, and therefore Table 3 of the NPPF PPG would class them as inappropriate to be located in boatyards or mooring basins, as these areas are usually classed as Flood Zone 3b Functional Floodplain. The Environment Agency state that they would object in principle to any houseboats as they would be an inappropriate ‘more vulnerable’ development in Flood Zone 3b Functional Floodplain. So houseboats are unlikely to be permitted, unless their proposed location is somehow not classed as Functional Floodplain, which would require the marina or mooring basin to not be at risk of flooding in a 5% (1 in 20) annual probability flood event.</a>   |
| #22 | Liam Robson     | Environment Agency   | Also, the last sentence of Section 3 states that ‘Houseboats are considered to be structures without means of independent propulsion and will be dealt with on a case by case basis due to their potential impact on character of the area’. We would object in principle to any houseboats as they would be an inappropriate ‘more vulnerable’ development in Flood Zone 3b Functional Floodplain, so it may be beneficial to make it clear that houseboats are unlikely to be permitted, unless their proposed location is somehow not classed as Functional Floodplain, which would require the marina or mooring basin to not be at risk of flooding in a 5% (1 in 20) annual probability flood event. | Response noted. That wording is from the Local Plan. But we will add it to the guide.  |   |
| #23 | Liam Robson     | Environment Agency   | We support the need for a Flood Risk Assessment (FRA) and Flood Response Plan with all applications for residential moorings. If the FRA and Flood Response Plan proposes refuge within the boat in times of flood then the boat will need to be capable of rising up above the extreme 0.1% (1 in 1000) climate change flood level. The FRA will need to detail what the required height of rise will be and demonstrate that the boat’s mooring can enable it to rise that high without posing a hazard to the occupants of the boat.  | Agreed. Text to be added.  | Add to section 5: <a href="#">If the FRA and Flood Response Plan proposes refuge within the boat in times of flood then the Environment Agency states that the boat will need to be capable of rising up above the extreme 0.1% (1 in 1000) climate change flood level. The FRA will need to detail what the required height of rise will be and demonstrate that the boat’s mooring can enable it to rise that high without posing a hazard to the occupants of the boat. If the FRA and Flood Response Plan does not propose refuge, but instead proposes evacuation in advance of a flood, then the FRA and response plan will need to show how the occupants will be able to receive advanced warnings and where they will be able to evacuate to in time. The Environment Agency go on to say there is always a residual risk of warnings not being received, so the FRA will need to address this risk. The ability to take refuge within the boat, as described above, is a valuable fall-back measure and, if possible, the mooring should be designed to provide this refuge as a precaution, even if the preferred option is evacuation in advance of flooding.</a> |
| #24 | Liam Robson     | Environment Agency   | If the FRA and Flood Response Plan does not propose refuge, but instead proposes evacuation in advance of a flood, then the FRA and response plan will need to show how the occupants will be able to receive advanced warnings and where they will be able to evacuate to in time. There is always a residual risk of warnings not being received, so the FRA will need to address this risk. The ability to take refuge within the boat, as described above, is a valuable fall-back measure and, if possible, the mooring should be designed to provide this refuge as a precaution, even if the preferred option is evacuation in advance of flooding.   | Agreed. Text to be added.  |   |
| #25 | Liam Robson     | Environment Agency   | The LPA and their Emergency Planners will need to ensure that they are satisfied with the proposed residential moorings and the proposed measures to ensure the safety of the future occupants should a flood occur.   | Noted. The Broads Authority does not have Emergency Planners in house. It is not clear how the District Emergency Planners are able to assist the Broads Authority. This issue is something that is being looked into currently. | No change to document.  |
| #26 | Liam Robson     | Environment Agency   | Line 131 refers to waste management. We would highlight that there is a byelaw that is relevant to the disposal of sewage from boats within the Norfolk and Suffolk Broads which makes it illegal for boats to discharge their sewage straight to the rivers.  | Response noted. Text to be added.  | See comment #18   |
| #27 | Liam Robson     | Environment Agency   | It may be beneficial to include the need for Flood Response signs in this section, so that everyone is aware of the flood risk and the actions to take.  | Noted. The Flood Risk SPD has recently been updated and applicants would be directed to the FRP guidance in that.  | No change to document.  |
| #28 | Liam Robson     | Environment Agency   | 9.2 Water<br>The management plans should include details of early consultation with the relevant water company to ensure there is sufficient capacity in their network to supply moorings in that specific location. The abstraction of 20 cubic metres or more a day from either surface or groundwater source would require an abstraction licence. If the chosen site for the additional moorings already holds an abstraction licence, there would need to be consideration of the impacts from additional update as a result of the new moorings.   | Agreed. Text to be added.  | Add this to 9.2: <a href="#">The Environment Agency are keen to emphasise that applications should include details of early consultation with the relevant water company to ensure there is sufficient capacity in their network to supply moorings in that specific location. The abstraction of 20 cubic metres or more a day from either surface or groundwater source would require an abstraction licence. If the chosen site for the additional moorings already holds an abstraction licence, there would need to be consideration of the impacts from additional update as a result of the new moorings.</a>  |
| #29 | Liam Robson     | Environment Agency   | 9.3 Sewage<br>This section should be strengthened by stating that ‘toilets on board will require pumping out’ and if possible it would be beneficial to add – ‘to either an appropriate package treatment plant, a containment tank emptied by registered waste carrier or to main sewer’.   | Agreed. Text to be added.  | See comment #18   |

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| #30 | Liam Robson  | Environment Agency                            | <p>Informative – Environmental Permit for Flood Risk Activities</p> <p>An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a>. Anyone carrying out these activities without a permit where one is required, is breaking the law.</p>   | Agreed. Text to be added.   | <p>Add this to the end of section 9: <a href="#">Informative – Environmental Permit for Flood Risk Activities</a></p> <p><a href="#">An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a>. Anyone carrying out these activities without a permit where one is required, is breaking the law.</a></p> |
| #31 | Kate Wood    | Pegasus Group on behalf of Crown Point Estate | We welcome the Guide’s intention to provide guidance that builds on already-adopted policy DM37 – New Residential Moorings. We note that this policy is extremely comprehensive in setting out requirements for location and facilities.  | Noted.  | No change to document.  |
| #32 | Kate Wood    | Pegasus Group on behalf of Crown Point Estate | The proposed Residential Moorings Guide adds little to the policy, but provides a helpful checklist which would be a useful basis for the planning officer’s consideration of the individual elements requiring consideration.  | We would suggest it adds to the policy and elaborates on many parts of the policy as well as many other aspects of a successful residential mooring scheme. But yes, it is also a useful basis as stated.   | No change to document.  |
| #33 | Kate Wood    | Pegasus Group on behalf of Crown Point Estate | We would like to see additional text in relation to management accommodation and the Council’s commitment to engagement with the applicant, particularly at pre-application stage.  | We offer a free pre-application advice service. The very nature of our role as a Local Planning Authority means we engage with applicants. Regarding management accommodation, DM38 covers that and refers to residential moorings. DM37 and this guide would then be used.   | No change to document.  |
| #34 | Kate Wood    | Pegasus Group on behalf of Crown Point Estate | Policy DM37 is a relatively self-contained policy. However, there may be circumstances, particularly with larger mooring developments, where the applicant considers that residential management accommodation would be necessary to ensure the moorings are well-managed, maintained and monitored. Such accommodation could, for example, be part of a larger building accommodating post boxes, storage lockers and other facilities.  | Noted. If a scheme requires this, then DM38 would be used as would all other relevant policies of the Local Plan and all relevant SPDs and Guides. One point to note however the storage building might be in a high risk flood zone, so accommodation might not necessarily be appropriate there.  | No change to document.  |
| #35 | Kate Wood    | Pegasus Group on behalf of Crown Point Estate | There is no mention in the Guide of the Authority’s pre-application service. We consider this should be included as an option for potential applicants to be aware of. With that option, we request that the Authority includes a commitment to provide advice in a timely manner and stand by its advice unless there have been significant material changes in policy circumstances since the advice was issued. This will enable applicants to have faith in the pre-application system. As you know, pre-application advice, especially when provided in an iterative way, ensures that a proposal can be refined to be the best scheme possible. This ultimately results in greater buy-in from consultees such as Parish Councils and neighbours, a greater likelihood of an efficient and successful application process, and improved development quality when implemented. | Noted. Any advice given on a proposal is as presented and its conformity with current policies. It will remain relevant unless the policy or other material considerations or the details of the application itself change. Pre-application advice is an officer level opinion and given without prejudice.   | No change to document.  |
| #36 | James Knight | Individual                                    | Although the Guide is presented as a planning document for adoption, the majority of its content falls into the category of helpful guidance for operators hoping to provide residential moorings, and is not directly related to planning.   | Noted.  | No change to document.  |
| #37 | James Knight | Individual                                    | <p>There is an over-riding tendency, both in the policy and in the Guide, to treat residential moorings as materially different to ordinary leisure moorings. In fact, the use of the land is identical - mooring a boat – and the risks are broadly the same, since people live &amp; sleep aboard for many weeks at a time, regardless of whether the boat is their primary residence. The differences from a planning perspective are:</p> <p>a) the fact that the vessel is used as a primary, rather than temporary, residence – which could result in increased demand on local services;</p> <p>b) the fact that residential paraphernalia can accumulate around the moorings, potentially changing the character of the surroundings</p>  | The policy treats them as different because the uses are different.   | No change to document.  |
| #38 | James Knight | Individual                                    | Whilst pleased to have the opportunity of providing input, this Guide ought more properly to be a living document which evolves over time to provide guidance to marina operators – not just as part of the planning process but for promoting ideas and best practice to all operators.  | Noted. It will be used for both purposes. We will review guides over time, update and amend and re-consult as required.   | No change to document.  |
| #39 | James Knight | Individual                                    | The formal consultation process is really designed for strategic planning documents which are adopted for more than a few years, rather than for detailed guidance which, necessarily, should change over time.   | The Broads Authority has undertaken consultation on many other guides that are used in planning and intends to produce more guides in future and intends to consult on them as well. We will review guides over time, update and amend and re-consult as required. The purpose of consultation is two fold. Firstly, people may have some really useful comments or observations that will improve the guide or correct it. Secondly, adoption reflects the fact that it has been through this process. | No change to document.  |
| #40 | James Knight | Individual                                    | The relevant strategic planning policies for residential moorings are set out in policy DM37. By contrast, this Guide is largely concerned with providing opinions and guidance about current practices and has very little to do with planning.  | The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful.  | No change to document.  |

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| #41 | James Knight | Individual | Planning relates to the use and development of land (which includes the land beneath water such as rivers, moorings and basins). The specific characteristics of vessels moored over land will generally fall outside the ambit of planning.  | Noted.   | No change to document. |
| #42 | James Knight | Individual | Whilst accepting that the definition is set out in the adopted policy, there are still significant grey areas surrounding the meaning of "main residence". For example:<br>a) Does "main residence" really mean "main UK residence"? If a person lives abroad for 6 months and on their boat on the Broads for 6 months, is this a residential mooring?<br>b) If a person stays on their boat during the summer and in a (UK) house during the winter, where is their main residence?   | Noted. This is assessed on a case by case basis.   | No change to document. |
| #43 | James Knight | Individual | Since it is the boat itself which is "residential" and not the mooring, and the policy wording ties the mooring to a specific singular vessel, the policy could easily be circumvented by moving boats from one mooring to another every 28 days.   | The policy is related to the use of the land.  | No change to document. |
| #44 | James Knight | Individual | A more sensible and enforceable future policy might instead want to consider limiting the overall number of moorings which could be used for residential purposes within a given marina or location, rather than trying to define individual moorings as residential - which is essentially impossible.   | Noted. There are a number of possible approaches. These can be discussed through the determination process.  | See #85.               |
| #45 | James Knight | Individual | In reviewing the policy direction, officers ought to consider what it is that they are trying to achieve by drawing distinctions between different types of mooring and by treating residential moorings as some kind of special case.  | We will note this as and when the policy/Local Plan is reviewed and seek views during any consultation.  | No change to document. |
| #46 | James Knight | Individual | Acceptable location for residential moorings<br>4.1. This section is simply a summary of the adopted policy and is therefore not open for consultation.   | Noted.   | No change to document. |
| #47 | James Knight | Individual | The Guide requires mooring operators to detail the technique/method of mooring vessels in the FRA.<br><br>It is an established fact of maritime law – and the Broads Authority's own navigation byelaws – that responsibility for the safe mooring of a vessel lies at all times with the master of a vessel. Broads Authority byelaw 58(1) (moored vessels to be properly secured) refers. Any planning condition which required the landowner to be responsible for the safe mooring of a navigable vessel would fail the NPPF para 55 tests because it would:<br>a) not be relevant to planning;<br>b) attempt to duplicate non-planning controls (the Navigation Byelaws);<br>c) be unreasonable as the landowner could not be expected to exercise the necessary degree of monitoring or control over the master of a vessel;<br>d) be unenforceable by virtue of the above.<br><br>It would be perfectly reasonable to ask mooring operators to provide guidance on safe mooring techniques to their customers, but there can be no transfer of responsibility. | The flood risk assessment and flood response plan will more than likely be required early on in the process so they can be used to determine the application. The Local Plan says that the FRA should show how the vessel will be moored so it does not cause issues at times of flooding. The Guide and Local Plan do not require a condition for a site manager to take over the mooring of a vessel; simply to show/discuss/state how, vessels will be checked to ensure the way they are moored will not impact on the vessel and its contents or other boats etc. nearby. It may be that the responsibility of mooring lies with the master, but if a manager of a site sees something that could need improving in terms of mooring a vessel, especially when a flood event is likely/is happening, it seems reasonable that they may discuss this with the master perhaps. The Manager has responsibility for the site and a poorly moored vessel may impact others on the site. It might be, for example, that the applicant simply says that from time to time, and even more so when flooding could ensue, they will check how vessels are moored. | No change to document. |
| #48 | James Knight | Individual | The Climate Change Checklist link on the Guide is broken, and the document does not appear to exist on the Broads Authority website. There is a climate change checklist within Local Plan policy DM9, which I take to be the relevant list. Whilst this is a very useful checklist for new land-based developments, it is hard to see how very much of it could be applied to residential moorings in any practical way – or indeed to moorings more generally.  | Will check the link and amend. The Checklist is here: <a href="https://www.broads-authority.gov.uk/_data/assets/word_doc/0009/1603656/Climate20change20checklist20template.docx">https://www.broads-authority.gov.uk/_data/assets/word_doc/0009/1603656/Climate20change20checklist20template.docx</a> and in the Local Plan. It is for the applicant to determine what aspects of the checklist are relevant and could be addressed in their scheme. If they think part is not relevant or does not apply, they have the option of ticking 'nil'.  | Check link.            |
| #49 | James Knight | Individual | Clearly the existence of a management plan is of benefit to mooring operators, as well as to their residents and other berth holders.   | Noted.   | No change to document. |
| #50 | James Knight | Individual | What is less clear is why the content of such a management plan could or should be within the ambit of planning. Planning authorities cannot prescribe the way in which businesses or moorings are managed. Management plans are operational documents, written to ensure that a business is run safely, efficiently, profitably and lawfully (including compliance with planning conditions).  | The requirement for a Management Plan is in the adopted policy and this guide expands on what a Management Plan could address.   | No change to document. |

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| #51 | James Knight | Individual | Planning conditions need to relate to planning and pass the NPPF para 55 tests. Amongst other things, they need to be specific, enforceable and not covered by other regulatory regimes. They should only be applied where they are necessary to make an unacceptable development acceptable. They can't simply be "nice to have".  | Noted.   | No change to document.  |
| #52 | James Knight | Individual | Boat safety certificates & insurance are matters for individual boat owners and are covered by the Broads Authority's own boat registration regulations. They cannot be turned into planning conditions imposed upon the mooring operator.  | Noted. This is not the intention of the guide.   | No change to document.  |
| #53 | James Knight | Individual | Similarly, noise pollution is covered by navigation byelaws as well as by district councils who are responsible for environmental protection - including waste management.  | Noted. It is also addressed in the Local Plan as part of the Amenity policy, DM21.   | No change to document.  |
| #54 | James Knight | Individual | Therefore, although the list is useful to an operator in terms of "things to consider", it would be inappropriate for any planning condition to require the existence of a management plan which featured such a list.  | Noted and this will be considered on a case by case basis.   | No change to document.  |
| #55 | James Knight | Individual | 7.1. Where a planning condition restricts the number of residential moorings, it will be necessary to keep a register to ensure compliance with that planning condition.<br>7.2. The nature of the information made available for inspection to the LPA will need to be carefully considered to ensure compliance with GDPR and other privacy laws. It is important for the Broads Authority to consider what information it could require the operator to provide, and the reasons for requiring it. | Noted. The Authority is mindful of the requirements of other legislation.  | No change to document.  |
| #56 | James Knight | Individual | Council Tax<br>8.1. This isn't a planning matter and there is no proposal upon which to consult, but it is useful information to provide in a guide.  | Noted.   | No change to document.  |
| #57 | James Knight | Individual | Facilities<br>9.1. This is all useful guidance and it is helpful to know how other marinas outside the Broads operate and provide facilities.<br>9.2. It might also be useful to provide details of relevant arrangements at marinas within the Broads, which offer residential moorings.   | Noted. This information will be available on the operator's websites.  | No change to document.  |
| #58 | James Knight | Individual | The questions within this section are posed as consultation queries but are really matters for individual planning applicants to consider. I cannot see how answers to these questions, provided as part of this consultation exercise, could inform the final version of a planning guidance document.   | These questions are prompts for the applicant to answer as set out in Appendix D. They will remain as part of the final document. They are not consultation questions.   | No change to document.  |
| #59 | James Knight | Individual | This Guide should not be considered as a planning document requiring adoption, but rather something to be continuously updated, intended to provide helpful guidance to new and existing residential mooring operators.   | The purpose of this guide, like the other adopted guides, is to provide advice and information. It will be updated as required.  | No change to document.  |
| #60 | James Knight | Individual | Planning (and other) documents from the LPA should not seek to prescribe the operational practices of businesses unless they directly relate to planning and are necessary in planning terms.   | Noted.   | No change to document.  |
| #61 | James Knight | Individual | Planning conditions must be limited to matters which are within the lawful control of the marina operator. They should never require the operator to be responsible for the conduct or actions of boat owners or others. Planning conditions which impose requirements on the operator relating to noise, boat safety, insurance, payment of tolls or mooring techniques would all probably be unlawful.  | Noted.   | No change to document.  |
| #62 | James Knight | Individual | Clarity is required on the nature of personal information which the operator can reasonably be asked to provide relating to individual berth holders.   | Noted.   | See #96, 97, 98 and 99. |
| #63 | James Knight | Individual | The Guide as it stands is a hybrid document containing a mixture of planning policy, guidance, links, and questions aimed at specific applicants. It isn't capable of being "adopted" in the formal sense.  | The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful. By undertaking consultation, we get wider views which will strengthen the document. Adoption reflects the fact that it has been through this process. | No change to document.  |
| #64 | James Knight | Individual | The majority of the guidance (as distinct from the policy) is applicable to all moorings (not just residential ones), and the document ought to be re-imagined as a means of providing evolving guidance and best practice for marina operators - rather than seeking to prescribe operational procedures under the guise of planning conditions.   | Noted. The suggestion about the potential wider role of the document is noted. But at this point, it is intended to focus primarily on residential moorings.   | No change to document.  |

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| #65 | James Knight     | Individual                           | I am a Fellow of the Royal Institution of Chartered Surveyors and I have lived and worked around the Broads for all of my life. In addition to enjoying recreational boating activities, I have worked in a professional capacity advising on planning matters. During the past 17 years, I have been a Director of three successful Broads tourism businesses, each employing over 60 people, and have engaged with the planning system as an applicant on numerous occasions. One of these businesses includes a marina which operates 10 residential moorings on the southern Broads. I am a former member of the RICS Governing Council, a South Norfolk District Councillor, and an appointed member of the Broads Authority and its Planning Committee. My response to this consultation is in my capacity as a private individual, property developer and company director. I am not responding in my capacity as a member of the Broads Authority or its Planning Committee. | Noted   | No change to document.                         |
| #66 | Hayley Goldson   | Chedgrave Parish Clerk               | The content of Marketing and Viability Supplementary Planning Document (SPD) and Residential Moorings Guide was considered by Chedgrave Parish Council on 7th May 2020. I can advise that councillors support the document as long as the guidelines described in the document are adhered to (particularly in relation to residential moorings).  | Support noted.  | No change to document.                         |
| #67 | William Hollocks | Loddon Marina                        | Can you please give me some background on why these are being proposed as you have just produced an excellent document on the Broads Plan that went through an extensive review by every party and then the Inspector for the Secretary of State and then approved at the highest level of government.   | Guides and SPDs provide more detail on certain policies in Local Plans. For example, the moorings and riverbank stabilisation guide that we adopted a few years back and the Flood Risk SPD we soon adopted all provide much more detail than would be appropriate in a Local Plan. Policies in the Local Plan provide the hooks for the guides and SPDs. SPDs and Guides help with the implementation of policies. A Local Planning Authority does not need to produce them, but can do. | No change to document.                         |
| #68 | William Hollocks | Loddon Marina                        | With regards the residential moorings there is every kind of boat currently on the Broads many used as residential and the BA already has bye law on this so why are the Planning Department trying to be a dictator on a matter which is under another departments jurisdiction (Lucy). The criteria for our residential moorings is well covered in policy LOD1. Does this mean that every boat that does meet this policy will be excluded from the Broads.   | The policies relate to the use of the land, not the use of the boat. The Guide elaborates on already adopted policy (the Local Plan for the Broads was adopted in May 2019).  | No change to document.                         |
| #69 | William Hollocks | Loddon Marina                        | Can you please confirm that any policy you end up will be approved by the Secretary of State through his Inspector as an approved amendment to your Broads Plan. Without this as far as I can see it will be another attempt by the Planning Dictatorship to control the further deterioration of the business's on the Broads and will not be worth the paper it is written on..  | These are not policies. These documents help to implement policies. Guides are not prescribed by regulations, but SPDs are. SPDs have a set procedure (see the regulations: <a href="http://www.legislation.gov.uk/uk/si/2012/767/part/5/made">http://www.legislation.gov.uk/uk/si/2012/767/part/5/made</a> ) and the Planning Inspector is not part of the process.  | No change to document.                         |
| #70 | William Hollocks | Loddon Marina                        | By copy of this e-mail to DR Packman, Lucy as the responsible manager for navigation and bye laws on boats and Marie as the boss of the out of control Planning Department I am asking to put a stop to these amendments as it is a complete waste of money and has no justification to be in the public interest.   | Noted   | No change to document.                         |
| #71 | William Hollocks | Loddon Marina                        | I am more than happy to start a campaign of getting support not for comments to the policies but to get them stopped. We are happy to lobby every Parish Council, BA members, Councils, MP's etc. I have also copied Mr Tarry as he is working with various parties to contribute to the consultation process.   | Noted. But guides and SDPs are not policies. They help with the implementation of adopted policies  | No change to document.                         |
| #72 | Thomas Foreman   | Thorpe St Andrew Town Council        | The Committee welcomed the consultation by the Broads Authority on its Residential Moorings Guide and felt it was a very well-considered document.   | Support noted.  | No change to document.                         |
| #73 | Thomas Foreman   | Thorpe St Andrew Town Council        | The Committee noted the important difference between houseboats and residential moorings, however, it was queried how the policy would apply to mixed sites with both houseboats and residential mooring.  | The Local Plan at page 118, second para says that we expect schemes for residential moorings to be occupied by vessels regarded as boats and that houseboats will be dealt with on a case by case basis. That would be the same for mixed schemes, if any were to come forward as a planning application.   | No change to document but see rows #21 and 22. |
| #74 | Thomas Foreman   | Thorpe St Andrew Town Council        | The Committee felt that the management plan was a positive step, particularly with site rules explaining who is resident and how waste will be managed. As part of this section, it was felt the need for an Emergency Evacuation Plan should be included. If safe access for emergency service vehicles is important, it is also important to consider how people might evacuate prior to (or when) the emergency services arrive.  | Noted. Access by emergency services would be considered as part of determining the application as per criterion g of DM37.  | No change to document.                         |
| #75 | Alan Wildman     | Residential Boat Owners' Association | RBOA is keen to work with the Broads Authority with a view to demonstrating how, with good management controls at site level, residential boaters are of considerable benefit to moorings operators, other berth holders, local communities and the Norfolk Broads as a whole. It is to be hoped that if demand for residential moorings exceeds the 63 already identified, then BA might consider increasing the figure in order to meet that demand.   | If applications come forward, they will be determined against the policies of the local plan. The number of 63 is not a maximum and we would not deny applications because we have permitted 63 residential moorings.   | No change to document.                         |

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| #76 | Alan Wildman | Residential Boat Owners' Association | Quite apart from the legal requirement and the many general benefits of having water based residents, to Navigation Authorities and to moorings providers, responsible residential boaters are particularly known to provide:<br><ul style="list-style-type: none"> <li>• Added security: Not just in terms of property - land dwellers, walkers, boaters and other waterway users often confirm that they feel safer knowing there are people living on the water, close by.</li> <li>• Local knowledge: Visitors to areas where there are live-aboards frequently interact and benefit from the available local knowledge, usually freely given, to enhance the visitors' enjoyment of the region.</li> <li>• Safety: Where there are residential craft moored, by nature usually occupied by necessarily safety aware individuals, others who might get into trouble near, in or on the water have potential assistance immediately at hand.</li> </ul> | Noted.   | No change to document.  |
| #77 | Alan Wildman | Residential Boat Owners' Association | We welcome the distinction between houseboats and other residential craft and would suggest a good, clear description be used to clarify what constitutes those other residential craft. RBOA suggests - traditional in that they would be identified as boats by "the man on the Clapham Omnibus".  | The Local Plan described what is expected at these moorings in the supporting text of DM37. Any changes to that wording would need to be as part of the Local Plan review.   | No change to document.  |
| #78 | Alan Wildman | Residential Boat Owners' Association | It is hoped that planning restrictions on houseboats might be negotiable with the applicants, rather than overly dictatorial, something that could be made clear in The Guide.   | The Local Plan is clear that houseboats will be judged on a case by case basis.  | No change to document. Also see comments #21 and 22.  |
| #79 | Alan Wildman | Residential Boat Owners' Association | Some marinas and boatyards already have on-line moorings. To locate a small number of residential slots in amongst those already existing moorings would impede neither navigation nor access to facilities. Perhaps this could be made clearer in The Guide.  | Planning applications will be determined against relevant policies in the Local Plan. Policy SP13 will be relevant and impact on navigation is included on DM37 at criterion d. Again, the policy DM37 sets out where residential moorings will be acceptable and other than in Norwich, that is in marinas or boatyards rather than on line. if the RBOA wish for that to be changed, it is something to discuss as part of the review of the Local Plan. | No change to document.  |
| #80 | Alan Wildman | Residential Boat Owners' Association | Some residential boaters have little need for nearby access to most "key" services; for instance, BA acknowledges that many residential boaters are single, perhaps slightly older (without children on board) and/or even fully retired. It is hoped that BA will look favourably on applications for residential berths in areas that are a little remote from such services and could state that fact in The Guide.   | The Local Plan for the Broads was adopted in 2019. The policy sets out the requirements for the location of residential moorings and this guide cannot change policy. DM37 is clear about where residential moorings will be deemed acceptable. Indeed, access to services was a key consideration when assessing the allocations in the Local Plan for residential moorings.  | No change to document.  |
| #81 | Alan Wildman | Residential Boat Owners' Association | Flood Risk and Climate Change<br>BA comments in The Guide are clear.   | Noted  | No change to document.  |
| #82 | Alan Wildman | Residential Boat Owners' Association | RBOA will readily offer advice to operators who may need assistance with creating Management Plans covering "responsible" residential boating. RBOA acknowledges BA's reference to our Association and/or our website and would like to see that reference strengthened within The Guide. RBOA anticipates no commercial benefit from providing such advice.<br><br>Follow up:<br>As regards what you might further comment on RBOA, perhaps just a mention that we do liaise with most major Navigation Authorities would suffice - if you agree and feel it appropriate, then all well and good  | Agreed, will add the extra wording to the RBOA paragraph.  | The Residential Boat Owners' Associations (RBOA). Their website says: 'Established in 1963 the Residential Boat Owners' Association is the only national organisation which exclusively represents and promotes the interests of people living on boats in the British Isles. We represent all those who have chosen to make a boat their home'. <a href="https://www.rboa.org.uk/">The RBOA ensure they liaise with Navigation Authorities like the Broads Authority. https://www.rboa.org.uk/</a> |
| #83 | Alan Wildman | Residential Boat Owners' Association | RBOA acknowledges that clear, strong and fair site management is the key to acceptable live-aboard craft. Good management will encourage responsible site maintenance and preservation of natural habitat and biodiversity. Reference in The Guide to LILO (Low Impact Living Aboard) might be advisable – RBOA can provide guidance in this respect if required.<br><br>Follow up:<br>For us, the points we would like to get across are that we (RBOA) are keen to lead operators and customers in the direction of Low Impact Life On Board and, through RBOA, there is a wealth of advice in that respect. Many will hopefully recognise the anachronism (LILO) and seek us out for such free advice.  | Agree. Will add reference to LILO.   | <a href="#">9.12 Low Impact Life on Board</a><br><a href="#">In response to the consultation on this guide, the RBOA were keen to emphasise Low Impact Life On Board and, through RBOA, there is a wealth of advice in that respect. Low impact life on board is an expression from UK waterways boaters who care about the environment.</a>  |
| #84 | Alan Wildman | Residential Boat Owners' Association | RBOA believes that boats used as primary residences should not stand out from leisure craft moored in the same vicinities. We would support BA in taking a similar stance and including such advice in The Guide.  | The policy and guide seek to influence and guide the moorings and use of land rather than what boats look like. It seems that is will be down to the owner of the boat and management of the moorings.   | No change to document.  |



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| #85  | Alan Wildman | Residential Boat Owners' Association | RBOA believes that moorings operators should have absolute (but reasonable) control of boat placements within their operational sites and would like to see this mentioned in The Guide.  | Agreed. Will add text.   | Amend section 4 so there are two sub sections - one for geographical location and another for location of residential moorings within a site. Under location of residential moorings within a site add: ' <a href="#">An applicant may want certain specific moorings to be permitted for residential moorings or may want an area to be permitted with a maximum number of residential moorings within that area, to reflect the operations of the marina or boatyard or site. This will need to be discussed and agreed with the Local Planning Authority. It will then be for the operator of the site to control which moorings are used for residential moorings in line with the permission granted. This would then be logged in the register and the approach may be explained in the management plan</a> '. |
| #86  | Alan Wildman | Residential Boat Owners' Association | It is reasonable to expect that any proposed inspection of moorings operators' records should only be requested with a good reason so to do. Such request should be negotiable with the operator, which fact should be made clear in The Guide.   | Noted. See #96, 97, 98 and 99.   | See #96, 97, 98 and 99.  |
| #87  | Alan Wildman | Residential Boat Owners' Association | RBOA has extensive experience of Council Tax issues; again RBOA would be happy for The Guide to refer to our Association and/or our website for advice.   | Agreed. Will add text.   | At section 8 add: ' <a href="#">and the RBOA also have information on Council Tax: https://www.rboa.org.uk/q-a/</a> '  |
| #88  | Alan Wildman | Residential Boat Owners' Association | Some facilities which may not be available "on site" but are available just a short cruise away from base are perfectly acceptable to many live-aboards. This is often the case on other waterways. RBOA suggests that point be clearly made within The Guide. We believe it reasonable to acknowledge that many live-aboard requirements, such as laundry, clothes drying, storage, etc. are often fully catered for within the confines of the craft (boat) itself. Moorings operators might be advised, via The Guide, that such a requirement could be part of their own Management Plan. | The guide is clear in that it says the section relating to facilities are things that an operator may wish to make available. It gives examples and case studies. The elements of this section tend to relate to policy criteria and so the application will need to show how they are addressed. It is up to the operator to consider how the needs of those living on their boats will be catered for.   | No change to document.   |
| #89  | Alan Wildman | Residential Boat Owners' Association | Key Messages<br>A good summary.   | Noted  | No change to document.   |
| #90  | Alan Wildman | Residential Boat Owners' Association | Helpful links and where to go to get advice<br>RBOA would encourage emphasis on the fact that we are a wholly volunteer group unlike other (commercial) organisations – our focus is not on RBOA revenue generation, but is solely on achieving our aims, as declared at the head of this response paper – RBOA is dedicated solely to the protection, promotion, universal acceptance and continued development of "responsible" residential boating (living-aboard).  | Noted. Consider the reference to the various organisations adequately addressed in the Guide.  | No change to document.   |
| #91  | Jason Beck   | East Suffolk Council                 | East Suffolk Council, Planning Policy Department has no comments to make on this document.  | Noted  | No change to document.   |
| #92  | Emily Curtis | Loddon Parish Council                | Councillors welcomed a management plan for the sites with residential moorings. LPC believes that a management plan would ensure the site was is well managed and will help protect land and boat residents from anti-social behaviour.   | Support noted.   | No change to document.   |
| #93  | Emily Curtis | Loddon Parish Council                | Councillors welcomed that consideration is being given to climate change, and agreed that it is important to consider the necessity for a site to have adequate provision for waste, sewage disposal and the prevention of pollution. How will these considerations be monitored?   | The ability to meet these requirements will be part of the assessment and form part of planning conditions which are routinely monitored.  | No change to document.   |
| #94  | Emily Curtis | Loddon Parish Council                | Councillors consider it is important that a safety plan for flooding is taken into consideration for the safety of the residents on the boat.   | Support noted.   | No change to document.   |
| #95  | Emily Curtis | Loddon Parish Council                | Councillors welcomed the policy regarding the necessity for facilities and services available for residential moorings, it is important for people living on land or water to have access to adequate services and facilities.  | Support noted.   | No change to document.   |
| #96  | Emily Curtis | Loddon Parish Council                | Councillors raised concerns over the necessity of a register and have asked why it is necessary for this information to be held by the site owner?  | The site owner will log who is on what mooring and whether they are residential moorings or other types of moorings they offer, just like any business would keep records. The Broads Authority would request to see this register from time to time to ensure that only the permitted number of boats are being lived on. It would be for the operator to ensure they kept their register in line with GDPR requirements. This approach is similar to the requirement that holiday accommodation operators have - to keep a log of those who stay, including the time period for periodic inspection by the Broads Authority, again to ensure the accommodation is being used as permitted. | Add some further explanatory text to this section:<br>7. Register<br>A register of those boats being lived on will be required. The register of who lives on which boat will be maintained at all times and is made available for inspections <a href="#">by the Broads Authority as part of monitoring of conditions set on any permission. The reason for keeping this register is to ensure that only the permitted number of boats are being lived on.</a>   |
| #97  | Emily Curtis | Loddon Parish Council                | What purpose does holding this register have for site owners?   |  |  |
| #98  | Emily Curtis | Loddon Parish Council                | Is this retention of register data inline with GDPR and should this information be held securely, and for what length of time the data be stored.   |  |  |
| #99  | Emily Curtis | Loddon Parish Council                | Why do the Broads Authority need to inspect this register?  |  |  |
| #100 | Emily Curtis | Loddon Parish Council                | We would note that management of any antisocial behaviour by occupants of residential boats is dependent on the quality of designated site manager and what further control measures could be put in place to help the site manager deal with anti-social behaviour?  | Operators will no doubt use a contract that sets out the requirements of staying on a boat at their site, including why and how such contract could be terminated. Perhaps anti-social behaviour may be such a reason for termination of a contract. Also such behaviour can be reported to the police or Council just the same as one would if there was anti-social behaviour from those living in a house on land.  | No change to document.   |

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| #101 | Emily Curtis | Loddon Parish Council | Will the Broads Authority have the power to withdraw a site owners licence to accommodate residential boats in the event of recurrent anti social behaviour?   | Planning permission, once granted, cannot be revoked like a licence might be. Anti-social behaviour by those living on their boats will be down to the management of the site. Anti-social behaviour will be dealt with in the same way it will be dealt with in any other sort of housing.  | No changes to document. |
| #102 | Rachel Card  | NSBA                  | The Norfolk and Suffolk Boating Association (NSBA) thanks the Broads Authority for the opportunity to participate in consultation on the above planning policy guide. The NSBA has no comment to make with regard to the advice and policies in this document.   | Noted.   | No change to document.  |
| #103 | Paul Harris  | SNDC and BDC          | I note that the document is referred to as a Guide, and whilst it is expressly 'designed to help implement the policies of the Local Plan' and seeks to elaborate on the adopted Broads Local Plan Policy DM37 - New Residential Moorings, it does not appear that you intend to adopt the Guide as a Supplement Planning Document, with the status which that confers.  | Correct. We have a few other guides as well: <a href="https://www.broads-authority.gov.uk/planning/planning-permission/design-guides">https://www.broads-authority.gov.uk/planning/planning-permission/design-guides</a>   | No change to document.  |
| #104 | Paul Harris  | SNDC and BDC          | Overall the Guide contains a range of useful information; however, at various points throughout the document, it is not entirely clear what issues the Broads Authority consider to be material to determining planning applications, and what is useful background information. The document could give the impression that a significant amount of information will be required to support a planning application, where this may not actually be the case.  | The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful.   | No change to document.  |
| #105 | Paul Harris  | SNDC and BDC          | <b>Section 5 – Flood risk and Climate Change</b><br>The aims of this section, to ensure that safety considerations are assessed as part of any Flood Risk Assessment and Flood Response Plan, are supported. The Guide relates this section to Local Plan Policies DM5 and DM37, but it is not clear how much of the suggested information would actually be required to support a planning application; if this information is being required for planning purposes, consideration needs to be given as to (a) how requirements will be monitored, (b) whether they are enforceable under planning legislation and (c) whether they might already be covered by other legislation.  | This section generally copies over text from the Local Plan. However amendments following this consultation, as detailed at #23 and #24 provide greater detail. Also see response to #47.  | See #23, 24 and 47.     |
| #106 | Paul Harris  | SNDC and BDC          | <b>Section 6 – Management Plan</b><br>Whilst it could be useful to condition a management plan as part of any planning permission, the list of issues covered would appear to extend beyond those related to the planning aspects of development; for example, conditioning a management plan that incorporates the 'site rules' or 'terms and conditions' could be requiring information that is largely concerned with non-planning issues. In addition, a number of the issues the Guide suggests the management plan could cover would appear to be seeking/requiring a level of detail that would not be required for a more regular residential development, even where that development has shared/communal/public space – the Guide does not make it clear why this level is required, and how it might be used to enforce a planning condition. | The points made are noted. And it is accepted that there is a level of detail set out in the guide, and required to help assess a planning application and this level of details goes beyond that which would be requested for a land based dwelling. However, as a unit of accommodation, residential moorings are different. Facilities required aren't routinely provided on sites which may be used for residential moorings (e.g. waste, pollution prevention, electricity) so we need to see how they will be provide. And there is a level of risk for example from drowning which is not usually present with bricks and mortar accommodation. The purpose of the guide is to prompt people to think about these things. | No change to document.  |
| #107 | Paul Harris  | SNDC and BDC          | <b>Section 7 – Register</b><br>Again the Guide does not make it clear why a register of who lives on each boat is required for residential moorings (as opposed to a register of the moorings themselves), this would only seem relevant if the Broads Authority was applying specific occupancy conditions to a site; however, this is not clear from the Guide.  | Noted. See #96, 97, 98 and 99.   | See #96, 97, 98 and 99. |
| #108 | Paul Harris  | SNDC and BDC          | <b>Section 8 – Council Tax</b><br>It is useful to highlight need to speak with relevant Local Authorities regarding Council Tax, although it may be worth highlighting that this does not affect the planning decision on a particular site.   | This section gives information and provides links to find out more as well as advising operators to contact the relevant district. There is nothing in the text to say that we require the applicant to do something.  | No change to document.  |
| #109 | Paul Harris  | SNDC and BDC          | <b>Section 9 – Facilities</b><br>This sets out a useful checklist for site providers. Again, what is not entirely clear is which of these issues could be material to any decision on a planning application e.g. car parking, or amenity space provision and which provides useful sources of background information e.g. methods of potable water supply.  | Section 9.1 to 9.8 relate to topics quoted in the policy. The section is also quite clear in that it uses some examples from elsewhere, but to discuss the approach favoured by the operator with the Broads Authority. 9.9 refers to other facilities/extras to consider.   | No change to document.  |

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| #110 | Paul Harris   | SNDC and BDC           | <p>In conclusion, the document contains a lot of useful information for the providers of residential moorings. By linking the document closely to adopted Local Plan Policy DM37, it gives the impression that the Guide is setting out the information that will be required to determine planning applications under that policy; however, in some instances this appears not to be the case. As such, it would be useful if the document were more clearly structured to emphasise that information which might be used to determine a planning application, and that information which is a useful resource to site providers about good practice and achieving the best quality of provision.</p> | <p>This is a summary comment and the issues raised have been addressed in previous comments.</p> | <p>See previous comments.</p> |
| #111 | Paul Fletcher | Beccles Parish Council | <p>I realise that I have missed the deadline for responses on the above document, ( Neighbourhood Plan and Beccles Society have taken up too much of my time). Nevertheless, I thought that you might like to know that we felt that it was a very comprehensive all encompassing document and we had no adverse comments to make.</p>   | <p>Support noted.</p>  | <p>No change to document.</p> |