

# Broads Authority

25 September 2020

Agenda item number 13

## Planning policy – Residential Moorings Guide

Report by Planning Policy Officer

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### Purpose

The Residential Moorings Guide will help implement the policies of the Broads Local Plan relating to residential moorings. This report outlines the consultation responses to the first draft guide, and arrangements for consultation on the revised draft guide.

### Recommended decision

The revised Residential Moorings Guide is endorsed for public consultation.

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## 1. Introduction

- 1.1. The Residential Moorings Guide is designed to help implement the policies of the Broads Local Plan relating to residential moorings. It is for decision makers as well as applicants and site owners, and contains useful information to help make schemes as successful as possible.
- 1.2. The first draft Guide was subject to public consultation earlier this year. Due to the Covid-19 restrictions, the consultation did not follow our usual approach as set out in the Statement of Community Involvement. However, we have assessed the responses and made amendments to the draft Guide.
- 1.3. The revised draft Guide and responses to the first stage consultation have been discussed at the September Planning Committee. The feedback from that meeting is reported in section 4.

## 2. First draft consultation

- 2.1. The first stage consultation ran for 12 weeks, ending on 5 June. The consultation responses and our proposed amendments to the Guide are at Appendix 2. A summary of comments is as follows:
  - Some people queried the need for a guide. Our response is that it provides more information than is in the Local Plan, to encourage successful schemes.
  - Some queried the Guide's status and felt some aspects were not relevant to planning. We have amended the Guide to make things clearer, but agree that it

includes ideas and case studies that relate to issues outside of planning, but which may be useful to the promoter of the scheme.

- Some comments provided additional information, such as flood risk advice from the Environment Agency and security advice from Norfolk Police. This information has generally been included in the amended Guide.
- Some people were not able to respond because of the Covid-19 lockdown. These people will hopefully benefit from this second round of consultation.
- Comments that supported the Guide were welcomed.

### 3. Second consultation on the Guide

- 3.1. The revised draft Residential Moorings Guide is at Appendix 1. Proposed amendments are shown as follows: deletions are ~~red-crossed through~~ and additions are blue underlined.
- 3.2. The consultation period on the revised Guide will be approximately 8 weeks; dates are to be confirmed, but may be 25 September to 20 November. To reflect the Statement of Community Involvement, which was updated in response to the Covid-19 access restrictions and social distancing guidance, we propose the following.
  - Advertise the consultation with a notice in the Eastern Daily Press and on social media, and contact those on our Local Plan consultation database.
  - Paper copies of the draft Guide will not be available for inspection at the Authority's head office or at other venues. However, paper copies can be sent at no charge to those who request them.
  - The Planning Policy Officer will be available by phone or video call for anyone wishing to discuss the draft Guide.

### 4. Planning Committee

- 4.1. The revised draft Residential Moorings Guide was discussed at the September Planning Committee. The key points made are as follows:
  - 4.1.1. One Member said it was not clear what the guide was for. They said that some information is relevant to all moorings, not just residential moorings. They queried its relation to planning. **As set out in the response to the comments received as part of the first consultation, the guide does relate to the requirements of the policy, but does also address other issues that can help make a scheme successful. It is important to note that the areas that are allocated for residential moorings do not officially provide residential moorings currently (in one marina, there is permission for a manager's residential mooring) and so this information is intended to be helpful.**

4.1.2. Related to the above scheme, another Member suggested, on adoption, an appendix at the end that sets out what aspects relate to planning and which aspects are for information. This was agreed.

4.2. The Planning Committee endorsed the Guide and recommended that it be consulted on.

## **5. Conclusion and Recommendation**

5.1. The Residential Moorings Guide will help implement the policies of the adopted Local Plan for the Broads relating to residential moorings. It is recommended that Broads Authority approve the guide for public consultation.

## **6. Financial Implications**

6.1. There will be a cost of around £400 for a press advert that will be shared with the Peat Guide.

Author: Natalie Beal

Date of report: 11 September 2020

Appendix 1 – Revised draft Residential Moorings Guide for consultation

Appendix 2 – First draft Residential Moorings Guide - comments and proposed responses

# Residential Moorings Guide

**Draft for second consultation  
xxx 20202 to xxx 20202**

[Second consultation – xxx 2020](#)

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# 1. Introduction

In the current Local Plan for the Broads, the Authority is required to identify a need of 63 residential moorings<sup>1</sup> and subsequently allocate sites for residential moorings to count towards that need. The Local Plan also contains a detailed policy that all proposals for residential moorings are required to address (Policy DM37 – see [Appendix A](#)).

This guide is designed to help implement the policies of the Local Plan relating to residential moorings. It is designed for decision makers as well as applicants and site owners. It contains useful information to help make schemes for residential moorings as successful as possible.

## 2. Consultation

This version is an amended draft version out for its second consultation. Please tell us your thoughts and suggest any changes you think would make the Guide better and set out your reasons.

During the first consultation, movement and access to public venues was restricted due to COVID19. We extended the consultation period twice and it ran for many more weeks than originally intended. We also offered the opportunity to request a hard copy of the document. Despite that, we do not think the consultation was adequate so we are consulting a second time.

This consultation document and consultation process have been developed to adhere to the Broads Authority's Statement of Community Involvement<sup>2</sup>. We have updated our Statement of Community Involvement. The main changes to how we intend to consult on this document are as follows:

- If you wish to discuss the document, you can still call on 01603 610734 and ask to speak to Natalie Beal. You can also contact Natalie Beal to request a video conference appointment to talk about the document.
- No hard copies will be in libraries.
- No hard copies will be in Yare House<sup>3</sup>.
- If you wish to have a hard copy, we can send this to you. This will initially be for free, but if we get many requests, we may have to consider charging for postage and

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<sup>1</sup> [Norfolk Caravans and Houseboats Accommodation Needs Assessment \(ANA\) including for Gypsies, Travellers and Travelling Show people](#)

<sup>2</sup> Current Statement of Community Involvement is here [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0024/209337/Final\\_adopted\\_SCI\\_formatted\\_July\\_2020.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0024/209337/Final_adopted_SCI_formatted_July_2020.pdf)

<sup>3</sup> Whilst this Guide is not a local plan or SPD, we still consult in the same way as we would those documents. The Government recently amended regulations saying that until 31 December 2021, Local Planning Authorities do not need to make hard copies of planning documents available in head offices or other venues.

printing. Please contact the number above to ask to speak to Natalie Beal to request a hard copy.

The second consultation on this document is for x weeks from xxxx to xxxx. We will then read each of the comments received and respond. We may make changes if we agree with you. If we do not make changes we will set out why. The final Guide will be adopted at a future meeting of the Broads Authority. Please email us your comments: [planningpolicy@broads-authority.gov.uk](mailto:planningpolicy@broads-authority.gov.uk).

Information provided by you in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), and the Environmental Information Regulations 2004). Please see [Appendix B](#) for the Privacy Notice. We will make your name and organisation public alongside your comment.

**Are you satisfied that this consultation has followed the Consultation Principles?** If not, or you have any other observations about how we can improve the process, please contact us at [planningpolicy@broads-authority.gov.uk](mailto:planningpolicy@broads-authority.gov.uk).

### 3. Residential Moorings - definitions

The supporting text of policy DM37 defines a residential mooring as ‘a mooring where someone lives aboard a vessel (capable of navigation), where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base’.

It goes on to say that ‘for the purposes of this policy, it should be noted that there is an expectation that the moorings will be occupied by a vessel of standard construction and appearance and which is conventionally understood to be a boat. For the avoidance of doubt, the policy does not apply to houseboats. Houseboats are considered to be structures without means of independent propulsion and will be dealt with on a case by case basis due to their potential impact on character of the area’.

The Environment Agency agree that all residential boats must be capable of navigation and so function as a boat, in order for residential moorings to be classed as ‘water compatible’ development. In response to the first consultation on this document, the Environment Agency went on to say that If the boat is non-navigable, such as a houseboat, the Environment Agency state that they would be classed as ‘more vulnerable’ residential development, and therefore Table 3 of the NPPF PPG would class them as inappropriate to be located in boatyards or mooring basins, as these areas are usually classed as Flood Zone 3b Functional Floodplain. The Environment Agency state that they would object in principle to any houseboats as they would be an inappropriate ‘more vulnerable’ development in Flood Zone 3b Functional Floodplain. So houseboats are unlikely to be permitted, unless their proposed location is somehow not classed as Functional Floodplain, which would

require the marina or mooring basin to not be at risk of flooding in a 5% (1 in 20) annual probability flood event.

## 4. Acceptable location for residential moorings

### 4.1 Where Residential Moorings could be permitted.

Policy DM37 sets out where residential moorings may be acceptable (criterion a) and would apply to applications for schemes in areas not allocated in the Local Plan. This section breaks that down and provides some more information.

i) 'Is in a mooring basin, marina or boatyard...'

The reason for this requirement is to remove any potential impact on navigation because of residential moorings as well as ensure access to boating facilities such as pump outs and maintenance.

ii) '...that is within or adjacent to a defined development boundary...'

The development boundary could be one of the four in the Local Plan for the Broads<sup>4</sup> or could be set out in the adopted Local Plan of one of our 5 district councils (see below for Norwich City). Development boundaries are areas within which housing (and in this case, residential moorings) are generally supported in principle (but subject to other policies in the Local Plan) because they have good access to key services and are well related to the existing built up area of a settlement.

iii) '...or 800m/10 minutes walking distance to three or more key services...'

Key services are set out in the supporting text for the policy and copied below. They reflect the Housing and Economic Land Availability Assessment methodology:

- A primary school
- A secondary school
- A local healthcare service (doctors' surgery)
- Retail and service provision for day to day needs (district/local shopping centre, village shop)
- Local employment opportunities which are defined as follows, which reflect areas with potentially a number of and variety of job opportunities:
  - Existing employment areas allocated/identified in our districts' Local Plans; or

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<sup>4</sup> These are in Wroxham/Hoveton, Thorpe St Andrew, Oulton Broad and Horning. See policy DM35 of the Local Plan and see the maps here: [DMS35: Residential development within defined development boundaries Maps](#)



○ City, Town or District Centre as identified in the Local Plan for the Broads or our District's Local Plan. We note that this means such centres count towards two of the three key services test; or

○ These sites that are allocated in the Local Plan for the Broads: BRU2, BRU4, CAN1, HOR6, POT1, STA1, TSA3.

• A peak-time public transport service to and from a higher order settlement (peak time for the purposes of this criterion will be 7-9am and 4-6pm)

Applications will need to submit supporting information about the location of these key services.

• '...and the walking route is able to be used and likely to be used safely, all year round...'

The walking route that is 800m or 10 minutes' walk to the key services needs to be available and attractive for use all year round. In practice this will more likely mean surfaced footways rather than rural public rights of ways. This will be judged on a case by case basis in liaison with the Highways Authority. Norfolk Police recommend that the route to the site should, where possible, be straight and have a width of 3m wide, with vegetation maintained to prevent fear of crime (removal of potential hiding places), and to consider lighting if appropriate (taking into account the dark skies policy of the Local Plan and the location of residential moorings). Applications will need to submit supporting information about the quality and experience of the routes used to travel between residential mooring and services.

• '...or is in Norwich City Council's Administrative Area'

Norwich City Council requested this addition as there are no mooring basins, marinas or boatyards in Norwich; this change now, ~~in theory,~~ allows for residential moorings in the City (subject to the normal planning application process) and is consistent with the policies of the River Wensum Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners).

It is important to note that applications in Norwich will need to be determined by Norwich City Council and the Broads Authority. Norwich City Council are the Local Planning Authority for the land. The Broads Authority is the Local Planning Authority for the river. Policies of both adopted Local Plans will be relevant to schemes in Norwich.

4.2 Location of residential moorings within a site/marina/boatyard/basin.  
An applicant may want certain specific moorings to be permitted for residential moorings or may want an area to be permitted with a maximum number of residential moorings within that area, to reflect the operations of the marina or boatyard or site. This will need to be discussed and agreed with the Local Planning Authority. It will be for the operator of the site to control which moorings are used for residential moorings in line with the permission

granted. The operator will need to produce a management plan (see section 6), and will also need to record the details of the residential moorings in a register (see section 7).

## 5. Flood Risk and climate change

The Authority will require site specific flood risk assessments including a flood response plan<sup>5</sup>. See policy DM5 of the Local Plan for the Broads as well as the Flood Risk SPD<sup>6</sup>.

Whilst the Authority appreciates that at times of flood the boat which is lived in will be already on water and is able to float, the issue is more to do with the risk arising because of flooding in this instance. The supporting text of DM37 identifies some issues that need to be addressed.

- a) The technique/method of mooring the vessel. The Flood Risk Assessment (FRA) should show how the boat will be moored to prevent it being too tight or too loose. If the vessel is moored too tightly it could list, and by being too loose it could float onto the landside of the quay heading or be cast adrift at times of flooding. Both scenarios have safety concerns for occupiers, possessions and other objects or vessels that could be hit by a loose boat, and should be addressed within the FRA.
- b) A Flood Response Plan needs to be produced. While it is acknowledged that residential boats will float, the access to the boat could be disrupted at times of flood, causing the occupier to be stranded on board the boat. The Flood Response Plan needs to advise what the occupier should do at times of flood to ensure their safety - whether they should evacuate the boat in advance of flooding or take refuge in the boat and therefore have supplies to help them sit out the flood.
- c) Finally, the FRA should include consideration of how the boat moored at the residential mooring will be monitored at times of flood to make sure it does not cause damage to other vessels, and to prevent damage to the belongings on board and the boat itself.

If the FRA and Flood Response Plan proposes refuge within the boat in times of flood then the Environment Agency states that the boat will need to be capable of rising up above the extreme 0.1% (1 in 1000) climate change flood level. The FRA will need to detail what the required height of rise will be and demonstrate that the boat's mooring can enable it to rise that high without posing a hazard to the occupants of the boat. If the FRA and Flood Response Plan does not propose refuge, but instead proposes evacuation in advance of a flood, then the FRA and response plan will need to show how the occupants will be able to

<sup>5</sup> A guide/template can be found here: [https://www.broads-authority.gov.uk/data/assets/word\\_doc/0032/298850/Appendix-D-Flood-Response-Plan-Guidance.docx](https://www.broads-authority.gov.uk/data/assets/word_doc/0032/298850/Appendix-D-Flood-Response-Plan-Guidance.docx)

<sup>6</sup> See guidance for best practice Broads Flood Risk Supplementary Planning Document: [https://www.broads-authority.gov.uk/data/assets/pdf\\_file/0019/236404/Broads-Flood-Risk-SPD-2020.pdf](https://www.broads-authority.gov.uk/data/assets/pdf_file/0019/236404/Broads-Flood-Risk-SPD-2020.pdf)

receive advanced warnings and where they will be able to evacuate to in time. The Environment Agency go on to say there is always a residual risk of warnings not being received, so the FRA will need to address this risk. The ability to take refuge within the boat, as described above, is a valuable fall-back measure and, if possible, the mooring should be designed to provide this refuge as a precaution, even if the preferred option is evacuation in advance of flooding.

Turning to climate change, you will be required to fill out a [climate change checklist](#)<sup>7</sup>. This identifies various effects that could arise in a changing climate. Flood risk may be one of them, but there are others. Filling out the checklist may ~~make~~ [help](#) you consider how you run and develop your site [in a changing climate](#). For example, how will you address risks associated with a changing climate? How will you manage high winds as a result of storms for example?

## 6. Management plan

You will be required to produce a plan that sets out how the residential moorings will be managed.

The management plan will help ensure the site as a whole is appropriately managed. The management plan will be a condition on the permission given to an application for residential moorings. A breach of this management plan would then be a breach of condition and could be enforced.

It is expected that a Management Plan will cover the following. This list is not exhaustive and there may be other aspects that need to be covered. You may already address these issues in some way [on your site](#).

- a) Site rules and/or terms and conditions.
- b) Noise – expectations relating to noise. This could cover aspects such as generators, when engines will run and generally any noise that could be considered a nuisance [such as boat maintenance and generally socialising at unsociable hours](#). Please note that there is a bye-law that could be of relevance: [Byelaw is 85 ‘Noise Nuisance’ of Broads Authority Navigation Byelaws 1995. Local Council guidance on noise would also be relevant and](#) so too will the amenity policy of the Local Plan for the Broads will be of relevance.
- c) Waste management – sewerage and rubbish and recycling. Methods for storage and removal need to be clearly identified.
- d) Management of increased vehicular movements.

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<sup>7</sup> Climate Change checklist: [https://www.broads-authority.gov.uk/\\_data/assets/word\\_doc/0033/259917/Climate20change20checklist20template.docx](https://www.broads-authority.gov.uk/_data/assets/word_doc/0033/259917/Climate20change20checklist20template.docx)

- e) Storage provision for residential boaters – bicycles and residential paraphernalia. Details of any storage provision needs to be included. Need to consider the impact on the character of the area.
- f) Details of water safety provisions – see policy in Local Plan and any related guidance produced.
- g) Contact details of who to contact if the management requirements of the site are not adhered to.
- h) Detail how the mooring will be managed. For example, who will be the point of contact and will they be on site 24/7 or 9-5 weekdays for example.
- i) State requirements on how vessels will meet the requirements of the bye-laws and legislation for example the need for boat safety certificates and appropriate insurance.

## 7. Register

A register of those boats being lived on will be required. The register of who lives on which boat will be maintained at all times and needs to be made available for inspections by the Broads Authority as part of monitoring of conditions set on any permission. The reason for keeping this register is to ensure that only the permitted number of boats are being lived on.

## 8. Council Tax

The Broads Authority is the Local Planning Authority and does not collect Council Tax. Residential moorings may be liable for Council Tax. The British Waterways Marinas Ltd (BWML) has produced this information on residential moorings and Council Tax: <https://bwml.co.uk/council-tax-for-residential-moorings/> and the Residential Boat Owners Association (RBOA) also have information on Council Tax: <https://www.rboa.org.uk/q-a/>

**You should contact your District Council to confirm the approach to Council Tax.**

## 9. Facilities, services and other considerations

The policy, [DM37](#), refers to the provision of facilities. This section provides some further information about [the facilities and services set out in DM37 and other relevant policies of the Local Plan and how](#) you may wish to make [them](#) available at residential moorings.

### Policy DM37 says:

- b) Provides an adequate and appropriate range of ancillary facilities on site to meet the needs of the occupier of the residential moorings (for example potable water, wastewater pump out (see j below), and electricity) or provides adequate access to these ancillary facilities in the vicinity of the residential mooring;
- g) Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians;
- i) Makes adequate provision for waste, sewage disposal and the prevention of pollution; and
- j) Provides for the installation of pump out facilities (where on mains sewer) unless there are adequate facilities in the vicinity.

Proposals need to set out how provisions will be made for facilities associated with residential uses (such as rubbish, amenity space, external storage and clothes drying for example).

### 9.1 Potential ways to address policy DM37 requirements for facilities and services

**Please note that the following are examples from elsewhere in England to give you an idea of how these issues are addressed. The approach of others who provide and manage residential moorings may not necessarily be relevant ~~to the Broads or may not be relevant~~ to your site or may not be how you want to run your site. We strongly suggest you contact us to talk through your proposed approach in advance of putting it in place.**

**We also need this kind of information shows on plans with details included in planning applications to help us to assess the application. There is a checklist at [Appendix D](#) that applicants can work through to address the topics raised in this section.**

#### 9.1.1 Electricity

By providing electricity, there will be no need for boat engines or generators to be run (which have associated noise and fumes). Some electric units come with lights on the top

227 which can cause light pollution so providing these at sites in more rural areas or on edge of  
228 settlements will need careful consideration.

229 **Q: How will you provide the residential moorings with electricity?**

230 **Q: How will the electricity unit impact on/add to light pollution?**



231 **Electricity meter cards dispenser and electricity (and water) unit at Cowroast Marina.**

232 9.1.2 Water

233 The Environment Agency are keen to emphasise that applications should include details of  
234 early consultation with the relevant water company to ensure there is sufficient capacity in  
235 their network to supply water to moorings in that specific location. The abstraction of 20  
236 cubic metres or more a day from either surface or groundwater source would require an  
237 abstraction licence from the Environment Agency. If the chosen site for the additional  
238 moorings already holds an abstraction licence, there would need to be consideration of the  
239 impacts from additional needs as a result of the new moorings.

240 **Q: How will you provide the residential moorings with potable water?**

241 Case Study – Cowroast Marina

242 Residential moorings are provided with one water tap per two boats. They use trace heating  
243 on water taps to prevent freezing in winter.

244 9.1.3 Sewerage

245 Toilets on boats may require pumping out or somewhere to empty cassettes. Your marina  
246 or boatyard may have a system or process to deal with this already. We would assess this  
247 part of the application against policy DM2 and as set out in that policy and connection to



248 [the public sewer network is the preferred approach. When considering how to address foul](#)  
249 [water, you will need to consider the potential for boats to release foul water directly to the](#)  
250 [waterbody. The Environment Agency also highlight that there is a byelaw that is relevant to](#)  
251 [the disposal of sewage from boats within the Broads which makes it illegal for boats to](#)  
252 [discharge their sewage straight to the rivers \(Water Resources Act 1963, Rivers \(Prevention](#)  
253 [of Pollution\) Acts, 1951-1961, BYELAWS Regulating the use of boats fitted with sanitary](#)  
254 [appliances\).](#)

255 **Q: How will you deal with sewerage arising from the boats on residential moorings?**

256 Case Study – BWML moorings

257 BWML sites tend to include one pump out per month in their residential mooring contract.

258 9.1.4 Rubbish collection

259 You will need to address how waste arising from those living on the boats is dealt with. Your  
260 marina or boatyard may have a system or process to deal with rubbish already. We  
261 recommend that you contact your District/Borough/City Council to discuss waste  
262 management.

263 **Q: How will you deal with rubbish (including recyclable materials) arising from the boats**  
264 **on residential moorings?**

265 [9.1.5 Cycle and](#) Car parking

266 You need to ensure ample car and cycle parking for those who are using residential  
267 moorings. Again, you may have car parking or cycle parking on site already. We defer to the  
268 parking standards of the relevant district. The standards at the time of adoption of the Local  
269 Plan (May 2019) are at Appendix J, page 239, of the Local Plan for the Broads. [Norfolk Police](#)  
270 [recommend that parking spaces be marked to help with correct usage \(assists with rule](#)  
271 [setting\) and suggest that you consider collapsible bollards/chain and lock, and where](#)  
272 [possible have some capability of surveillance over the area.](#)

273 **Q: How will you address car and cycle parking for those who are using residential**  
274 **moorings?**

275 9.1.6 Amenity space and landscaping

276 The Amenity policy of the Local Plan (DM21) requires schemes to provide a ‘satisfactory and  
277 usable external amenity space to residential properties in keeping with the character of the  
278 surrounding development’. It may also be appropriate to provide landscape enhancements  
279 of the land associated with the Residential Mooring to improve the amenity of the area in  
280 connection with the development.

281 **Q. How will you address amenity space and landscaping?**

### 9.1.7 Storage

Scheme promoters/operators are required to address storage of residential paraphernalia. Unless a system for storing kit and possessions is put in place, the residential moorings could become cluttered with residential paraphernalia which will alter the character of the area. [Norfolk Police recommend storage is of robust construction with secure locks \(e.g. Sold Secure or equivalent\). If possible consider fencing off the area \(with lockable gate for residents only\) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender\).](#)

**Q: How will you provide storage for those who are using residential moorings?**



**Storage lockers at Priory Marina**

### 9.1.8 Light pollution

[Schemes for residential mooring may include lighting. But sites for residential moorings may be on the fringe of settlements, where there is a transition from urban to rural and so the impact of lighting may be significant. The Authority also seeks dark waterways to protect the wildlife in the area. The need for such lighting needs to be justified in line with Local Plan for the Broads policy DM22. If lighting is justified and agreed, then the design needs to ensure no impact on the dark skies of the Broads. The Authority plans to produce light pollution guidance, but in the meantime, the policy requirements of the Local Plan will guide how applications are determined and assessed.](#)

**[Q: How does your scheme address light pollution? How does your scheme maintain dark skies?](#)**

### 9.2 Other facilities/extras

Depending on your specific circumstances, you may wish to provide other facilities for those who are living on the residential moorings at your site. This may depend on the location of your site as well as what buildings you already have on site. Examples include drying of clothes, post boxes and communal facilities. You will need to consider the impact on the character of the area. You may wish to ensure you have a fire or emergency evacuation procedure too.



310 Case Study - Cowroast Marina

311 There is a communal lounge with kitchenette. The lounge tends to be used once a month for  
312 functions.

313 Case Study – Priory Marina

314 Facilities on site for those living on boats include toilets, showers, library, post boxes  
315 (reception collects the parcels), large storage boxes, launderette, parking, cycle parking,  
316 electricity and water.

317 Part of contract includes 6 weeks out of water on hard standing for anti-fouling. The marina  
318 organises a crane company to come and remove boats and put them back in. The marina  
319 coordinate crane and dates – probably five boats at a time. Boats are lived on outside of the  
320 water.



321 **Post boxes**

322 In relation to post boxes, Norfolk Police say that there is an increasing rise in crime  
323 associated with post--delivery so post boxes should be of robust construction with max  
324 aperture size of 260mmx40mm and have anti-fishing properties (Secured by Design  
325 recommends letter boxes certificated to TS 009).

326 9.3 Other considerations

327 9.3.1 Informative – Environmental Permit for Flood Risk Activities

328 An environmental permit for flood risk activities will be needed for any proposal that wants  
329 to do work in, under, over or within 8 metres (m) from a fluvial main river and from any  
330 flood defence structure or culvert or 16m from a tidal main river and from any flood  
331 defence structure or culvert. Application forms and further information can be found at:  
332 <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying  
333 out these activities without a permit where one is required, is breaking the law.

334 9.3.2 Security

335 You should ensure you consider security at your site. This may already adequately be in  
336 place.

337 9.3.3 Low Impact Life on Board

338 In response to the consultation on this guide, the RBOA were keen to emphasise Low Impact  
339 Life On Board and, through RBOA, there is a wealth of advice in that respect. Low impact life  
340 on board is an expression from UK waterways boaters who care about the environment.

## 10. Key messages

- a) You need to consider flood risk through a flood risk assessment and flood response plan.
- b) You need to consider the impacts of Climate Change.
- c) A management plan is required that details how you will manage the residential moorings. A template is included at [Appendix C](#).
- d) You need to keep a register of those who are living on the residential moorings.
- e) You should contact your District Council to confirm the approach to Council Tax.
- f) You need to provide adequate facilities for those living at the residential moorings. You may already have many of these in place.
- g) There are many permitted residential moorings around the country who have systems in place. They may not necessarily be relevant to the Broads or may not be relevant to your site or may not be how you want to run your site. But they give you an idea of how to do things. We strongly suggest you contact us to talk through your proposed approach in advance of putting it in place.
- h) A template to address many of the requirements in the policy and guide is included at [Appendix D](#).

## 11. Helpful links and where to go to get advice

The Residential Boat Owners' Association (RBOA), the British Waterways Marinas Limited (BWML) and Canal and Rivers Trust (CRT) have many useful webpages that cover a variety of topic areas or issues that may be relevant to you.

**Please note that just because the BWML, CRT or RBOA suggest a certain approach, it may not necessarily be acceptable in the Broads or indeed it may not be how you wish to run your site. The point of sharing these websites with you is to give you information on how things are done elsewhere. We strongly recommend that you contact us to talk about any specific approach you wish to take to make sure it is acceptable here in the Broads.**

This webpage **covers many aspects** of living on a boat: <https://bwml.co.uk/guides/a-guide-to-residential-living/>

This webpage talks about **Council Tax**. <https://bwml.co.uk/council-tax-for-residential-moorings/>

**You should contact your District Council to confirm the approach to Council Tax.**

372 This webpage shows **where the BWML residential moorings are**. It also states what you get  
 373 when you stay at one of their Marinas. <https://bwml.co.uk/residential-moorings/>

374 Life Afloat; Ever wondered what life is like living on a boat? This webpage has **videos about**  
 375 **life afloat**: <https://bwml.co.uk/life-afloat/?src=residential>

376 This webpage shows how BWML approach **charging for electricity**:  
 377 <https://bwml.co.uk/electricity/>

378 This website contains **BWML's Terms and Conditions and policies**:  
 379 <https://bwml.co.uk/customer-info/>. And this website contains the **Terms and Conditions for**  
 380 **the Canals and Rivers Trust**:  
 381 <https://www.watersidemoorings.com/Home/TermsAndConditions>

382 This website talks about **insurance**. It talks about a specific deal that BWML have with one  
 383 particular policy provided. You may or may not be entitled to that deal, but the webpage  
 384 may contain advice useful for those who live on boats: [https://bwml.co.uk/marine-](https://bwml.co.uk/marine-insurance-for-bwml-berth-holders/)  
 385 [insurance-for-bwml-berth-holders/](https://bwml.co.uk/marine-insurance-for-bwml-berth-holders/).

386 **The Residential Boat Owners' Associations (RBOA)**. Their website says: 'Established in 1963  
 387 the Residential Boat Owners' Association is the only national organisation which exclusively  
 388 represents and promotes the interests of people living on boats in the British Isles. We  
 389 represent all those who have chosen to make a boat their home'. The RBOA ensure they  
 390 liaise with Navigation Authorities like the Broads Authority. <https://www.rboa.org.uk/>

391 **RBOA Code of Good Practice**. The Association would encourage all boaters who live afloat  
 392 to follow this Voluntary Code of Good Practice: [https://www.rboa.org.uk/code-of-good-](https://www.rboa.org.uk/code-of-good-practice/)  
 393 [practice/](https://www.rboa.org.uk/code-of-good-practice/)

394 **BOATSHIELD (& Outboard Engine Cover)**. This weblink from Norfolk & Suffolk Police offers  
 395 advice on boat safety and security, also information about the Boatshield Scheme.  
 396 <https://www.norfolk.police.uk/advice/roads-and-vehicles/boats>

397 **AWEIGH App**. Thousands of people enjoy the Broads throughout the year and the AWEIGH  
 398 app has been designed to help those on and around the waterways.  
 399 [apps.apple.com>app>aweigh](https://apps.apple.com>app>aweigh) Or [play.google.com>store>apps>details>id=com.aweigh](https://play.google.com>store>apps>details>id=com.aweigh)

400 **BOAT SECURITY ADVICE - NORFOLK & SUFFOLK POLICE**. Norfolk & Suffolk Police advice on  
 401 water safety and boat security:  
 402 [https://www.norfolk.police.uk/sites/norfolk/files/boatshield\\_v1.pdf](https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf)

## Appendix A – Adopted Policy DM37 – New Residential Moorings

### Policy DM37: New residential moorings

The Authority will endeavour to enable delivery to meet its assessed need of 63 residential moorings.

Applications for permanent residential moorings will be permitted provided that the mooring:

- a) Is in a mooring basin, marina or boatyard that is within or adjacent to a defined development boundary or 800m/10 minutes walking distance to three or more key services (see reasoned justification) and the walking route is able to be used and likely to be used safely, all year round or is in Norwich City Council's Administrative Area.
- b) Provides an adequate and appropriate range of ancillary facilities on site to meet the needs of the occupier of the residential moorings (for example potable water, wastewater pump out (see j below), and electricity) or provides adequate access to these ancillary facilities in the vicinity of the residential mooring;
- c) Would not result in the loss of moorings available to visitors/short stay use;
- d) Would not impede the use of the waterway;
- e) Would not have an adverse impact upon:
  - i) the character and appearance of the site or the surrounding area arising from the moorings and the use of adjacent land incidental to the mooring;
  - ii) protected species, priority habitats and designated wildlife sites;
  - iii) the amenities of neighbouring occupiers; or
  - iv) bank erosion.
- f) Provides safe access between vessels and the land without interfering with or endangering those using walkways;
- g) Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians;
- h) Would not prejudice the current or future use of adjoining land or buildings;
- i) Makes adequate provision for waste, sewage disposal and the prevention of pollution; and

434 j) Provides for the installation of pump out facilities (where on mains sewer) unless  
 435 there are adequate facilities in the vicinity.

436 If more than one residential mooring is proposed, the proposal must be commensurate with  
 437 the scale of development proposed for that settlement (as a whole).

438 Converting an entire basin, marina or boatyard to residential moorings would be judged on  
 439 a case by case basis to assess and take account of the impact on infrastructure in the area  
 440 (such as highways) and the impact on neighbouring uses.

441 Whilst the policy contains a general presumption in support of residential moorings in  
 442 Norwich, the cumulative impact resulting from any proposal will be considered, along with  
 443 the impact on the infrastructure and amenity of the area.

444 The economy policies of the Local Plan will also be of relevance and in Norwich, so too will  
 445 the City Council's policies for proposals in Norwich.

446 Conditions will be used to restrict the number, scale and size of boats using the residential  
 447 moorings. A management plan for the site and a register of those who live on boats will be  
 448 required and will be covered by a planning condition imposed on any planning permission  
 449 granted.

450 Proposals need to set out how provisions will be made for facilities associated with  
 451 residential uses (such as rubbish, amenity space, external storage and clothes drying for  
 452 example).

453 All such development will meet the requirements of the Water Framework Directive.

454 (Note: Refer to [www.gov.uk/guidance/pollution-prevention-for-businesses](http://www.gov.uk/guidance/pollution-prevention-for-businesses) for information  
 455 on pollution prevention measures)

456 Reasoned Justification

457 The Authority acknowledges that the high environmental quality of the Broads and wide  
 458 range of opportunities it offers for boating make the area a popular location. As a  
 459 consequence, there is a significant associated demand for residential moorings. The  
 460 provision of residential moorings must, however, be carefully managed to make sure the  
 461 special qualities of the Broads and their enjoyment are protected.

462 Tourism makes a valuable contribution to the local economy, and a statutory purpose of the  
 463 Broads is to provide opportunities for the understanding and enjoyment of the special  
 464 qualities of the area by the public. To make sure there are sufficient facilities to allow  
 465 visitors to enjoy the Broads, the Authority will resist proposals for permanent residential  
 466 moorings where they would result in the loss of visitor/short term moorings or boatyard  
 467 services.

468 To ensure that people living on boats have access to adequate facilities and services such as  
469 education, recreation, and domestic waste collection, and to minimise impact of new  
470 development on landscape character, the Authority will require new residential moorings to  
471 be directed to mooring basins, marinas or boatyards within walking distance of at least  
472 three of the key services listed below or in or adjacent to defined development boundaries  
473 (which could be within the Broads Authority Executive Area or in the planning area of our  
474 constituent districts). Residential moorings may also be appropriate on parts of the river in  
475 Norwich, subject to other policy considerations in particular the impact on neighbouring  
476 uses and impact on navigation of the river. Proposals for residential moorings will be  
477 expected to be commensurate in scale with the size of the settlement and the level of  
478 residential development proposed for the settlement by the relevant Local Planning  
479 Authority. Furthermore, converting an entire marina, basin or boatyard, or in Norwich the  
480 entirety of the river banks, may not be appropriate because of the potential impact on  
481 neighbouring uses and infrastructure in the area, as well as the consequences of the loss of  
482 the facility for non-residential boaters; the Authority will consider such proposals on a case  
483 by case basis.

484 The key services referred to in the policy could be three or more of the following. These key  
485 services reflect the Housing and Economic Land Availability Assessment methodology:

- 486 • A primary school
- 487 • A secondary school
- 488 • A local healthcare service (doctors' surgery)
- 489 • Retail and service provision for day to day needs (district/local shopping centre,  
490 village shop)
- 491 • Local employment opportunities which are defined as follows, which reflect areas  
492 with potentially a number of and variety of job opportunities:
  - 493 ○ Existing employment areas allocated/identified in our districts' Local Plans; or
  - 494 ○ City, Town or District Centre as identified in the Local Plan for the Broads or  
495 our District's Local Plan. We note that this means such centres count towards  
496 two of the three key services test; or
  - 497 ○ These sites that are allocated in the Local Plan for the Broads: BRU2, BRU4,  
498 CAN1, HOR6, POT1, STA1, TSA3.
- 499 • A peak-time public transport service to and from a higher order settlement (peak  
500 time for the purposes of this criterion will be 7-9am and 4-6pm)

501 Residential moorings that have the potential to affect a protected site or species will only be  
502 permitted where a project level Appropriate Assessment (under the Habitats Directive) can  
503 successfully demonstrate that there are no adverse effects on qualifying features on the site  
504 or a detrimental impact on the species.

505 Where permission is granted for a new permanent residential mooring, planning conditions  
506 and/or obligations will be used to secure agreements for the management of the mooring  
507 and surrounding land. This will be done to protect visual and residential amenity and make  
508 sure the use of residential moorings does not compromise public safety. The use of  
509 surrounding land for incidental purposes such as storage and seating can have a negative  
510 impact if incorrectly managed. Proposals will need to set out how they will address areas for  
511 the drying of clothes and amenity space, as well as any other related facilities for those  
512 living on the boats. The Authority does not expect marinas and boatyards to subdivide or  
513 demarcate areas of land to be associated with residential moorings.

514 Policy DM50 provides guidance on the forms of development permissible on the adjacent  
515 waterside environment associated with a mooring.

516 For the purposes of this policy, a 'residential mooring' is a mooring where someone lives  
517 aboard a vessel (capable of navigation), where the vessel is used as the main residence, and  
518 where the vessel is moored in one location for more than 28 days in a year. The vessel may  
519 occasionally/periodically go cruising and return to base.

520 For the purposes of this policy, it should be noted that there is an expectation that the  
521 moorings will be occupied by a vessel of standard construction and appearance and which is  
522 conventionally understood to be a boat. For the avoidance of doubt, the policy does not  
523 apply to houseboats. Houseboats are considered to be structures without means of  
524 independent propulsion and will be dealt with on a case by case basis due to their potential  
525 impact on character of the area.

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

533 Proposals for residential moorings must ensure they have adequately considered the  
534 following:

- 535 a) The technique/method of mooring the vessel. The Flood Risk Assessment (FRA)  
536 should show how the boat will be moored to prevent it being too tight or too loose.  
537 If the vessel is moored too tightly it could list, and by being too loose it could float



538 onto the landside of the quay heading or be cast adrift at times of flooding. Both  
539 scenarios have safety concerns for occupiers, possessions and other objects or  
540 vessels that could be hit by a loose boat, and should be addressed within the FRA.

541 b) A Flood Response Plan needs to be produced. While it is acknowledged that  
542 residential boats will float, the access to the boat could be disrupted at times of  
543 flood, causing the occupier to be stranded on board the boat. The Flood Response  
544 Plan needs to advise what the occupier should do at times of flood to ensure their  
545 safety - whether they should evacuate the boat in advance of flooding or take refuge  
546 in the boat and therefore have supplies to help them sit out the flood.

547 c) Finally, the FRA should include consideration of how the boat moored at the  
548 residential mooring will be monitored at times of flood to make sure it does not  
549 cause damage to other vessels, and to prevent damage to the belongings on board  
550 and the boat itself.

551 The Authority intends to produce a guide for residential moorings as well as a template to  
552 assist with the production of management plans. The Authority is aware of guidance being  
553 produced by other organisations on residential moorings and we will ensure we are involved  
554 with those guides and reflect them in our own guide.

555 Development proposals for residential moorings should provide a biodiversity net gain as a  
556 result of the development as there are likely to be significant opportunities for waterside  
557 biodiversity enhancement.

#### 558 Meeting the need for residential moorings

559 The Accommodation Needs Assessment completed in 2017 identifies a need for 63  
560 residential moorings. This figure needs to be interpreted with some caution, as it is based on  
561 limited interviews with boat dwellers and on anecdotal estimates rather than a  
562 comprehensive count or survey of the people who live on boats.

563 The study also indicates that those living on boats do so from choice, rather than from an  
564 ethnic background, and that most are single people or childless couples.

565 The Local Plan seeks to address the need for residential moorings in several ways:

- 566 • Ten residential moorings have been permitted on appeal at Waveney River Centre  
567 and six sites have been allocated for residential moorings amounting to around 41  
568 residential moorings. See Appendix K for the residential moorings trajectory which  
569 shows the total identified supply as 10 residential moorings.
- 570 • Some areas of the Broads have been identified in this Local Plan as suitable in  
571 principal for residential moorings and these are policies STA1 and HOR6. Although  
572 they are potentially suitable in principle, deliverability is not confirmed, therefore  
573 they are not allocated in the Plan and do not appear in the identified supply figures.

574       • The Authority also intends to meet with marinas and boatyards that meet the  
575       locational criteria of the policy to discuss the potential for residential moorings.

576 The [Residential Moorings Topic Paper](#) (revised 2017)<sup>8</sup> and its [addendum](#)<sup>9</sup> has more  
577 information on meeting the need for residential moorings.

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<sup>8</sup> [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0019/1020475/Assessment-of-resi-moorings-nominations-update-and-topic-paper-July-2017.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0019/1020475/Assessment-of-resi-moorings-nominations-update-and-topic-paper-July-2017.pdf)

<sup>9</sup> [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0010/1356778/EPS20-Assessment-of-residential-moorings-nominations-received-during-the-Publication-Consultation-January-2018-Amended-July-2018.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0010/1356778/EPS20-Assessment-of-residential-moorings-nominations-received-during-the-Publication-Consultation-January-2018-Amended-July-2018.pdf)

## Appendix B – Privacy notice

### Personal data

The following is to explain your rights and give you the information you are entitled to under the Data Protection Act 2018. Our [Data Protection Policy](#) is available on the Broads Authority website..

The Broads Authority will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will be made publicly available as part of the process. It will not however be sold or transferred to third parties other than for the purposes of the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer  
The Broads Authority is the data controller. The Data Protection Officer can be contacted at: [dpo@broads-authority.gov.uk](mailto:dpo@broads-authority.gov.uk) or (01603) 610734.

#### 2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters. We will also contact you about later stages of the Local Plan process.

#### 3. Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a Local Planning Authority, the Broads Authority may process personal data as necessary for the effective performance of a task carried out in the public interest, i.e. a consultation.

#### 4. With whom we will be sharing your personal data

Your personal data will not be shared with any organisation outside of MHCLG. Only your name and organisation will be made public alongside your response to this consultation.

Your personal data will not be transferred outside the EU.

#### 5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for 16 years from the closure of the consultation in accordance with our [Data and Information Retention Policy](#).

#### 6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

a) to see what data we have about you

b) to ask us to stop using your data, but keep it on record

- 612 c) to ask to have all or some of your data deleted or corrected
- 613 d) to lodge a complaint with the independent Information Commissioner (ICO) if you
- 614 think we are not handling your data fairly or in accordance with the law. You can
- 615 contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.
- 616 7. Your personal data will not be used for any automated decision making.

## Appendix C – Residential Moorings management plan checklist

It is expected that a Management Plan will cover the following. This list is not exhaustive and there may be other aspects that need to be covered.

Checklist	✓
1. Site rules and/or terms and conditions.	
2. Noise – expectations relating to noise.	
3. Waste management – sewerage and rubbish and recycling.	
4. Management of increased vehicular movements.	
5. Storage provision for residential boaters.	
6. Details of water safety provisions.	
7. Contact details of who to contact if the management requirements of the site are not adhered to.	
8. State requirements on how vessels will meet the requirements of the bye-laws and legislation for example the need for boat safety certificates and appropriate insurance.	

## Appendix D – Residential moorings questionnaire

This simple questionnaire template covers most of the policy and guide requirements. It should be filled in and accompany applications for residential moorings.

Question	Answer
1. Have you completed a flood risk assessment?	
2. Have you completed a flood response plan?	
3. Have you completed a management plan?	
4. How will you provide the residential moorings with electricity? <a href="#">How will the electricity unit impact on/add to light pollution? Please mark on a plan of the site.</a>	
5. How will you provide the residential moorings with potable water? <a href="#">Please mark on a plan of the site.</a>	
6. How will you deal with sewerage arising from the boats on residential moorings? <a href="#">Please mark on a plan of the site.</a>	
7. How will you deal with rubbish (including recyclable materials) arising from the boats on residential moorings? <a href="#">Please mark on a plan of the site.</a>	
8. How will you address car and cycle parking for those who are using residential moorings? <a href="#">Please mark on a plan of the site.</a>	
9. How will you address amenity space and landscaping? <a href="#">Please mark on a plan of the site.</a>	
10. How will you provide storage for those who are using residential moorings? <a href="#">Please mark on a plan of the site.</a>	
11. <a href="#">How does your scheme address light pollution? How does your scheme maintain dark skies?</a>	

## Appendix 2 – First draft Residential Moorings Guide – comments and proposed responses

Ref	Name	Organisation	Comment	BA response	Amendments
#1	Trevor Warren	-	In the Draft, there are references to preserving/enhancing the local area amenity and character; e.g., lines 312 - 314 in Appendix A. I wonder if noise and light pollution have been sufficiently stressed. Section 6, line 127, refers to noise from generators; there are plenty of other source such as boat maintenance and normal social life. Similarly,	Comment noted. The Local Plan for the Broads has a policy on amenity which would be used to determine applications, but agree that there needs to be better mention of other sources of noise.	This could cover aspects such as generators, when engines will run and generally any noise that could be considered a nuisance <a href="#">such as boat maintenance and generally socialising at unsociable hours.</a>
#2	Trevor Warren	-	Section 9.1, line 178, mentions light pollution from generators. More significant might be general safety lighting required in a quayside setting. Both these conditions are made more conspicuous in a peaceful broads location.	Comment noted. The Local Plan for the Broads has a policy on dark skies which would be used to determine applications, but agree that there needs to be better mention of light pollution.	<a href="#">9.1.8 Light pollution</a> <a href="#">Schemes for residential mooring may include lighting. But sites for residential moorings may be on the fringe of settlements, where there is a transition from urban to rural and so the impact of lighting may be significant. The Authority also seeks dark waterways to protect the wildlife in the area. The need for such lighting needs to be justified in line with Local Plan for the Broads policy DM22. If lighting is justified and agreed, then the design needs to ensure no impact on the dark skies of the Broads. The Authority plans to produce light pollution guidance, but in the meantime, the policy requirements of the Local Plan will guide how applications are determined and assessed. Q: How does your scheme address light pollution? How does your scheme maintain dark skies?</a>
#3	Alistair Lipp	-	I am actually not in favour of residential moorings, but considering it is in the plan to have 63, then the proposals suggested seem to be a reasonable way of creating quality moorings.	Response noted.	No change to document.
#4	B J Du Brow	-	In these constrained times we are unable to give any useful comments.	Response noted.	No change to document.
#5	Jeremy Burton	Bungay Town Council	I confirm that the members of Bungay Town Council Planning, Environment and Highways Committee have considered these Documents and have no additional comments to make.	Response noted.	No change to document.
#6	Shamsul Hoque	Highways England	No comment	Response noted.	No change to document.
#7	Penny Turner	Norfolk Police	My main concern for residential moorings is potential vulnerability of uninvited access: (The lack, or reduction in perimeter security of a residence (mooring) due to nature of the site (i.e. open access	See following comments.	See following comments.

Ref	Name	Organisation	Comment	BA response	Amendments
			of quay side) may make it vulnerable to ‘attack’ from would be offenders).		
#8	Penny Turner	Norfolk Police	The location of residential moorings next to defined a defined development boundary for support of key services, together with the potential lack of ‘usual’ residential perimeter boundaries may open up access opportunities for uninvited visitors – being able to move along the same access routes as genuine users. Therefore it is essential to acknowledge what can be done to prevent would-be offenders entering residential boats. Proposed solutions would be individual to a site and its layout, but I recommend if possible that boatyards/Marinas control access to these moorings via a lockable gate (with resident access only) to the particular quay/boardwalk involved; and that individual boat owners also be aware of further protection/security products designed for boats to increase ‘home’ security. That this information be linked to ‘Helpful links/advice (Section 11).	Comment noted. Security should be considered on a site by site basis. Sites in the Broads tend to be relatively small and many of them are adjacent to other facilities so there tends to be a high level of surveillance. We don't consider that there is a need for the guide to promote this level of security, but we will make reference to security.	New sub section in section 9: <a href="#">You should ensure you consider security at your site. This may already adequately be in place.</a>
#9	Penny Turner	Norfolk Police	Also, the proposed walking route of 800m/10 mins (usable all year round) should were possible be straight and a width of 3m wide, with vegetation maintained to prevent fear of crime (removal of potential hiding places), and to consider lighting if appropriate.	Agreed. Text to be added.	Add this text to the end of section 4: <a href="#">Norfolk Police recommend that the route to the site should, where possible, be straight and have a width of 3m wide, with vegetation maintained to prevent fear of crime (removal of potential hiding places), and to consider lighting if appropriate (taking into account the dark skies policy of the Local Plan and the location of residential moorings).</a>
#10	Penny Turner	Norfolk Police	I support management of sites with rules/terms of conditions, this together with the potential presence of staff would increase guardianship/ownership of area.	Support noted.	No change to document.
#11	Penny Turner	Norfolk Police	Again I support the proposal to provide parking and storage facilities to prevent moorings becoming cluttered.	Support noted.	No change to document.
#12	Penny Turner	Norfolk Police	I recommend that parking spaces be marked to help with correct usage (assists with rule setting) – consider collapsible bollards/chain & lock , and where possible have some capability of surveillance over the area.	Agreed. Text to be added.	Add to 9.5: <a href="#">Norfolk Police recommend that parking spaces be marked to help with correct usage (assists with rule setting) – consider collapsible bollards/chain &amp; lock, and where possible have some capability of surveillance over the area.</a>
#13	Penny Turner	Norfolk Police	With regards external storage facilities, I recommend they are of robust construction with secure locks (e.g. Sold Secure or equivalent). If	Agreed. Text to be added.	Add to 9.7: <a href="#">Norfolk Police recommend that storage is of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing</a>



Ref	Name	Organisation	Comment	BA response	Amendments
			possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender).		<u>off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender).</u>
#14	Penny Turner	Norfolk Police	Post-boxes – there is an increasing rise in crime associated with post delivery so post boxes should be of robust construction with max aperture size of 260mmx40mm and have anti-fishing properties (the examples pictured look good, Secured by Design recommends letter boxes certificated to TS 009).	Agreed. Text to be added.	Will add this wording to section 9.8 in relation to extra facilities: <u>There is an increasing rise in crime associated with post delivery so post boxes should be of robust construction with max aperture size of 260mmx40mm and have anti-fishing properties (Secured by Design recommends letter boxes certificated to TS 009).</u>
#15	Penny Turner	Norfolk Police	<p>As mentioned above, I would like links to boat security to be included, but would wish to consult with my police colleagues on BroadBeat as to which should be included. (1st Principles boat security; BoatShield and Aweigh).</p> <p>LINK FOR BOATSHIELD (&amp; Outboard Engine Cover) This weblink from Norfolk &amp; Suffolk Police offers advice on boat safety and security, also information about the Boatshield Scheme. <a href="https://www.norfolk.police.uk/advice/roads-and-vehicles/boats">https://www.norfolk.police.uk/advice/roads-and-vehicles/boats</a></p> <p>AWEIGH App Thousands of people enjoy the Broads throughout the year and the AWEIGH app has been designed to help those on and around the waterways. apps.apple.com&gt;app&gt;aweigh play.google.com&gt;store&gt;apps&gt;details&gt;id=com.aweigh</p> <p>BOAT SECURITY ADVICE - NORFOLK &amp; SUFFOLK POLICE Norfolk &amp; Suffolk Police advice on water safety and boat security: <a href="https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf">https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf</a></p>	Agreed. Text to be added.	Add these links to guide.
#16	David Broad	-	Section 3. – I think that continuing to make a distinction between boats suitable for residential moorings and houseboats might become somewhat artificial and unnecessary with the passage of time. (a bit like mobile homes and caravans where the	We consider houseboats to be floating caravans or floating sheds on a pontoon and these will be dealt with on a case by case basis. We do not promote or expect these at residential moorings around the Broads. This is set out in the Local Plan.	No change to document.

Ref	Name	Organisation	Comment	BA response	Amendments
			former have residual wheels and tow bar stored underneath but are still classed the same for The Caravan Act/ planning purposes). The BA hung on to this motor and moving thing when the working party initially considered the issue, bit I would suggest it is now unnecessary and that it is the matters of controlling the use and appearance which is common and important to both.		
#17	David Broad	-	Item 7 – Register – It might be helpful and save unnecessary administration and enforcement if the policy stating that guests staying less than, say, 30days, were exempt	It does not seem onerous to write down the details of the person visiting or staying in a register.	No change to document.
#18	David Broad	-	Item 9.3 Pump Out and Sewerage – It could be inviting non-compliance by allowing holding tanks and pump-outs as an alternative to mains drainage. History and experience shows that valves are often used for illegal discharge. There could be a strong planning policy preference for the latter and the register extended for logging genuine pump out occurrences.	Noted. Whilst areas of residential moorings may provide toilets and shower blocks, the boats themselves are probably going to have toilets on them. It is not clear how we can stop that from happening through planning. Because they will have toilets on them, the sewerage and foul water need to go somewhere and that is what we are referring to - the provision on site of somewhere to dispose of foul water. We do have policies that promote the connection to the public sewer network as the preference, as set out in that policy, that the facilities provided for pump out to be connected to the public sewer network. If this is not possible, then we set out a hierarchy for disposal methods and seek thorough justification for the method used. If Mr Broad is suggesting that there should be some kind of mechanism that attaches to the on-board toilets and the like and connects to the public sewer network, then that would be something for the management to address as they plan the scheme. We could add some text to raise the issue of valves and illegal discharge and cross refer to the policy that seeks connection to the public network.	Add this to section 9.3: Toilets on boats may require pumping out or somewhere to empty cassettes. Your marina or boatyard may have a system or process to deal with this already. <u>We would assess this part of the application against policy DM2 and as set out in that policy, attachment to the public sewer network is the preferred approach. When considering how to address foul water, you will need to consider the potential for boats to release foul water directly to the waterbody. The Environment Agency also highlight that there is a byelaw that is relevant to the disposal of sewage from boats within the Broads which makes it illegal for boats to discharge their sewage straight to the rivers.</u>
#19	David Broad	-	Notwithstanding the above, you are to be congratulated in producing such a comprehensive and thoughtful draft policy and I look forward to hearing of its progress.	Support noted.	No change to document.
#20	Judith Davidson	Norwich City Council	I just have one comment / suggested change to make in relation to lines 81-84 of the document: • I would suggest deleting the words “ in theory” from this sentence, and adding to the end “and is consistent with the policies of the River Wensum	Agreed. Text to be added.	<ul style="list-style-type: none"> <li>• ‘...or is in Norwich City Council’s Administrative Area’</li> </ul> Norwich City Council requested this addition as there are no mooring basins, marinas or boatyards in Norwich; this change now, <del>in theory</del> , allows for

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			Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners)."		residential moorings in the City ( <u>subject to the normal planning application process</u> ) and is <u>consistent with the policies of the River Wensum Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners).</u>
#21	Liam Robson	Environment Agency	We agree that all residential boats must be capable of navigation and so function as a boat, in order for residential moorings to be classed as 'water compatible' development. If the boat is non-navigable, such as a houseboat, then they would be classed as 'more vulnerable' residential development, and therefore Table 3 of the NPPF PPG would class them as inappropriate to be located in boatyards or mooring basins, as these areas are usually classed as Flood Zone 3b Functional Floodplain. It may be beneficial to include this reason within the explanation as to why the boats on the residential moorings need to be navigable.	Agreed. Text to be added.	Section 3. Add this as last paragraph: <u>The Environment Agency agree that all residential boats must be capable of navigation and so function as a boat, in order for residential moorings to be classed as 'water compatible' development. If the boat is non-navigable, such as a houseboat, the Environment Agency state that they would be classed as 'more vulnerable' residential development, and therefore Table 3 of the NPPF PPG would class them as inappropriate to be located in boatyards or mooring basins, as these areas are usually classed as Flood Zone 3b Functional Floodplain. The Environment Agency state that they would object in principle to any houseboats as they would be an inappropriate 'more vulnerable' development in Flood Zone 3b Functional Floodplain. So houseboats are unlikely to be permitted, unless their proposed location is somehow not classed as Functional Floodplain, which would require the marina or mooring basin to not be at risk of flooding in a 5% (1 in 20) annual probability flood event.</u>
#22	Liam Robson	Environment Agency	Also, the last sentence of Section 3 states that 'Houseboats are considered to be structures without means of independent propulsion and will be dealt with on a case by case basis due to their potential impact on character of the area'. We would object in principle to any houseboats as they would be an inappropriate 'more vulnerable' development in Flood Zone 3b Functional Floodplain, so it may be beneficial to make it clear that houseboats are unlikely to be permitted, unless their proposed location is somehow not classed as Functional Floodplain, which would require the marina or mooring basin to not be at risk of flooding in a 5% (1 in 20) annual probability flood event.	Response noted. That wording is from the Local Plan. But we will add it to the guide.	

Ref	Name	Organisation	Comment	BA response	Amendments
#23	Liam Robson	Environment Agency	We support the need for a Flood Risk Assessment (FRA) and Flood Response Plan with all applications for residential moorings. If the FRA and Flood Response Plan proposes refuge within the boat in times of flood then the boat will need to be capable of rising up above the extreme 0.1% (1 in 1000) climate change flood level. The FRA will need to detail what the required height of rise will be and demonstrate that the boat's mooring can enable it to rise that high without posing a hazard to the occupants of the boat.	Agreed. Text to be added.	Add to section 5: <u>If the FRA and Flood Response Plan proposes refuge within the boat in times of flood then the Environment Agency states that the boat will need to be capable of rising up above the extreme 0.1% (1 in 1000) climate change flood level. The FRA will need to detail what the required height of rise will be and demonstrate that the boat's mooring can enable it to rise that high without posing a hazard to the occupants of the boat. If the FRA and Flood Response Plan does not propose refuge, but instead proposes evacuation in advance of a flood, then the FRA and response plan will need to show how the occupants will be able to receive advanced warnings and where they will be able to evacuate to in time. The Environment Agency go on to say there is always a residual risk of warnings not being received, so the FRA will need to address this risk. The ability to take refuge within the boat, as described above, is a valuable fall-back measure and, if possible, the mooring should be designed to provide this refuge as a precaution, even if the preferred option is evacuation in advance of flooding.</u>
#24	Liam Robson	Environment Agency	If the FRA and Flood Response Plan does not propose refuge, but instead proposes evacuation in advance of a flood, then the FRA and response plan will need to show how the occupants will be able to receive advanced warnings and where they will be able to evacuate to in time. There is always a residual risk of warnings not being received, so the FRA will need to address this risk. The ability to take refuge within the boat, as described above, is a valuable fall-back measure and, if possible, the mooring should be designed to provide this refuge as a precaution, even if the preferred option is evacuation in advance of flooding.	Agreed. Text to be added.	
#25	Liam Robson	Environment Agency	The LPA and their Emergency Planners will need to ensure that they are satisfied with the proposed residential moorings and the proposed measures to ensure the safety of the future occupants should a flood occur.	Noted. The Broads Authority does not have Emergency Planners in house. It is not clear how the District Emergency Planners are able to assist the Broads Authority. This issue is something that is being looked into currently.	No change to document.
#26	Liam Robson	Environment Agency	Line 131 refers to waste management. We would highlight that there is a byelaw that is relevant to the disposal of sewage from boats within the Norfolk and Suffolk Broads which makes it illegal for	Response noted. Text to be added.	See comment #18

Ref	Name	Organisation	Comment	BA response	Amendments
			boats to discharge their sewage straight to the rivers.		
#27	Liam Robson	Environment Agency	It may be beneficial to include the need for Flood Response signs in this section, so that everyone is aware of the flood risk and the actions to take.	Noted. The Flood Risk SPD has recently been updated and applicants would be directed to the FRP guidance in that.	No change to document.
#28	Liam Robson	Environment Agency	9.2 Water The management plans should include details of early consultation with the relevant water company to ensure there is sufficient capacity in their network to supply moorings in that specific location. The abstraction of 20 cubic metres or more a day from either surface or groundwater source would require an abstraction licence. If the chosen site for the additional moorings already holds an abstraction licence, there would need to be consideration of the impacts from additional update as a result of the new moorings.	Agreed. Text to be added.	Add this to 9.2: <u>The Environment Agency are keen to emphasise that applications should include details of early consultation with the relevant water company to ensure there is sufficient capacity in their network to supply moorings in that specific location. The abstraction of 20 cubic metres or more a day from either surface or groundwater source would require an abstraction licence. If the chosen site for the additional moorings already holds an abstraction licence, there would need to be consideration of the impacts from additional update as a result of the new moorings.</u>
#29	Liam Robson	Environment Agency	9.3 Sewage This section should be strengthened by stating that 'toilets on board will require pumping out' and if possible it would be beneficial to add – 'to either an appropriate package treatment plant, a containment tank emptied by registered waste carrier or to main sewer'.	Agreed. Text to be added.	See comment #18
#30	Liam Robson	Environment Agency	Informative – Environmental Permit for Flood Risk Activities An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a> . Anyone carrying out these activities without a permit where one is required, is breaking the law.	Agreed. Text to be added.	Add this to the end of section 9: <u>Informative – Environmental Permit for Flood Risk Activities An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a>. Anyone carrying out these activities without a permit where one is required, is breaking the law.</u>
#31	Kate Wood	Pegasus Group on behalf of Crown Point Estate	We welcome the Guide's intention to provide guidance that builds on already-adopted policy DM37 – New Residential Moorings. We note that this policy is extremely comprehensive in setting out requirements for location and facilities.	Noted.	No change to document.

Ref	Name	Organisation	Comment	BA response	Amendments
#32	Kate Wood	Pegasus Group on behalf of Crown Point Estate	The proposed Residential Moorings Guide adds little to the policy, but provides a helpful checklist which would be a useful basis for the planning officer's consideration of the individual elements requiring consideration.	We would suggest it adds to the policy and elaborates on many parts of the policy as well as many other aspects of a successful residential mooring scheme. But yes, it is also a useful basis as stated.	No change to document.
#33	Kate Wood	Pegasus Group on behalf of Crown Point Estate	We would like to see additional text in relation to management accommodation and the Council's commitment to engagement with the applicant, particularly at pre-application stage.	We offer a free pre-application advice service. The very nature of our role as a Local Planning Authority means we engage with applicants. Regarding management accommodation, DM38 covers that and refers to residential moorings. DM37 and this guide would then be used.	No change to document.
#34	Kate Wood	Pegasus Group on behalf of Crown Point Estate	Policy DM37 is a relatively self-contained policy. However, there may be circumstances, particularly with larger mooring developments, where the applicant considers that residential management accommodation would be necessary to ensure the moorings are well-managed, maintained and monitored. Such accommodation could, for example, be part of a larger building accommodating post boxes, storage lockers and other facilities.	Noted. If a scheme requires this, then DM38 would be used as would all other relevant policies of the Local Plan and all relevant SPDs and Guides. One point to note however the storage building might be in a high risk flood zone, so accommodation might not necessarily be appropriate there.	No change to document.
#35	Kate Wood	Pegasus Group on behalf of Crown Point Estate	There is no mention in the Guide of the Authority's pre-application service. We consider this should be included as an option for potential applicants to be aware of. With that option, we request that the Authority includes a commitment to provide advice in a timely manner and stand by its advice unless there have been significant material changes in policy circumstances since the advice was issued. This will enable applicants to have faith in the pre-application system. As you know, pre-application advice, especially when provided in an iterative way, ensures that a proposal can be refined to be the best scheme possible. This ultimately results in greater buy-in from consultees such as Parish Councils and neighbours, a greater likelihood of an efficient and successful application process, and improved development quality when implemented.	Noted. Any advice given on a proposal is as presented and its conformity with current policies. It will remain relevant unless the policy or other material considerations or the details of the application itself change. Pre-application advice is an officer level opinion and given without prejudice.	No change to document.
#36	James Knight	Individual	Although the Guide is presented as a planning document for adoption, the majority of its content falls into the category of helpful guidance for operators hoping to provide residential moorings, and is not directly related to planning.	Noted.	No change to document.



Ref	Name	Organisation	Comment	BA response	Amendments
#37	James Knight	Individual	There is an over-riding tendency, both in the policy and in the Guide, to treat residential moorings as materially different to ordinary leisure moorings. In fact, the use of the land is identical - mooring a boat – and the risks are broadly the same, since people live & sleep aboard for many weeks at a time, regardless of whether the boat is their primary residence. The differences from a planning perspective are: a) the fact that the vessel is used as a primary, rather than temporary, residence – which could result in increased demand on local services; b) the fact that residential paraphernalia can accumulate around the moorings, potentially changing the character of the surroundings	The policy treats them as different because the uses are different.	No change to document.
#38	James Knight	Individual	Whilst pleased to have the opportunity of providing input, this Guide ought more properly to be a living document which evolves over time to provide guidance to marina operators – not just as part of the planning process but for promoting ideas and best practice to all operators.	Noted. It will be used for both purposes. We will review guides over time, update and amend and re-consult as required.	No change to document.
#39	James Knight	Individual	The formal consultation process is really designed for strategic planning documents which are adopted for more than a few years, rather than for detailed guidance which, necessarily, should change over time.	The Broads Authority has undertaken consultation on many other guides that are used in planning and intends to produce more guides in future and intends to consult on them as well. We will review guides over time, update and amend and re-consult as required. The purpose of consultation is two fold. Firstly, people may have some really useful comments or observations that will improve the guide or correct it. Secondly, adoption reflects the fact that it has been through this process.	No change to document.
#40	James Knight	Individual	The relevant strategic planning policies for residential moorings are set out in policy DM37. By contrast, this Guide is largely concerned with providing opinions and guidance about current practices and has very little to do with planning.	The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful.	No change to document.
#41	James Knight	Individual	Planning relates to the use and development of land (which includes the land beneath water such as rivers, moorings and basins). The specific characteristics of vessels moored over land will generally fall outside the ambit of planning.	Noted.	No change to document.

Ref	Name	Organisation	Comment	BA response	Amendments
#42	James Knight	Individual	<p>Whilst accepting that the definition is set out in the adopted policy, there are still significant grey areas surrounding the meaning of “main residence”. For example:</p> <p>a) Does “main residence” really mean “main UK residence”? If a person lives abroad for 6 months and on their boat on the Broads for 6 months, is this a residential mooring?</p> <p>b) If a person stays on their boat during the summer and in a (UK) house during the winter, where is their main residence?</p>	Noted. This is assessed on a case by case basis.	No change to document.
#43	James Knight	Individual	Since it is the boat itself which is “residential” and not the mooring, and the policy wording ties the mooring to a specific singular vessel, the policy could easily be circumvented by moving boats from one mooring to another every 28 days.	The policy is related to the use of the land.	No change to document.
#44	James Knight	Individual	A more sensible and enforceable future policy might instead want to consider limiting the overall number of moorings which could be used for residential purposes within a given marina or location, rather than trying to define individual moorings as residential - which is essentially impossible.	Noted. There are a number of possible approaches. These can be discussed through the determination process.	See #85.
#45	James Knight	Individual	In reviewing the policy direction, officers ought to consider what it is that they are trying to achieve by drawing distinctions between different types of mooring and by treating residential moorings as some kind of special case.	We will note this as and when the policy/Local Plan is reviewed and seek views during any consultation.	No change to document.
#46	James Knight	Individual	Acceptable location for residential moorings 4.1. This section is simply a summary of the adopted policy and is therefore not open for consultation.	Noted.	No change to document.
#47	James Knight	Individual	<p>The Guide requires mooring operators to detail the technique/method of mooring vessels in the FRA.</p> <p>It is an established fact of maritime law – and the Broads Authority’s own navigation byelaws – that responsibility for the safe mooring of a vessel lies at all times with the master of a vessel. Broads Authority byelaw 58(1) (moored vessels to be properly secured) refers. Any planning condition which required the landowner to be responsible for the safe mooring of a navigable vessel would fail the NPPF para 55 tests because it would:</p> <p>a) not be relevant to planning;</p> <p>b) attempt to duplicate non-planning controls (the</p>	The flood risk assessment and flood response plan will more than likely be required early on in the process so they can be used to determine the application. The Local Plan says that the FRA should show how the vessel will be moored so it does not cause issues at times of flooding. The Guide and Local Plan do not require a condition for a site manager to take over the mooring of a vessel; simply to show/discuss/state how, vessels will be checked to ensure the way they are moored will not impact on the vessel and its contents or other boats etc. nearby. It may be that the responsibility of mooring lies with the master, but if a manager of a site sees something that could need improving in	No change to document.



Ref	Name	Organisation	Comment	BA response	Amendments
			<p>Navigation Byelaws);</p> <p>c) be unreasonable as the landowner could not be expected to exercise the necessary degree of monitoring or control over the master of a vessel;</p> <p>d) be unenforceable by virtue of the above.</p> <p>It would be perfectly reasonable to ask mooring operators to provide guidance on safe mooring techniques to their customers, but there can be no transfer of responsibility.</p>	<p>terms of mooring a vessel, especially when a flood event is likely/is happening, it seems reasonable that they may discuss this with the master perhaps. The Manager has responsibility for the site and a poorly moored vessel may impact others on the site. It might be, for example, that the applicant simply says that from time to time, and even more so when flooding could ensue, they will check how vessels are moored.</p>	
#48	James Knight	Individual	<p>The Climate Change Checklist link on the Guide is broken, and the document does not appear to exist on the Broads Authority website. There is a climate change checklist within Local Plan policy DM9, which I take to be the relevant list. Whilst this is a very useful checklist for new land-based developments, it is hard to see how very much of it could be applied to residential moorings in any practical way – or indeed to moorings more generally.</p>	<p>Will check the link and amend. The Checklist is here: <a href="https://www.broads-authority.gov.uk/data/assets/word_doc/0009/1603656/Climate20change20checklist20template.docx">https://www.broads-authority.gov.uk/data/assets/word_doc/0009/1603656/Climate20change20checklist20template.docx</a> and in the Local Plan. It is for the applicant to determine what aspects of the checklist are relevant and could be addressed in their scheme. If they think part is not relevant or does not apply, they have the option of ticking 'nil'.</p>	Check link.
#49	James Knight	Individual	<p>Clearly the existence of a management plan is of benefit to mooring operators, as well as to their residents and other berth holders.</p>	Noted.	No change to document.
#50	James Knight	Individual	<p>What is less clear is why the content of such a management plan could or should be within the ambit of planning. Planning authorities cannot prescribe the way in which businesses or moorings are managed. Management plans are operational documents, written to ensure that a business is run safely, efficiently, profitably and lawfully (including compliance with planning conditions).</p>	<p>The requirement for a Management Plan is in the adopted policy and this guide expands on what a Management Plan could address.</p>	No change to document.
#51	James Knight	Individual	<p>Planning conditions need to relate to planning and pass the NPPF para 55 tests. Amongst other things, they need to be specific, enforceable and not covered by other regulatory regimes. They should only be applied where they are necessary to make an unacceptable development acceptable. They can't simply be "nice to have".</p>	Noted.	No change to document.
#52	James Knight	Individual	<p>Boat safety certificates &amp; insurance are matters for individual boat owners and are covered by the</p>	Noted. This is not the intention of the guide.	No change to document.

Ref	Name	Organisation	Comment	BA response	Amendments
			Broads Authority's own boat registration regulations. They cannot be turned into planning conditions imposed upon the mooring operator.		
#53	James Knight	Individual	Similarly, noise pollution is covered by navigation byelaws as well as by district councils who are responsible for environmental protection - including waste management.	Noted. It is also addressed in the Local Plan as part of the Amenity policy, DM21.	No change to document.
#54	James Knight	Individual	Therefore, although the list is useful to an operator in terms of "things to consider", it would be inappropriate for any planning condition to require the existence of a management plan which featured such a list.	Noted and this will be considered on a case by case basis.	No change to document.
#55	James Knight	Individual	7.1. Where a planning condition restricts the number of residential moorings, it will be necessary to keep a register to ensure compliance with that planning condition. 7.2. The nature of the information made available for inspection to the LPA will need to be carefully considered to ensure compliance with GDPR and other privacy laws. It is important for the Broads Authority to consider what information it could require the operator to provide, and the reasons for requiring it.	Noted. The Authority is mindful of the requirements of other legislation.	No change to document.
#56	James Knight	Individual	Council Tax 8.1. This isn't a planning matter and there is no proposal upon which to consult, but it is useful information to provide in a guide.	Noted.	No change to document.
#57	James Knight	Individual	Facilities 9.1. This is all useful guidance and it is helpful to know how other marinas outside the Broads operate and provide facilities. 9.2. It might also be useful to provide details of relevant arrangements at marinas within the Broads, which offer residential moorings.	Noted. This information will be available on the operator's websites.	No change to document.
#58	James Knight	Individual	The questions within this section are posed as consultation queries but are really matters for individual planning applicants to consider. I cannot see how answers to these questions, provided as part of this consultation exercise, could inform the final version of a planning guidance document.	These questions are prompts for the applicant to answer as set out in Appendix D. They will remain as part of the final document. They are not consultation questions.	No change to document.
#59	James Knight	Individual	This Guide should not be considered as a planning document requiring adoption, but rather something to be continuously updated, intended to provide	The purpose of this guide, like the other adopted guides, is to provide advice and information. It will be updated as required.	No change to document.

Ref	Name	Organisation	Comment	BA response	Amendments
			helpful guidance to new and existing residential mooring operators.		
#60	James Knight	Individual	Planning (and other) documents from the LPA should not seek to prescribe the operational practices of businesses unless they directly relate to planning and are necessary in planning terms.	Noted.	No change to document.
#61	James Knight	Individual	Planning conditions must be limited to matters which are within the lawful control of the marina operator. They should never require the operator to be responsible for the conduct or actions of boat owners or others. Planning conditions which impose requirements on the operator relating to noise, boat safety, insurance, payment of tolls or mooring techniques would all probably be unlawful.	Noted.	No change to document.
#62	James Knight	Individual	Clarity is required on the nature of personal information which the operator can reasonably be asked to provide relating to individual berth holders.	Noted.	See #96, 97, 98 and 99.
#63	James Knight	Individual	The Guide as it stands is a hybrid document containing a mixture of planning policy, guidance, links, and questions aimed at specific applicants. It isn't capable of being "adopted" in the formal sense.	The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful. By undertaking consultation, we get wider views which will strengthen the document. Adoption reflects the fact that it has been through this process.	No change to document.
#64	James Knight	Individual	The majority of the guidance (as distinct from the policy) is applicable to all moorings (not just residential ones), and the document ought to be re-imagined as a means of providing evolving guidance and best practice for marina operators - rather than seeking to prescribe operational procedures under the guise of planning conditions.	Noted. The suggestion about the potential wider role of the document is noted. But at this point, it is intended to focus primarily on residential moorings.	No change to document.
#65	James Knight	Individual	I am a Fellow of the Royal Institution of Chartered Surveyors and I have lived and worked around the Broads for all of my life. In addition to enjoying recreational boating activities, I have worked in a professional capacity advising on planning matters. During the past 17 years, I have been a Director of three successful Broads tourism businesses, each employing over 60 people, and have engaged with the planning system as an applicant on numerous occasions. One of these businesses includes a marina which operates 10 residential moorings on the southern Broads. I am a former member of the	Noted	No change to document.

Ref	Name	Organisation	Comment	BA response	Amendments
			RICS Governing Council, a South Norfolk District Councillor, and an appointed member of the Broads Authority and its Planning Committee. My response to this consultation is in my capacity as a private individual, property developer and company director. I am not responding in my capacity as a member of the Broads Authority or its Planning Committee.		
#66	Hayley Goldson	Chedgrave Parish Clerk	The content of Marketing and Viability Supplementary Planning Document (SPD) and Residential Moorings Guide was considered by Chedgrave Parish Council on 7th May 2020. I can advise that councillors support the document as long as the guidelines described in the document are adhered to (particularly in relation to residential moorings).	Support noted.	No change to document.
#67	William Hollocks	Loddon Marina	Can you please give me some background on why these are being proposed as you have just produced an excellent document on the Broads Plan that went through an extensive review by every party and then the Inspector for the Secretary of State and then approved at the highest level of government.	Guides and SPDs provide more detail on certain policies in Local Plans. For example, the moorings and riverbank stabilisation guide that we adopted a few years back and the Flood Risk SPD we soon adopted all provide much more detail than would be appropriate in a Local Plan. Policies in the Local Plan provide the hooks for the guides and SPDs. SPDs and Guides help with the implementation of policies. A Local Planning Authority does not need to produce them, but can do.	No change to document.
#68	William Hollocks	Loddon Marina	With regards the residential moorings there is every kind of boat currently on the Broads many used as residential and the BA already has bye law on this so why are the Planning Department trying to be a dictator on a matter which is under another departments jurisdiction (Lucy). The criteria for our residential moorings is well covered in policy LOD1. Does this mean that every boat that does meet this policy will be excluded from the Broads.	The policies relate to the use of the land, not the use of the boat. The Guide elaborates on already adopted policy (the Local Plan for the Broads was adopted in May 2019).	No change to document.
#69	William Hollocks	Loddon Marina	Can you please confirm that any policy you end up will be approved by the Secretary of State though his Inspector as an approved amendment to your Broads Plan. Without this as far as I can see it will be another attempt by the Planning Dictatorship to control the further deterioration of the business's on the Broads and will not be worth the paper it is written on.	These are not policies. These documents help to implement policies. Guides are not prescribed by regulations, but SPDs are. SPDs have a set procedure (see the regulations: <a href="http://www.legislation.gov.uk/uksi/2012/767/part/5/made">http://www.legislation.gov.uk/uksi/2012/767/part/5/made</a> ) and the Planning Inspector is not part of the process.	No change to document.

Ref	Name	Organisation	Comment	BA response	Amendments
#70	William Hollocks	Loddon Marina	By copy of this e-mail to DR Packman, Lucy as the responsible manager for navigation and bye laws on boats and Marie as the boss of the out of control Planning Department I am asking to put a stop to these amendments as it is a complete waste of money and has no justification to be in the public interest.	Noted	No change to document.
#71	William Hollocks	Loddon Marina	I am more than happy to start a campaign of getting support not for comments to the policies but to get them stopped. We are happy to lobby every Parish Council, BA members, Councils, MP's etc. I have also copied Mr Tarry as he is working with various parties to contribute to the consultation process.	Noted. But guides and SDPs are not policies. They help with the implementation of adopted policies	No change to document.
#72	Thomas Foreman	Thorpe St Andrew Town Council	The Committee welcomed the consultation by the Broads Authority on its Residential Moorings Guide and felt it was a very well-considered document.	Support noted.	No change to document.
#73	Thomas Foreman	Thorpe St Andrew Town Council	The Committee noted the important difference between houseboats and residential moorings, however, it was queried how the policy would apply to mixed sites with both houseboats and residential mooring.	The Local Plan at page 118, second para says that we expect schemes for residential moorings to be occupied by vessels regarded as boats and that houseboats will be dealt with on a case by case basis. That would be the same for mixed schemes, if any were to come forward as a planning application.	No change to document but see rows #21 and 22.
#74	Thomas Foreman	Thorpe St Andrew Town Council	The Committee felt that the management plan was a positive step, particularly with site rules explaining who is resident and how waste will be managed. As part of this section, it was felt the need for an Emergency Evacuation Plan should be included. If safe access for emergency service vehicles is important, it is also important to consider how people might evacuate prior to (or when) the emergency services arrive.	Noted. Access by emergency services would be considered as part of determining the application as per criterion g of DM37.	No change to document.
#75	Alan Wildman	Residential Boat Owners' Association	RBOA is keen to work with the Broads Authority with a view to demonstrating how, with good management controls at site level, residential boaters are of considerable benefit to moorings operators, other berth holders, local communities and the Norfolk Broads as a whole. It is to be hoped that if demand for residential moorings exceeds the 63 already identified, then BA might consider increasing the figure in order to meet that demand.	If applications come forward, they will be determined against the policies of the local plan. The number of 63 is not a maximum and we would not deny applications because we have permitted 63 residential moorings.	No change to document.

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#76	Alan Wildman	Residential Boat Owners' Association	<p>Quite apart from the legal requirement and the many general benefits of having water based residents, to Navigation Authorities and to moorings providers, responsible residential boaters are particularly known to provide:</p> <ul style="list-style-type: none"> <li>• Added security: Not just in terms of property - land dwellers, walkers, boaters and other waterway users often confirm that they feel safer knowing there are people living on the water, close by.</li> <li>• Local knowledge: Visitors to areas where there are live-aboards frequently interact and benefit from the available local knowledge, usually freely given, to enhance the visitors' enjoyment of the region.</li> <li>• Safety: Where there are residential craft moored, by nature usually occupied by necessarily safety aware individuals, others who might get into trouble near, in or on the water have potential assistance immediately at hand.</li> </ul>	Noted.	No change to document.
#77	Alan Wildman	Residential Boat Owners' Association	We welcome the distinction between houseboats and other residential craft and would suggest a good, clear description be used to clarify what constitutes those other residential craft. RBOA suggests - traditional in that they would be identified as boats by "the man on the Clapham Omnibus".	The Local Plan described what is expected at these moorings in the supporting text of DM37. Any changes to that wording would need to be as part of the Local Plan review.	No change to document.
#78	Alan Wildman	Residential Boat Owners' Association	It is hoped that planning restrictions on houseboats might be negotiable with the applicants, rather than overly dictatorial, something that could be made clear in The Guide.	The Local Plan is clear that houseboats will be judged on a case by case basis.	No change to document. Also see comments #21 and 22.
#79	Alan Wildman	Residential Boat Owners' Association	Some marinas and boatyards already have on-line moorings. To locate a small number of residential slots in amongst those already existing moorings would impede neither navigation nor access to facilities. Perhaps this could be made clearer in The Guide.	Planning applications will be determined against relevant policies in the Local Plan. Policy SP13 will be relevant and impact on navigation is included on DM37 at criterion d. Again, the policy DM37 sets out where residential moorings will be acceptable and other than in Norwich, that is in marinas or boatyards rather than on line. if the RBOA wish for that to be changed, it is something to discuss as part of the review of the Local Plan.	No change to document.
#80	Alan Wildman	Residential Boat Owners' Association	Some residential boaters have little need for nearby access to most "key" services; for instance, BA acknowledges that many residential boaters are single, perhaps slightly older (without children on board) and/or even fully retired. It is hoped that BA will look favourably on applications for residential	The Local Plan for the Broads was adopted in 2019. The policy sets out the requirements for the location of residential moorings and this guide cannot change policy. DM37 is clear about where residential moorings will be deemed acceptable. Indeed, access to services was a key consideration	No change to document.

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			berths in areas that are a little remote from such services and could state that fact in The Guide.	when assessing the allocations in the Local Plan for residential moorings.	
#81	Alan Wildman	Residential Boat Owners' Association	Flood Risk and Climate Change BA comments in The Guide are clear.	Noted	No change to document.
#82	Alan Wildman	Residential Boat Owners' Association	RBOA will readily offer advice to operators who may need assistance with creating Management Plans covering "responsible" residential boating. RBOA acknowledges BA's reference to our Association and/or our website and would like to see that reference strengthened within The Guide. RBOA anticipates no commercial benefit from providing such advice.  Follow up: As regards what you might further comment on RBOA, perhaps just a mention that we do liaise with most major Navigation Authorities would suffice - if you agree and feel it appropriate, then all well and good	Agreed, will add the extra wording to the RBOA paragraph.	The Residential Boat Owners' Associations (RBOA). Their website says: 'Established in 1963 the Residential Boat Owners' Association is the only national organisation which exclusively represents and promotes the interests of people living on boats in the British Isles. We represent all those who have chosen to make a boat their home'. <a href="https://www.rboa.org.uk/">The RBOA ensure they liaise with Navigation Authorities like the Broads Authority. https://www.rboa.org.uk/</a>
#83	Alan Wildman	Residential Boat Owners' Association	RBOA acknowledges that clear, strong and fair site management is the key to acceptable live-aboard craft. Good management will encourage responsible site maintenance and preservation of natural habitat and biodiversity. Reference in The Guide to LILO (Low Impact Living Aboard) might be advisable – RBOA can provide guidance in this respect if required.  Follow up: For us, the points we would like to get across are that we (RBOA) are keen to lead operators and customers in the direction of Low Impact Life On Board and, through RBOA, there is a wealth of advice in that respect. Many will hopefully recognise the anachronism (LILO) and seek us out for such free advice.	Agree. Will add reference to LILO.	<a href="#">9.12 Low Impact Life on Board</a> <a href="#">In response to the consultation on this guide, the RBOA were keen to emphasise Low Impact Life On Board and, through RBOA, there is a wealth of advice in that respect. Low impact life on board is an expression from UK waterways boaters who care about the environment.</a>
#84	Alan Wildman	Residential Boat Owners' Association	RBOA believes that boats used as primary residences should not stand out from leisure craft moored in the same vicinities. We would support BA in taking a similar stance and including such advice in The Guide.	The policy and guide seek to influence and guide the moorings and use of land rather than what boats look like. It seems that is will be down to the owner of the boat and management of the moorings.	No change to document.

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#85	Alan Wildman	Residential Boat Owners' Association	RBOA believes that moorings operators should have absolute (but reasonable) control of boat placements within their operational sites and would like to see this mentioned in The Guide.	Agreed. Will add text.	Amend section 4 so there are two sub sections - one for geographical location and another for location of residential moorings within a site. Under location of residential moorings within a site add: ' <a href="#">An applicant may want certain specific moorings to be permitted for residential moorings or may want an area to be permitted with a maximum number of residential moorings within that area, to reflect the operations of the marina or boatyard or site. This will need to be discussed and agreed with the Local Planning Authority. It will then be for the operator of the site to control which moorings are used for residential moorings in line with the permission granted. This would then be logged in the register and the approach may be explained in the management plan</a> '.'
#86	Alan Wildman	Residential Boat Owners' Association	It is reasonable to expect that any proposed inspection of moorings operators' records should only be requested with a good reason so to do. Such request should be negotiable with the operator, which fact should be made clear in The Guide.	Noted. See #96, 97, 98 and 99.	See #96, 97, 98 and 99.
#87	Alan Wildman	Residential Boat Owners' Association	RBOA has extensive experience of Council Tax issues; again RBOA would be happy for The Guide to refer to our Association and/or our website for advice.	Agreed. Will add text.	At section 8 add: ' <a href="#">and the RBOA also have information on Council Tax: https://www.rboa.org.uk/q-a/</a> '
#88	Alan Wildman	Residential Boat Owners' Association	Some facilities which may not be available "on site" but are available just a short cruise away from base are perfectly acceptable to many live-aboards. This is often the case on other waterways. RBOA suggests that point be clearly made within The Guide. We believe it reasonable to acknowledge that many live-aboard requirements, such as laundry, clothes drying, storage, etc. are often fully catered for within the confines of the craft (boat) itself. Moorings operators might be advised, via The Guide, that such a requirement could be part of their own Management Plan.	The guide is clear in that it says the section relating to facilities are things that an operator may wish to make available. It gives examples and case studies. The elements of this section tend to relate to policy criteria and so the application will need to show how they are addressed. It is up to the operator to consider how the needs of those living on their boats will be catered for.	No change to document.
#89	Alan Wildman	Residential Boat Owners' Association	Key Messages A good summary.	Noted	No change to document.
#90	Alan Wildman	Residential Boat Owners' Association	Helpful links and where to go to get advice RBOA would encourage emphasis on the fact that we are a wholly volunteer group unlike other (commercial) organisations – our focus is not on RBOA revenue generation, but is solely on achieving	Noted. Consider the reference to the various organisations adequately addressed in the Guide.	No change to document.



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			our aims, as declared at the head of this response paper – RBOA is dedicated solely to the protection, promotion, universal acceptance and continued development of “responsible” residential boating (living-aboard).		
#91	Jason Beck	East Suffolk Council	East Suffolk Council, Planning Policy Department has no comments to make on this document.	Noted	No change to document.
#92	Emily Curtis	Loddon Parish Council	Councillors welcomed a management plan for the sites with residential moorings. LPC believes that a management plan would ensure the site was is well managed and will help protect land and boat residents from anti-social behaviour.	Support noted.	No change to document.
#93	Emily Curtis	Loddon Parish Council	Councillors welcomed that consideration is being given to climate change, and agreed that it is important to consider the necessity for a site to have adequate provision for waste, sewage disposal and the prevention of pollution. How will these considerations be monitored?	The ability to meet these requirements will be part of the assessment and form part of planning conditions which are routinely monitored.	No change to document.
#94	Emily Curtis	Loddon Parish Council	Councillors consider it is important that a safety plan for flooding is taken into consideration for the safety of the residents on the boat.	Support noted.	No change to document.
#95	Emily Curtis	Loddon Parish Council	Councillors welcomed the policy regarding the necessity for facilities and services available for residential moorings, it is important for people living on land or water to have access to adequate services and facilities.	Support noted.	No change to document.
#96	Emily Curtis	Loddon Parish Council	Councillors raised concerns over the necessity of a register and have asked why it is necessary for this information to be held by the site owner?	The site owner will log who is on what mooring and whether they are residential moorings or other types of moorings they offer, just like any business would keep records. The Broads Authority would request to see this register from time to time to ensure that only the permitted number of boats are being lived on. It would be for the operator to ensure they kept their register in line with GDPR requirements. This approach is similar to the requirement that holiday accommodation operators have - to keep a log of those who stay, including the time period for periodic inspection by the Broads Authority, again to ensure the accommodation is being used as permitted.	Add some further explanatory text to this section: 7. Register A register of those boats being lived on will be required. The register of who lives on which boat will be maintained at all times and is made available for inspections <u>by the Broads Authority as part of monitoring of conditions set on any permission. The reason for keeping this register is to ensure that only the permitted number of boats are being lived on.</u>
#97	Emily Curtis	Loddon Parish Council	What purpose does holding this register have for site owners?		

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#98	Emily Curtis	Loddon Parish Council	Is this retention of register data inline with GDPR and should this information be held securely, and for what length of time the data be stored.		
#99	Emily Curtis	Loddon Parish Council	Why do the Broads Authority need to inspect this register?		
#100	Emily Curtis	Loddon Parish Council	We would note that management of any antisocial behaviour by occupants of residential boats is dependent on the quality of designated site manager and what further control measures could be put in place to help the site manager deal with anti-social behaviour?	Operators will no doubt use a contract that sets out the requirements of staying on a boat at their site, including why and how such contract could be terminated. Perhaps anti-social behaviour may be such a reason for termination of a contract. Also such behaviour can be reported to the police or Council just the same as one would if there was anti-social behaviour from those living in a house on land.	No change to document.
#101	Emily Curtis	Loddon Parish Council	Will the Broads Authority have the power to withdraw a site owners licence to accommodate residential boats in the event of recurrent anti social behaviour?	Planning permission, once granted, cannot be revoked like a licence might be. Anti-social behaviour by those living on their boats will be down to the management of the site. Anti-social behaviour will be dealt with in the same way it will be dealt with in any other sort of housing.	No changes to document.
#102	Rachel Card	NSBA	The Norfolk and Suffolk Boating Association (NSBA) thanks the Broads Authority for the opportunity to participate in consultation on the above planning policy guide. The NSBA has no comment to make with regard to the advice and policies in this document.	Noted.	No change to document.
#103	Paul Harris	SNDC and BDC	I note that the document is referred to as a Guide, and whilst it is expressly 'designed to help implement the policies of the Local Plan' and seeks to elaborate on the adopted Broads Local Plan Policy DM37 - New Residential Moorings, it does not appear that you intend to adopt the Guide as a Supplement Planning Document, with the status which that confers.	Correct. We have a few other guides as well: <a href="https://www.broads-authority.gov.uk/planning/planning-permission/design-guides">https://www.broads-authority.gov.uk/planning/planning-permission/design-guides</a>	No change to document.
#104	Paul Harris	SNDC and BDC	Overall the Guide contains a range of useful information; however, at various points throughout the document, it is not entirely clear what issues the Broads Authority consider to be material to determining planning applications, and what is useful background information. The document could give the impression that a significant amount of information will be required to support a	The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful.	No change to document.

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			planning application, where this may not actually be the case.		
#105	Paul Harris	SNDC and BDC	<p>Section 5 – Flood risk and Climate Change</p> <p>The aims of this section, to ensure that safety considerations are assessed as part of any Flood Risk Assessment and Flood Response Plan, are supported. The Guide relates this section to Local Plan Policies DM5 and DM37, but it is not clear how much of the suggested information would actually be required to support a planning application; if this information is being required for planning purposes, consideration needs to be given as to (a) how requirements will be monitored, (b) whether they are enforceable under planning legislation and (c) whether they might already be covered by other legislation.</p>	This section generally copies over text from the Local Plan. However amendments following this consultation, as detailed at #23 and #24 provide greater detail. Also see response to #47.	See #23, 24 and 47.
#106	Paul Harris	SNDC and BDC	<p>Section 6 – Management Plan</p> <p>Whilst it could be useful to condition a management plan as part of any planning permission, the list of issues covered would appear to extend beyond those related to the planning aspects of development; for example, conditioning a management plan that incorporates the ‘site rules’ or ‘terms and conditions’ could be requiring information that is largely concerned with non-planning issues. In addition, a number of the issues the Guide suggests the management plan could cover would appear to be seeking/requiring a level of detail that would not be required for a more regular residential development, even where that development has shared/communal/public space – the Guide does not make it clear why this level is required, and how it might be used to enforce a planning condition.</p>	The points made are noted. And it is accepted that there is a level of detail set out in the guide, and required to help assess a planning application and this level of details goes beyond that which would be requested for a land based dwelling. However, as a unit of accommodation, residential moorings are different. Facilities required aren't routinely provided on sites which may be used for residential moorings (e.g. waste, pollution prevention, electricity) so we need to see how they will be provide. And there is a level of risk for example from drowning which is not usually present with bricks and mortar accommodation. The purpose of the guide is to prompt people to think about these things.	No change to document.
#107	Paul Harris	SNDC and BDC	<p>Section 7 – Register</p> <p>Again the Guide does not make it clear why a register of who lives on each boat is required for residential moorings (as opposed to a register of the moorings themselves), this would only seem relevant if the Broads Authority was applying specific occupancy conditions to a site; however, this is not clear from the Guide.</p>	Noted. See #96, 97, 98 and 99.	See #96, 97, 98 and 99.

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#108	Paul Harris	SNDC and BDC	Section 8 – Council Tax It is useful to highlight need to speak with relevant Local Authorities regarding Council Tax, although it may be worth highlighting that this does not affect the planning decision on a particular site.	This section gives information and provides links to find out more as well as advising operators to contact the relevant district. There is nothing in the text to say that we require the applicant to do something.	No change to document.
#109	Paul Harris	SNDC and BDC	Section 9 – Facilities This sets out a useful checklist for site providers. Again, what is not entirely clear is which of these issues could be material to any decision on a planning application e.g. car parking, or amenity space provision and which provides useful sources of background information e.g. methods of potable water supply.	Section 9.1 to 9.8 relate to topics quoted in the policy. The section is also quite clear in that it uses some examples from elsewhere, but to discuss the approach favoured by the operator with the Broads Authority. 9.9 refers to other facilities/extras to consider.	No change to document.
#110	Paul Harris	SNDC and BDC	In conclusion, the document contains a lot of useful information for the providers of residential moorings. By linking the document closely to adopted Local Plan Policy DM37, it gives the impression that the Guide is setting out the information that will be required to determine planning applications under that policy; however, in some instances this appears not to be the case. As such, it would be useful if the document were more clearly structured to emphasise that information which might be used to determine a planning application, and that information which is a useful resource to site providers about good practice and achieving the best quality of provision.	This is a summary comment and the issues raised have been addressed in previous comments.	See previous comments.
#111	Paul Fletcher	Beccles Parish Council	I realise that I have missed the deadline for responses on the above document, ( Neighbourhood Plan and Beccles Society have taken up too much of my time). Nevertheless, I thought that you might like to know that we felt that it was a very comprehensive all encompassing document and we had no adverse comments to make.	Support noted.	No change to document.