



Local Plan for the Broads
Broads Authority response to Matter 12 – Site-specific policies

May 2018

Issue – Are the proposed allocations justified, effective, developable/deliverable and in line with national policy?

[Chapter 32]

Questions

Policy PUBBEC1: Former Loaves and Fishes, Beccles

- a) Does the policy provide a robust and deliverable approach which is consistent with Policy PUBDM43? Is there viability evidence which indicates that the public house is capable of retention?
- i. *The site is allocated in the Local Plan to provide a positive policy framework to encourage appropriate development at this prominent site that has been redundant for a number of years; the policy also identifies that residential use is not permitted.*
 - ii. *PUBBEC1 identifies the land uses that the Authority considers appropriate for the site, whilst PUBDM43 is a more generic policy which does not identify specific uses appropriate for a particular site. PUBDM43 will be of relevance for proposals that relate to PUBBEC1 if the owners seek to change it from a pub to a visitor or community facility and this is the stage (planning application) at which a viability assessment would be required.*
 - iii. *No specific viability assessment relating to the use as a pub has been completed by the Authority, so there is no evidence that the pub is capable of retention.*
 - iv. *On reflection, the site might be appropriate for some employment uses (particularly B1) but also some retail (A1, A2 and A3) subject to the sequential test and any evidence base or Beccles retail policy produced by Waveney District Council. Elsewhere in the Broads, there are live/work units in areas of similar flood risk and these seem to work well. The policy could refer to live/work units with employment on the lower floor and linked residential on the upper floor. This would allow more flexibility for proposals and may be a more proactive approach to bringing the site into use. The lack of car parking opportunities in the area will be a consideration for future uses and this could also be referred to in the policy or supporting text.*
 - v. *Further to explanation in Matter 7 relating to the Waveney SFRA, flood risk in the Beccles area has been modelled. The Loaves and Fishes lies in modelled zone 3b. This will need to be reflected in the policy. The Authority would like to amend the wording related to flood risk to PUBBEC1.*

b) Does the policy provide suitable protection for the historic environment?

- i. *Historic England has requested an amendment to the policy (LP-PUB4, rep 15, page 792) which seems reasonable. This is addressed in proposed change 78 (LP-SUB2). With this amendment, the protection for the historic environment is addressed.*

Policy PUBBEC2: Beccles residential moorings (Hipperson's Boatyard)

a) Is the proposal for five permanent residential moorings suitable and deliverable? What proportion of overall moorings does it represent? Should the proposed number of new moorings be specified in the policy itself?

- i. *The proposal for 5 residential moorings here was submitted by the landowner so it is likely that it will come forward if the policy is adopted. The nomination was assessed in the Residential Moorings Topic Paper and deemed suitable for the site and location. The town centre of Beccles is walking distance from the site and offers many services and facilities. As set out in EPS6, page 2, the landowner has confirmed their anticipated timeline and this is reflected in the amended residential moorings trajectory.*
- ii. *Including the wet shed (5 spaces), there are 40 moorings, which increases to 45 if you include the houseboats. So 5 out of 45 represent 11% of the site.*
- iii. *If the Inspector is suggesting that the number of moorings acceptable should be within the policy, then that could be a useful improvement to the policy.*

b) Does the policy provide sufficient protection for the historic environment?

- i. *Historic England has requested an amendment to the policy (LP-PUB4, rep 153, page 80) which seems reasonable. This is addressed in proposed change 79 (LP-SUB2). With this amendment, the protection for the historic environment is suitable.*

Policy PUBBRU2: Riverside estate boatyards

a) Is the proposed development and retention of the boatyard and related uses justified and deliverable? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?

- i. *This area is home to a significant number of boatyards and water related businesses. A number of these are of significant scale (e.g. the sites occupied by Brooms and Barnes Brinkcraft) and are important to the economy of both Brundall and the Broads more generally. Cumulatively they offer the full range of boating facilities from boat sales, hire, service and maintenance. There are both established and recently developed businesses in this area and there has been considerable recent investment in a number of the sites. The Authority has no evidence to suggest that any uses other than those which are boat related would be a better land use here, nor is there any pressure for significant alternative uses. Other policies in the economy section will be of relevance if change or diversification was proposed. The policy sets out the Authority's preference and reflects the general approach of the policies in the employment section of the Local Plan.*

- ii. The policy does not require change to the site, but seeks to guide any proposals for change. Proposals would originate from the site owner and will need to meet the requirements of this policy and of other policies in the Local Plan. If large scale proposals were to come forward then if necessary Paragraph 116 of the NPPF will come into play.*
- b) Is the proposal for up to two permanent residential moorings suitable and deliverable? What proportion of overall moorings does it represent? Should the proposed number of new residential moorings be specified in the policy itself, and captured within the residential moorings supply calculations?
 - i. The area covered by this policy is made up of a number of separate boatyards, all of which are slightly different, with some, for example, including boat sales and others providing some holiday accommodation. The area is not allocated for residential moorings; however a small number of these might be appropriate in some of the individual boatyard sites and might offer a useful diversification. The policy says that the area will be treated as though it is adjacent to a development boundary for the purpose of applying the residential moorings policy. Without this, any proposals for residential moorings would not meet the location criteria of PUBDM36. Any proposals that come forward would be counted as windfall. None of the boatyards in this area put their sites forward during the call for sites for an allocation for residential moorings, but this does not mean that this use might not come forward over the plan period.*
 - ii. The development boundary criteria of PUBBRU2 reflects the broadly sustainable location of Brundall Riverside as it is close to the centre of Brundall with many services and facilities, as well as being adjacent to a train station. People can walk to the centre of Brundall easily.*
 - iii. A development boundary was considered for Brundall during the early stages of the Local Plan. However one was not introduced mainly because the Broadland District Council Site Allocations Local Plan allocated land for 150 dwellings in Brundall and there is a settlement limit as well, so the settlement as a whole is accommodating some growth in a more appropriate location than the Broads part of the settlement. See EB7.*
 - iv. Policy PUBDM36 criterion a) gives guidance on the number of residential moorings acceptable. On reflection, it seems appropriate for PUBDM36 to specify that converting an entire boatyard to residential moorings would be judged on a case by case basis to reflect the impact on infrastructure in the area such as highways and that the economy policies of the Local Plan will also be of relevance. That would be an additional amendment proposed to PUBDM36.*
 - v. The various boatyards are of different sizes and scales, and vary from approximately 30 moorings to approximately 95 moorings. The addition of one or two residential moorings will therefore represent a different proportion at each of the yards.*
 - vi. The reference in the supporting text to PUBBRU2 relating to 1 or 2 residential moorings being acceptable is useful as it gives an indication of the rough number of residential moorings the Authority considers acceptable in this area.*

Policy PUBBRU4: Brundall Marina

- a) Is the proposed development and retention of the marina, boatyard and related uses justified and deliverable? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- i. *This area is home to a significant cluster of boatyard and water related businesses important to the economy of the Broads. Other policies in the economy section are of relevance if change or diversification was proposed. The policy sets out the Authority's preference and reflects the general approach of the policies in the employment section of the Local Plan.*
 - ii. *The policy does not require change to the site, but seeks to guide any proposals for change. Proposals would originate from the site owner and will need to meet the requirements of this policy and of other policies in the Local Plan. If large scale proposals were to come forward then if necessary Paragraph 116 of the NPPF will come into play.*
- b) How many permanent residential moorings would be suitable on this site? Should this figure be specified in the policy itself, and captured within the residential moorings supply calculations?
- i. *The site is not allocated for residential moorings. The policy says that the site will be treated as though it is adjacent to a development boundary for the purpose of applying the residential moorings policy at this site. Without this, any proposals for residential moorings would not meet the location criteria of PUBDM36. Any proposals that come forward would be counted as windfall. The boatyard did not come forward during the call for sites requesting an allocation for residential moorings.*
 - ii. *If the Inspector is minded to put a figure in the policy or supporting text in a similar way to BRU2, the Authority considers 10% of the boatyard's moorings being converted to residential moorings could be acceptable in this case. This reflects transport constraints (the road access and level crossing) and opportunities (the proximity of the train station and services and facilities in Brundall). But this would be windfall and not count in the trajectory.*

Policy PUBBRU6: Brundall Gardens

- a) Is the proposal for up to two permanent residential moorings on this site suitable and deliverable? What proportion of overall moorings does it represent? Should the proposed number of new residential moorings be specified in the policy itself?
- i. *There is an error in the supporting text. This should read '...up to 5 of the moorings at the boatyard...'*
 - ii. *The allocation as shown on the policies map was rolled forward from the Sites Specifics Local Plan 2014 and is not correct anymore as there have been extensions to the basin since the Site Specifics Local Plan. As such an amended allocation is proposed as shown in Appendix B.*
 - iii. *The site came forward during the Regulation 19 stage of the Sites Specifics Local Plan 2014. The Inspector examining that Local Plan considered the site suitable for residential moorings and concluded:*

'64. In addition to these areas, Brundall Parish Council has identified two more areas, which the BA agrees are suitable for residential mooring subject to criteria. I inspected these areas on my site visit and they appear to me to be appropriate for this use.

65. Therefore, to permit appropriate residential moorings in these locations, and to justify the Plan and ensure its compliance with the Framework, MM3, MM4, MM5, MM6 and MM7 are recommended relating to BRU2 (Riverside Estate Boatyard) and new policy BRU6 (Brundall Gardens). However, unless the submitted policies map is correspondingly modified, these policies will be unsound. Therefore, MM28 is recommended to resolve this position'.

- iv. There is good access by foot to the centre of Brundall with the services and facilities it provides. There is also Brundall Gardens train station next to the site.*
 - iv. If the Inspector is suggesting that the number of moorings acceptable should be within the policy, then that could be a useful improvement to the policy.*
- b) Are these new mooring allocations captured in the supply table in the Addendum to the Residential Moorings Topic Paper (August 2017) (LP-PUB9)?
- i. Yes. This is captured in more detail in the amended residential moorings trajectory and supporting table as set out in the Housing Supply Topic Paper (EPS6).*

Policy PUBCAN1: Cantley Sugar Factory

- a) Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- i. The policy does not require change to the site, but seeks to guide any proposals for change. Proposals would originate from the site owner and will need to meet the requirements of this policy and of other policies in the Local Plan. If large scale proposals were to come forward then if necessary Paragraph 116 of the NPPF will come into play. The Authority does not have any evidence to suggest that any major change is proposed in respect of this site.*
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- i. Yes and Historic England and Norfolk County Council requested amendments to the policy (LP-PUB4, page 80, rep numbers 154 and 78) which seem reasonable. Proposed changes 83 and 82 address these comments.*

Policy PUBCHE1: Greenway Marine residential moorings

- a) Is the proposal for five permanent residential moorings suitable and deliverable? What proportion of overall moorings does it represent? Are access/highway issues capable of being resolved?
- i. The nomination was assessed in the Residential Moorings Topic Paper and deemed suitable for the site and location. Loddon town centre is in walking distance from the site and offers many services and facilities, so too is the retail*

centre in Chedgrave. As set out in EPS6 page 2, the landowner has confirmed their anticipated timeline and this is reflected in the amended residential moorings trajectory.

- ii. *Following discussions with the police regarding the comments received on this allocation and PUBL0D1 relating to anti-social behaviour, whilst the Police did not have any specific complaints relating to moorings at Greenway Marine, they do support a management plan for residential moorings at this site as well as at Loddon Marina (see later). It is therefore proposed to amend the policy to require a management plan.*
- iii. *There are 18 moorings in total so 5 out of 18 is 28%.*
- iv. *As set out in Residential Moorings Topic Paper (EB24, page 16, 3rd column, third row) Norfolk County Council say 'It should be noted however, that the access with the highway, is restricted and that the Highway Authority have recently recommend refusal of a proposal for three residential properties accessed of the track leading to the boatyard due to restricted visibility. Accordingly unless visibility improvements can be secured, which given they cross third party land may be difficult and improvements are made to the access itself in terms of width and surface, Highways Authority may object in terms of highway safety'. So an agreement with a third party to enable adequate visibility is required.*
- v. *More detail regarding the visibility issue has been provided from Norfolk County Council as Local Highways Authority:*
 - *The issue with visibility is due to the fact that the visibility splay crosses third party land (the house to the right of the access when exiting). The wall height is not the issue it is the fact that the visibility splay crosses the land behind the wall, and as far as can be determined there is nothing preventing a shrub or tree (potted or not), or any other form of obstruction being erected that exceeds the height of the wall and therefore blocks the visibility. Given that any shrub or planting would be deemed as temporary, no planning legislation would control this.*
 - *It should be reiterated that the existing use is a matter of fact and it is the cumulative effect and intensification of use of the access that raises the issues regarding visibility.*
 - *One option to address the visibility issue would be for a Section 106 Agreement to be entered into to secure the visibility splay across the third party land, but that would need all parties, the applicant, the land owner and the Highway Authority to be in agreement. Whilst no land would be lost by this Agreement, only its use restricted, it would be for the applicant to seek agreement from the land owner.*
 - *Apart from a Section 106 Agreement, or it being evidenced that there is an extant condition protecting the visibility splay, an option that would possibly provide visibility to required levels would be a total revision of the access to Greenway Marine and Wherry close such that there was one point of access to the main highway, but this is likely to be a costly proposal and not necessarily reasonable given the scale of development and would be unlikely to meet the condition test of the NPPF. Likewise there would be land issues to be resolved.*

Policy PUBGTY1: Marina Quays (Port of Great Yarmouth)

a) Does the policy set out a clear and robust approach for redevelopment of the site? Is there sufficient clarity regarding the scale and type of uses, and the extent to which current uses can be retained, supported by enabling development? Is the policy approach supported by viability evidence?

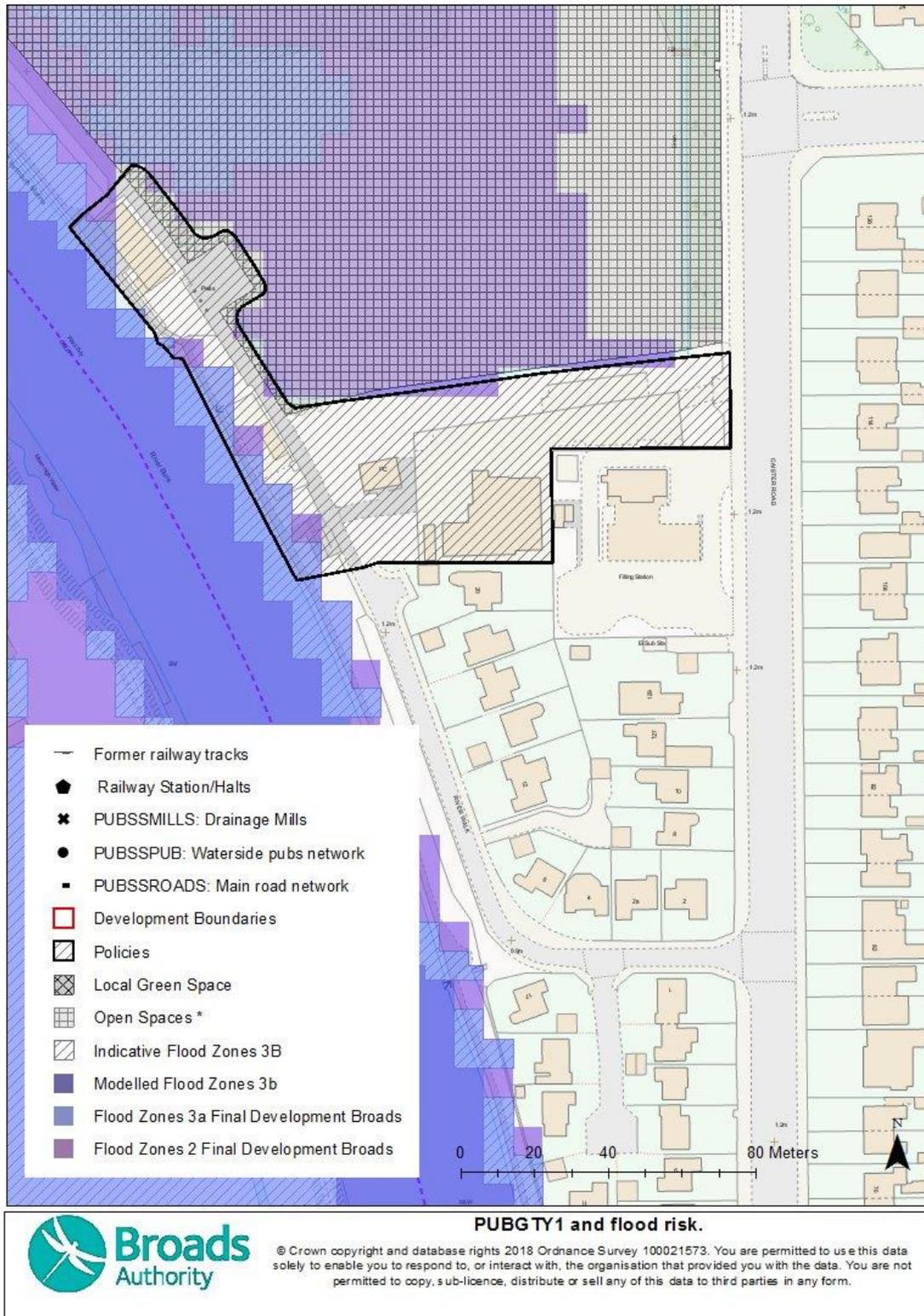
i. The policy was rolled forward from the adopted Sites Specifics Local Plan 2014 with minor amendments. The policy is flexible with regards to what could happen on that site, albeit with emphasis on the importance of design to reflect its location and flood risk. The aim of the policy is to provide a positive framework to help promote and guide change to the site.

ii. A site specific flood risk assessment would be required (as per PUBDM4) to identify the flood risk to the site as it is in an area of indicative 3b. The flood risk associated with the site would be the starting point in relation to any increase in footprint (see footnote 26, page 33 of the Local Plan). Additional development may be acceptable if flood risk is addressed. Furthermore, other policies of the Local Plan will come into play and the design policy (PUBDM42) will help guide the scale of any redevelopment.

iii. There is no site-specific viability study. The policy was rolled forward from the adopted Sites Specifics Local Plan 2014 with minor amendments.

b) Can flood risk be effectively dealt with as part of any redevelopment scheme?

i. As shown on the policies maps (LP-PUB7, map 9) only a small part of the site is affected by flood risk, albeit flood zone 2, 3a and indicative 3b. For clarification, please see the following map which shows the allocation with flood risk. Whilst flood risk will be an important consideration, the SFRA implies that flood risk could be effectively dealt with. A flood risk assessment will be required to provide specific information on site.



c) Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?

- i. *The policy seeks regeneration of a site that is at the urban/rural transition gateway. It is in a prominent location. The site has been subject to repeated vandalism, so there are health and safety issues as well as issues of adverse visual amenity. It would be in the public benefit for the site to be regenerated.*

- ii. *The policy guides the types of development that could be acceptable at this site. If proposals are for major development then it is likely that NPPF Paragraph 116 would come into play.*
- d) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- i. *Yes and Historic England requested an amendment to the policy (LP-PUB4, page 93, rep numbers 155) which seems reasonable. Proposed change 88 addresses these comments.*
- e) How were the site boundaries identified and are they robustly based?
- i. *The boundaries were identified in the Sites Specifics Local Plan 2014 (AP3a, page GTY1, page 44 and policies map 6). These reflect the extent of the previously developed land which is currently occupied by the buildings which the policy seeks to regenerate. There is no justification to extend the area allocated as the rundown buildings are within the current allocation.*

Policy PUBHOR6: Horning - Boatyards etc at Ferry Road and Ferry View Road

- a) Is the proposed development and retention of the boatyard and related uses justified and deliverable? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- i. *This area is home to a number of businesses which rely on the waterside location, including around 5 boatyards, a significant number of holiday units, a public house and restaurant. Together they are important to the economy of Horning and the Broads generally. Other policies in the economy section are of relevance if change or diversification was proposed. The policy sets out the Authority's preference and reflects the general approach of the policies in the employment section of the Local Plan.*
 - ii. *The policy does not propose change to the area, but seeks to guide any proposals for change. Proposals would originate from the owner of any particular site and will need to meet the requirements of this policy and of other policies in the Local Plan. If large scale proposals were to come forward then if necessary Paragraph 116 of the NPPF will come into play.*
- b) How many permanent residential moorings would be suitable on this site? Should this figure be specified in the policy itself, and included in the residential moorings supply calculations?
- i. *The site is not allocated for residential moorings. The policy says that the area will be treated as though it is adjacent to a development boundary for the purpose of applying the residential moorings policy. Without this, any proposals for residential moorings would not meet the location criteria of PUBDM36. Any proposals that come forward would be counted as windfall. None of the boatyards in this area came forward during the call for sites requesting an allocation for residential moorings.*

Policy PUBHOV3: Brownfield land off Station Road, Hoveton

- a) Is the proposed A3/A4 use of the former Broads Hotel Cottage and Waterside Rooms sites justified and deliverable? What proportion/scale of retail or residential development may be appropriate as part of any redevelopment scheme? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- i. *The policy is flexible in its approach, stating what is potentially acceptable here to reflect the sites' central location with good access by foot to many services and facilities. These brownfield sites are either redundant or underutilised and the policy provides a positive framework to encourage appropriate change and redevelopment. The former Waterside Rooms and the former Broads Hotel Cottage site have been vacant for a number of years.*
 - ii. *Recently an application for the former Broads Hotel Cottage site was received by the Authority and is due to be determined at Planning Committee on 22 June 2018. This application is for temporary use as car parking and is recommended for approval. This reflects that there is a temporary need for car parking whilst the extension at Roys (the other side of Station Road and discussed more under HOV5 part of this matter) is completed. The Authority considers this a low grade use that is not appropriate in this prominent location on a permanent basis, but acknowledges the short term need to enable development of Roys's extension. The policy approach is still sound as the permission for car parking is only temporary for 5 years and the Local Plan period is until 2036.*
 - iii. *Regarding paragraph 116 in the NPPF, the policy seeks regeneration of a site in a prominent location. It would be in the public benefit for the site to be regenerated.*
- b) Is the proposed allocation of the building next to the Kings Head pub as holiday accommodation justified and deliverable?
- i. *The Authority considers that this building is prominent on the street scene and reflects the historic use of the site as an inn, and hence links to the cultural heritage of the Broads. Its current use for storage does not make the most of the building's potential, and the Authority considers that holiday accommodation here would contribute to the local economy and provide for the visitors. Often holiday accommodation represents the best use of a heritage asset as explained in our responses to Matter 9, b).*
- c) Does the policy provide suitable protection for the historic environment?
- i. *Yes and Historic England requested an amendment to the policy (LP-PUB4, page 95, rep numbers 158) which seems reasonable. Proposed change 101 addresses these comments.*

Policy PUBHOV4 – BeWILDerwood Adventure Park

- a) What scale and form of new development in the Park would be supported? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- i. *Bewilderwood is a large visitor attraction based on outdoor play. It is located within woodland within the Broads and has been developed very carefully over a number of years with close liaison between the Authority and the operators.*

It is unlikely that further significant development could be accommodated on or adjacent to the site, accordingly the policy does not propose change to the site, but seeks to guide any proposals for change. Proposals would originate from the site owner and will need to meet the requirements of this policy and of other policies in the Local Plan. If large scale proposals were to come forward then if necessary Paragraph 116 of the NPPF will come into play.

ii. The criteria taken as a whole, as well as the policies in the tourism section of the Local Plan, will guide what is acceptable in this area.

b) Does the policy provide an effective framework for guiding/assessing future proposals?

i. The policy was produced using previous experience of determining planning applications relating to the Park. With this experience in mind, the policy addresses many of the issues that previous applications have had to deal with. As such, it is deemed effective for determining future applications for this important site.

Policy HOV5: Hoveton town centre and areas adjacent to the town centre

a) Is the strategy for Hoveton town centre aligned with North Norfolk District Council's approach for the remainder of the town centre? How does it fit with the strategy for Wroxham?

i. The Strategy for Hoveton Town Centre was produced jointly with Officers from North Norfolk District Council and based on EB22. North Norfolk District Council is yet to write their policies for their emerging Local Plan.

ii. There is no separate town centre in Wroxham, with the main commercial uses (an art gallery, launderette, tourist centre, library and two restaurants) located close to the bridge which marks the boundary with Hoveton, so there is a degree of coalescence. There is no retail strategy for Wroxham.

b) Is the estimated floorspace requirement of 1,234m² robustly based and capable of delivery in Hoveton town centre as a whole over the Plan period? Is the need for comparison or convenience goods?

i. Section 6.76 of EB22 sets out the justification. In line with the requirements of the NPPF EB22 assesses the qualitative and quantitative scope for new retail floorspace. The qualitative analysis is based upon the district study area, which covers the primary catchment areas of the main shopping destinations in North Norfolk and extends across both the Broads and the District Council boundaries towards Norwich. In setting the extent of the study area consideration is given to the influence of existing centres outside the district boundary based on a consumer habits survey undertaken in Oct 2016. The level of available expenditure is based on establishing per capita levels of spending in the study area population now and in the future and as above also includes an estimation of expenditure available through the tourist economy. Population projections are based on the ONS 2014 projections as the most up to date available, published May 2016. Tourist spending is based on the levels identified in the Economic Impact of Tourism North Norfolk Report 2015¹, which when the

¹ <https://www.north-norfolk.gov.uk/media/3681/economic-impact-of-tourism-north-norfolk-report-2016.pdf>

number of tourist is spread throughout the year equates to an additional 26,800 people per day. The EB22 identifies limited potential to accommodate growth broken down in the following table:

Table 6.6 Hoveton/Wroxham Floorspace Projections (Sq.M Gross)

Type	By 2026	By 2031	By 2036
Convenience	0	0	0
Comparison	342	643	957
Food/Beverage	88	182	277
Total	430	825	1,234

Source: Table 13 in Appendix 2, Table 14 in Appendix 3 and Table 11 in Appendix 4.

- ii. EB22 at section 7.33 says: *'There is limited potential to accommodate growth within vacant shop units and no development sites are allocated within Hoveton/Wroxham town centre. The short term need up to 2026 could be accommodated by small in-fill developments, shop extensions and expansion into upper floors. In the longer term residual growth, if achieved, could be accommodated on surface car parks around the centre or alternatively growth could be redistributed to North Walsham'. Since the report was written and the Local Plan was submitted, planning permission has been granted by North Norfolk District Council for a 1,672sqm extension (the application says the same size for gross and net) to the Roys Department Store which will increase comparison floorspace; this development is due to commence later in 2018.*
 - iii. *If an alteration is required to the policy to reflect this permission, the policy could be changed to say that retail and other town centre development will be supported at a scale appropriate to the Town Centre (located in the primary shopping area) in accordance with the NNDC study and future updates and complies with the sequential and impacted tests and other national policy requirements.*
- c) Is the Primary Shopping Area (PSA) boundary clearly defined and justified? How would applications for retail uses A1-A5 be dealt with in the areas outside the PSA but within the identified town centre boundary?
- i. *The PSA is based upon the adopted PSA of North Norfolk District Council. EB22 says at 6.79 'The primary shopping area currently only includes units to the east of Station Road. However there is a concentration of retail/services uses between Station Road and the River Bure, along both sides of Norwich Road. The Council should consider extending the primary shopping area within this area'. The PSA was drawn based on the existing area, taking into consideration EB22 recommendations and drawn in liaison with North Norfolk District Council.*
 - ii. *It is noted that the Sequential Test should be town centre first rather than PSA (NPPF paragraph 24). The policy (PUBHOV5) requires the location of retail development (A1- A5) to be first concentrated in the PSA. For proposals that are not in the PSA but lie within the Authority's part of the Town centre they will be supported provided that there is a review of suitable site across the town centre in line with the sequential approach requirements.*

- iii. *This policy only applies to the Broads part of the town and the Authority is working closely with NNDC to ensure a collective single policy approach to the town centre.*
 - iv. *If the Inspector is minded to propose a change to this policy, the policy could be amended to say that retail uses should be located within the town centre with a focus on PSA first.*
- d) Is the impact assessment threshold of 500m² for Hoveton town centre justified and soundly based?
- i. *Section 6.77 of EB22 sets out the justification for this and is copied here: 'Retail development of 2,500 sq.m gross would be significant in relation to the scale of existing retail provision in Hoveton/Wroxham and is more than double the total floorspace projection over the plan period. A locally set threshold of 500 sq.m gross would be appropriate for retail and leisure development in Hoveton/Wroxham reflecting the existing scale of the town centre and the floorspace projections shown in Table 6.6'.*
- e) Is the approach to the redevelopment of the identified 'areas adjacent to Hoveton town centre' justified and deliverable? Should the PSA be extended to incorporate these areas?
- i. *In the sites Specifics Local Plan 2014 (AP3a), the general area covered by the emerging town centre policy was addressed in Policy HOV4. On receipt of the North Norfolk retail evidence (EB22) PUBHOV5 was produced. The town centre excluded some of the area covered by HOV4 (of AP3a) and so the Authority decided to incorporate these remaining areas into HOV5 as areas adjacent to Hoveton Town Centre because these areas are important locally and would not have a policy approach to guide them otherwise. The evidence (EB22) did not indicate that these sites should be included within the PSA.*

Policy PUBL0D1: Loddon Marina Residential Moorings

- a) Is the proposal for up to 10 permanent residential moorings suitable and deliverable? What proportion of overall moorings on the site does it represent? Are there exceptional circumstances that justify the proposed allocation, in line with paragraph 116 in the NPPF?
- i. *The proposal for residential moorings here was submitted by the landowner so it is likely that it will come forward if the policy is adopted. The nomination was assessed in the Residential Moorings Topic Paper and deemed suitable for the site and location. Loddon town centre is within walking distance from the site and offers many services and facilities, so too is the retail centre in Chedgrave. As set out in EPS6, page 2, the landowner has confirmed their anticipated timeline and this is reflected in the amended residential moorings trajectory.*
 - ii. *Following discussions with the police and site manager regarding the comments received on this allocation and PUBL0D1 relating to anti-social behaviour a management plan is proposed. Please see Appendix A for more details on this.*
 - iii. *The allocation of 10 moorings provides residential moorings to contribute to the need identified for the Broads pursuant to the Housing and Planning Act 2016. The site is located in the centre of a town providing many services and facilities.*

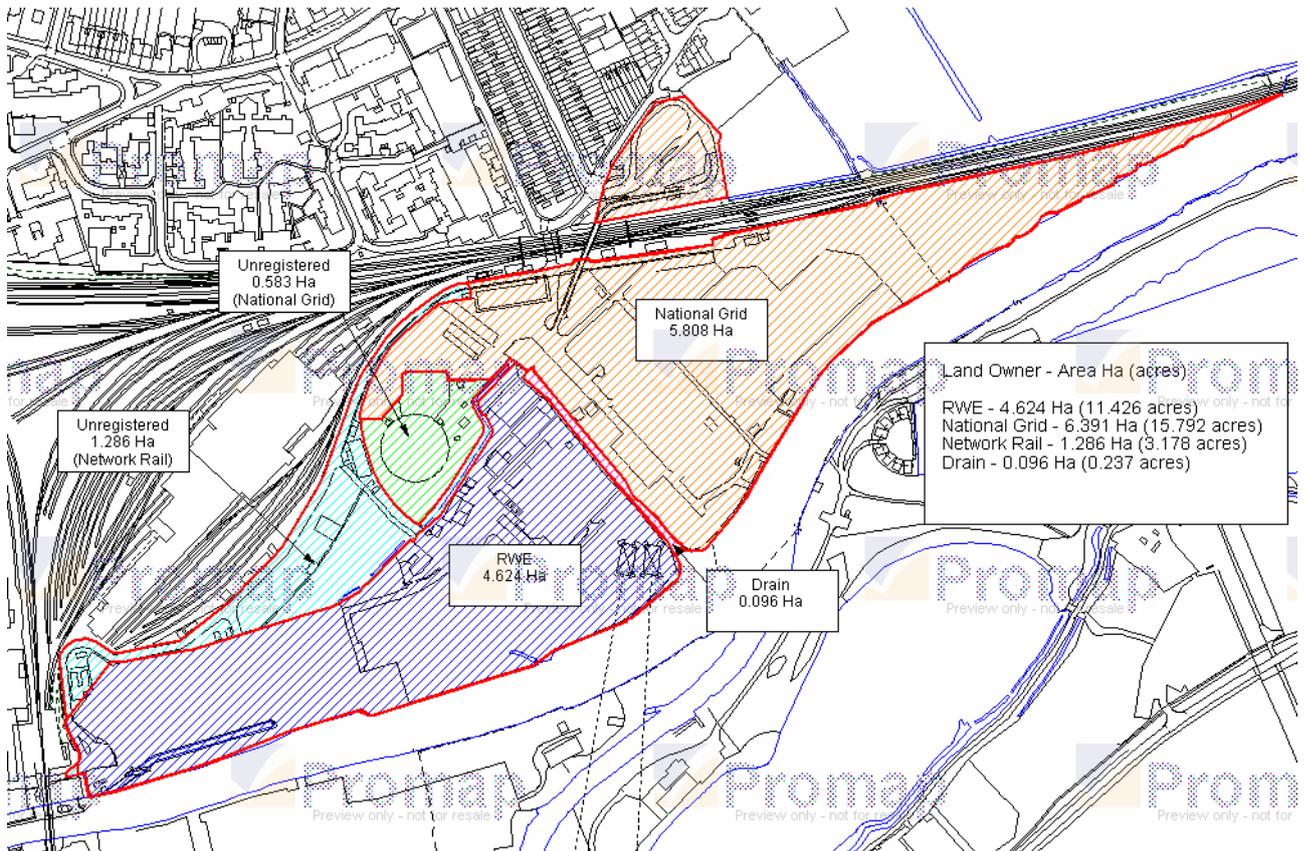
- iv. *There are 40 moorings on site. The allocation represents up to 25%.*
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- i. *Yes as the policy refers to designated sites. Other constraints and features are identified in the supporting text. Ways of addressing anti-social behaviour concerns are discussed previously.*
- c) Are highway and foul water disposal matters capable of being resolved?
- i. *Regarding highways, comments from Norfolk County Council as Local Highways Authority are included on page 17 of EB24 and copied here: 'This would result in a significant increase in traffic movements to and from the site. The access with the highway affords appropriate visibility and width to accommodate such movements but Loddon High Street does have some lengths over which the width is restricted. Aware there are already some issues with traffic flows at present without any increase in traffic despite it being classed as link road (serves as a link between the Primary and Secondary network). The main issues in terms of traffic movements relate to unrestricted parking on Church Plain (High Street) opposite the Church Plain car park and it would appear that this would need to be regulated. Whilst having some reservation, appropriate mitigation measures would be required in the form of parking restrictions to address the issues discussed above'. So the highway issues are capable of being resolved.*
 - ii. *Turning to foul water disposal, following liaison with Anglian Water Services who raised the concern initially, it appears that the landowner is proposing an upgrade to an existing connection rather than introduction of new flows into the public sewerage network. This may result in a slightly higher flow rate but it is unlikely to significantly increase loading however Anglian Water Services have indicated that they don't have an objection to the principle of development on this site and they could consider the implications of an increased flow rate to the foul sewerage network at planning application stage including whether any improvements are required.*

Policy PUBNOR1: Utilities site

- a) What mix and scale of uses are proposed on the site? Is the proposal justified and deliverable? Are there exceptional circumstances that justify the proposed allocation, in line with paragraph 116 in the NPPF?
- i. *It is anticipated that 120 dwellings could come forward on this site as this is what the initial application proposed and is consistent with the plans of the land owner (who stated a similar amount as part of the examination of the Sites Specifics Local Plan 2014).*
 - ii. *PUBNOR1 regenerates a prominent brownfield site on the urban/rural fringe of Norwich and enables the housing need for the Central Norfolk HMA part of the Broads to be met (and exceeded). As set out in the Housing Supply Topic Paper (ESP5), this site is part of a wider scheme within both the Broads Authority Executive Area and Norwich City Council's area. The Authority considers it*

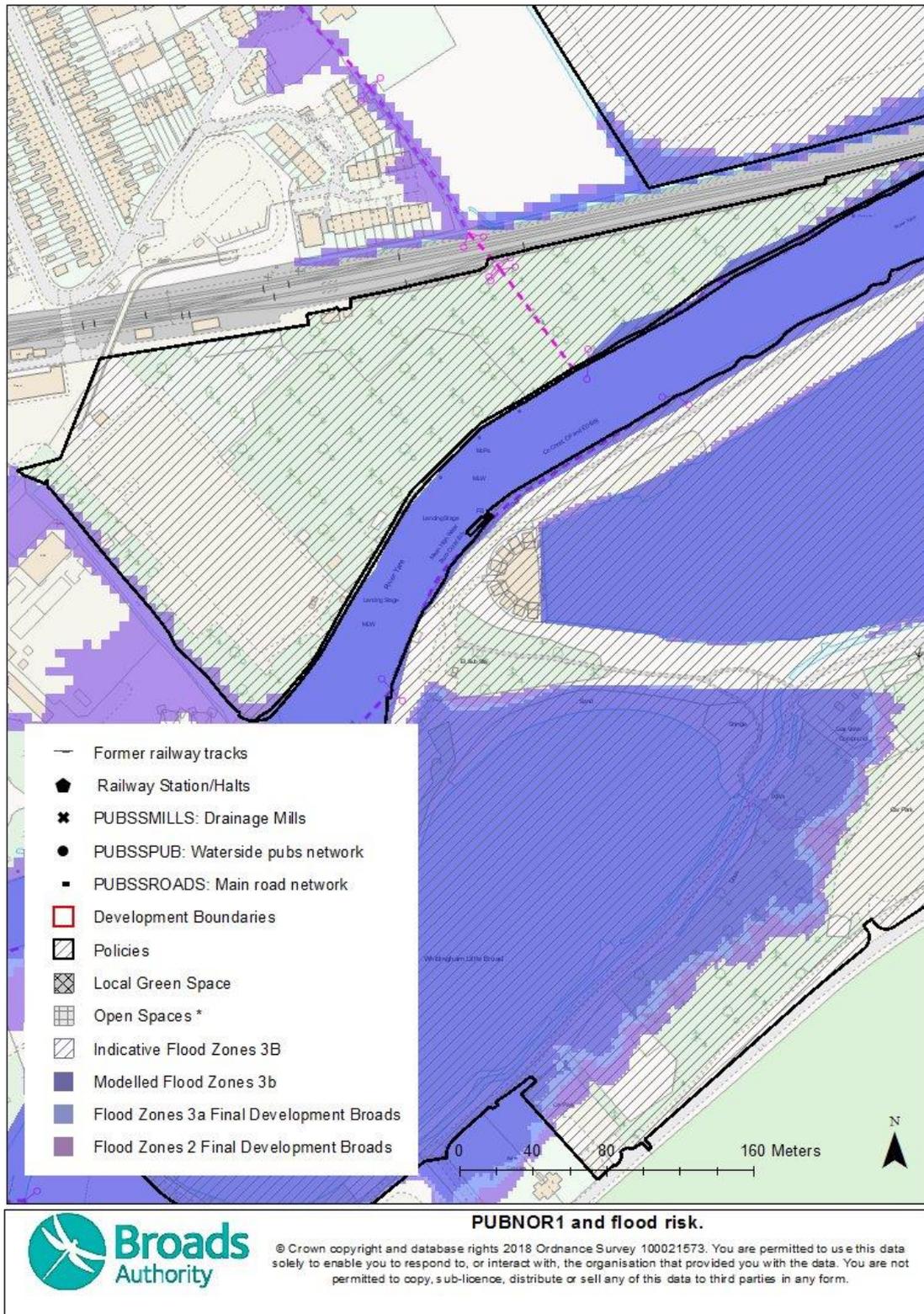
important to continue to allocate this site as it forms part of the strategic needs of the wider Norwich area.

- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- i. *Yes and Historic England requested an amendment to the policy (LP-PUB4, page 108, rep numbers 159) which seems reasonable and can be taken forward. Proposed change 106 addresses these comments.*
- c) What progress has been made in bringing forward the site for redevelopment? Are landownership, access and flood risk issues capable of being resolved?
- i. *The progress in bringing forward development on the Utilities site needs to be considered alongside the development of the Deal Ground which lies to the south of the River Wensum mostly within the administrative area of Norwich City Council, through which access is likely to be taken.*
 - ii. *In 2013 outline planning permission was issued for the redevelopment of the Deal Ground to provide a mixed use residential led (City Council ref 12/00875/O issued 12th July 2013). This consent is still extant but has not yet been implemented. It was issued subject to an access agreement that provides for the Deal Ground owners, Utilities site owners and river owners (Norwich City Council) to have reciprocal access rights. This access agreement is also still extant.*
 - iii. *The Utilities site was subject to a major planning application for a biomass power plant led mixed use redevelopment in 2015 (BA ref BA/2015/0225/FUL City Council ref 15/00997/F). This application was accompanied by a flood risk assessment. The application was withdrawn in July 2016. The outstanding issues pertinent to the application did not include flood risk.*
 - iv. *Current ownership details for the Deal Ground and Utilities site are illustrated on the following plan. The owners continue to work closely together to assess their development options.*



Source: Norwich City Council

- v. *In September 2017 the City Council bid for Housing Infrastructure Funding to assist with delivery of the Deal Ground. Unfortunately this bid was not successful but both the City and County Councils are working closely with Homes England to unlock funding for infrastructure that is needed to support the development of the brownfield sites in East Norwich.*
- vi. *A new bridge is likely to be needed to access the site. Flood risk is not likely to be a significant constraint on site according to the SFRA – see following map.*
- vii. *The landowner, Norwich City Council and Broads Authority are keen for the site to be developed with the regeneration benefits and contribution to housing need in the City it brings.*



Policy PUBOUL1: Boathouse Lane leisure plots

a) Does the policy provide sufficient recognition of constraints relating to minerals?

- i. *In response to Suffolk County Council's comment (LP-PUB4, page 109, rep number 98) the Authority proposes change 109. That amendment will ensure sufficient recognition of constraints relating to minerals.*

Policy PUBOUL2: Oulton Broad, former Pegasus/Hamptons site

- a) What mix and scale of uses have been given planning permission on the site? Does the policy provide a suitable level of detail which reflects the permission? Do exceptional circumstances exist which justify the allocation, in line with paragraph 116 in the NPPF?
- iii. *The planning permission is for 76 dwellings, boatyard building at 432 sqm, office building at 380 sqm and 30 moorings.*
 - iv. *The policy wording is rolled forward from the Sites Specifics Local Plan 2014 and does not include the detail of the planning permission because this could limit flexibility if an application to amend the details of the scheme were to be submitted. The policy outlines the acceptable uses, which form the approved scheme.*
 - v. *PUBOUL2 regenerates a prominent brownfield site and enables the housing need for the Waveney part of the Broads to be met (and exceeded).*
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- i. *Yes and Historic England has requested an amendment (LP-PUB4, page 110, rep 160) which seems reasonable. Proposed Change 112 (LP-SUB2) addresses this comment.*

Policy PUBOUL3: Oulton Broad District Shopping Centre

- a) Is the approach in Policy PUBOUL3 consistent with that of Waveney District Council, justified and in line with national policy?
- i. *Recently Waveney District Council undertook their Regulation 19 consultation and their version of the policy has some additions to the Authority's versions.*
 - ii. *In discussion with Waveney District Council Officers and to ensure consistency it is proposed that this text is added to the PUBOUL3 'the impact assessment threshold that applies to development within the District Centre is locally derived and set at 350 square meters'. This is because the Retail and Leisure Needs Assessment (EB39) states that in Waveney a lower threshold of 350sqm would be appropriate. The Retail Impact Threshold Advice for Waveney District (2018)² provides further analysis and evidence for setting an appropriate retail impact threshold based on the health and size of town centres in the District, the average size of retail units and recent planning permissions for retail. This additional work confirms that the 350 square metre retail impact threshold is appropriate for the whole District.*
- b) Are the District Centre boundaries clearly defined and robustly based?

² <http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Retail-Impact-Threshold-Advice.pdf>

- i. *Yes. We have chosen to show the entire district centre, even outside of our area, on the policies maps. It is clearly identified which part is outside of our area.*
- ii. *The boundary generally follows the existing allocation (see adopted Waveney District Council Proposals Maps³) for the part outside of the Broads. The boundary within the Broads Authority Executive Area was produced in liaison with Waveney District Council Officers and reflecting the land uses identified through their monitoring regime.*

Policy PUBPOT1: Bridge Area

- a) What form and scale of improvements/change would be permitted in this area? Does the policy provide clear guidance on the matter? Do exceptional circumstances exist which justify the allocation, in line with paragraph 116 in the NPPF?
- i. *This area is one of the 'honey pots' of the Broads with many different attractions and constraints within a small area. As such, a policy is considered essential to guide development or change to this important area of the Broads. Particularly as it acts as a gateway (in fact the bridge acts as a barrier as large craft are unable to pass through it) to one of the most tranquil and important areas of the Broads (the Upper Thurne area).*
 - ii. *The policy sets out general principles for what is accepted in this area. Depending on the detail of proposals, other policies will be of relevance. If the boatyard sites wish to change or develop, then policies in the economy section will be of relevance with their various criteria. If the former Bridge Hotel site is to be developed or changed, the pubs policy will be of relevance. If the green space near to the bridge were to have proposals relating to it, then the Local Green Space policy would be of relevance.*
 - iii. *The policy does not propose change to the site, but seeks to guide any proposals for change. Proposals would originate from the site owner and will need to meet the requirements of this policy and of other policies in the Local Plan. If large scale proposals were to come forward then if necessary Paragraph 116 of the NPPF will come into play.*
 - iv. *That being said, the former Bridge Hotel site is in a very prominent location, near to the waterfront and bridge. The policy seeks improvements to this site that are appropriate to its prominent location, and which would provide regeneration and bring this site back into an appropriate use.*
- b) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?
- i. *Yes. The public realm and Scheduled Ancient Monument are addressed within the policy itself, with other considerations identified under the constraints and features section. Other policies of the Local Plan will be used to determine applications if relevant.*

³ <http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Proposals-Map/Central-Lowestoft.pdf>

Policy PUBSOL2: Land adjacent to A43 Beccles Road and the New Cut (former Spinnakers restaurant)

- a) What scale of development, including holiday accommodation, is anticipated on this site? Do exceptional circumstances exist which would justify major development, in line with paragraph 116 in the NPPF?
- i. *The constraints will govern what is acceptable here. Fundamentally, the site is allocated in the Local Plan to provide a positive policy framework to encourage appropriate change to this prominent redundant site as well as to highlight that residential is not permitted for flood risk issues and for the fact that it is outside of a development boundary. The Authority would accept a conversion of the existing building or redevelopment on a comparable footprint to an appropriate use including those listed in the policy. The site is currently for sale.*
 - ii. *A site specific flood risk assessment would be required (as per PUBDM4) to identify the flood risk to the site as it is in an area of indicative 3b. The flood risk associated with the site would be the starting point in relation to any increase in footprint (see footnote 26, page 33 of the Local Plan). Additional development may be acceptable if flood risk is addressed. Furthermore, other policies of the Local Plan will come into play and the design policy (PUBDM42) will help guide the scale of any redevelopment.*
 - iii. *The policy does not propose change to the site, but seeks to guide any proposals for change. Proposals would originate from the site owner and will need to meet the requirements of this policy and of other policies in the Local Plan. If large scale proposals were to come forward then if necessary Paragraph 116 of the NPPF will come into play.*

Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)

- a) Is the proposed development and retention of the boatyard and related uses justified and deliverable? Do exceptional circumstances exist which would justify major development on the site, in line with paragraph 116 in the NPPF?
- i. *This policy is rolled forward from the Sites Specifics Local Plan 2014 with some amendments. Richardson's at Stalham Staithe is one of the biggest boatyard operators on the Broads and this is their main site with around 400 moorings. This policy is considered important to guide what change and development is acceptable at such a large boatyard.*
 - ii. *The policy does not propose change to the site, but seeks to guide any proposals for change. Proposals would originate from the site owner and will need to meet the requirements of this policy and of other policies in the Local Plan. If large scale proposals were to come forward then if necessary Paragraph 116 of the NPPF will come into play.*
- b) How many permanent residential moorings would be suitable on this site? Should this figure be specified in the policy itself, and included in the residential moorings supply calculations?
- i. *The site is not allocated for residential moorings. The policy says that the site will be treated as though it is adjacent to a development boundary for the purpose of applying the residential moorings policy at this site. Without*

this, any proposals for residential moorings would not meet the location criteria of PUBDM36. Any proposals that come forward would be counted as windfall. The boatyard did not come forward during the call for sites requesting an allocation for residential moorings.

- ii. The development boundary criterion of PUBSTA1 reflects the broadly sustainable location of Stalham Staithe as it is close to the centre of Stalham with many services and facilities. People can walk to the centre of Stalham, albeit by using the pedestrian island to help cross the A149 that separates Stalham Staithe from Stalham.*
- iii. A development boundary was considered for Stalham Staithe during the early stages of the Local Plan. However one was not introduced mainly because of the impact of development on the character of the staithe, it is also not clear where the development would go as the staithe area has seen much infill development and the community consider the area is at capacity. On balance, whilst the services and facilities in Stalham can be accessed by pedestrians using the pedestrian refuge, further residential development in the area has the potential to impact negatively on the character of the area and also the highway network. Consequently, a development boundary for the Stalham Staithe area was not taken forward.*
- iv. Policy PUBDM36 criterion a) gives guidance on the number of residential moorings acceptable. On reflection, it seems appropriate for PUBDM36 to specify that converting an entire boatyard to residential moorings would be judged on a case by case basis to reflect the impact on infrastructure in the area such as highways and that the economy policies of the Local Plan will also be of relevance. That would be an additional amendment proposed to PUBDM36.*

Policy PUBSTO1: Land adjacent to Tiedam, Stokesby

- a) Is the proposed housing allocation justified and deliverable? Does the policy provide sufficient detail regarding the scale of the scheme?
 - i. Yes. The justification for the allocation is set out in EB17 with information relating to deliverability included in the Housing Supply Topic Paper (EPS5).*
 - ii. The scale is not within the policy. The reasoned justification (page 182, third paragraph) sets the scale at around 4 dwellings. This could be added to the policy text.*

Policy PUBTSA2: Thorpe Island

- a) Is the overall strategy for the island in Policy PUBTSA2 justified, effective and soundly based? In particular:
 - i. Does the policy allow for the expansion/extension of existing buildings in the eastern end of the site as part of well-designed upgrades or renewals? If so, what scale/form would be supported?
 - A. Yes the policy allows the changes quoted. Schemes should be along existing lines of the existing development and the scale of change that would be accepted would be guided by design and other policies in the economy section. Any improvements to the visual appearance to the existing boat shed buildings*

would be welcomed. Thorpe St Andrew Town Council raised some concerns about this part of the policy (see LP-PUB4 page 113 and 114) and their comment is addressed through proposed change 115 of LP-SUB2. The Authority has referred Thorpe St Andrew Town Council to the proposed changes and they are content.

ii. What potential scale of permanent residential moorings would be suitable in the eastern end of the site? Should this figure be identified in the Plan and included in the residential moorings supply calculations?

A. *There are no authorised residential moorings here and nor does the policy allow for these. Policy PUBDM36 refers to proposals needing to be adjacent to or within development boundaries but the Authority proposes to remove the development boundary at Thorpe St Andrew (as discussed in matter 2). As such the Authority proposes to remove that final sentence that refers to DM36 from the policy.*

iii. Are 'low key recreation and private amenity space' uses clearly defined, as relating to the central section of the island?

A. *The Authority notes that the use in this instance is not consistent with the proposed change 115 in LP-SUB2 and therefore it is proposed to amend the policy to refer to this part of the island being retained in its current use with no significant extensions to the existing buildings and only replacements on a like for like basis and used for informal recreational purposes only.*

iv. Does the policy seek to restrict development in the western end of the island to 25 private moorings in the basin and associated infrastructure only? What is the justification for this approach, and why were other uses rejected?

A. Yes the policy does take this approach which is in accordance with the appeal decision reference number APP/E9505/C/11/2165163 dated 20 October 2014

v. What is the justification for requiring moorings on the western end of the island to be located within the basin?

A. This approach is in accordance with the appeal decision referred to in the previous answer.

Policy PUBTHU1: Tourism development at Hedera House, Thurne

a) What type and mix of tourism uses does the policy seek to secure? What proportion of the site should be retained in short-stay holiday accommodation use, as referred to in criteria i)?

i. *The policy sets out that short stay holiday accommodation and some market housing is acceptable on the site. The policy does not seek to specify the proportion to be short stay accommodation. The criteria of the policy guide what is acceptable, in particular criterion ii).*

b) Is the proposal justified and deliverable? Are there exceptional circumstances that justify the proposed allocation, in line with paragraph 116 in the NPPF?

- i. *The site came forward during the Regulation 19 stage of the Sites Specifics Local Plan 2014. The previous Local Plan Inspector considered the allocation and policy suitable as it will result in regeneration of the site. The following is an extract from the Inspector's Report:*

'82. Nonetheless, there is one site at Hedera House in Thurne, which has not been properly provided for within the Plan. The site is currently used for tourist accommodation, and contributes significantly to the tourist trade. Consequently, the BA would ideally like to see it retained as a tourist facility.

83. However, the site's buildings are outdated and in need of significant renovation or replacement and, I understand that the business is running at a loss. In order to retain this site as an attractive tourist facility, it will need redeveloping, although I am told that in order to provide new tourist accommodation an element of enabling housing development will be required. Consequently, an element of market housing is justified in these circumstances.

84. As the site is neither within a development boundary, nor the subject of an allocation, such development is not supported by the SSPLP. This is not appropriate in this case. Therefore, to rectify the situation, MM18 and MM19 are recommended, which introduce a new Policy THU1 (Tourism development at Hedera House), thereby allocating the site for tourist development whilst also allowing a proportionate amount of general market housing as enabling development. However, unless the submitted policies map is also amended, the policy will be unsound. Therefore, to ensure consistency with the policy, MM29 is also recommended.'

- ii. *As can be seen in the Inspector's report, the exceptional circumstances as set out in NPPF 116 relate to the site needing significant regeneration as it is running at a loss.*

c) Are the detailed policy requirements sufficient to avoid or minimise any detrimental effects on the environment, landscape and recreational opportunities?

- i. *Yes and Historic England have requested an amendment to the policy (LP-PUB4, page 115, re number 162) which seems reasonable and is addressed through proposed change 119 (LP-SUB2). The policy will also be read alongside other topic specific policies in the Local Plan.*

d) What development has been permitted on the site by the recent planning permission, and should the housing numbers and other details be reflected within the policy?

- i. *Planning Permission at Hedera House was granted in September 2017 for 6 market dwellings and 10 holiday lets.*

- ii. *It is not considered appropriate to reflect the specifics of this planning permission in the policy because this would reduce flexibility in terms of any potential amendments which may be required. The policy wording is clear that only the minimum amount of market dwellings to enable the provision and upgrading of holiday accommodation offer will be permitted. A detailed explanation is set out in EPS5.*

Policy PUBSSA47: Changes to the Acle Straight (A47T)

- a) Does Policy PUBSSA47 provide a positive strategy for future improvements to the Acle Straight, which balances the need to protect the special qualities of the Broads against social and economic benefits?
- i. The policy does not promote nor seek to prevent the changes to the Acle Straight and is intended to be neutral. The policy seeks to guide the design of any future scheme by setting out the local considerations a scheme will need to address. This is a major development that passes through a unique part of the local area with the highest level of protection. The criteria within the policy reflect the important special characteristics of the Broads in that area. To reiterate, the policy does not attempt to stop the changes, but seeks to ensure they are as well designed as they can be and are respectful and sympathetic to the area the road travels through.*
 - ii. The representation (Rep number 195 on page 120 in LP-PUB4) from Highways England encapsulates the approach: "It is clear that the Policy (PUBSSA47) is intended not to rule out any possible future improvements but to ensure that the designers of any such schemes take into account important considerations which would not apply outside of the Broads and therefore to provide the justification to overcome the strong presumption against any such schemes contained in central government policy. The Policy therefore appears to be a practical attempt to balance the competing needs of the A47 as a key link in the SRN with those of the Broads as a National Park status area and is welcomed by Highways England. Highways England supports PUBSSA47."*
- b) Is the provision of walking, cycling and horse riding routes, as set out in criterion vi), justified and deliverable?
- i. Broadland District Council raised a concern about this requirement of the policy (LP-PUB4, page 117, rep number 2). To address this, the policy is proposed to be amended as set out in proposed change 125 (LP-SUB2) which has the support of Broadland Council. The reason for this criterion is to provide opportunities for walking and cycling to enable the understanding of the Broads in line with the purposes of the Broads. Whilst the policy has been further amended (as discussed in the next point), the general thrust of the policy remains the same as included in LP-SUB2.*
- c) Are there any outstanding objections to the policy from other Councils or statutory bodies, taking account of any changes proposed by the authority? If so, the Authority is requested to produce a Statement of Common Ground with each organisation, which outlines common ground and any remaining areas of disagreement.
- i. Following discussions with all interested parties, an amended policy has been produced and agreed and this is included in the Statement of Common Ground with Norfolk County Council. There are no outstanding objections from Norfolk County Council. The amended policy was shared with Waveney District Council, Great Yarmouth Borough Council and Highways England (as they made representations on the original policy) and they are content with the amendments as well.*

Appendix A: Antisocial behaviour comments relating to Loddon Marina



Note relating to anti-social behaviour comments received relating to the allocations for residential moorings at Loddon Marina and Greenway Marine. Broads Authority Local Plan May 2018

1. Introduction

There are two residential mooring allocations nearly opposite to each other on the River Chet. Loddon Marina on the south bank is allocated for ten residential moorings (LOD1) and Greenway Marine on the north bank is allocated for 5 residential moorings (CHE1).

Following submission of the Local Plan, the site promoter for Loddon Marina and the local Police were contacted for their views in relation to the comments received on the Local Plan allocations for residential moorings in Loddon and Chedgrave.

2. Manager of Loddon Marina

The Authority wrote to the Manager of Loddon Marina to ask for confirmation about delivery of his site and to inform him that we had received negative comments about his site. The Manager stated that he was disappointed with the comments we had received about the site he manages. Whilst not intended to be verbatim quotes from the Manager, in general, he said the following:

- He has been in place as manager for a year.
- He inherited some issues which he has rectified.
- He has strict rules about the standard of boats, cleaning of boats and says he will keep copies of safety certificates, insurance and river licences on file.
- There has been one incident of poor behaviour by one of his tenants. He worked with the police, and South Norfolk Council to resolve this and the individual is now living elsewhere in accommodation better suited to his needs.
- There is a plan to upgrade quay heading and other facilities on site. In particular upgrading to the fixed electric points so berth holders no longer need to run generators or boat engines for power.
- There is staff on site 24/7 as well as security cameras that can be logged onto by berth holders.
- He wonders if the negative comments could be in relation to the nearby public moorings

3. Greenway Marine

The Authority wrote to the owner of Greenway Marine to ask for confirmation about delivery of the site and to inform him that we had received negative comments about his site. In general the owner said the following in response:

- Greenway Marine Ltd had never received any complaints about our mooring or hardstanding clients not from Wherry Close or any other neighbours.
- Parking will not be an issue as they currently have enough space for the cars belonging to all our moorers nothing will change if a few become residential.
- There is one large wheely bin emptied fortnightly and they will increase this to two or three to cope with more rubbish produced.
- Work is about to start on our toilet block; it is to be completely upgraded with the addition of a shower and washing machine.
- They have recently introduced mooring agreements for moorers and hardstanders.
- Any potential new residential moorer would be vetted as would their boat be inspected for suitability.
- They try to keep the boatyard as tidy but they need to bear in mind it's a working boatyard.

4. Local Police Officer comments

The Authority contacted the local Police for their thoughts on the allocation as well as the comments received in relation to the allocation. Whilst not intended to be verbatim quotes from the police, in general, they said the following:

- In March 2016 there were a number of boats in the area that resulted in anti-social behaviour complaints (ASB). These were located at the Staithe west of Loddon Marina. The complaints were of noise and frequent visitors all through the night. The boats were only there for a couple of weeks and in that time there were three thefts and two ASB calls to police and also numerous complaints to the parish council of ASB
- Considers that Loddon Marina has improved in the last 12 months or so, with no complaints in that time.
- Is not aware of any complaints relating to Greenway Marine in the last six years.
- Suggested that any residential moorings in the area would need to keep records of who is on what boat as well as have rules in place and need to understand who will be responsible for any ASB at the locations and who will monitor this and how easily problem persons/boats could be moved from the area.
- Further to this suggestion, this issue could be covered by a planning condition. For example, on short term holiday accommodation the standard condition states "...A register of bookings of the development hereby permitted shall be maintained at all times and shall be made available for inspection to an officer of the local planning authority upon reasonable notification by that officer to inspect the register and shall be available for a period of twelve months following the first occupation of the development hereby permitted." A similar condition could be used, requiring information to be kept regarding who is on which boats, as long as it can be demonstrated

that it would be 'reasonable'. Further, a 'management plan' could also be required to ensure the site as a whole is appropriately managed. This would normally cover things like noise, waste, deliveries times etc and would have contact details for when the management of the site is not adhered to. A breach of this management plan would then be a breach of condition and could be enforced. Both of these types of condition could be considered reasonable when considered in the potential impact on public amenity in the area.'

- The Police agreed that such a management plan would be useful and could also be a requirement for Greenway Marine.

5. Summary

It appears that over the last twelve months, much work has been undertaken at Loddon Marina to improve facilities as well as improve the management of the site. The police have confirmed that in the last twelve months there have not been any reports of issues in the area in relation to residential moorings and anti-social behaviour. It is important to note that the anti-social behaviour reports were related to boats moored at the staithe rather than at Loddon Marina and Greenway Marine. A management plan seems to be a reasonable request for this site given the history and nature of comments received and it is proposed that this requirement is included within the policies LOD1 and CHE1 as well as supporting text on this issue. Please see Sections 6 and 7 below for proposed changes to the policies LOD1 and CHE1 respectively.

6. Proposed Amended Policy LOD1.

Policy PUBL0D1: Loddon Marina Residential Moorings

Inset Map 5

Policy PUBDM36 (New residential moorings) will apply as the boatyard will be treated as if it were adjacent to a development boundary. Proposals for residential moorings of up to a maximum of 10 will be allowed in this area if they are not at a scale which would compromise existing business on the site and which would meet the criteria in Broads' policies on general employment and boatyards.

Proposals must ensure no adverse effects on water quality and the conservation objectives and qualifying features of the nearby SSSI.

The residential boats moored here must not encroach further into the river.

A satisfactory solution will be required to address the Highways Authority's concerns regarding impact of the development on High Street and Church Plain.

[A management plan for the site and a register of those who live on boats will be required and will be covered by a planning condition imposed on any planning](#)

Constraints and features

- In the vicinity of Hardley Flood SSSI part of the Broadland SPA
- Flood Zone 3 (EA Mapping) and indicative 3b (SFRA 2017)
- Within the Loddon and Chedgrave Conservation Area
- Generally the approach to the boatyards in this area is quite busy with occupied moorings.
- Electricity, water, toilet and shower pump out facilities available on site.
- Many services and facilities at walking distance from site.
- Potential issues relating to impact of residential moorings on traffic flow of High Street and Church Plain.

Reasoned Justification

The Broads Authority would support up to ten of the moorings at Loddon Marina being converted to residential moorings in line with policy PUBDM36. The benefits of a regular income, as well as passive security that residential moorings can bring, are acknowledged. However, in accordance with other Local Plan policies, the conversion of an entire business to residential moorings would not be supported. While the entire length of moorings at Loddon Marina is allocated, the Authority supports a maximum of ten of these moorings to be residential moorings. It is anticipated that the moorings will be place within a few years of adoption of the Local Plan perhaps by the end of 2020.

To ensure the residential boats moored here do not impact adversely navigation and as the moorings are stern on, there could be a length restriction on boats here as part of any application. It is not a requirement of this policy that the basin is extended; rather, that private moorings are converted to residential moorings.

Loddon Marina has good access by foot to everyday services and facilities provided in Loddon and Chedgrave (such as a supermarket, pharmacy, school and post office). Bus stops to wider destinations are also within walking distance from these areas.

Proposals must also take into consideration the SSSI near to this Marina and the Marina's location within a conservation area.

The quay heading used to moor and access boats may be in need of improvements and any application should address this.

The Highways Authority has raised some concerns regarding the impact of the development on High Street and Church Plain, which already experience traffic related issues. Any proposals will need to address these concerns satisfactorily.

Anglian Water Services will need further information relating to foul water disposal to assess if there is capacity in the network.

The policy requires a management plan for the site as well as a register of those boats being lived on within the marina. These will be required through conditions on planning application(s). The management plan will help ensure the site as a whole is appropriately managed. This would normally cover things like noise, waste, deliveries times etc. and would have contact details of who to contact if the management requirements of the site are not adhered to. A breach of this management plan would then be a breach of condition and could be enforced. The register of who lives on which boat will be maintained at all times.

Evidence used to inform this section

- Residential moorings topic paper www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2

7. Proposed Amended Policy CHE1.

Policy PUBCHE1: Greenway Marine residential moorings

Inset Map 5

Policy PUBDM36 (New residential moorings) will apply as the boatyard will be treated as if it were adjacent to a development boundary. Proposals for residential moorings of up to a maximum of five will be allowed in this area if they are not at a scale which would compromise existing business on the site, as well as meeting the criteria in Broads' policies on general employment and boatyards.

Proposals must ensure no adverse effects on water quality and the conservation objectives and qualifying features of the nearby SSSI.

The residential boats moored here must not encroach further into the river.

A satisfactory solution will be required to address the Highways Authority concerns regarding visibility at the junction of the access road to Greenway Marine (and other properties) with Bridge Street.

A management plan for the site and a register of those who live on boats will be required and will be covered by a planning condition imposed on any planning permission granted.

Constraints and features

- In the vicinity of Hardley Flood SSSI part of the Broadland SPA.

- Flood Zone 3 (EA Mapping) and indicative 3b (SFRA 2017).
- Loddon and Chedgrave Conservation Area is across the river.
- Generally the approach to the boatyards in this area is quite busy with occupied moorings.
- Electricity, water and pump out facilities available on site although uses a septic tank.
- Many services and facilities walking distance from site.
- Visibility concerns at junction with Bridge Street.

Reasoned Justification

Whilst the entire length of moorings at Greenway Marine is allocated, the Authority would support up to five of the moorings at the Greenway Marine Boatyard being converted to residential moorings in line with policy PUBDM36. The benefits of a regular income as well as passive security that residential moorings can bring are acknowledged. However, in accordance with other Local Plan policies, the conversion of an entire business to residential moorings would not be supported. It is anticipated that the moorings will be place within a few years of adoption of the Local Plan perhaps by the end of 2020.

To make sure the residential boats moored here do not impact adversely on navigation and as the moorings are stern on, there could be a length restriction on boats here as part of any application.

The Greenway Marine Boatyard has good access by foot to everyday services and facilities provided in Loddon and Chedgrave (such as a supermarket, pharmacy, school and post office). Bus stops to wider destinations are also within walking distance from these areas. Proposals must also take into consideration the SSSI and Conservation Area near to this Boatyard.

The quay heading used to moor and access boats may be in need of improvements and any application should address this.

The Authority is aware of plans to improve the toilet and include a shower available to residential moorings users. We would expect this to be completed prior to any occupation of the moorings for residential purposes. It is also noted that the site uses a septic tank and policy PUBDM1 may be of relevance.

The Highways Authority has raised concerns regarding the visibility available to vehicles exiting the track from Greenway Marine (and the other properties along this track) at the junction to Bridge Street, and this will need to satisfactorily be addressed.

[The policy requires a management plan for the site as well as a register of those boats being lived on within the marina. These will be required through conditions on planning application\(s\). The management plan will help ensure the site as a](#)

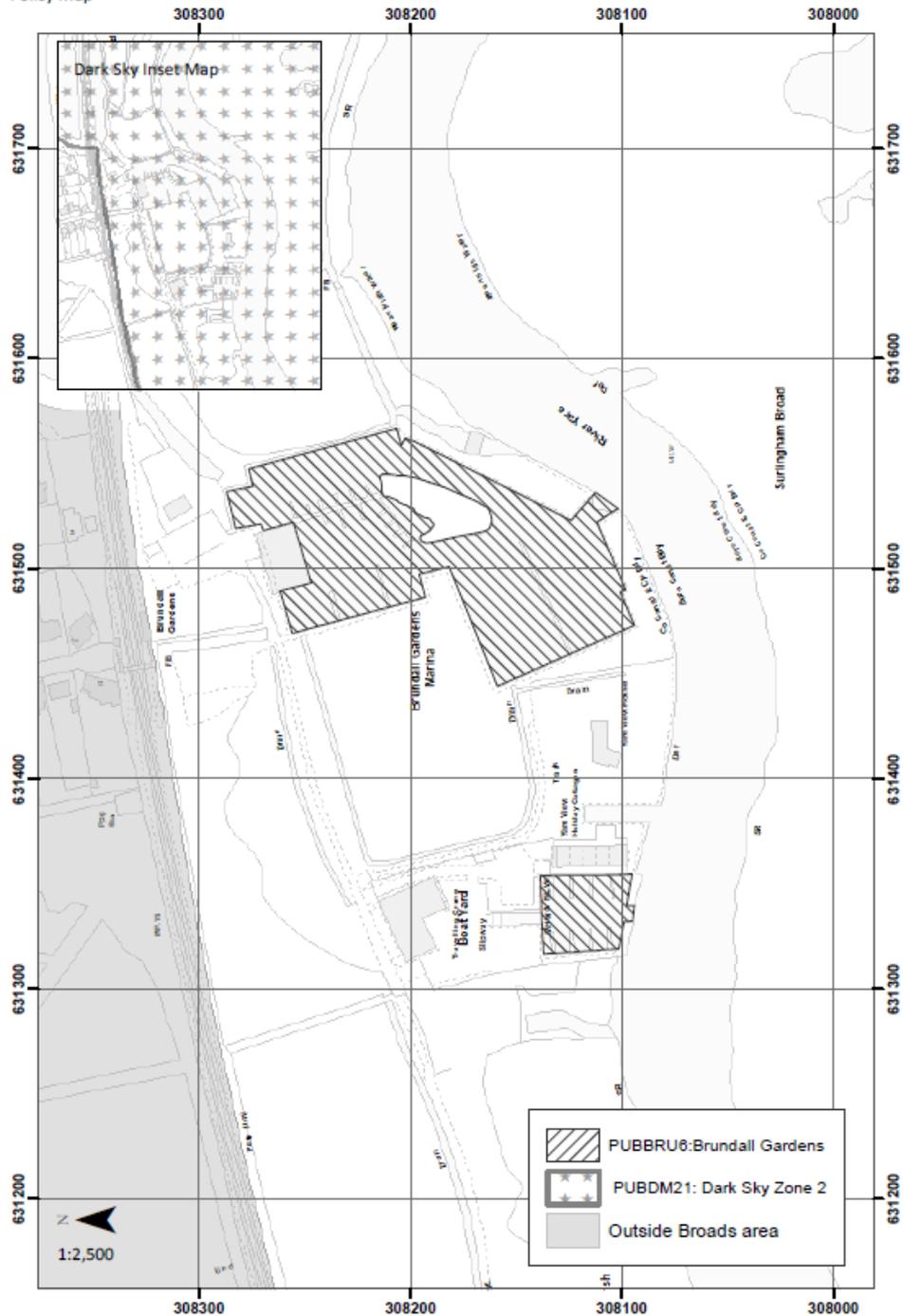
whole is appropriately managed. This would normally cover things like noise, waste, deliveries times etc. and would have contact details of who to contact if the management requirements of the site are not adhered to. A breach of this management plan would then be a breach of condition and could be enforced. The register of who lives on which boat will be maintained at all times.

Evidence used to inform this section

- Residential moorings topic paper
www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan

Appendix B – amended allocation for BRU6 Brundall Gardens

Broads Local Plan - Publication version - May 2018
 3A. BRUNDALL GARDENS
 Policy Map



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