

# Planning Committee

10 January 2020

Agenda item number 8

## BA 2018 0514 FUL Ludham Field base

Report by Planning Officer

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### Proposal

Extension of mooring basin and realignment of access from Womack Dyke.

### Applicant

Mr Paul Carrington

### Recommendation

Approval subject to conditions and s106 agreement

### Reason for referral to committee

Objections from internal consultees

### Application target date

12 March 2019

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# 1. Description of site and proposals

- 1.1. The subject site comprises a mooring basin and adjacent land at the Ludham Field Base Centre sited on the north-east side of Womack Water at the far south-eastern end of the village of Ludham. The subject mooring basin serves the workshop and offices of the former Broads Authority field base, currently the home of the Norfolk Broads Yachting Company, accessed from Horsefen Road. The wider site also provides an area of car parking and associated hardstanding.
- 1.2. The area at the southern end of Horsefen Road and fronting Womack Water is home to a small cluster of boat workshops and mooring basins. To the immediate east of the subject site is Hunters Yard, home to the Norfolk Heritage Fleet Trust. To the immediate west is the Forsythe Wherry Yard, home to the Norfolk Wherry Trust, a site which includes a boathouse utilised by the Broads Authority as a billet for a launch, and beyond that is the Swallowtail Boatyard. There are residential properties to the north and west of the commercial sites. The surrounding landscape is dominated by expanses of grazing marsh interspersed with narrow dykes draining into the River Thurne which lies to the south of Womack Water. At the end of Horse Fen Road a public footpath runs along the eastern edge of the Hunters Yard site, leading south towards the River Thurne.
- 1.3. The application site lies within the Ludham Conservation Area and approximately 100 metres to the west of the Ludham-Potter Heigham Site of Special Scientific Interest and National Nature Reserve, the Broads Special Protected Area and Ramsar Site and the Broadland Special Area of Conservation.
- 1.4. The existing basin is rectangular with a narrow access opening diagonally from Womack Water, set back from the water's edge by approximately 13.5 metres. The basin measures 16 metres by 33 metres, which is a footprint of around 528 square metres, and has current capacity for up to 18 small boats.
- 1.5. The proposal would see the basin enlarged to 45 metres by 47 metres which would provide capacity for up to 18 large boats; this would be achieved by expanding the basin to both sides and also towards Womack Water. The enlarged basin would be realigned to reflect the course of Womack Water where it passes the site, and the access widened. The basin's set back from Womack Water would be between 2 and 4 metres. The basin would be surrounded by 2 metre wide boardwalks, and 8 finger jetties would be provided within the basin.
- 1.6. The overall footprint of the enlarged basin would be 1,920 square metres, with the area of proposed excavation being 1,263 square metres, requiring the removal of approximately 2,210 cubic metres of spoil.
- 1.7. The application proposes the establishment of narrow areas of new reedbed within the site using reed turves. This would be on a strip of land between the workshop building and the reedbed on the adjacent site (which is currently being used as amenity grassland), on an area to the north-west of the workshop, adjacent to the boundary

with the Norfolk Wherry Trust and on the strip of land to be retained between the proposed enlarged basin and the basin at the Norfolk Wherry Trust site.

- 1.8. There are currently a number of trees within the area of proposed development, these are mostly at the extremities of the site. The trees which are sited between the existing basin and Womack Water appear to be self-seeded in that they are fairly randomly sited, and the proximity to the water's edge has resulted in them growing at angles presumably due to the ground conditions. The trees adjacent to the boundary with the Norfolk Wherry Trust site appear better considered, although by number, siting, and proximity have an overall haphazard appearance. By virtue of the works proposed the trees within and adjacent to the enlarged basin area would be removed.

## **2. Site history**

- 2.1. BA/1990/2882/HISTAP - Broads Authority joint field base (workshops, ancillary offices). Approved subject to conditions, May 1990.
- 2.2. BA/2004/1386/HISTAP - Siting of secure container. Approved subject to conditions, October 2004.
- 2.3. BA/2017/0268/PREAPP - Redevelopment of site to include enlargement of basin. Advice given.

## **3. Consultations received**

### **Parish Council**

- 3.1. We would like a condition requested that the spoil has to be removed by river as Horse Fen Road is totally unsuitable for a large number of large lorries up and down during the excavation. The PC would also like to see a condition that any large boats have to arrive at the site in future by water. A condition such as this was put on Swallowtail Boatyard when it was developed.

### **Environment Agency**

- 3.2. No objection subject to flood risk considerations and application of the sequential test.

### **Norfolk County Council (NCC) Highways**

- 3.3. No objection raised, recommended that the river/Broads network be utilised for the transport of arisings, otherwise conditions proposed to ensure protection of Horsefen Road.

### **District Councillor for St Benets Ward (Cllr Varley)**

- 3.4. I have read through all the relevant documents and believe that it doesn't need to go to committee and therefore, the application can be determined by the Head of Planning (delegated decision).

### **BA Landscape Architect**

- 3.5. The opening up of views into the site from Womack Water and beyond. The proposals involve enlarged moorings and ancillary features, parking, equipment etc., the adverse landscape effects of which would be increased by removal of tree screening.

Removal of the trees would expose the Forsythe Wherry Yard and buildings to views from Womack Water. It would be helpful to have the need/justification for the removal of these trees clarified.

The revised proposals are an improvement although details are rather unclear. On balance the development would have an overall adverse impact on landscape.

The mitigation proposed would not be sufficient to offset adverse effects on the character of the surrounding landscape and its visual amenity arising from the development. Although the revisions and additional information are appreciated, I remain unable to support the application.

### **BA Tree Officer**

- 3.6. It will still be difficult to retain trees without compromising their roots and associated structural integrity, and consequently the present screening would be lost. However, there could be potential to replant if sheet piling is to be used as will restrict and 'control' the roots of any new trees planted. Given this is a commercial project I am sure the owners would want to be sure the trees did not affect the quay headings.

However, with the restricted access there is also the issue of the trees being a nuisance to owners restricting movement around the quay-heading and branch/leaves messing up the boats and restricting access to the moorings.

On reflection, if the project is to go ahead perhaps future tree planting should be restricted to a minimum with perhaps just a few willows planted that can be regularly pollarded to maintain/restrict their size and potential nuisance.

### **BA Ecologist**

- 3.7. The application site is reedbed, a priority Biodiversity Action Plan (Section 41) habitat with national targets for no net loss. Reedbeds support an array of wildlife including nesting birds, invertebrates as well as mammals including otters and water voles.

The proposed tree removal would break up an ecological corridor leading to the river. The removal of the peat soils would subsequently result in a loss of a finite resource and the subsequent drying and oxidation of the peat leading to the release of carbon dioxide to the atmosphere.

Conclusion: Strong objection based on removal of peat soils and loss of Section 41 priority habitats.

If the planning team/committee are considering granting planning permission for the removal of UK priority habitat, then an offsite mitigation project for the creation of

reedbed should be secured. This is to ensure there is no net loss of Biodiversity Action Plan/Section 41 habitat in the National Park.

### **BA Rivers Engineer**

- 3.8. I would like to see a ground investigation survey which would give me confidence that they are planning to penetrate far enough into firm material to ensure the piling above water retains its position and integrity? As there is no room or scope for tie rods, so the sheets are going to have to be very well driven down and of a high specification to cope.

A Works licence will be required if working in, on, or over the navigation channel.

## **4. Representations**

- 4.1. Norfolk Wherry Trust made the following comments:

While we have no actual objections to the development we have two concerns that we wish to raise:

(a) There will be quite a narrow spit of land separating the enlarged basin from our dyke and the method of removal of any tree and shrub roots may affect the stability of that land.

(b) The manoeuvrability of the two wherries - Albion and Maud - into and out of our dyke would be adversely affected by any mooring in Womack Dyke immediately outside the enlarged basin. Anything that made Womack Dyke narrower for navigation would be of considerable concern to us. The front bank of the property concerned in the application has in recent years partially collapsed into the water already causing some restriction.

We wish to have assurances that these aspects related to the development have been raised and will be considered during the planning process.

## **5. Policies**

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).

- 5.2. The following policies were used in the determination of the application:

SP5 - Historic environment

SP7 - Landscape character

SP11 - Waterside sites

SP14 - Mooring provision

DM5 - Development and flood risk

DM10 - Peat soils

DM11 - Heritage assets

DM16 - Development and landscape

DM23 - Transport, highways and access

DM28 - Development on waterside sites in employment or commercial use, including boatyards

DM31 - Access to water

DM33 - Moorings, mooring basins and marinas

DM43 - Design

DM47 - Planning obligations and developed contributions

Landscape Character Assessment: Area 31 Thurne/ Bure Valley - Martham Ferry to Oby  
National Planning Policy Framework (NPPF)

## 6. Assessment

- 6.1. The proposal is for an enlargement of the existing mooring basin, a repositioning of the access from the adjacent water body, and the provision of areas of reedbed. The main issues in the determination of this application are the principle of development, impact on landscape, impact on priority habitats, impact on trees and highways safety.

### Principle of development

- 6.2. The principle of the proposed development is acceptable as the enlarged basin will contribute to the network of facilities around the Broads system and would result in an improvement to the quality of the mooring provision. The mooring provision is existing and the improvement would increase the revenue stream which would help support the viability of the business at the site. In these respects the proposal is considered to accord with the general thrust of Policy DM33 of the Local Plan for the Broads.

### Impact upon the landscape

- 6.3. The proposed development would result in changes to the appearance of the subject site and consequently the appearance of the landscape in this area. This has led to objections being raised by the BA landscape architect. Whilst the objections are acknowledged, the changes must be considered in the context of the site and the surrounding area, and take into account the nature and scale of development in this location.
- 6.4. The subject site lies within a sensitive area in landscape terms, where the areas to the south, south-east, and south-west comprise open, flat grazing marsh and areas of arable farmland. Owing to the areas of woods and trees along Womack Water, it is only the commercial areas towards the south of Horsefen Road that are visible from the wider area. The site is readily visible from Womack Water and the public footpath

running to the south-east, and there are long views into the site from properties to the west situated along Cold Harbour Road.

- 6.5. The location, siting, and scale of the workshop buildings at both the subject site and the adjacent Hunters Yard site are such that they are part of the landscape character in this locale. Other development along Horsefen Road is only hinted at, whereas the workshop buildings are particularly apparent. That they are on waterfront sites, have a clear commercial character and are of a scale which means they sit below the tree line backdrop, results in an appearance which does not appear unsuitable or unexpected. They neither dominate nor undermine the landscape character. It is inevitable and conventional that a commercial boatyard workshop would have a mooring basin to its river side, and this is the case with all such businesses in this small cluster of waterside commercial interests. The notable point about the subject site is the relatively small scale of the basin in comparison to the scale of the building, such that an increase in the scale of the basin would not appear at odds with the scale of development at the site.
- 6.6. The impacts on the landscape would come in the form of the increase in activity or perception of activity at the site and the loss of some areas of landscaping, particularly the trees on the north-west boundary. The BA landscape architect has made the point that a larger basin for larger vessels will result in additional impact on the appearance of the landscape. It is the case, however, that the moorings at Hunters Yard and Swallowtail both support larger vessels and these do not impact adversely on the landscape, and, in the context of the group of sites and the backdrop of large workshops, any increase in vessel size at the application site would not appear out of place, or at odds with the scale of development locally. Indeed the presence of moored vessels to the front of a large commercial building gives it an important context so that the relationship between water and land-based development is reinforced.
- 6.7. The loss of the trees is regrettable as they do provide a level of screening to the adjacent boatyard. The adjacent boatyard, both the canopy and workshop, along with the boathouse utilised by the Broads Authority, are of an evidently smaller scale than the two larger buildings to the south-west. The removal of the trees and consequent revealing of the neighbouring site would make that site more visible, but its scale, particularly when considered within the setting of the larger buildings, is low key and has a character and appearance which complements the two larger buildings. Therefore the loss of some screening to this site is not considered to be sufficient to justify refusal of the application. Further to this, the majority of views of the neighbouring site would be as background to the proposed enlarged basin, and in this setting would appear as an expected part of the commercial waterside interests, and therefore not markedly detrimental to the landscape appearance in this area.
- 6.8. With regard to the loss of the areas of existing reedbed, it must be noted that these are relatively small areas in terms of the scale of the larger areas of reedbed elsewhere in the immediate area. Whilst the loss of reedbed is unfortunate, it is not considered that the proposed development would have an unacceptable impact on the local landscape

or that of the wider Broads area because the enlarged basin would be seen as extension of the existing use and activity at the site and would not appear as an incongruous feature in the landscape. Therefore, the loss of these areas would not have a detrimental impact in strictly landscape terms.

- 6.9. The proposed enlargement of the mooring basin, the potential for use by larger vessels, and the opening up of the views to the neighbouring site, taking into account existing development, the setting within the landscape and the existing backdrop, would not result in a significant adverse impact on landscape character and appearance and in this respect the proposed works are acceptable with regard to Policies DM16 and DM33 of the Local Plan for the Broads, with regard to Landscape Character Assessment: Area 31.

### Impact on ecology and protected sites

- 6.10. The proposed enlargement of the existing mooring basin would be achieved by digging out adjoining areas of land, these areas are identified as Section 41 habitat in the form of peat soils supporting for the most part reedbed. These areas would be lost as a direct consequence of the development and there is not sufficient space within the application site for compensation in the form of re-provision of comparable areas with sufficient value and forming part of a coherent ecological network.
- 6.11. Some areas of new reedbed are proposed where possible within the site, and whilst it is accepted that these are limited in scope and value they do nonetheless provide some small landscape gains, and contribute to a group of similar narrow bands of reed and other vegetation.
- 6.12. As the proposal involves the excavation of peat it is necessary to consider this carefully. Policy DM10 sets out a presumption in favour of the preservation of peat in-situ, with development proposals that will result in unavoidable harm to peat only being permitted subject to assessment against specific criteria, namely:
- i) There is not a less harmful viable option;
  - ii) The amount of harm has been reduced to the minimum possible;
  - iii) Satisfactory provision is made for the evaluation, recording and interpretation of the peat before commencement of development; and
  - iv) The peat is disposed of in a way that will limit carbon loss to the atmosphere.
- 6.13. Throughout the processing of the applications, discussions have taken place with the applicant regarding the scale of the development and viability of the business with regard to the current proposal. Small reductions in the loss of peat were made through reducing the overall scale of the enlarged basin, but given the requirements of modern marinas and the additional capacity required to make a meaningful contribution to the business, it became apparent that to meet the business need would inevitably result in the loss of a not insignificant area of peat soils. The applicants have considered this carefully and the basin footprint has been positioned such that areas of made ground are utilised where possible to allow for the smallest amount of reedbed to be removed.



Although not an especially significant contribution, it does demonstrate that the process and relevant policy have informed the approach at this site. It is considered that this does address criteria i) and ii) of Policy DM10 of the Local Plan for the Broads.

- 6.14. Following advice from the Broads Authority, the current proposal was submitted to Norfolk County Council's Historic Environment Officer. It is noted that a significant excavation took place at the Hunters Yard site in 2011 and relevant research was undertaken of the geoarchaeological and paleoenvironmental value of the site, which resulted in no requirement for further archaeological work or archaeological conditions. In an assessment submitted with the current application, it was noted that the proposed development will result in the removal of approximately 150-200 cm depth of material, the majority of this being comprised of made ground, clays and secondary peat. As part of a package of mitigation measures, local geodiversity specialists would be invited to undertake recording and sampling of geological features uncovered during development work, excavated peat will be reused on site along the site frontage and in the newly created areas of reedbed and excess peat will be taken to a local water garden site and used for void infilling. It is considered that this does address criteria iii) and iv) of Policy DM10 of the Local Plan for the Broads.
- 6.15. In terms of impact on Section 41 habitat, there is a national target for no net loss. The proposed basin enlargement would result in the loss of an area of this protected habitat and the areas of compensatory habitat proposed on site will not (and cannot) provide equivalent biodiversity value. The NPPF is clear when assessing a proposal which would result in significant harm to biodiversity, if that harm cannot be avoided through locating development on an alternative site with less harmful impacts, then it should be adequately mitigated, or as a last resort compensated for. Only if these options are not possible should planning permission be refused.
- 6.16. The applicants are mindful of the site's limitations, and through a number of discussions made proposals for habitat creation at the site. Unfortunately, the existing site's limitations mean that any habitat creation which would be achievable here is not comparable either in area or quality, but the willingness to seek a solution does demonstrate an awareness of the issues by the applicant. With on-site options exhausted, the applicant has proposed instead to make a financial contribution to reedbed creation and management projects to be carried out by or on behalf of the Broads Authority. This will require both parties to enter into a legal agreement (known as a s106 agreement) which would be completed prior to issuing a planning decision.
- 6.17. Whilst it is always preferable to avoid or reduce harm, or mitigate where possible, national policy makes it clear that compensation, in this case in the form of a contribution to an apposite project, is an acceptable mechanism where no other option presents itself, and should be utilised to avoid refusal of an application on these grounds. The fund will be used to offset the loss of Section 41 habitat, and in this way makes the proposal acceptable with regard to Policy DM13 of the Local Plan for the Broads.

- 6.18. With regard to protected species, a water vole survey has been undertaken which concluded that the impact of the development on water voles is assessed as neutral. Precautionary mitigation has been proposed to render the site less favourable to this species prior to construction commencing. A re-survey of the site prior to commencement has been recommended to ensure that water voles remain absent from the construction zone and this will be secured by planning condition.
- 6.19. With regard to the designated sites which are situated approximately 100 metres to the east of subject site, taking into account the nature of the proposal, along with the separation to the designated sites, it is considered that there would be no adverse impact on the designated sites.

### **Removal of trees**

- 6.20. The trees at the site are afforded some level of protection by virtue of being sited in a Conservation Area so that works to them or their removal would require permission. Were an application for such works to be submitted and were it concluded that the trees should be retained, the LPA would have to serve a Tree Preservation Order to achieve this; if the trees were not considered to be worthy of protection, the application for the works would have to be approved. In this case the quality and status of the trees have been assessed and it is accepted that they are not of a sufficient quality to be protected.
- 6.21. An arboricultural assessment was submitted with the application and this describes the trees as relatively poor-quality, young self-seeded trees and some slightly larger (perhaps also self-seeded) individual trees. They are showing signs of decline and are likely to be relatively short lived because of the high water table and the relatively narrow habitable soil horizon in which they are growing. In addition, two groups of younger self-seeded trees which would be partially impacted by the proposals and will also be removed.
- 6.22. The BA Tree Officer has commented that it would be difficult to retain the trees without compromising their roots and associated structural integrity, and accepts that they are also likely to prove a nuisance boat owners. It is common practice to require replacement planting, and the BA Tree Officer has suggested that perhaps future tree planting should be restricted to a minimum with a few willows planted that can be regularly pollarded to maintain/restrict their size and potential nuisance. This is considered to be a pragmatic solution.
- 6.23. At this point it is worth noting the comments of the adjacent site owners, the Norfolk Wherry Trust; they highlight the quite narrow spit of land that would separate the enlarged basin from their mooring dyke. Their concern regards the method of removal of any tree and shrub roots and that this may affect the stability of that land and, with this in mind, it is recommended that a tree removal method statement be provided, secured by planning condition.

### **Highways and public rights of way**

- 6.24. Horsefen Road which provides land based access to the site is a narrow road with soft verges, a number of which are protected by marker posts. The proposal has been considered by Norfolk County Council as Highways Authority who commented that “the development if approved will involve significant excavation and disposal of arisings. The use of Horsefen Road to facilitate significant construction traffic movements is likely to give rise to verge damage and or even pavement damage, as well as conflict with other road users.” Taking into account the river fronting location, arisings could be transported from the site by river which is considered to be the favoured method of transportation. The applicant has confirmed that this is the approach that they will take and this can be covered by planning condition.
- 6.25. The applicant is confident that this is achievable. However, if it proves unfeasible and it is necessary to remove the materials by road, then details of a Construction Traffic Management Plan and Access Route, provision for addressing any abnormal wear and tear to the highway together, wheel cleaning facilities, and contractor parking will be required. It is recommended that a condition in the alternative be attached to the decision covering this.

### **Impact on residential amenity**

- 6.26. The proposal is for an enlargement of an existing basin where provision of a larger mooring would accommodate larger vessels. The number of moorings would not be increased, the overall siting of the basin is not altered, and the separation in excess of 100 metres to the nearest residential property is maintained. Taking into account the existing use and the neighbouring uses, it is considered that the proposed development will not be detrimental to the amenity enjoyed by nearby residents.

### **Mooring policy**

- 6.27. Policy DM33 of the Local Plan for the Broads covers moorings, mooring basins, and marinas. Relevant to this specific planning proposal, and not covered in previous sections of this report, the following considerations are addressed.
- 6.28. The proposed moorings are sited within an off-river basin and although extending towards the river, do not encroach on the river channel. There has been erosion of the reedbed so that the quayheading at the adjacent Norfolk Wherry Trust site appears to stick out into the river channel. This will be addressed by reinstating reedbed along its original line, but without extending further into the river channel than the previous situation, thereby having no impact on navigation.
- 6.29. There would be no net loss of visitor/short stay moorings. The existing basin would be enlarged but the number of moorings provided would remain the same, demarcated by finger jetties to provide a regulated layout and control the intensity of use. By virtue of the works proposed there would be no increase in vessels using the basin and consequently no increase in the number of vessels on this part of the Broads system, it

is therefore considered that no provision of visitor/short stay moorings is required as part of any grant of planning permission.

- 6.30. Car parking is provided at the site. In terms of other services, pump-out and potable water are available further north along Womack Water and will be made available at the site. Electric charging points are not available on site, however, given the setting of the basin these would not be necessary or appropriate in this location. Taking into account the other facilities available in the area it is considered that the proposal is broadly compliant with this policy requirement. Overall it is considered that the proposal has addressed the requirement of Policy DM33 of the Local Plan for the Broads.

### **Flood risk**

- 6.31. The Environment Agency has considered the proposal and raised no objections. The enlargement of the mooring basin will increase the area within the site where water can flow. There is no proposed increase in the number of visitors to the site. An Emergency Flood Plan has been produced which is considered satisfactory. With regard to the sequential test (NPPF paragraph 158 which states that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding), the subject site has an established boat workshop and mooring basin use and there are no reasonably available comparable sites in the area at a lower risk of flooding. The proposal is therefore considered to be acceptable in accordance with Policy DM5 of the Local Plan for the Broads and the NPPF.

### **Other matters**

- 6.32. The BA Rivers Engineer has raised issues regarding how the works would be carried out to an acceptable standard, bearing in mind how narrow the resulting spit of land would be on the north-west and south-west side of the basin. The Rivers Engineer has pointed out that there is no room or scope for tie rods, so the piling sheets are going to have to be very well driven down to penetrate far enough into firm material to ensure the piling above water retains its position and integrity, and be of a high specification to cope. The Agents for the application have confirmed that such details can be provided via a planning condition.

## **7. Conclusion**

- 7.1. The proposed development represents an opportunity for the owners of the former Ludham Field Base site to upgrade their mooring provision to reflect current requirements. The proposed development would not have an adverse impact on either landscape character or appearance, and whilst there would be an impact on ecology this has been mitigated by on-site works as far as is achievable and a contribution to off-site works to provide biodiversity gain. There would be no adverse impact on designated sites, or the amenity of neighbouring residents. The removal of peat soils is considered acceptable subject to swift reuse on a neighbouring sites, and the loss of

Section 41 habitat whilst regrettable is considered reasonably offset by a contribution to related projects. Consequently, the application is considered to be in accordance with Policies DM5, DM10, DM16, DM23, DM28, DM31, DM33, and DM47 of the Local Plan for the Broads, along with the National Planning Policy Framework.

## 8. Recommendation

- 8.1. To delegate authority to the Head of Planning to approve subject to the completion of a S106 to secure the financial contribution towards offsite biodiversity gain, along with the following conditions:
- i. Standard time limit
  - ii. In accordance with approved plan
  - iii. Details of method statement for piling and dredging works
  - iv. Details of reedbed management plan
  - v. Details of tree removal method statement
  - vi. Details of replacement trees/landscaping
  - vii. Details of ecological mitigation method statement, and an ecological management plan
  - viii. Water vole re-survey prior to works
  - ix. No external lighting without agreement in writing
  - x. Reuse of peat within 7 days of extraction
  - xi. Timber preservatives
  - xii. Arising transported by water
  - xiii. Highways conditions as recommended, if the transportation by water is unachievable

## 9. Reason for recommendation

- 9.1. The proposal is considered to be in accordance with Policies DM5, DM10, DM16, DM23, DM28, DM31, DM33, and DM47 of the Local Plan for the Broads, and the National Planning Policy Framework (2012) which is a material consideration in the determination of this application.

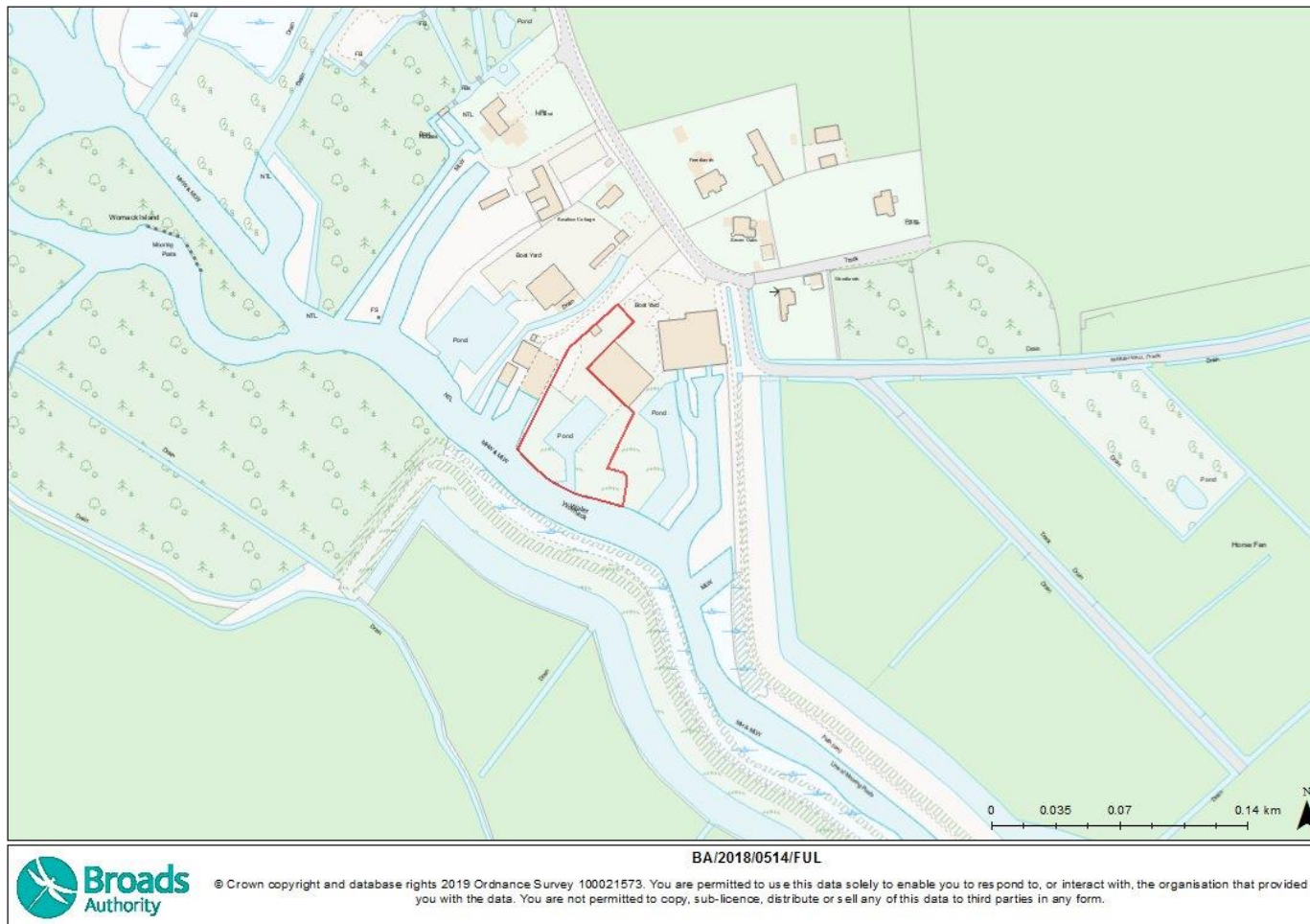
Author: Nigel Catherall

Date of report: 17 December 2019

Background papers: Application file BA/2018/0514/FUL

Appendix 1 – Location map

## Appendix 1 - Location map



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