

Navigation Committee

Agenda 14 January 2021

2.00pm

This is a remote meeting held under the Broads Authority's [Standing Orders on Procedure Rules for Remote Meetings](#).

Participants: You will be sent a link to join the meeting. The room will open at 1.00pm and we request that you **log in by 1.30pm** to allow us to check connections and other technical details.

Members of the public: We will publish a live stream link two days before the meeting at [Navigation Committee - 14 January 2021](#). The live stream will be suspended for any exempt items on the agenda. Please email committees@broads-authority.gov.uk with any queries about this meeting.

Introduction

1. To receive apologies for absence
2. To receive declarations of interest
3. To note whether any items have been proposed as matters of urgent business
4. Public question time – to note whether any questions have been raised by members of the public
5. **To receive and confirm the minutes of the Navigation Committee meeting held on 22 October 2020** (Pages 3-10)
6. **Summary of actions and outstanding issues following discussion at previous meetings** (Pages 11-12)

Reports for information

7. **Chief Executive's report and current issues** (Pages 13-20)
Report by Chief Executive
8. **Construction, Maintenance, and Ecology work programme – progress update** (Pages 21-26)
Report by Head of Construction, Maintenance, and Ecology
9. **Draft budget 2021/22 and Financial Strategy to 2023/24** (Pages 27-54)
Report by Chief Financial Officer

10. **Tolls enforcement** (Pages 55-56)
Report by Chief Executive and Collector of Tolls
11. **Changes to Hire Boat Licencing Conditions** (Pages 57-63)
Report by Head of Safety Management
12. **Residential Moorings Guide – final draft** (Pages 64-111)
Report by Planning Policy Officer

Other matters

13. **To note the date of the next meeting – Thursday 15 April 2021 at 2.00pm**

Navigation Committee

Minutes of the meeting held on 22 October 2020

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Present

Nicky Talbot – in the Chair, Kelvin Allen, John Ash, Linda Aspland, Mike Barnes, Harry Blathwayt, Matthew Bradbury, Andrew Hamilton, Greg Munford, Simon Sparrow, Paul Thomas, Alan Thomson.

In attendance

Dan Hoare – Head of Construction, Maintenance and Environment, Essie Guds – Governance Officer (moderator), Bill Housden – Collector of Tolls, Emma Krelle - Chief Financial Officer, Sarah Mullarney - Governance Officer (minute taker), John Packman - Chief Executive, Rob Rogers - Director of Operations, Sara Utting – Governance Officer.

1. Apologies for absence

Apologies received from Leslie Mogford.

Remote meeting standing orders and recording

The Chair welcomed everyone to this meeting of the Navigation Committee, which was being held remotely under the Standing Orders for remote meetings adopted by the Broads Authority on 22 May 2020. The meeting was being live streamed and recorded, with the live stream accessible from a link on the Authority's website. The Broads Authority retained the copyright of the recording and the minutes remained the formal record of the meeting.

2. Matters of urgent business

No items were proposed as a matter of urgent business.

3. Declarations of interest

Members expressed their declarations of interest as set out in Appendix 1 of these minutes.

4. Public question time

No public questions were raised.

5. Minutes of last meeting

The minutes of the meeting held on 3 September 2020 were approved as a correct record and would be signed by the Chair.

6. Summary of actions and outstanding issues following discussions at previous meetings

Members received a report summarising the progress of issues recently presented to the Committee.

In response to a member's question about the status of Haven Bridge, it was explained that there had been problems with the electrics and a major overhaul of this was expected in the spring. Norfolk County Council, who owned the bridge, were seeking an interim solution to

allow manual operation to raise and lower the bridge. UK Power Networks was expected to make power available to the bridge soon to allow this solution to be tested.

The report was noted.

7. Improving safety on the Broads waterways

The Chief Executive (CEO) paid tribute to the work of the Ranger team and Quay Assistants who had been under additional pressures this year following the four tragic accidents, which were highly unusual for the Broads. They had also been responding to incidents of poor behaviour from the increased numbers of visitors and boats. He also thanked the Construction, Maintenance and Environment teams who had continued to work throughout the COVID restrictions.

The CEO outlined the proposed measures for improving safety on the Broads waterways, including development of an online training package for hirers. This was being explored with the Broads Hire Boat Federation and would be discussed at a meeting next week, along with handover procedures. A member said the visitor training needed to be targeted to highlight the hazards with boarding and disembarking vessels. Another member referred to the international regulations for preventing collisions at sea, and suggested this be included in the training as it applied to the Broads Authority. The importance of wearing lifejackets was also discussed, with one member suggesting this and other safety messages be incorporated into a mobile app such as Aweigh.

It was reported that an issue raised by the Marine Accident Investigation Branch (MAIB) inspectors was that of tidal conditions. Following discussions with the Broads Hire Boat Federation, training will be offered by the Broads Authority's Head of Ranger Services to hire boat yard staff who were not familiar with navigating difficult conditions on the Bure and Breydon Water.

In relation to Ranger Services, the CEO reported that there had been an increase in the time spent on navigation functions, as outlined in the Chief Executive's report (item 9) and Table 3 in Appendix 2, which shows that the current position for navigation/national park functions is a 83:17 split. Ordinarily, the divide is 60:40, with this time being funded, in proportion to the time spent, from Navigation income and National Park Grant respectively. The funding split would be amended at the end of the year to reflect the actual divide, projected as 70:30, and it was proposed to use this ratio for Ranger time and costs in future years.

The CEO said it was likely that the same level of intense activity and potentially poor behaviour would be present on the waterways next year, and the Authority had a responsibility to assess and reduce risk under the Port Marine Safety Code. It was acknowledged that other National Parks had encountered similar issues with antisocial behaviour. The CEO added that further messaging was required about the issues related to alcohol consumption on the water. Members discussed stricter measures for people under the influence of alcohol.

The consensus from members at the tolls briefing, held on 5 October 2020, was that they supported an increase in levels of patrolling. The proposal for additional Rangers was covered in agenda item 8. Some members commented that the high volume of visitors was to the National Park area and not just limited to navigation, and they suggested the National Park Grant fund more of the Ranger activities. The CEO explained that the costs were attributed to the activity, and the navigation element was inevitably more demanding.

The Chair reiterated thanks to the Rangers and Yacht Station staff for their response to the recent tragedies, and offered condolences to the families affected. The Vice Chair of the Authority said it was important not to forget the impact of the incidents on staff and members, highlighting the issues around mental health. He added that the safety measures had the support of the Broads Authority Chair. Members were also in support of the initiative to promote safety on the Broads, and asked to be updated on discussions regarding an online training package. The CEO concluded that any additional safety measures implemented before the publication of the MAIB investigation could be included in their final report.

The report was noted.

8. Proposed navigation charges for 2021-2022 in the navigation area and adjacent waters

The Chief Executive presented members with an update on the second survey of hire boat businesses. Responses indicated that companies were in a better position than originally predicted in June, and had benefited from local authority grants, the Job Retention Scheme, and relief on VAT. However, there has been a decrease in weekly hire boat numbers this year and the trend was expected to continue in future years, but not at the same rate.

As of 30 September, hire boat numbers were down 10.5% (a loss of 154 hire boats). The most significant loss was from the weekly hire cruisers, which accounted for approximately 85% of the hire boat toll income. Private motor cruisers were also down by 3%, whereas rowing craft, including stand up paddle boards, small dinghies, and kayaks, were up 16%. The CEO added that the huge growth in small vessels was positive for the future of the Broads.

It was reported that using the latest figures, toll income up to 20 October, the forecast had been adjusted to a potential shortfall of £143,000, which was much less than previously forecast at the beginning of the pandemic. It was noted that payments were not being made to the earmarked reserves, attributing to the reduction in expenditure outweighing the reduction in income. Expenditure had also been revised to take account of the additional time Rangers had spent on navigation activities. The closing reserves were now predicted to be approximately 15% of expenditure, above the minimum level required.

Priorities for the forthcoming year were ongoing maintenance for moorings and dredging, public safety and a replacement of the computer software for the tolls system. The proposed safety measures included an online training package for hirers, as outlined in the previous item, and an increase in Ranger patrols, with the introduction of a dedicated prosecution and

Boat Safety Scheme (BSS) Ranger and four additional seasonal Rangers to cover the extended patrol time.

The intention for the online training was that it would be industry led, with the Broads Authority providing support and a contribution of £20,000. An overall cost for the training package was to be determined. The additional Ranger posts would allow the team to cover the system seven days a week and into the evenings. A specification for the tolls system would need to be developed next year for initial work to commence in 2022/23. The Authority would need to explore the benefits of capitalising the costs of the replacement system and borrowing from the Public Work Loans Board.

To maintain the current levels of service, a 3% toll increase across the board would be required, whereas the inclusion of all additional safety measures, supported at the Members' Briefing, would need a 7.5% increase. The Chief Executive proposed that the Authority seek approval from Defra, on a once only basis, to use £250,000 from the National Park reserves to fund the navigation safety package (i.e. online training and one full time and four seasonal Ranger posts) for the first two years, at a cost of £130,000 in 2021/22 and £120,000 in 2022/23. With this funding, only a 4% toll increase would be required for 2021/2022. This would provide the Authority with the opportunity to fund the safety package in 2023/24 from tolls if it was still required.

Members were presented with sample toll increases for the most common size boats. The percentage of private boats paying less than £10 extra for the year was 45% with a 7.5% toll increase, and 67% with a 4% toll increase.

Members discussed the cause of an increase in visitors to the Broads this year, and how new visitors could be retained in the future. The Chief Executive said it was a pattern seen across the National Park family. The NPUK Communications team would be launching a variety of campaigns on the new [National Parks website](#), encouraging people to enjoy the National Parks in a safe and appropriate manner.

A member commented on the need to manage the trend of a decreasing number of hire boats and the loss in toll income this would incur, and whether private payers would subsidise a smaller fleet of hire boats. He added that private tolls were good value compared to other inland waterways; however, another member said it was difficult to make comparisons. A member questioned whether hire boat trends would revert to smaller craft given the current Covid-19 restrictions, but it was noted that it was difficult to predict demands and that everything remained uncertain at this time.

A member observed that there had been fewer boats in the water this season, but visitor numbers in August appeared not to differ greatly from the same period last year. He added that forward bookings were ahead of where they were forecast, and that visitors were receptive to digital content with the pre-arrival information sent by hire boat operators being accessed by more visitors. However, the increase in new visitors had also brought new challenges, which had also been witnessed by other National Parks.

In response to member concerns about the certainty of Defra agreeing to the safety package funding, the Chief Executive said he hoped to have a formal response to the proposal before the November Broads Authority meeting. It was explained that the Authority would need to agree a Change Control Notice as a formal amendment to the Authority's grant agreement with Defra. If unsuccessful, an alternative recommendation would need to be made to the Broads Authority. Navigation Committee members would be kept up to date.

In response to a member question, the Chief Executive explained that additional funding from the Treasury was unlikely at this time given the financial position of the country. He noted that, of the four major UK inland waterway authorities, the Broads Authority was the only one that did not receive any public funding. The CEO said Defra had not ruled out the possibility of additional funding, and officers would pursue this in the future.

Members welcomed the one-off deal with Defra and supported the 4% toll increase with the proviso that Defra fund the safety package over the next two years. Members discussed the importance of clear and positive messaging with a toll increase.

It was proposed by Matthew Bradbury and seconded by Linda Aspland to make the following recommendations to the Broads Authority:

- 1. In view of the recovery of the industry it is not appropriate to offer hire boat companies a reduction in this year's tolls. The deadline for the collection of the final instalment of Hire Boat tolls is the end of November.**
- 2. To seek permission from Defra to fund the navigation safety package in 2021/2022 and 2022/2023 from National Park Reserves.**
- 3. To raise tolls across the board by +4% to maintain services and provide for funding the safety package in 2023/2024.**

The first recommendation received nine votes in favour with three abstentions, and members were unanimous in supporting the second and third recommendations.

The three recommendations would be presented to the Broads Authority at the 20 November 2020 meeting.

9. Chief Executive's report and current issues

Members received an update report on matters relating to the maintenance and management of the waterways.

The report was noted.

10. Construction, maintenance and environment work programme - progress update

The Head of Construction, Maintenance and Environment (CME) gave an update on the work programme.

A member referred to issues with high water levels in the Northern broads and asked what mitigation measures were being taken to avoid vessels becoming stuck under bridges. The Head of CME acknowledged the difficulties faced by businesses and residents and said the longer-term effects of rising water levels were starting to become apparent. He explained that dredging deeper and increasing river depths was not a solution for a tidal system such as the Broad, as dredging specifically removes accumulated sediments so would not manage rivers in terms of water flow. He added that the Broadland Futures Initiative focused on longer and wider term interaction of river depth, width and placement of flood banks.

The Head of CME said the immediate response was to look at water level trends and whether there had been a recent increase. Water level data from the Environment Agency could be used to look at the frequency of impact of high water levels. A member commented that the Broad Internal Drainage Board (BIDB) had been pumping out floodplains into over topping rivers on rising tides, and he said he would be raising the issue at the BIDB meeting on Monday.

A report on the results of the experimental cutting of stoneworts in Hickling Broad would be shared with the Upper Thurne Working Group as part of the next stage of consultation. The final output would be presented at a future Navigation Committee meeting.

The report was noted.

11. Date of next meeting

The next meeting of the Navigation Committee would be held on Thursday 14 January 2021, starting at 2pm.

The meeting ended at

Signed

Chairman

Appendix 1 – Declaration of interests: Navigation Committee, 22 October 2020

Member	Agenda/minute	Nature of interest
Kelvin Allen	8	Broads Angling Services Group, Chairman
John Ash	8	Toll payer, Trustee Wherry Yacht Charter Charitable Trust
Linda Aspland	8	Toll payer
Mike Barnes	8	Toll payer
Harry Blathwayt	8	Toll payer
Matthew Bradbury	8	Toll payer – Canoe England
Andy Hamilton	8 & 9	Private and commercial toll payer
Greg Munford	8 & 9	Director of boating holiday business
Simon Sparrow	8 & 9	Private and commercial toll payer
Nicky Talbot	8	Toll payer
Paul Thomas	8	Toll payer
Alan Thomson	8	Toll payer

Navigation Committee

14 January 2021

Agenda item number 6

Summary of actions and outstanding issues following discussions at previous meetings

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
Network Rail Whole Life Strategy	19/10/2017	John Packman	Network Rail Whole Life Strategy planning for swing bridges and replacing Trowse Swing Bridge with fixed bridge.	<p>May 2020: Following sensor replacement works at Somerleyton, Reedham & Oulton, Network Rail believes operational reliability of these bridges will be improved. As we enter Summer 2020 we will monitor opening and breakdowns to ascertain this reliability. BA and NR continue to discuss swing bridge issues. BA also in Working Group with Norfolk County Council, Norwich City Council, LEP, NR and Greater Anglia working on Trowse Bridge issues and gathering wider support and funding for replacement/ better operational reliability of this bridge.</p> <p>July 2020: Trowse Rail Bridge Working Group continuing to meet. Next phase of project is to meet with Train Services Director for Southeastern - meeting to include spokespeople from working group, incl. John Packman. Further updates provided when meeting date confirmed.</p> <p>Sept 2020: BA written officially to Norfolk County Council regarding Haven Bridge, Great Yarmouth.</p> <p>Dec 2020: See update on swing bridges in Chief Executive's report on this agenda.</p>	
Planning application with navigation implications: BA/2018/0466/FUL – Land at Burgh Castle – BFAP Compartment 34	17/01/2019	Rob Rogers	Lease arrangements and repiling at Burgh Castle for reinstatement of free 24-hour moorings.	<p>Following exempt paper considered at Navigation Committee and Broads Authority, officers presented landowner with series of options on alternative Burgh Castle mooring site, based on recommendations in exempt report.</p> <p>16 Jan 2020: Members supported 99-year lease agreement, including BA taking on full responsibility for piling structure.</p> <p>21 Jan 2020: Management Team agreed 99-year lease at peppercorn rent and for BA to take full responsibility for piling structure at Burgh Castle moorings.</p> <p>27 May 2020: Development and improvements at Belton Reach (new name for Burgh Castle's moved mooring location) progressing from operational planning perspective, but project deferred to 2021/2022 due to Covid-19 impact on funding issues.</p> <p>15 Dec 2020: Following funding review by Environment Agency, plans to pile original Burgh Castle mooring site reinstated - EA negotiating site access with landowner with view to start pilings works this winter. Separate negotiation taking place between BA and landowner to agree terms of lease for site to enable operation as BA 24-hour free mooring.</p>	

Title	Meeting date	Lead officer	Summary of actions	Progress so far	Target date
Feedback on Navigation Committee appointment process	13/06/2019	John Packman	Areas identified for improvement in co-opted member appointment process; members discussed list of user organisations consulted as part of process, for feedback to officers.	Member feedback has suggested grouping organisations by interest rather than consulting large list of individual organisations. Any formal changes to process will be presented to the Broads Authority to adopt for future appointments.	01/09/2022
Safety by the water - draft guide	05/09/2019	Natalie Beal	Draft guide being produced to support Broads Local Plan. Members suggested guide be reviewed by BA solicitor for advice on adding disclaimer at beginning of document.	Navigation Committee feedback will be reported to Planning Committee; final draft guide will be shared with committee for review before guide is adopted by Broads Authority. Updates to be reported to future Navigation Committee.	
Landscapes Review	16/01/2020	John Packman	Navigation Committee asked to comment on BA's proposed response to Landscapes Review (Glover report) - to be reported to BA meeting on 31 Jan 2020.	31 Jan 2020: BA report on Landscapes Review Proposal 27: A new financial model – more money, more secure, more enterprising; "unnecessary complexities, such as the requirement for the Broads Authority to account for income and expenditure from National Park Grant separately ... should be addressed." BA draft response is that it would be a Government decision whether to combine the finances and the BA would await the Government's response. Dec 2020: Still awaiting Government response.	
Mooring priorities - update	16/01/2020	Rob Rogers	Members made recommendations on mooring updates previously reviewed by Committee on 13 June 2019.	Lease negotiations of new and existing sites progressing. Aug 2020: Acle Bridge moorings open after major repairs to piling, and electric charging posts will be operational soon when UK Power Networks connects power. Castle Staithe mooring at Wroxham repaired and open. Stalham Staithe mooring repairs completed; when Land Registry complete land transfer to Town Council, agreement with BA to manage site as 24 hour mooring will start. Dec 2020: First phase of works at Acle Bridge completed (piling and timbering, electric charging points).	

Date of report: 14 December 2020

Navigation Committee

14 January 2021

Agenda item number 7

Chief Executive's report and current issues

Report by Chief Executive

Purpose

To give a briefing on significant matters relating to the maintenance and management of the waterways and allow members to raise any such issues.

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1. Broads Authority – 20 November 2020

- 1.1. Members unanimously agreed with the recommendations of the Navigation Committee to raise navigation charges for 2021/2022 by +4% to maintain services and provide for continued funding of the safety package in the financial year 2023/2024. Defra has agreed to a one-off use of £250,000 of National Park Reserves over the next two years to support the Navigation safety package.

2. Online training package

- 2.1. Excellent progress is being made, in collaboration with the Broads Hire Boat Federation and Archant, on developing an online training package for visitors. Nine short videos are already in production and due to be completed by the end of February, in time for use and distribution by hire boat companies for the 2021 season.

3. Reedham and Somerleyton swing bridges

- 3.1. Navigation Committee members were consulted in November on the operation of the swing bridges on Christmas Day and Boxing Day 2020. Network Rail requested that no operatives be stationed at the bridges during this period as there had been no requests to open or close the bridges to vessels in the last few years. All other duties were automated. Following consultation with the Committee, officers took the decision to inform Network Rail that the bridges could be unmanned during this period and requested that the Somerleyton swing bridge be left open to river traffic. This is not possible for the Reedham swing bridge as the operator needs to use it to access the signal box.

4. Trowse Swing Bridge and East Norwich development sites

- 4.1. Authority officers are involved in meetings to discuss the future of Trowse Swing Bridge and the development opportunities in East Norwich presented by three large brownfield sites, namely the Carrow Works, the Deal Ground and the Utilities Site. The Chief Executive and Director of Operations are members of a working group looking at the Trowse Bridge (along with Network Rail, Abellio Greater Anglia, Norfolk County Council, Norwich City Council and New Anglia). The Head of Planning and the Senior Planning Officer sit on another group looking at the development sites. There is an important relationship between the two issues and our officers are making sure that navigation interests are considered.

5. Navigation patrolling and performance targets

- 5.1. The latest update on the significant use of powers by the Rangers is shown in Appendix 1, and reflects the continued busy period since the easing of lockdown restrictions. Appendix 2 shows the average navigation/countryside splits up to 6 December. As noted in the last report, this year the percentage time spent on Navigation duties is above average. Patrolling was considered a priority task during the Covid-19 lockdown period and, combined with the extended season, Rangers have patrolled more often this year. Rangers are now prioritising Countryside tasks that were delayed earlier in the year, but the variance will not be fully closed over this time. It was agreed at the Broads Authority meeting on 20 November to adjust the split at the end of the financial year to accurately reflect the time spent. This is expected to be 30/70% National Park/Navigation.

6. Sunken and abandoned vessel update

6.1. The latest position on abandoned and sunken vessels is shown in Appendix 3.

7. Planning enforcement update

7.1. There are no further enforcement matters with navigation implications to report.

Author: John Packman

Date of report: 10 December 2020

[Broads Plan](#) strategic actions

Appendix 1 – Rangers exercise of powers analysis: October-November 2020

Appendix 2 – Ranger duties total time allocated and actual days

Appendix 3 – Sunken and abandoned vessels - position at 07 December 2020

Appendix 4 – Prosecutions dealt with in court for non-payment of tolls since 24 October 2019

Appendix 1 – Rangers’ exercise of powers analysis: October-November 2020

Table 1

Verbal warnings	Wroxham launch Wroxham and upper Bure	Irstead launch Ant	Ludham launch Hickling, Potter Heigham, upper Thurne	Ludham launch 2 lower Thurne and lower Bure	Norwich launch Norwich and upper Yare	Hardley Launch Reedham, Chet and middle Yare	Burgh St Peter launch Oulton Broad and upper/middle Waveney	Breydon launch Breydon water, lower Waveney and Yare
Care and caution	8	9						
Speed	377	144	53	43	4	4	21	15
Other	10	16	5	2		6		6

Table 2

Written warnings	Wroxham launch	Irstead launch	Ludham launch	Ludham launch 2	Norwich launch	Hardley Launch	Burgh St Peter launch	Breydon launch
Care and caution								
Speed	7	1	1	1				
Other	2	3	3		1	5		3
Special directions	9	15					5	1

Table 3

Launch patrols	Wroxham launch	Irstead launch	Ludham launch	Ludham launch 2	Norwich launch	Hardley Launch	Burgh St Peter launch	Breydon launch
Launch staffed by ranger	31	22	24	28	21	28	23	45
Volunteer patrols	0	0	0	0	0	0	0	0
IRIS reports	5	2	5	1	5	3	1	9

Table 4

Broads Control total calls

Contact method	Number of calls
Telephone	4153
VHF	461
Total	4614

Appendix 2 – Ranger duties: total time allocated and actual days

Table 1

Broads Authority corporate duties

Work area	Actual days to date
Training	95.54
Broads Control	137.09
Team meetings, work planning	249.80
Partnership working	3.78
Assisting other sections	19.86
Billets and boatsheds	2.70
Launch – general	1.35
Trailers - general	0
Vehicle maintenance	1.69
Other equipment repair	1.62
Total	513.43

Table 2

Navigation duties

Work area	Actual days to date
Patrolling	539.97
Escorts	20.14
Prosecution files	17.43
Bankside tree management	27.77
Obstruction removal	6.96
Channel markers and buoys	1.01
Signs and boards maintenance	15.88
Adjacent waters	37.03
Reactive mooring maintenance	4.66
Total	670.85

Table 3

Conservation, recreation, countryside maintenance

Work area	Actual days to date
Fen management	2.43
Lake, riverbank restoration	0.61
Invasive species control	3.99
Other conservation work	6.28
Pollution response	1.15
Visitor site maintenance	115.14
Public engagement	0
Public footpath work	3.78
Education work	0
Total	133.38

Team total up to 01 December 2020

Percentage Navigation: 83%

Percentage National Park: 17%

Appendix 3 – Sunken and abandoned vessels - position at 07 December 2020

Description	Location found	Action	Notice affixed	Result
Motor Cruiser	River Yare, old River Thorpe	Vessel sunk at owner's mooring	No	Not affecting the navigation
Motor Cruiser	Sutton/ Stalham cut	Liaising with landowner, vessel not in navigation channel	No	Monitoring
Motor Cruiser	River Yare, Thorpe Marshes	Vessel raised by owner	Yes	Vessel removed
Yacht	River Yare, near Chet Mouth	Vessel raised	No	Vessel Raised
Workboat	River Yare, Thorpe Island	Vessel sunk at mooring	No	Owner
Motor cruiser	Thorpe	Sunk vessel	Yes	Will raise when dredging equipment is in the area

Appendix 4 – Prosecutions dealt with in court for non-payment of tolls since 24 October 2019

Type of vessel	Vessel name	Fined	Costs awarded	Victim surcharge	Compensation
Motor Boat	Swallow	£750.00	£150.00	£75.00	£530.01
Motor Boat	Loch Leven	-	£150.00	-	£380.52

Navigation Committee

14 January 2021

Agenda item number 8

Construction, Maintenance and Ecology work programme - progress update

Report by Head of Construction, Maintenance and Ecology

Purpose

To give an update on the Broads Authority's management activities to maintain the public navigation, develop mooring facilities for public use and demonstrate the effective use of available resources.

Broads Plan context

Construction, Maintenance and Ecology activities contribute to multiple objectives, in particular to Aspirations 3, 4 and 6 to manage sediment sustainably, maintain a safe open navigation, and maintain the access network and visitor facilities.

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1. Maintaining water depths for navigation

- 1.1. The detailed breakdown in Appendix 1 gives the volumes for the annual dredging programme to the end of November 2020. A total of 31,530 m³ of dredged sediment has been removed from the prioritised sites. This figure represents 76% of the programmed target of 41,400 m³ for 2020/21.

- 1.2. The Upper Thurne dredging programme for this winter is proceeding to plan, with the first phase almost complete at Horsey Mere. Dredging on the Mere started in early October and an estimated 5000 m³ should be removed by Christmas, before we move to Hickling Broad. The final phase of dredging will be in March on the River Thurne between Candle Dyke and Martham Ferry. All the sediment removed will be used in the reedbed creation as part of the EU-funded CANAPE project. On the River Yare, dredging has been carried out at both ends of Haddiscoe Cut, with sediment taken to a flood bank setback area near Raveningham.
- 1.3. Other dredging work planned in early January, but not connected with the CANAPE project, will see the second phase of Waxham Cut completed, with a further 3000 m³ of sediment dredged from its northern section between Brograve Mill and Bridge Farm. A closure of the navigation will be in place from 4 January to 5 February 2021 - see https://www.broads-authority.gov.uk/data/assets/pdf_file/0025/364390/NTM-12-2020-website.pdf

2. Maintaining safe public mooring facilities

- 2.1. 15 electric points were damaged over the busy summer season and needed electrical repairs to return them to full use. Three new pillars installed at Acle Bridge 24-hour mooring are now operational. Hoveton Viaduct 24-hour mooring has recently had the surfacing improved, with a wider and higher path installed along its whole length. In addition to the new boardwalk from Hoveton Riverside Park, this is a popular section of riverside to walk along.
- 2.2. Contractors will refurbish 87 metres of quay heading at Hardley Cross 24-hour mooring from December to January. How Hill 24-hour mooring will have three phases of refurbishment work over the next three years. The first phase will start in January 2021 with the timber waling and capping replaced on the upstream 100 metres. To avoid disruption at this popular location, subsequent 100 metre phases will follow over the winters of 2021/22 and 2022/23.
- 2.3. A public tender is open for replacement of the 300 meters of timberwork on the St Benet's 24-hour mooring - see [Invitations to tender \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/invitations-to-tender).

3. Our resources

- 3.1. Five additional pontoon sections (NATO floats) have been purchased and delivered this month, reducing our equipment hire needs. We already had seven pontoons, and the additional five will allow us to make a pontoon large enough to carry out a whole range of navigational maintenance activities including riverside tree management with an excavator and our tree shears, 24-hour mooring refurbishment, transporting equipment, piling and other works.

4. Managing water plants

4.1. The final report from the three-year monitoring of stonewort cutting in Hickling Broad has been completed and shared with the Upper Thurne Working Group as local stakeholders (interested Navigation Committee members can request a copy of the full report). Conclusions from the report are that:

- Cutting had a negative effect on the height and cover of stoneworts for up to two seasons after the cutting.
- Within the stonewort bed, cutting inadvertently affected a greater area than just the cut treatment plots, with negative impacts on plant height and cover observed in the adjacent non-cut and control plots.
- Cutting stoneworts allowed other vascular plants to populate the cut areas, depressing the abundance and range of stonewort species present.

4.2. The steering group overseeing this trial (Broads Authority, Environment Agency, Natural England and Norfolk Wildlife Trust) are seeking to use this latest evidence to guide the Authority's management of navigation access within the broad. The future options that can be sustainably managed by the Authority in pursuit of all of its statutory functions are:

- Seasonal cutting within the marked channels from the beginning of June to the end of August
- Annual survey of plant growth throughout the broad and subsequent production of an early season map showing distribution of dense and taller submerged plant beds, to assist the setting of sailing courses
- Routine ranger patrols to check on the condition and safety of the marked channels

4.3. Following consultation with the Upper Thurne Working Group, actions to support waterway safety will be implemented.

5. Other navigation works

5.1. We had hoped to bring an update on the development of the Waterways Management Strategy to this meeting, but this has been deferred until April. One positive element to report is that the Authority's GIS Officer has completed the rebuild and refresh of the computer model used to calculate sediment dredging requirements. This has incorporated the updated water level data reported at the last meeting, and has removed the need for surveying and reporting of areas not within the navigable area. This is encouraging, as we can save staff time and develop far simpler monitoring, processing and reporting routines each year.

5.2. The focus this winter of the annual round of hydrographic surveys of water depth is along the River Waveney (Beccles to Breydon), the mid Bure (Ant Mouth to Acle) and the upper Bure (Horstead to Wroxham). This information will be checked against the

Waterways Specification depths for these stretches and we will report compliance in 2021.

- 5.3. A public tender is open for replacement of some of the channel markers through Breydon Water - see [Invitations to tender \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/invitations-to-tender).
- 5.4. In Hickling Broad, the start of the marked channel towards Catfield Dyke is now marked with one yellow post (North) and one yellow buoy (South). Vessels wishing to navigate to Catfield Dyke must turn between the yellow markers to remain in the maintained channel. The leading marks have been removed. [https://www.broads-authority.gov.uk/ data/assets/pdf file/0028/356437/NTM-11-website2.pdf](https://www.broads-authority.gov.uk/data/assets/pdf_file/0028/356437/NTM-11-website2.pdf)

Author: Dan Hoare

Date of report: 16 December 2020

[Broads Plan](#) strategic actions: 2.1, 2.3, 3.1, 3.2, 4.2, 6.1

Appendix 1 – Dredging progress

Appendix 1 - Dredging progress

Project title	Active Broads Authority dredging weeks completed/ planned	Planned volume removed m ³	Actual volume removed m ³	Planned annual project cost ¹	Actual project cost
River Bure - COMPLETED South Walsham & Acle to Oby (Apr-May)	6/8	2,000	4,605	40,703	36,820
River Waveney - COMPLETED Oulton Broad to Peto's Marsh (May-Sept)	13/20	8,500	7,655	110,104	86,140
River Yare - COMPLETED Prioritised shoals between Trowse & Cantley (Jun-Sept)	16/15	6,400	8,570	114,507	94,430
River Thurne River Thurne sites & Catfield Dyke to Chara Bay (Oct-Feb) Plus 4 weeks for planting geotextile bags	8/19	8,000	3,760	150,664	43,460
River Yare Haddiscoe Cut to Raveningham (Nov-Feb)	8/20	8,500	6,940	106,990	43,460
River Thurne, Waxham Cut Sidecast (Jan-Feb)	0/7	6,000	0	26,862	1,030
Lower Bure	Contractor	2,000	0	10,000	0

1 project costs include staff time for all elements (pre-works ecological mitigation, site set-up, active dredging & site restoration); BA plant; & budgetary expenditure (equipment hire, survey costs, contractor costs, mitigation works, materials & consumables, etc); within the reporting period.

Project title	Active Broads Authority dredging weeks completed/ planned	Planned volume removed m³	Actual volume removed m³	Planned annual project cost ¹	Actual project cost
Plough dredge (Mar)					
Site restoration Waxham Cut (Phase 1), Tyler's Cut	-	-	-	12,000	11,680
Site preparation Peto's Marsh, Carlton Marshes	-	-	-	16,000	7,840
Total	51/89	41,400	31,530	587,830	324,860

Navigation Committee

14 January 2021

Agenda item number 9

Draft budget 2021/22 and financial strategy to 2023/24

Report by Chief Financial Officer

Purpose

To inform the Committee of:

- i. the actual Navigation income and expenditure for the seven-month period to 31 October 2020, and provide a forecast of the projected expenditure at the end of the financial year (31 March 2021);
 - ii. the principal of transferring an underspend at year end in the launch budget to the earmarked reserve, as set out in paragraph 2.2; and
 - iii. to consult on the preparation of the Draft Budget for 2021/22 and Financial Strategy to 2023/24 prior to its consideration by the Broads Authority on 29 January 2021.
-

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1. Introduction

- 1.1. This report covers two items, Navigation Income and Expenditure and the draft budget.
- 1.2. Sections 2 to 5 give a summary of the income and expenditure for the Navigation budget up until 31 October, any amendments to the Latest Available Budget (LAB), Forecast Outturn (predicted year end position) and the movements on the earmarked reserves.
- 1.3. Section 6 contains the updated draft budget for 2021/22 and the draft financial strategy to 2023/24. The draft budget for 2021/22 was the basis of determining the navigation charges for 2021/22 considered by this committee on 22 October 2020. This is based on the 4% increase in navigation charges adopted formally by the Authority on 20 November 2020.

2. Overview of actual income and expenditure

Table 1

Actual Navigation income and expenditure by Directorate to 31 October 2020

Source	Profiled Latest Available Budget £	Actual income and expenditure £	Actual variance £
Income	(3,430,009)	(3,009,291)	- 420,718
Operations	1,587,856	1,192,916	+ 394,940
Strategic Services	191,123	189,753	+ 1,370
Chief Executive	449,714	399,252	+ 50,462
Projects, Corporate Items and Contributions from Earmarked Reserves	(88,046)	17,771	- 105,817
Net (Surplus) / Deficit	(1,289,362)	(1,209,599)	- 79,763

- 2.1. Core Navigation income is behind the profiled budget at the end of month seven. The overall position as at 31 October is an adverse variance of £79,763 or a 6.19% difference from the profiled LAB. This is principally due to:

- An overall adverse variance of £420,718 within toll income:
 - Hire craft tolls is £375,362 behind the profiled budget due to the delay of the final split payment to 30 November.
 - Private craft tolls is £36,252 behind the profiled budget.
 - An underspend within Operations relating to delayed practical works expenditure following COVID-19. Where savings have been identified and works delayed until 2021/22 these have been reflected in the forecast outturn for 2020/21.
 - An underspend within Chief Executive relating to delayed expenditure following COVID-19. These mainly relate to legal and professional fees on prosecutions and lease arrangements and at this stage are considered timing differences.
 - An adverse variance within reserves relating to delayed capital expenditure caused by COVID-19. The majority of these are considered timing differences with some being transferred to 2021/22. See paragraph 12.3 for more details.
- 2.2. At the start of 2020/21 it had been hoped to progress the electrifying of the Rangers launches. However, the impact of COVID-19 has meant that this work has fallen behind although it may be possible to trial an engine before the end of the financial year. It is proposed that any underspend in the launch budget will be transferred to the launch section of the Plant, Vessel and Equipment Reserve to fund the replacement in future years.
- 2.3. The charts at Appendix 1 provide a visual overview of actual income and expenditure compared with both the original budget and the LAB.

3. Latest Available Budget

- 3.1. The Authority's income and expenditure is monitored against the Latest Available Budget (LAB) for 2020/21. The LAB is based on the original budget for the year, with adjustments for known and approved budget changes such as carry-forwards and budget virements. Full details of movements from the original budget are shown in Appendix 2.

Table 2

Adjustments to Navigation LAB

Item	Authorisation reference	Amount £
Original navigation budget 2020/21 (deficit)	Broads Authority 31/01/2020 Agenda item number 12	45,402
Approved carry-forward from 2019/20	Broads Authority 22/05/2020 Agenda item number 9	88,491
LAB as at 31 October 2020	n/a	133,893

- 3.2. The LAB therefore provides for a navigation deficit of £133,893 in 2020/21 as at 31 October 2020.
- 3.3. Due to the huge amount of uncertainty at the start of the COVID-19 outbreak, the decision was made not to adjust the LAB but to focus on the forecast outturn.

4. Overview of forecast outturn 2020/21

- 4.1. Budget holders have been asked to comment on the expected income and expenditure at the end of the financial year in respect of all budget lines for which they are responsible.
- 4.2. As at the end of October 2020, the forecast indicates that:
- The total forecast income is £3,393,100. This assumes that the remaining split payments are collected in full.
 - Total expenditure is forecast to be £3,419,702.
 - The resulting deficit for the year is forecast to be £26,602.
- 4.3. The forecast outturn reflects the following changes from the LAB as shown in Table 3. The forecast deficit represents a favourable variance of £107,291 against the LAB.

Table 3

Adjustments to Forecast Outturn

Item	Amount £
Forecast outturn deficit per LAB	133,893
Cancelled contributions to reserves (vehicle contributions to be reinstated)	(153,100)
Reduction in toll income	123,000
Drop in interest rates	9,500
Delayed practical works	(134,173)
Salary savings through delayed recruitment	(27,633)
Change in Ranger split from 40/60 to 30/70	75,389
Volunteers	(6,000)
HR (staff training)	(6,968)
Visitor services	17,265
Office and travel expenses (including members)	(8,490)
IT	3,919
Forecast outturn deficit as at 31 October 2020	26,602

5. Reserves

Table 4

Navigation Earmarked Reserves

Reserve name	Balance at 1 April 2020 £	In-year movements £	Current reserve balance £
Property	(393,440)	(1,296)	(394,736)
Plant, Vessels and Equipment	(310,245)	32,165	(278,080)
Premises	(89,966)	0	(89,966)
CANAPE	(155,922)	41,010	(114,912)
Computer Software	(7,184)	309	(6,875)
Total	(956,757)	72,188	(884,569)

- 5.1. Items funded from the Plant, Vessel and Equipment reserve include a second hand JCB and a mini excavator. The CANAPE reserve contains the expenditure relating to the project with the next claim due to be submitted in the New Year.

6. 2021/22 budget proposals

- 6.1. The draft budget is set out in Appendix 3 and the financial strategy to 2023/24 to provide context.
- 6.2. As with the 2019/20 and 2020/21 budget, it has been prepared on a zero budget basis. This makes no assumptions of the automatic rollover of previous years' budgets. Budget holders are sent a template in July to consider expenditure for the next financial year in line with strategic direction previously agreed with members. It takes into consideration priorities around dredging, moorings and plant cutting agreed in the relevant strategies and is split between essential and desirable expenditure. This is then reviewed by Management Team in September to ensure requests are in line with expectations. It provides the baseline information for the Tolls briefing to consider in October prior to making recommendations around the level of navigation charges required.
- 6.3. The draft budget takes account of the following factors:
- A provisional 2% pay increase for staff. This figure was used for calculating the toll increase prior to the government's announcement in the Comprehensive Spending Review (CSR) that public sector pay was to be frozen. It has since been confirmed that the National Joint Council (NJC) is outside of this arrangement and may still negotiate a pay deal for 2021/22.

- The loss of hire boats in 2020/21 will not recover and a further twenty boats will be removed in 2021/22.
- National Park Grant remains at 2020/21 level. This is subject to confirmation from DEFRA.
- The safety package of additional seasonal rangers, enforcement and safety videos will be funded by a transfer between National Park and Navigation reserves over the next two financial years.
- Delayed project expenditure from 2020/21 will be delivered in 2021/22.
- Maintaining the Navigation reserve at 10% of next expenditure.

6.4. Total core Navigation income for 2021/22 is budgeted to be £3,503,650, including £1,131,000 for hire craft tolls and £2,303,000 for private craft tolls. This income takes account of the latest available data for boat numbers. Net Navigation expenditure is budgeted at £3,725,565. This will result in a budget deficit of £221,915, which is funded from the Navigation reserve and the £130,000 transfer from the National Park reserve. After taking into account the transfer of £3,375 of interest to earmarked reserves, reserves at the end of March 2022 are forecast to be £415,809, 11.2% of net expenditure for the year.

6.5. Table 5 sets out an overview of the proposed 2021/22 budget, which is provided in more detail in Appendix 3.

Table 5

Draft 2021/22 Budget

Source	National Park £	Navigation £	Consolidated £
National Park Grant	(3,414,078)	0	(3,414,078)
Navigation Tolls	0	(3,496,900)	(3,496,900)
Other Income	(6,750)	(6,750)	(13,500)
Total Income	(3,420,828)	(3,503,650)	(6,924,478)
Operations	1,498,439	2,902,656	4,401,095
Strategic Services	1,202,893	304,821	1,507,714
Chief Executive	852,511	726,553	1,579,064
Corporate Items	91,440	50,960	142,400
Contributions from earmarked reserves	(116,530)	(259,425)	(375,955)
Total Expenditure	3,528,753	3,725,565	7,254,318

Source	National Park £	Navigation £	Consolidated £
Net (Surplus) / Deficit	107,925	221,915	329,840
Opening Reserves (Forecast)	(1,121,047)	(511,098)	(1,632,145)
(Surplus) / Deficit for the year	107,925	221,915	329,840
Interest transfer	3,375	3,375	6,750
Contribution from National Park Reserve (General)	130,000	(130,000)	0
Closing Reserves (Forecast)	(879,747)	(415,808)	(1,295,555)

7. Operations

- 7.1. The Operations budget has seen an increase to staff costs to reflect the provisional 2% pay increase, subject to negotiations by the NJC. Contributions to the Plant, Vessel and Equipment earmarked reserve has been increased, in particular for vehicles due to the increased costs of moving to a green fleet. All other contributions to the earmarked reserves that were cancelled during 2020/21 as part of the savings have been reinstated for 2021/22 onwards. Ranger Services has seen an additional increase to the salary budget following the agreement to recruit four additional seasonal Rangers and a Compliance and Safety Ranger as part of the safety package. The remaining costs of the safety package has been incorporated into the Safety budget for the production of the online safety training. Small-scale savings identified in 2020/21 have also been incorporated into 2021/22. In other areas of the budget, the provision represents the level of funding required to enable services to be delivered.
- 7.2. As with previous years, however, it is important to recognise that the Operations budget has no capacity to take on additional projects or ad-hoc work in 2020/21.

8. Strategic Services

- 8.1. As with the Operations budget, staff costs have increased for the same reasons, and there is little capacity to take on additional projects or other ad-hoc work. In other areas of the budget, the provision represents the level of funding required to enable continuation of the levels of service delivered in the current year.

9. Chief Executive

- 9.1. As with the Operations and Strategic Services budgets, staff costs have increased for the same reasons. ICT has been increased for the single project of the file server replacement. Again, there remains little capacity for additional work.

10. Central and shared costs and cost apportionment

- 10.1. Cost apportionments have remained the same as those for 2020/21 and are consistent with the principles agreed by the Resources Allocation Working Group. Full details of apportionments by budget line for 2021/22 are set out in Appendix 3.
- 10.2. The overall split of estimated income and proposed net expenditure in 2021/22 remains broadly the same, 49% National Park and 51% Navigation.
- 10.3. Table 6 provides further details of central and shared costs. These should not be seen as synonymous with overheads, but have been identified in line with those areas specifically examined by the Resource Allocation Working Group. As such, they reflect costs across the Authority included within the budgets of both Operations and Strategic Services directorates, and from the Chief Executive section.

Table 6

Central and shared costs

Cost/Percentage split	2021/22 National Park £000s	2021/22 Navigation £000s	2021/22 Consolidated £000s	2022/23 National Park £000s	2022/23 Navigation £000s	2022/23 Consolidated £000s	2023/24 National Park £000s	2023/24 Navigation £000s	2023/24 Consolidated £000s
Share of central and shared costs	1,587	1,071	2,658	1,526	1,041	2,567	1,649	1,055	2,704
Pension contribution lump-sum	91	51	142	94	53	147	82	55	137
Total	1,678	1,122	2,800	1,620	1,094	2,713	1,731	1,110	2,841
Percentage split of central and shared costs	60%	40%	100%	60%	40%	100%	61%	39%	100%

Cost/Percentage split	2021/22 National Park £000s	2021/22 Navigation £000s	2021/22 Consolidated £000s	2022/23 National Park £000s	2022/23 Navigation £000s	2022/23 Consolidated £000s	2023/24 National Park £000s	2023/24 Navigation £000s	2023/24 Consolidated £000s
Total core income	(3,421)	(3,504)	(6,924)	(3,424)	(3,648)	(7,072)	(3,429)	(3,799)	(7,228)
Central and shared costs as a percentage of core income	49%	32%	40%	47%	30%	38%	50%	29%	39%

10.4. Central and shared costs have been identified in line with the work of the Resource Allocation Working Group to include operational property, finance and insurance; communications; collection of tolls; ICT; legal; head office; office expenses and pool vehicles; directorate management and administration costs; human resources and staff training; governance and member's allowances; and the Chief Executive. All of these play a vital role in supporting the delivery of front-line services. Central and shared costs also include the lump sum pension contribution, which is made annually to reduce the Authority's share of the pension deficit as calculated by the pension fund actuary. As a percentage of income, central and shared costs are broadly static and remain at the same level as 2020/21 (Navigation percentage split of central and shared costs 40%, central and shared costs as a percentage of core income 31%).

11. Assumptions used for the budget and financial strategy

11.1. The following key assumptions have been applied in developing the draft budget and financial strategy:

- Navigation tolls will be collected in line with the budget and boat numbers will remain as forecast;
- Salary increases from 2021/22 onwards are based on a provisional increase of 2%, subject to negotiations with the NJC. This will create a saving if the NJC proposals are in line with other public sector pay awards;
- Staffing levels will remain at 100% of budget. Staff turnover may result in timing differences between vacancy and appointment. Where these savings arise, the forecast will be adjusted accordingly;

- The forecast outturn position for 2020/21 will be delivered in line with budget holders' projections;
- The safety package in 2021/22 and 2022/23 will be funded via a transfer from the National Park reserve, up to a maximum of £250,000. This will be subject to a Control Change Notice (CCN) from DEFRA; and
- The continuation of the four additional seasonal Rangers will be reviewed from 2023/24 onwards.

11.2. A detailed sensitivity analysis for some of these key assumptions is set out below in table 7.

Table 7

Budget sensitivity analysis

Assumption	Change in assumption	Approximate financial impact of change £ (+/-)
National Park Budget for 2020/21 will be delivered in line with forecast outturn	1% under/overspend against National Park budget	34,000
Navigation Budget for 2020/21 will be delivered in line with forecast outturn	1% under/overspend against Navigation budget	34,000
Overall salary increase of 2% in 21/22	1% change in salary inflation	49,000
Boat numbers and distribution remain as predicted in 2021/22	1% change in navigation toll income	34,000
National Park Grant in line with current allocations and no further reduction applied in 2021/22	1% change in National Park Grant allocation	34,000

12. Earmarked reserves

- 12.1. The Authority's earmarked reserve strategy for the period 2021/22 to 2023/24 is set out in Appendix 4. The strategy details the actual balance of earmarked reserves at the end of October 2020, planned expenditure until the end of the financial year, and also provides an analysis of movements in reserves split between national park and navigation in all years to 2023/24.
- 12.2. Navigation earmarked reserves stand at £884,569 at the end of October 2020 and are forecast to decrease (to £868,901) by the end of the financial year. There will be an adjustment at the end of the financial year to correct the split on the reserve between National Park and Navigation. This is due to the contributions to the reserves being

brought in line with splits on the sub reserve balances. For example, the Plant, Vessel and Equipment reserve contains the following sub-reserves; Fen Management Equipment (100% National Park), Dockyard Vessels and Equipment (30%/70% National Park/Navigation), Vessel Replacement (100% Navigation) and Vehicle Replacement (41%/59% National Park/Navigation). This is included in Appendix 4 but will be subject to the closing reserve position at 31 March 2021. It is also proposed to reinstate the cancelled contributions to the vehicle and launch replacements within the Plant, Vessel and Equipment reserve that were cancelled as part of the COVID-19 savings given. This has become possible now that income has performed better than initial expectations.

12.3. Appendix 4 reflects the contributions to reserves allowed for in the budget and financial strategy set out in Appendix 3. Planned expenditure from reserves is itemised within Appendix 2 and includes in 2021/22:

- Replace hydraulic boat cradle, hydro acoustic kit, NATO floats and large mowers;
- Replace seven vehicles, two deferred from 2020/21;
- Replacement of a ranger launch;
- Dockyard slip-way piling (deferred from 202/21) and wet dock; and
- CANAPE project expenditure.

12.4. Planned expenditure from earmarked reserves in 2022/23 and 2023/24 includes the continued CANAPE project expenditure, replacement of ten vehicles at an estimated cost of £175,165 (with £122,616 relating to navigation), replacement of JCB JS160 (2011) at an estimated cost of £75,000 (with £52,500 relating to navigation), replacement of JCB tractor at an estimated cost of £30,000 (with £21,000 relating to navigation), replacement of Yanmar Tracked Carrier at an estimated cost of £15,000 (with £10,500 relating to navigation), a second welfare barge at an estimated cost of £20,000 (with £14,000 relating to navigation) and the replacement of a wherry at an estimated cost of £120,000 (with £84,000 relating to navigation).

12.5. Taking account of all these items, the forecast balance of navigation earmarked reserves at the end of 2023/24 is £923,904, although it should be noted that expenditure plans for 2022/23 and beyond are likely to be refined again when the Financial Strategy for 2022/23 is developed later on this year.

12.6. In 2022/23 the CANAPE project will have been completed. Any surplus balance will need to be redistributed 50:50 between national park and navigation reserves. The exact amount is currently difficult to forecast given the income is received in Euros and there is uncertainty surrounding the exchange rate, so the figure included in Appendix 4 should not be seen as absolute. Members will need to consider how a potential surplus could be distributed. Options on the navigation side could include increasing the moorings/piling part of the property reserves or creating a new reserve to provide match funding for future projects.

13. Summary

- 13.1. The draft budget presented here incorporates the navigation charges for 2021/22 and is designed to allow the Authority to continue to deliver priority navigation activities at the required level, while making prudent provision for asset maintenance over the life of the strategy and beyond. Minor adjustments have also been made reflecting the latest staffing forecasts. As a result of all these factors, there is no capacity within the budget for additional projects.
- 13.2. The National Park part of the budget shows a deficit for the next three years. This will be funded from the National Park Reserve, resulting in a reserve balance of £879,747 at the end of 2021/22. While the outcome of a new settlement is awaited, figures for 2021/22 onwards should be viewed with a high degree of uncertainty. The impact of any change (positive or negative) will need careful consideration to make sure expenditure is sustainable.
- 13.3. It is important to recognise that the budget as a whole is highly sensitive to changes in salary inflation, and as a result a significant proportion of the budget is made up of staff costs. The budget is based on a 2% increase in salaries for period April 2021 to March 2024. There continues to be uncertainty about the likely award.
- 13.4. The deficit of £221,915 allowed for in the 2021/22 budget will be partially offset by the transfer from National Park reserves of £130,000 and will continue to maintain the navigation reserve just above the 10%. During 2021/22 there will be a review of the reserve policy for both National Park and Navigation to ensure that the minimum levels are adequate and allow the Authority to survive any future lockdown restrictions that government may impose. As in previous years, it remains the case that the indicative tolls increase in 2022/23 and beyond will need to be revisited during next year's budget setting process to ensure they remain appropriate. This could be as a result of any variations from current assumptions or changes to outturn figures for 2020/21.

Author: Emma Krelle

Date of report: 15 December 2020

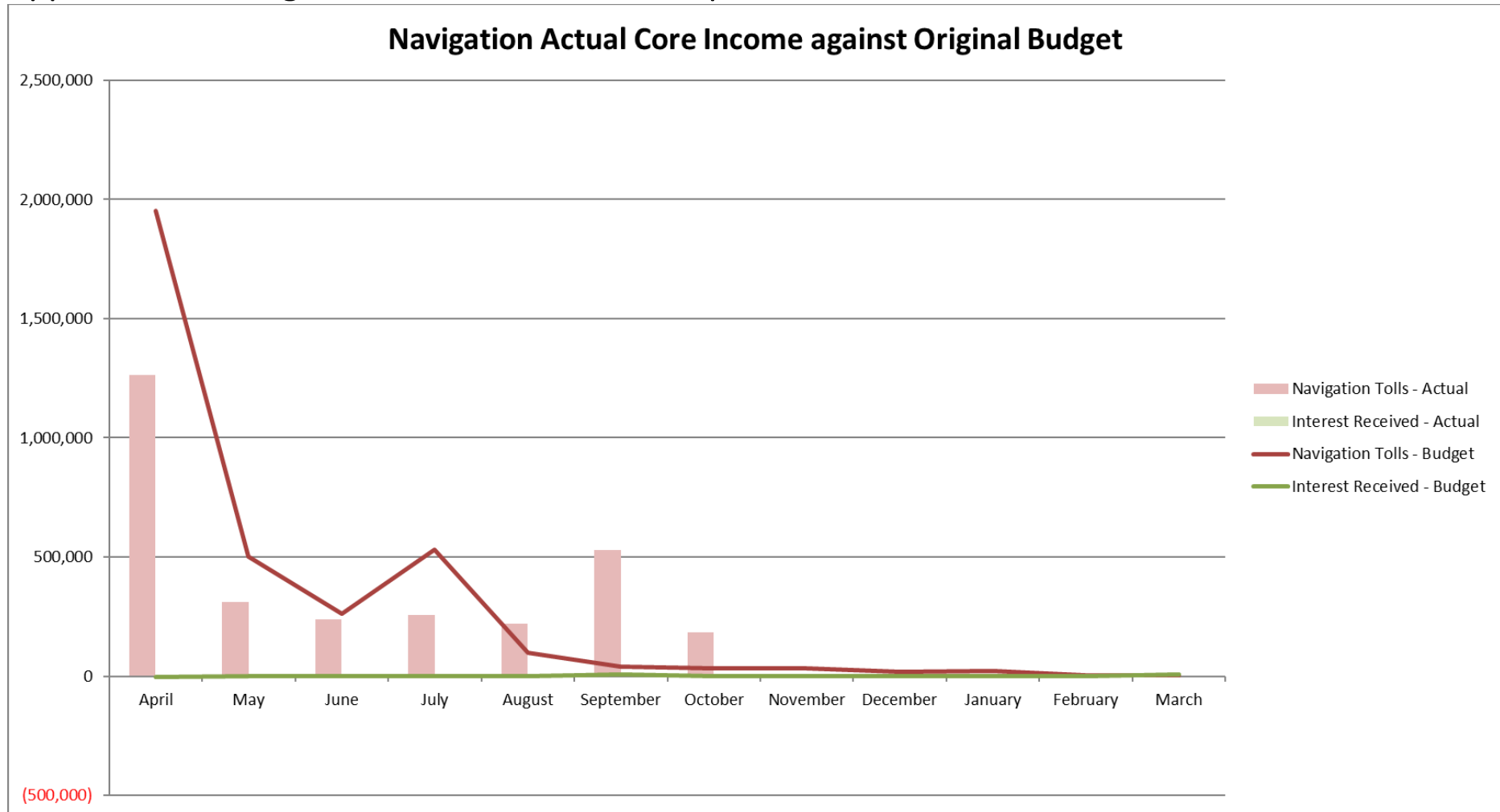
Appendix 1 – Navigation actual income and expenditure charts to 31 October 2020

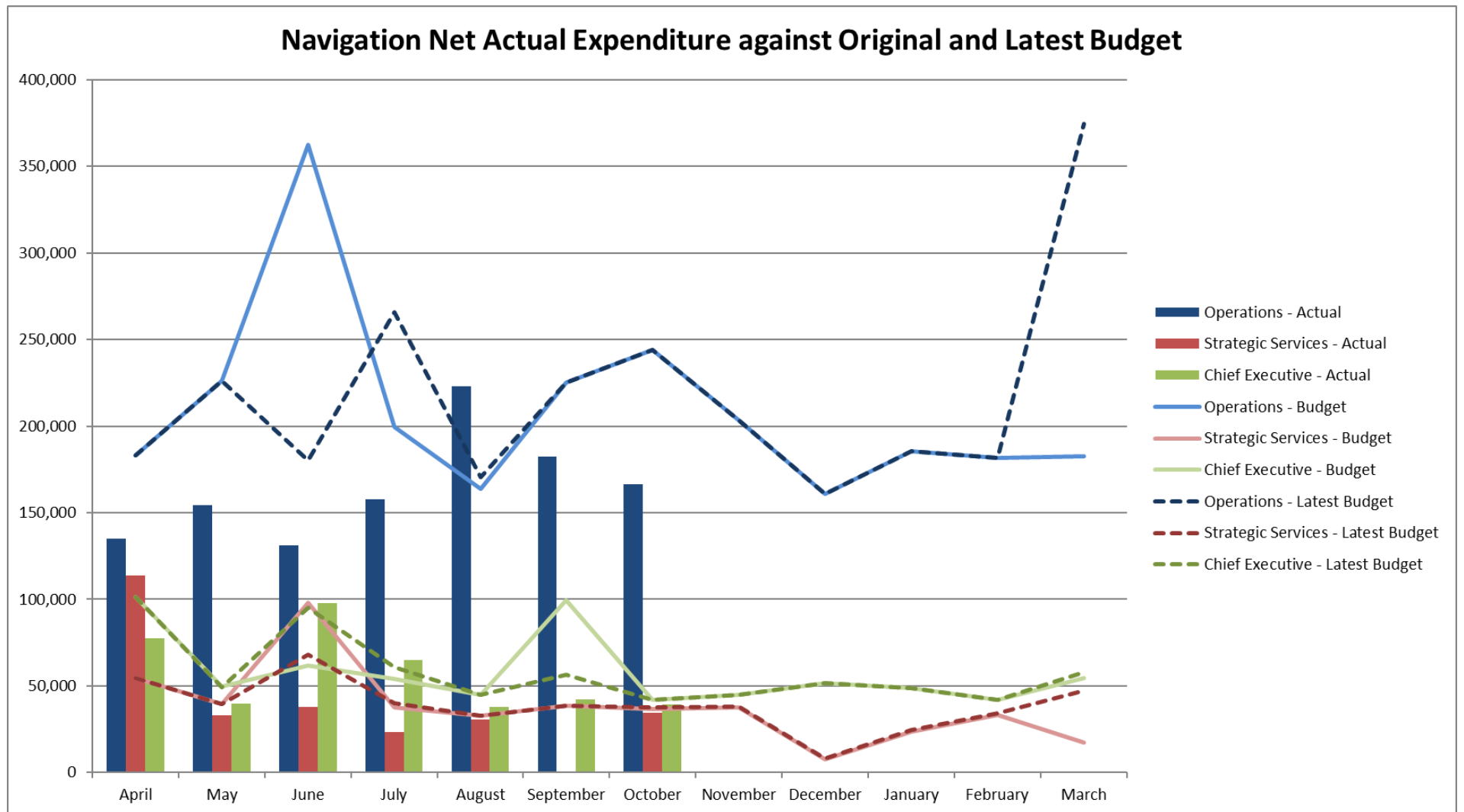
Appendix 2 – Financial monitor: Navigation income and expenditure 2020/21

Appendix 3 – 2020/21 Budget and Financial Strategy to 2023/24

Appendix 4 – Earmarked reserves 2021-22 for budget

Appendix 1 – Navigation actual income and expenditure charts to 31 October 2020





Appendix 2 – Financial monitor: Navigation income and expenditure 2020/21

Table 1

Income

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Income	(3,525,600)	0	(3,525,600)	(3,393,100)	- 132,500
National Park Grant	0	0	0	0	+ 0
Income	0	0	0	0	+ 0
Hire Craft Tolls	(1,199,000)	0	(1,199,000)	(1,106,000)	- 93,000
Income	(1,199,000)	0	(1,199,000)	(1,106,000)	- 93,000
Private Craft Tolls	(2,244,000)	0	(2,244,000)	(2,214,000)	- 30,000
Income	(2,244,000)	0	(2,244,000)	(2,214,000)	- 30,000
Short Visit Tolls	(43,000)	0	(43,000)	(43,000)	+ 0
Income	(43,000)	0	(43,000)	(43,000)	+ 0
Other Toll Income	(19,100)	0	(19,100)	(19,100)	+ 0
Income	(19,100)	0	(19,100)	(19,100)	+ 0
Interest	(20,500)	0	(20,500)	(11,000)	- 9,500
Income	(20,500)	0	(20,500)	(11,000)	- 9,500

Table 2
Operations

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Operations Total	2,636,347	82,938	2,719,285	2,473,258	+ 246,027
Construction and Maintenance Salaries	812,328	0	812,328	797,478	+ 14,850
Salaries	812,328	0	812,328	797,478	+ 14,850
Expenditure	0	0	0	0	+ 0
Equipment, Vehicles & Vessels	375,760	0	375,760	311,360	+ 64,400
Income	0	0	0	0	+ 0
Expenditure	375,760	0	375,760	311,360	+ 64,400
Water Management	98,670	13,000	111,670	94,980	+ 16,690
Expenditure	98,670	13,000	111,670	94,980	+ 16,690
Land Management	0	0	0	0	+ 0
Income	0	0	0	0	+ 0
Expenditure	0	0	0	0	+ 0
Practical Maintenance	421,260	69,938	491,198	348,715	+ 142,483
Income	(9,000)	0	(9,000)	(9,000)	+ 0
Expenditure	430,260	69,938	500,198	357,715	+ 142,483
Waterways and Recreation Strategy	27,180	0	27,180	27,300	- 120

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Salaries	18,180	0	18,180	18,300	- 120
Expenditure	9,000	0	9,000	9,000	+ 0
Project Funding	1,067	0	1,067	1,067	+ 0
Expenditure	0	0	0	0	+ 0
Pension Payments	1,067	0	1,067	1,067	+ 0
Ranger Services	560,656	0	560,656	620,723	- 60,067
Income	0	0	0	0	+ 0
Salaries	430,956	0	430,956	489,723	- 58,767
Expenditure	129,010	0	129,010	130,310	- 1,300
Pension Payments	690	0	690	690	+ 0
Safety	88,319	0	88,319	86,590	+ 1,729
Income	(1,500)	0	(1,500)	(1,500)	+ 0
Salaries	43,411	0	43,411	41,682	+ 1,729
Expenditure	46,408	0	46,408	46,408	+ 0
Premises	132,237	0	132,237	65,737	+66,500
Income	(700)	0	(700)	(700)	+ 0
Expenditure	132,937	0	132,937	66,437	+ 66,500

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Operations Management and Administration	43,794	0	43,794	44,233	- 439
Salaries	41,154	0	41,154	41,593	- 439
Expenditure	2,640	0	2,640	2,640	+ 0
Premises - Head Office	75,075	0	75,075	75,075	+ 0
Income	0	0	0	0	+ 0
Expenditure	75,075	0	75,075	75,075	+ 0

Table 3

Strategic Services

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Strategic Services Total	300,548	5,553	306,101	316,292	- 10,191
Development Management	4,244	0	4,244	4,274	- 31
Income	0	0	0	0	+ 0
Salaries	4,244	0	4,244	4,274	- 31
Expenditure	0	0	0	0	+ 0
Pension Payments	0	0	0	0	+ 0
Strategy and Projects Salaries	8,809	0	8,809	8,453	+ 356
Salaries	8,719	0	8,719	8,385	+ 334
Expenditure	90	0	90	68	+ 23
Biodiversity Strategy	0	0	0	0	+ 0
Income	0	0	0	0	+ 0
Expenditure	0	0	0	0	+ 0
Human Resources	57,084	0	57,084	56,467	+ 617
Salaries	32,087	0	32,087	38,438	- 6,351
Expenditure	24,998	0	24,998	18,030	+ 6,968
Volunteers	29,392	0	29,392	23,524	+ 5,868

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Salaries	19,292	0	19,292	19,424	- 132
Expenditure	10,100	0	10,100	4,100	+ 6,000
Communications	78,473	5,553	84,026	84,498	- 472
Income	0	0	0	0	+ 0
Salaries	67,973	0	67,973	68,445	- 472
Expenditure	10,500	5,553	16,053	16,053	+ 0
Visitor Centres and Yacht Stations	90,053	0	90,053	106,418	- 16,365
Income	(68,700)	0	(68,700)	(44,304)	- 24,396
Salaries	132,840	0	132,840	131,940	+ 900
Expenditure	25,913	0	25,913	18,782	+ 7,130
Strategic Services Management and Administration	32,493	0	32,493	32,658	- 165
Salaries	31,293	0	31,293	31,533	- 240
Expenditure	1,200	0	1,200	1,125	+ 75

Table 4

Chief Executive

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Chief Executive Total	694,432	0	694,432	688,975	+ 5,457
Legal	27,500	0	27,500	27,500	+ 0
Income	(2,500)	0	(2,500)	(2,500)	+ 0
Expenditure	30,000	0	30,000	30,000	+ 0
Governance	96,670	0	96,670	85,322	+ 11,349
Income	0	0	0	0	+ 0
Salaries	56,635	0	56,635	53,209	+ 3,425
Expenditure	40,036	0	40,036	32,112	+ 7,923
Chief Executive	48,370	0	48,370	48,245	+ 125
Salaries	46,490	0	46,490	46,835	- 345
Expenditure	1,880	0	1,880	1,410	+ 470
Asset Management	83,284	0	83,284	83,428	- 144
Income	(2,000)	0	(2,000)	(2,000)	+ 0
Salaries	20,799	0	20,799	20,943	- 144
Expenditure	64,485	0	64,485	64,485	+ 0
Finance and Insurance	183,810	0	183,810	184,375	- 565

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Salaries	82,520	0	82,520	83,085	- 565
Expenditure	101,290	0	101,290	101,290	+ 0
Collection of Tolls	146,440	0	146,440	147,380	- 940
Salaries	135,240	0	135,240	136,180	- 940
Expenditure	11,200	0	11,200	11,200	+ 0
ICT	108,359	0	108,359	112,726	- 4,368
Salaries	64,304	0	64,304	64,753	- 449
Expenditure	44,055	0	44,055	47,974	- 3,919

Table 5

Projects and Corporate items

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Projects and Corporate Items Total	87,894	0	87,894	57,169	+ 30,725
Partnerships / HLF	38,494	0	38,494	7,769	+ 30,725
Income	(50,655)	0	(50,655)	(49,830)	- 825
Salaries	14,145	0	14,145	14,245	- 100
Expenditure	75,003	0	75,003	43,353	+ 31,650
Corporate Items	49,400	0	49,400	49,400	+ 0
Expenditure	1,400	0	1,400	1,400	+ 0
Pension Payments	48,000	0	48,000	48,000	+ 0

Table 6

Contributions from earmarked reserves

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Total contributions from Earmarked Reserves	(148,219)	0	(148,219)	(115,994)	- 32,225
Earmarked Reserves	(148,219)	0	(148,219)	(115,994)	- 32,225

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Expenditure	(148,219)	0	(148,219)	(115,994)	- 32,225

Table 7

Net (Surplus) / Deficit

Row Labels	Original budget (Navigation) £	Budget adjustments (Navigation) £	Latest Available Budget (Navigation) £	Forecast outturn (Navigation) £	Forecast outturn variance (Navigation) £
Grand Total	45,402	88,491	133,893	26,601	+ 107,292

Appendix 3 - 2020/21 Budget and Financial Strategy to 2023/24

Row Labels	2019/20			2020/21			2021/22			2022/23			2023/24			2020/21 Apportionment		
	National Park 2019/20 (Actual)	Navigation 2019/20 (Actual)	Consolidated 2019/20 (Actual)	National Park 2020/21 (Latest Available Budget)	Navigation 2020/21 (Latest Available Budget)	Consolidated 2020/21 (Latest Available Budget)	National Park 2021/22 (Forecast)	Navigation 2021/22 (Forecast)	Consolidated 2021/22 (Forecast)	National Park 2022/23 (Budget)	Navigation 2022/23 (Budget)	Consolidated 2022/23 (Budget)	National Park 2023/24 (Budget)	Navigation 2023/24 (Budget)	Consolidated 2023/24 (Budget)	National Park	Navigation	
Income																		
Income																		
National Park Grant	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	(3,414,078)	0	(3,414,078)	100%	0%	
Hire Craft Tolls	0	(1,179,951)	(1,179,951)	0	(1,199,000)	(1,199,000)	0	(1,106,000)	(1,106,000)	0	(1,131,000)	(1,131,000)	0	(1,177,000)	(1,177,000)	0%	100%	
Private Craft Tolls	0	(2,195,215)	(2,195,215)	0	(2,244,000)	(2,244,000)	0	(2,214,000)	(2,214,000)	0	(2,303,000)	(2,303,000)	0	(2,396,000)	(2,396,000)	0%	100%	
Short Visit Tolls	0	(39,790)	(39,790)	0	(43,000)	(43,000)	0	(43,000)	(43,000)	0	(45,000)	(45,000)	0	(47,000)	(47,000)	0%	100%	
Other Toll Income	0	(20,227)	(20,227)	0	(19,100)	(19,100)	0	(19,100)	(19,100)	0	(17,900)	(17,900)	0	(17,900)	(17,900)	0%	100%	
Interest	(24,507)	(24,507)	(49,014)	(20,500)	(20,500)	(41,000)	(11,000)	(22,000)	(6,750)	(13,500)	(10,000)	(20,000)	(15,000)	(15,000)	(30,000)	50%	50%	
Income Total	(3,438,585)	(3,459,691)	(6,898,276)	(3,434,578)	(3,525,600)	(6,960,178)	-3,425,078	-3,993,100	-6,818,178	-3,420,828	-3,503,650	-6,924,478	-3,424,078	-3,647,900	-7,071,978	-3,429,078	-3,798,900	-7,227,978
Net Expenditure	(3,438,585)	(3,459,691)	(6,898,276)	(3,434,578)	(3,525,600)	(6,960,178)	-3,425,078	-3,993,100	-6,818,178	-3,420,828	-3,503,650	-6,924,478	-3,424,078	-3,647,900	-7,071,978	-3,429,078	-3,798,900	-7,227,978
Operational																		
Construction and Maintenance Salaries	480,976	808,388	1,289,364	497,572	830,508	1,328,080	492,282	815,778	1,308,060	515,704	854,246	1,369,950	536,160	886,900	1,423,060	552,324	911,736	1,464,060
Construction and Maintenance Salaries (Income)	(497)	(1,160)	(1,657)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Equipment, Vehicles and Vessels	139,886	326,401	466,288	161,040	375,760	536,800	133,440	311,360	444,800	158,730	370,370	529,100	175,964	410,582	586,545	170,556	397,964	568,520
Equipment, Vehicles and Vessels (Income)	(3,086)	(7,202)	(10,288)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Water Management	4,939	103,819	108,759	5,000	111,670	116,670	5,000	94,980	99,980	3,500	95,135	98,635	3,500	95,135	98,635	3,500	95,135	98,635
Water Management (Income)	0	(4,739)	(4,739)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Land Management	44,308	0	44,308	58,710	0	58,710	64,210	0	64,210	56,680	0	56,680	56,680	0	56,680	56,680	0	56,680
Land Management (Income)	(154,251)	0	(154,251)	(103,796)	0	(103,796)	(103,796)	0	(103,796)	(86,536)	0	(86,536)	(86,536)	0	(86,536)	(86,536)	0	(86,536)
Waterways and Recreation Strategy	373	6,345	6,718	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000
Waterways and Recreation Strategy (Income)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Practical Maintenance	90,747	352,637	443,384	89,300	502,198	591,498	89,300	359,715	449,015	85,550	407,836	493,386	85,550	397,836	483,386	85,550	397,836	483,386
Practical Maintenance (Income)	(3,396)	(15,771)	(19,167)	0	(9,000)	(9,000)	0	(9,000)	(9,000)	0	(11,000)	(11,000)	0	(11,000)	(11,000)	0	(11,000)	(11,000)
Ranger Services	208,392	548,656	757,048	304,304	560,656	864,960	221,367	620,723	842,090	275,982	844,448	1,120,430	288,879	774,541	1,063,429	280,689	755,431	1,036,120
Ranger Services (Income)	(21,139)	(31,972)	(53,112)	0	0	0	0	0	0	0	(7,000)	(7,000)	0	0	0	0	0	0
Safety	52,764	73,932	126,696	60,651	89,819	150,470	40,975	79,015	119,990	55,407	93,113	148,520	37,814	65,866	103,680	38,662	67,718	106,380
Safety (Income)	0	(743)	(743)	0	(1,500)	(1,500)	0	(1,500)	(1,500)	0	(1,000)	(1,000)	0	(1,000)	(1,000)	0	(1,000)	(1,000)
Project Funding	101,843	1,069	1,080	60,793	61,860	60,793	60,793	61,860	60,793	61,011	1,080	62,100	61,011	1,080	62,100	61,011	1,080	62,100
Project Funding (Income)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Operational Property	99,123	137,402	236,525	98,973	132,937	231,910	40,473	66,437	106,910	97,748	128,912	226,660	88,748	107,912	196,660	88,748	107,912	196,660
Operational Property (Income)	(4,920)	(11,481)	(16,402)	(300)	(700)	(1,000)	(300)	(700)	(1,000)	(1,050)	(2,450)	(3,500)	(1,050)	(2,450)	(3,500)	(1,050)	(2,450)	(3,500)
Operations Management and Admin	84,817	41,775	126,592	88,916	43,794	132,710	89,807	44,233	134,040	92,118	45,372	137,490	92,802	46,857	136,514	95,133	47,887	141,990
Operations Management and Admin (Income)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Head Office	189,597	77,441	267,038	183,805	75,075	258,880	183,805	75,075	258,880	183,805	75,075	258,880	183,805	75,075	258,880	183,805	75,075	258,880
Head Office (Income)	(116)	(48)	(164)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Operations Total	1,400,359	2,404,659	3,805,018	1,504,967	2,721,285	4,226,252	1,319,980	2,466,184	3,786,164	1,498,439	2,902,656	4,401,095	1,523,116	2,854,704	4,377,820	1,518,962	2,850,813	4,369,675
Strategic Services																		
Development Management	573,132	4,196	577,328	511,681	8,719	520,400	480,365	513,420	8,800	522,220	504,005	522,220	504,005	513,029	517,029	9,391	526,420	534,280
Development Management (Income)	(105,732)	0	(105,732)	(74,500)	0	(74,500)	(85,000)	0	(85,000)	(90,000)	0	(90,000)	(90,000)	0	(90,000)	0	(90,000)	0
Strategy and Projects Salaries	164,369	12,246	176,615	61,687	4,244	65,930	62,216	4,274	66,490	67,860	4,361	69,240	64,789	4,451	69,240	45,828	4,542	50,670
Strategy and Projects (Income)	88,637	569	89,197	72,129	90	72,219	66,677	68	66,744	101,080	45	101,125	101,055	45	101,100	102,495	45	102,540
Strategy and Projects (Income)	(1,173)	0	(1,173)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Biodiversity Strategy	8,199	52	8,251	11,870	0	11,870	11,870	0	11,870	11,270	0	11,270	11,270	0	11,270	11,270	0	11,270
Biodiversity Strategy (Income)	(380)	0	(380)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Environment Land Management System	24,072	0	24,072	32,170	0	32,170	32,170	0	32,170	0	0	0	0	0	0	0	0	0
Environment Land Management System (Income)	(24,072)	0	(24,072)	(32,170)	0	(32,170)	(32,170)	0	(32,170)	0	0	0	0	0	0	0	0	0
Water Environment Grant	23,118	0	23,118	11,653	0	11,653	11,653	0	11,653	11,653	0	11,653	11,653	0	11,653	0	0	0
Water Environment Grant (Income)	(26,350)	0	(26,350)	(11,653)	0	(11,653)	(11,653)	0	(11,653)	0	0	0	0	0	0	0	0	0
Communications	230,417	73,597	304,014	268,133	84,026	352,159	267,971	84,498	352,469	251,670	80,430	332,100	255,414	81,846	337,260	260,545	83,935	344,480
Communications (Income)	(10,205)	5	(10,201)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
UK NP Communications Team	102,813	0	102,813	114,060	0	114,060	114,660	0	114,660	117,100	0	117,100	117,100	0	117,100	55,900	0	55,900
UK NP Communications Team (Income)	(102,813)	0	(102,813)	(118,800)	0	(118,800)	(118,800)	0	(118,800)	(121,095)	0	(121,095)	(121,095)	0	(121,095)	0	0	0
Visitor Centres and Yacht Stations (Income)	363,447	151,968	515,415	300,128	158,753	458,880	289,635	150,722	440,357	159,713	146,130	298,795	159,765	146,560	299,690	162,548	146,560	300,000
Visitor Centres and Yacht Stations (Income)	(179,593)	(64,874)	(244,467)	(105,400)	(68,700)	(174,100)	(78,442)	(44,304)	(122,746)	(136,650)	(69,450)	(206,100)	(136,650)	(69,450)	(206,100)	(131,650)	(69,450)	(201,100)
Human Resources	83,893	58,298	142,191	82,146	57,084	139,230	81,258	56,468	137,726	82,431	57,283	139,714	83,723	58,181	141,904	85,057	59,107	144,164
Human Resources (Income)	(384)	(267)	(650)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Volunteers	35,824	23,863	59,707	44,088	29,392	73,480	35,286	23,233	58,510	44,514	29,676	64,044	30,686	76,740	103,434	31,756	79,380	109,000
Volunteers (Income)	(226)	(150)	(376)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic Services Management and Admin	70,459	30,197	100,656	75,817	32,493	108,310	76,202	32,658	108,860	79,247	33,963	113,210	80,822	34,638	115,460	82,418	35,322	117,740
Strategic Services Management and Admin (Income)	(209)	(90)	(299)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic Services Total	1,337,263	289,624	1,626,887	1,243,037	306,101	1,549,138	1,195,512	316,293	1,511,805	1,202,893	304,821	1,507,714	1,187,642	309,267	1,496,909	1,278,129	317,195	1,585,324
Chief Executive																		
Legal	42,316	34,229	76,545	70,000	30,000	100,000	70,000	30,000	100,000	45,000	35,000	80,000	45,000	35,000	80,000	70,000	30,000	100,000
Legal (Income)	(1,310)	(5,965)	(7,275)	0	(2,500)	(2,500)	0	(2,500)	(2,500)	0	(2,500)	(2,5						

Appendix 4 – Earmarked reserves 2021-22 for budget

Year	Earmarked Reserves	Property Reserve - TOTAL	Plant, Vessels and Equipment Reserve - TOTAL	Premises Reserve - TOTAL	Other Earmarked Reserves - TOTAL	HLF	CANAPE	Total Earmarked Reserves - National Park	Total Earmarked Reserves - Navigation	GRAND TOTAL Earmarked Reserves
	Actual Balance 1 April 2020 (incl interest)	(663,487)	(349,280)	(246,701)	(535,055)	(11,955)	(311,844)	(1,161,565)	(956,757)	(2,118,322)
2020/21	Contributions to Reserves to 31/10/20									
	Mutford Lock Rent (MLK000552)	(1,296)	0	0	0			0	(1,296)	(1,296)
	Upper Thurne Monies Recd (UTE000552)	0	0	0	2,932			2,932	0	2,932
	Catchment Partnership (CAT000451)	0	0	0	(33,010)			(33,010)	0	(33,010)
	Heritage Lottery Fund Income (HLF61X552)	0	0	0	0	(74,498)		(74,498)	0	(74,498)
	CANAPE Income (CANXXX552)	0	0	0	0		55,656	27,828	27,828	55,656
	UK Communications Team (Income)	0	0	0	(118,800)			(118,800)	0	(118,800)
	Contributions from Reserves to 31/10/20									
	Replace mini digger, Sanderson Telehandler & NATO Floats x5 (VES000450)	0	44,950	0	0			13,485	31,465	44,950
	Replace AO12 DWY, AO12 DWX & AO12 KFJ (VEH000450)	0	1,000	0	0			300	700	1,000
	Planning Officer (Compliance & Implementation) (DVM000450)	0	0	0	1,723			1,723	0	1,723
	Section 106 payments	0	0	0	1,441			1,441	0	1,441
	Potter Heigham Staither alterations (UTE000450)	0	0	0	6,529			6,529	0	6,529
	Catchment Partnership (CAT000450)	0	0	0	18,628			18,628	0	18,628
	UK Communications Team (UKC000450)	0	0	0	72,361			72,361	0	72,361
	Computer Software (ICT000450)	0	0	0	937			628	309	937
	COVID-19 Expenditure (COV000450)	0	0	30,293	0			30,293	0	30,293
	Heritage Lottery Fund costs (HLFXX450)	0	0	0	0	285,235		285,235	0	285,235
	CANAPE Expenditure (CANXXX450)	0	0	0	0		26,364	13,182	13,182	26,364
	Actual Balance 01 November 2020	(664,783)	(303,330)	(216,408)	(582,313)	198,782	(229,824)	(913,308)	(884,569)	(1,797,876)
	<u>Contributions to Reserves to 31/03/21</u>									
	Vehicles (VEH000451)	0	(22,000)	0	0			(6,600)	(15,400)	(22,000)
	Mutford Lock Rent (MLK000552)	(704)	0	0	0			0	(704)	(704)
	Launches (LAU000451)	0	(30,000)	0	0			0	(30,000)	(30,000)
	Ranger Vehicles (RAN000451)	0	(13,000)	0	0			(3,900)	(9,100)	(13,000)
	Pool Vehicles (PCP000451)	0	(14,000)	0	0			(9,380)	(4,620)	(14,000)
	Asset Management for Countryside sites (SIM00451)	(46,000)	0	0	0			(46,000)	0	(46,000)
	Computer Software (ICT000451)	0	0	0	(10,000)			(6,700)	(3,300)	(10,000)
	Upper Thurne Monies Recd (UTE000552)	0	0	0	(2,932)			(2,932)	0	(2,932)
	Potter Heigham Chalet Income (UTE000451)	0	0	0	(21,000)			(21,000)	0	(21,000)
	Heritage Lottery Fund (HLF000451)	0	0	0	0	(50,000)		(50,000)	0	(50,000)
	Heritage Lottery Fund Income (HLF61X552)	0	0	0	0	(421,665)		(421,665)	0	(421,665)
	CANAPE Income (CANXXX552)	0	0	0	0		(156,965)	(78,482)	(78,482)	(156,965)
	<u>Contributions from Reserves to 31/03/21</u>									
	Replace mini digger, Sanderson Telehandler & NATO Floats x 5 (VES000450)	0	23,050	0	0			6,915	16,135	23,050
	Replace AO12 DWY, AO12 DWX & AO12 KFJ (VEH000450)	0	65,500	0	0			19,650	45,850	65,500
	Repairs to How Hill Boat Shed (BHB000450)	0	0	25,000	0			18,000	7,000	25,000
	Planning Officer (Compliance & Implementation) (DVM000450)	0	0	0	32,577			32,577	0	32,577
	Potter Heigham Staither alterations (UTE000450)	0	0	0	1,471			1,471	0	1,471
	Catchment Partnership (CAT000450)	0	0	0	64,812			64,812	0	64,812
	UK Communications Team (UKC000450)	0	0	0	42,299			42,299	0	42,299
	COVID-19 Expenditure (COV000450)	0	0	4,707	0			4,707	0	4,707
	Heritage Lottery Fund costs (HLFXX450)	0	0	0	0	210,928		210,928	0	210,928
	CANAPE Expenditure (CANXXX450)	0	0	0	0		63,642	31,821	31,821	63,642
	Reserve split correction (to be journalled at year end)		0					(56,469)	56,469	0
	Forecast Balance 01 April 2021	(711,487)	(293,780)	(186,701)	(475,087)	(61,955)	(323,147)	(1,183,256)	(868,901)	(2,052,157)

Year	Earmarked Reserves	Property Reserve - TOTAL	Plant, Vessels and Equipment Reserve - TOTAL	Premises Reserve - TOTAL	Other Earmarked Reserves - TOTAL	HLF	CANAPE	Total Earmarked Reserves - National Park	Total Earmarked Reserves - Navigation	GRAND TOTAL Earmarked Reserves
2021/22	<u>Contributions to Reserves to 31/03/22</u>									
	Vessels and Equipment (VES000451)	0	(92,000)	0	0			(27,600)	(64,400)	(92,000)
	Vehicles (VEH000451)	0	(38,000)	0	0			(11,400)	(26,600)	(38,000)
	Mutford Lock (MLK000451)	(25,000)	0	0	0			0	(25,000)	(25,000)
	Mutford Lock Rent (MLK000451)	(2,000)	0	0	0			0	(2,000)	(2,000)
	Launches (LAU000451)	0	(30,000)	0	0			0	(30,000)	(30,000)
	Ranger Vehicles (RAN000451)	0	(13,000)	0	0			(3,900)	(9,100)	(13,000)
	Dockyard Site (PRM009451)	0	0	(30,000)	0			(9,000)	(21,000)	(30,000)
	Pool Vehicles (PCP000451)	0	(15,000)	0	0			(10,050)	(4,950)	(15,000)
	Building repairs (PRM000451)	0	0	(50,000)	0			(36,000)	(14,000)	(50,000)
	Asset Management for Countryside sites (SIM00451)	(46,000)	0	0	0			(46,000)	0	(46,000)
	Computer Software (ICT000451)	0	0	0	(10,000)			(6,700)	(3,300)	(10,000)
	Potter Heigham Chalet Income (UTE000451)	0	0	0	(21,000)			(21,000)	0	(21,000)
	Catchment Partnership (CAT000451)	0	0	0	(33,950)			(33,950)	0	(33,950)
	Trade in for replacement vehicle (VEH000552)	0	(8,000)	0	0			(2,400)	(5,600)	(8,000)
	Sale of old launch (LAU000552)	0	(7,000)	0	0			0	(7,000)	(7,000)
	Heritage Lottery Fund Income (HLF61X552)	0	0	0	0	(521,799)		(521,799)	0	(521,799)
	CANAPE Income (CANXXX552)	0	0	0	0		(129,047)	(64,524)	(64,524)	(129,047)
	UK Communications Team (Income)	0	0	0	(121,095)			(121,095)	0	(121,095)
	<u>Contributions from Reserves to 31/03/22</u>									
	Replacement of AO12 TXS, AO12 TXU & AP12 GUA (VEH000450)	0	62,000	0	0			18,600	43,400	62,000
	Replacement of AU12 OMA & AU12 OMB (RAN000450)	0	40,000	0	0			12,000	28,000	40,000
	£30,000 hydraulic boat cradle; £10,500 hydro acoustic kit; £31,000 NATO floats (deferred £24,000 from 20/21); £8,000 large reciprocating mower; £7,000 rotary grass mower	0		0						
	see replacement plan details here I:\Operations\CME\Management\CME Management\Vessels & Equipment\Forward purchase plan (VES000450)		86,500		0			25,950	60,550	86,500
	Replacement of M/L Yare (LAU000450)	0	100,000	0	0			0	100,000	100,000
	3D Hydrographic Survey about and below waterline(MLK000450)	10,000	0	0	0			0	10,000	10,000
	Replacement of Yare House pool vehicles (two Smart) (PCP000450)	0	27,500	0	0			18,425	9,075	27,500
	Dockyard slipway and wet dock pilling projects (PRM009450)	0	0	30,000	0			9,000	21,000	30,000
	Catchment Partnership (CAT000450)	0	0	0	38,950			38,950	0	38,950
	Heritage Lottery Fund costs (HLFXXX450)	0	0	0	0	568,432		568,432	0	568,432
	CANAPE Expenditure (CANXXX450)	0	0	0	0		81,680	40,840	40,840	81,680
	UK Communications Team (UKC000450)	0	0	0	117,100			117,100	0	117,100
	Forecast Balance 01 April 2022	(774,487)	(180,780)	(236,701)	(505,082)	(15,322)	(370,514)	(1,249,377)	(833,509)	(2,082,886)
2022/23	<u>Contributions to Reserves to 31/03/23</u>									
	Vessels and Equipment (VES000451)	0	(92,000)	0	0			(27,600)	(64,400)	(92,000)
	Vehicles (VEH000451)	0	(38,000)	0	0			(11,400)	(26,600)	(38,000)
	Mutford Lock (MLK000451)	(25,000)	0	0	0			0	(25,000)	(25,000)
	Mutford Lock Rent (MLK000451)	(2,000)	0	0	0			0	(2,000)	(2,000)
	Launches (LAU000451)	0	(30,000)	0	0			0	(30,000)	(30,000)
	Ranger Vehicles (RAN000451)	0	(13,000)	0	0			(3,900)	(9,100)	(13,000)
	Dockyard Site (PRM009451)	0	0	(30,000)	0			(9,000)	(21,000)	(30,000)
	Pool Vehicles (PCP000451)	0	(15,000)	0	0			(10,050)	(4,950)	(15,000)
	Building repairs (PRM000451)	0	0	(50,000)	0			(36,000)	(14,000)	(50,000)
	Asset Management for Countryside sites (SIM00451)	(46,000)	0	0	0			(46,000)	0	(46,000)
	Computer Software (ICT000451)	0	0	0	(10,000)			(6,700)	(3,300)	(10,000)
	Potter Heigham Chalet Income (UTE000451)	0	0	0	(21,000)			(21,000)	0	(21,000)
	Catchment Partnership (CAT000451)	0	0	0	(34,650)			(34,650)	0	(34,650)
	Heritage Lottery Fund Income (HLF61X552)	0	0	0	0	(234,918)		(234,918)	0	(234,918)
	UK Communications Team (Income)	0	0	0						
	<u>Contributions from Reserves to 31/03/23</u>									
	Replacement of AO12 URK, AO12 DWP & AU12 OCN, (VEH000450)	0	57,945	0	0			17,384	40,562	57,945
	Welfare barge, JCB JS160, Yanmar tracked carrier and JCB Tractor replacements (VES000450)	0	140,000	0	0			42,000	98,000	140,000
	Replacement of AO12 URF, AO12 TXV & AO12 URE(RAN000450)	0	57,300	0	0			17,190	40,110	57,300
	Catchment Partnership (CAT000450)	0	0	0	34,650			34,650	0	34,650
	Heritage Lottery Fund costs (HLFXXX450)	0	0	0	0	200,240		200,240	0	200,240
	CANAPE Expenditure (CANXXX450)	0	0	0	0		11,380	5,690	5,690	11,380
	UK Communications Team (UKC000450)	0	0	0	48,280			48,280	0	48,280
	Closure of CANAPE & HLF reserve & repayment of loan	(26,000)	(32,500)	(32,500)	0	50,000	91,000	0	0	0
	Forecast Balance 01 April 2023	(873,487)	(146,035)	(349,201)	(487,802)	0	(268,134)	(1,325,161)	(849,498)	(2,174,659)

Year	Earmarked Reserves	Property Reserve - TOTAL	Plant, Vessels and Equipment Reserve - TOTAL	Premises Reserve - TOTAL	Other Earmarked Reserves - TOTAL	HLF	CANAPE	Total Earmarked Reserves - National Park	Total Earmarked Reserves - Navigation	GRAND TOTAL Earmarked Reserves
2023/24	<u>Contributions to Reserves to 31/03/24</u>									
	Vessels and Equipment (VES000451)	0	(92,000)	0	0			(27,600)	(64,400)	(92,000)
	Vehicles (VEH000451)	0	(38,000)	0	0			(11,400)	(26,600)	(38,000)
	Mutford Lock (MLK000451)	(25,000)	0	0	0			0	(25,000)	(25,000)
	Mutford Lock Rent (MLK000451)	(2,000)	0	0	0			0	(2,000)	(2,000)
	Launches (LAU000451)	0	(30,000)	0	0			0	(30,000)	(30,000)
	Ranger Vehicles (RAN000451)	0	(13,000)	0	0			(3,900)	(9,100)	(13,000)
	Dockyard Site (PRM009451)	0	0	(30,000)	0			(9,000)	(21,000)	(30,000)
	Pool Vehicles (PCP000451)	0	(15,000)	0	0			(10,050)	(4,950)	(15,000)
	Building repairs (PRM000451)	0	0	(50,000)	0			(36,000)	(14,000)	(50,000)
	Asset Management for Countryside sites (SIM00451)	(46,000)	0	0	0			(46,000)	0	(46,000)
	Computer Software (ICT000451)	0	0	0	(10,000)			(6,700)	(3,300)	(10,000)
	Potter Heigham Chalet Income (UTE000451)	0	0	0	(21,000)			(21,000)	0	(21,000)
	Catchment Partnership (CAT000451)	0	0	0	(35,370)			(35,370)	0	(35,370)
	<u>Contributions from Reserves to 31/03/24</u>									
	Replacement of AO12 TXR, AO13 ABU, AO63 BHX & AV61 BWZ (VEH000450)	0	59,920	0	0			17,976	41,944	59,920
	Replacement wherry (VES000450)	0	120,000	0	0			36,000	84,000	120,000
	Catchment Partnership (CAT000450)	0	0	0	35,370			35,370	0	35,370
	UK Communications Team (UKC000450)	0	0	0	55,900			55,900	0	55,900
	Forecast Balance 01 April 2024	(946,487)	(154,115)	(429,201)	(462,902)	0	(268,134)	(1,386,935)	(923,904)	(2,310,839)

Navigation Committee

14 January 2021

Agenda item number 10

Tolls enforcement

Report by Chief Executive and Collector of Tolls

Purpose

This report gives a briefing on a change in the tolls collection process for those boat owners who persistently delay payment of the charge.

Broads Plan context

Effective tolls collection underpins Aspiration 4 to 'maintain a safe, open navigation and reduce pressures on busy or vulnerable areas.'

1. Introduction

- 1.1. There are around 10,000 private boat owners on the Broads. The majority (77%) of tolls are paid before the end of April and 86% before the end of May. This has been an exceptional year for late payments because of the COVID-19 pandemic, and the Tolls staff have had to send over 1,000 reminder letters (840 first letters and 240 follow up letters). Currently, 157 payments are outstanding, which is higher than normal. This year has drawn attention to a small core of boat owners who appear to deliberately delay payment as long as possible and thereby create a significant additional workload for our small Tolls team and additional work for our Ranger service.
- 1.2. The current process is as follows. Reminder letters are sent to all toll payers from late February through to early March. In May, the Ranger Team surveys the navigation area and adjacent waters to identify boats present in the water and checks whether they have paid a toll and have a valid Boat Safety Certificate. Our procedures state that boat owners that have not paid the toll are given a Notice of Contravention. This is either affixed to the boat or handed to the owner. It is then followed up by letter with a copy of the Notice. If the toll is not paid in the following 10 days a second letter is sent, which states that the Authority will go to the Courts if the charge is not paid and will seek to recover its costs.
- 1.3. This process works well and most of outstanding toll monies are paid. In the process it is important to demonstrate that the Notice of Contravention (which sets out the alleged offence committed) has been served and brought to the attention of the registered owner and demonstrates fairness in the legal process. It also secures the Authority's position in seeking costs, as the evidence shows that the registered owner

has received the Notice and has had the opportunity to respond to the circumstances and settle the account before court action is taken.

- 1.4. For those boat owners who have a history of not paying in a timely way it is intended that, in future, a first and final letter will be sent to speed up the process and avoid an unnecessary call upon the Authority's limited resources.

2. Risk implications

- 2.1. Legal advice on this matter has been gained and this confirms that the change proposed is sound. The majority of the Authority's toll payers will not notice any difference in the way tolls are managed, as the change only concerns a small number of boat owners.

Author: John Packman and Bill Housden

Date of report: 10 December 2020

Navigation Committee

14 January 2021

Agenda item number 11

Changes to Hire Boat Licencing Conditions

Report by Head of Safety Management

Purpose

This report explains the proposed changes to the Hire Boat Licencing Conditions following a review of the risk management system to ensure compliance, using a risk-based approach.

Broads Plan context

As the harbour and navigation authority, the Broads Authority is responsible for maintaining the navigation area. Its powers include health and safety provisions.

1. Introduction

- 1.1. The Broads Authority is the licensing authority for boat operators who provide boats for hire within the Broads executive waters. Hire Boat licenses are issued under Section 94 of the Public Health Acts (Amended Act) 1907 and Sections 12 & 40 of the Broads Authority Act 2009.
- 1.2. A license is granted for vessels that are let for hire or used for carrying passengers, subject to conditions being met as set out in the various schedules.
- 1.3. Licensing charges made by the hire boat operators allow the Authority to employ a Licensing Officer on a part-time basis (7.4 hrs). The role of the Licensing Officer is to audit the hire boat operators to ensure they meet the standards required under the licencing conditions and the hire boat code.
- 1.4. At the end of December 2019, British Marine and the Association of Inland Navigation Authorities (AINA) launched a consultation on proposed changes to the Code for the Design, Construction and Operation of Hire Boats, better known as the Hire Boat Code. The Hire Boat Code was developed by British Marine and AINA to help ensure the continued safe operation of hire boats on inland waterways. It provides the framework for safe business operations, clarification of operators, and navigation authorities and users responsibilities. It also helps businesses by consistent application of licensing requirements through inland navigation authority waterways in the UK.
- 1.5. It was envisaged that the final version of the Hire Boat Code would be completed by October 2020, but this has been delayed by COVID-19.

2. Review of Hire Boat Licensing Conditions

- 2.1. Following the end of the first COVID lockdown in June, the Broads saw a huge increase in visitors. Many of these were new to boating with varying degrees of knowledge or experience of boat handling within a tidal system. This lack of experience and awareness of boating etiquette led to high numbers of water related incidents.
- 2.2. While the Broads is a relatively safe environment for boating, this year there have been five fatal accidents, albeit not all related to boating incidents. The Marine Accident Investigation Branch (MAIB) are currently investigating one of the fatalities. As part of their investigation they are focusing on hire boat licensing and powers within the Broads Authority Act 2009 and the Hire Boat Code.
- 2.3. There are 66 hire boat operators licensed on the Broads, ranging from large fleet operators to single hire operators (Appendix 1).
- 2.4. At present, all hire boat operators are audited every 3 years on a rolling programme. It may be necessary to visit them sooner if we have received a complaint from a member of the public, notified of an accident or Ranger intervention. All new licence applications are visited by the Hire Boat Licensing Officer to ensure they meet the required conditions of the licence before it is granted.
- 2.5. There is no formal framework in place to measure compliance of hire boat operators against the requirements of the hire boat licencing conditions, or actions recorded to improve performance. To ensure the Broads are measuring compliance effectively, we are proposing to introduce a system using a risk-based approach, with a traffic light system that identifies poor, reasonable and good performance (Appendix 2).
- 2.6. At the initial stage of introducing the risk-based approach scheme, we will need to carry out a desk top risk assessment and place all hire boat operators into a risk category based on previous history. This will allow the Hire Boat Licensing Officer to concentrate on high and medium risk hire boat operators and take any necessary steps to ensure they are meeting the hire boating licensing conditions. All risks are managed to ensure they are reduced 'As low as reasonably practicable' (ALARP).
- 2.7. Our aim is to ensure that all hire boat operators fall within the Medium (Amber) to Low risk (Green) risk rating category. Any hire boat operator identified as High risk (Red) will be required to carry out improvements. We will provide a written report highlighting any failings, and will provide information and advice on how they can achieve compliance with the licencing requirements. Hire boat operators may be subject to enforcement action if improvements are not made. The risk rating categories will determine how frequently they are audited to ensure they are complying with the Hire Boat Licensing Conditions.
- 2.8. The new Senior Ranger (Compliance and Safety) will assist with follow-up visits where improvements have been identified and help to gather evidence and prepare prosecution files when required.

3. Risk implications

- 3.1. The advantage of a risk-based system is that available resources can be targeted to those businesses that most need them, raising standards, reducing risks and improving the safety on our waters.

Author: Linda Ibbitson-Elks

Date of report: 09 December 2020

[Broads Plan](#) strategic actions: 4.3

Appendix 1 - Hire and passenger boat operators

Appendix 2 - Risk-based approach matrix

Appendix 1 – Hire and passenger boat operators

Name	Licence Type	No of Craft
Barnes Brinkcraft	Hire	Large Fleet
Herbert Woods	Hire	Large Fleet
Norfolk Broads Direct (Day Launch)	Hire	Large Fleet
Richardsons	Hire	Large Fleet
Ferry Marina	Hire	Large Fleet
Broom Boats Limited	Hire	24
Silverline Marine	Hire	23
Bridgecraft	Hire	20
Waveney River Centre	Hire	20
Phoenix Fleet	Hire	15
Wroxham Boat Hire	Hire	14
Maycraft	Hire	13
Thorpe Pleasure Craft Ltd	Hire	11
Simpsons Boatyard	Hire	10
Sutton Staithe Boatyard	Hire	10
Martham Boats	Hire	9
Pacific Cruisers	Hire	9
Waveney River Tours	Hire	9
Sanderson Marine Craft Ltd	Hire	8
Summer Craft Ltd	Hire	8
Wayford Day Boats (Mark King)	Hire	8
Martham Ferry Services	Hire	7
Norfolk Boat Hire	Hire	7
H E Hipperson Ltd	hire	6
Riverside Rentals	Hire	6
Whispering Reeds	Hire	6
Bank Boats	Hire	4
Barrett, NC	Hire	3
Horning Pleasurecraft	Hire	3

Name	Licence Type	No of Craft
JB Boats	Hire	3
Norfolk Yacht Agency	Hire	3
Weeds, Alison (Bridge Stores)	Hire	3
Bass Online	Hire	2
Cooper, Michael	Hire	2
JAT Properties Ltd	Hire	2
Kingline Cottages (Ellis-Frost Marine Ltd)	Hire	2
Bramley, Robin	Hire	1
Buck, Mr L	Hire	1
Fencraft Ltd	Hire	1
Hack, Philip	Hire	1
Jenkins, James	Hire	1
King, Helen	Hire	1
Lodge, Andrew	Hire	1
Norfolk Mead Hotel	Hire	1
Rowan Craft Ltd	Hire	1
Russell Marine Ltd	Hire	1
Thwaites, Matthew	Hire	1
Wells, Mrs Carol	Hire	1
Whitwood, Martin	Hire	1
Withers, Jan	Hire	1
Yare View Hire Boats	Hire	1
Broads Authority	Passenger	3
How Hill Trust	Passenger	3
Norfolk Wildlife	Passenger	2
The Fairhaven Garden Trust	Passenger	2
Beccles Lido Ltd	Passenger	1
Broadland Charters (Pam Waters)	Passenger	1
Griffiths, Allan	Passenger	1
Napthine, Timothy	Passenger	1

Name	Licence Type	No of Craft
Norfolk Wherry Trust	Passenger	1
RSPB	Passenger	1
Salhouse Broad	Passenger	1
Scragg, David	Passenger	1
Warrell, Ross	Passenger	1
Wherry Yacht Charter	Passenger	3

Appendix 2 – Risk based approach matrix

Performance	Definition	Risk Rating Score	Action
Poor	<ul style="list-style-type: none"> • There is a history of non-compliance • There is a general failure of compliance across a range of licensing issues • Witnessed a dangerous activity/occurrence • Poor condition of vessel likely to cause harm to persons/environment. • No documented risk assessments • No BSS/Toll • Complaints of a high-risk nature 	High	Consider formal action: <ul style="list-style-type: none"> • Prosecution • Seize Vessel/s • Suspend Operators Licence • Suspend Vessel Licence • Improvement letter with timescale
Reasonable	The majority of issues found are adequately addressed with only minor omissions.	Medium	Improvement letter with timescales.
Good	Full compliance across the whole range of licensing conditions.	Low	Compliant letter.

Navigation Committee

14 January 2021

Agenda item number 12

Residential Moorings Guide – final draft

Report by Planning Policy Officer

Purpose

A Residential Moorings Guide is being produced to help implement the Broads Local Plan policy and guide decision makers, applicants and site owners. Members' views are sought on the final draft guide.

Broads Plan context

The guide relates to strategic action 8.1 to update and adopt spatial planning policy and guidance to support local business, community facilities and transport choices, and to ensure development occurs within environmental limits.

1. Introduction

- 1.1. A Residential Moorings Guide has been produced to help implement the policies of the adopted Local Plan for the Broads relating to residential moorings. It is designed for decision makers, applicants and site owners, with information to make schemes as successful as possible.
- 1.2. The first draft guide was subject to public consultation earlier this year, with a revised version published for a second round of consultation from September to November.

2. Consultation

- 2.1. The responses to the first consultation are at Appendix 1. Some of these comments resulted in changes to the revised guide. We then consulted on the revised guide, and the responses are at Appendix 2. Some of these comments resulted in changes to the final draft guide at Appendix 3.

3. Final version for adoption

- 3.1. The proposed amendments to the final guide are at Appendix 3. Additions are underlined in blue and deleted text is shown as red strikethroughs. The marked changes result from the second consultation; changes made after the first consultation are not commented on in the second consultation, were accepted and are not marked.

- 3.2. Members' views are invited on the final draft guide and the comments received. These views will be reported to the Planning Committee, and the guide will then be presented to the Broads Authority for recommended adoption.

Author: Natalie Beal

Date of report: 11 December 2020

Appendix 1 – Draft Residential Moorings Guide - responses to first consultation

Appendix 2 – Revised draft Residential Moorings Guide - responses to second consultation

Appendix 3 – Final Draft Residential Moorings Guide (for adoption)

Appendix 1 - Draft Residential Moorings Guide - responses to first consultation

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 such as boat maintenance and generally socialising at unsociable hours.
#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.	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?
#3	Alistair Lipp	-	I am actually not in favour of residential moorings, but considering it is in the plan to have 63, then the proposals suggested seem to be a reasonable way of creating quality moorings.	Response noted.	No change to document.
#4	B J Du Brow	-	In these constrained times we are unable to give any useful comments.	Response noted.	No change to document.
#5	Jeremy Burton	Bungay Town Council	I confirm that the members of Bungay Town Council Planning, Environment and Highways Committee have considered these Documents and have no additional comments to make.	Response noted.	No change to document.
#6	Shamsul Hoque	Highways England	No comment	Response noted.	No change to document.
#7	Penny Turner	Norfolk Police	My main concern for residential moorings is potential vulnerability of uninvited access: (The lack, or reduction in perimeter security of a residence (mooring) due to nature of the site (i.e. open access of quay side) may make it vulnerable to ‘attack’ from would be offenders).	See following comments.	See following comments.
#8	Penny Turner	Norfolk Police	The location of residential moorings next to defined a defined development boundary for support of key services, together with the potential lack of ‘usual’ residential perimeter boundaries may open up access opportunities for uninvited visitors – being able to move along the same access routes as genuine users. Therefore it is essential to acknowledge what can be done to prevent would-be offenders entering residential boats. Proposed solutions would be individual to a site and its layout, but I recommend if possible that boatyards/Marinas control access to these moorings via a lockable gate (with resident access only) to the particular quay/boardwalk involved; and that individual boat owners also be aware of further protection/security products designed for boats to increase ‘home’ security. That this information be linked to ‘Helpful links/advice (Section 11).	Comment noted. Security should be considered on a site by site basis. Sites in the Broads tend to be relatively small and many of them are adjacent to other facilities so there tends to be a high level of surveillance. We don't consider that there is a need for the guide to promote this level of security, but we will make reference to security.	New sub section in section 9: You should ensure you consider security at your site. This may already adequately be in place.
#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: 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).
#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: Norfolk Police 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.

#13	Penny Turner	Norfolk Police	With regards external storage facilities, I recommend they are of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender).	Agreed. Text to be added.	Add to 9.7: Norfolk Police recommend that storage is of robust construction with secure locks (e.g. Sold Secure or equivalent). If possible consider fencing off the area (with lockable gate for residents only) to provide an additional layer for what is to be stored within – these items will no doubt be portable with possible value to an offender).
#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: 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).
#15	Penny Turner	Norfolk Police	As mentioned above, I would like links to boat security to be included, but would wish to consult with my police colleagues on BroadBeat as to which should be included. (1st Principles boat security; BoatShield and Aweigh). LINK FOR BOATSHIELD (& Outboard Engine Cover) This weblink from Norfolk & Suffolk Police offers advice on boat safety and security, also information about the Boatshield Scheme. https://www.norfolk.police.uk/advice/roads-and-vehicles/boats 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>app>aweigh play.google.com>store>apps>details>id=com.aweigh BOAT SECURITY ADVICE - NORFOLK & SUFFOLK POLICE Norfolk & Suffolk Police advice on water safety and boat security: https://www.norfolk.police.uk/sites/norfolk/files/boatshield_v1.pdf	Agreed. Text to be added.	Add these links to guide.
#16	David Broad	-	Section 3. – I think that continuing to make a distinction between boats suitable for residential moorings and houseboats might become somewhat artificial and unnecessary with the passage of time. (a bit like mobile homes and caravans where the former have residual wheels and tow bar stored underneath but are still classed the same for The Caravan Act/ planning purposes). The BA hung on to this motor and moving thing when the working party initially considered the issue, 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.	We consider houseboats to be floating caravans or floating sheds on a pontoon and these will be dealt with on a case by case basis. We do not promote or expect these at residential moorings around the Broads. This is set out in the Local Plan.	No change to document.
#17	David Broad	-	Item 7 – Register – It might be helpful and save unnecessary administration and enforcement if the policy stating that guests staying less than, say, 30days, were exempt	It does not seem onerous to write down the details of the person visiting or staying in a register.	No change to document.
#18	David Broad	-	Item 9.3 Pump Out and Sewerage – It could be inviting non-compliance by allowing holding tanks and pump-outs as an alternative to mains drainage. History and experience shows that valves are often used for illegal discharge. There could be a strong planning policy preference for the latter and the register extended for logging genuine pump out occurrences.	Noted. Whilst areas of residential moorings may provide toilets and shower blocks, the boats themselves are probably going to have toilets on them. It is not clear how we can stop that from happening through planning. Because they will have toilets on them, the sewerage and foul water need to go somewhere and that is what we are referring to - the provision on site of somewhere to dispose of foul water. We do have policies that promote the connection to the public sewer network as the preference, as set out in that policy, that the facilities provided for pump out to be connected to the public sewer network. If this is not possible, then we set out a hierarchy for disposal methods and seek thorough justification for the method used. If Mr Broad is suggesting that there should be some kind of mechanism that attaches to the on-board toilets and the like and connects to the public sewer network, then that would be something for the management to address as they plan the scheme. We could add some text to raise the issue of valves and illegal discharge and cross refer to the policy that seeks connection to the public network.	Add this to section 9.3: Toilets on boats may require pumping out or somewhere to empty cassettes. Your marina or boatyard may have a system or process to deal with this already. 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.
#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 Strategy, a partnership document adopted by both the Broads Authority and Norwich City Council (and other partners).”	Agreed. Text to be added.	<ul style="list-style-type: none"> • ‘...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 <u>(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).</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.	
#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,</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.	<u>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>
#25	Liam Robson	Environment Agency	The LPA and their Emergency Planners will need to ensure that they are satisfied with the proposed residential moorings and the proposed measures to ensure the safety of the future occupants should a flood occur.	Noted. The Broads Authority does not have Emergency Planners in house. It is not clear how the District Emergency Planners are able to assist the Broads Authority. This issue is something that is being looked into currently.	No change to document.
#26	Liam Robson	Environment Agency	Line 131 refers to waste management. We would highlight that there is a byelaw that is relevant to the disposal of sewage from boats within the Norfolk and Suffolk Broads which makes it illegal for boats to discharge their sewage straight to the rivers.	Response noted. Text to be added.	See comment #18
#27	Liam Robson	Environment Agency	It may be beneficial to include the need for Flood Response signs in this section, so that everyone is aware of the flood risk and the actions to take.	Noted. The Flood Risk SPD has recently been updated and applicants would be directed to the FRP guidance in that.	No change to document.
#28	Liam Robson	Environment Agency	9.2 Water 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	<p>Informative – Environmental Permit for Flood Risk Activities</p> <p>An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. Anyone carrying out these activities without a permit where one is required, is breaking the law.</p>	Agreed. Text to be added.	<p>Add this to the end of section 9: Informative – Environmental Permit for Flood Risk Activities</p> <p>An environmental permit for flood risk activities will be needed for any proposal that wants to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. Anyone carrying out these activities without a permit where one is required, is breaking the law.</p>
#31	Kate Wood	Pegasus Group on behalf of Crown Point Estate	We welcome the Guide’s intention to provide guidance that builds on already-adopted policy DM37 – New Residential Moorings. We note that this policy is extremely comprehensive in setting out requirements for location and facilities.	Noted.	No change to document.
#32	Kate Wood	Pegasus Group on behalf of Crown Point Estate	The proposed Residential Moorings Guide adds little to the policy, but provides a helpful checklist which would be a useful basis for the planning officer’s consideration of the individual elements requiring consideration.	We would suggest it adds to the policy and elaborates on many parts of the policy as well as many other aspects of a successful residential mooring scheme. But yes, it is also a useful basis as stated.	No change to document.
#33	Kate Wood	Pegasus Group on behalf of Crown Point Estate	We would like to see additional text in relation to management accommodation and the Council’s commitment to engagement with the applicant, particularly at pre-application stage.	We offer a free pre-application advice service. The very nature of our role as a Local Planning Authority means we engage with applicants. Regarding management accommodation, DM38 covers that and refers to residential moorings. DM37 and this guide would then be used.	No change to document.
#34	Kate Wood	Pegasus Group on behalf of Crown Point Estate	Policy DM37 is a relatively self-contained policy. However, there may be circumstances, particularly with larger mooring developments, where the applicant considers that residential management accommodation would be necessary to ensure the moorings are well-managed, maintained and monitored. Such accommodation could, for example, be part of a larger building accommodating post boxes, storage lockers and other facilities.	Noted. If a scheme requires this, then DM38 would be used as would all other relevant policies of the Local Plan and all relevant SPDs and Guides. One point to note however the storage building might be in a high risk flood zone, so accommodation might not necessarily be appropriate there.	No change to document.
#35	Kate Wood	Pegasus Group on behalf of Crown Point Estate	There is no mention in the Guide of the Authority’s pre-application service. We consider this should be included as an option for potential applicants to be aware of. With that option, we request that the Authority includes a commitment to provide advice in a timely manner and stand by its advice unless there have been significant material changes in policy circumstances since the advice was issued. This will enable applicants to have faith in the pre-application system. As you know, pre-application advice, especially when provided in an iterative way, ensures that a proposal can be refined to be the best scheme possible. This ultimately results in greater buy-in from consultees such as Parish Councils and neighbours, a greater likelihood of an efficient and successful application process, and improved development quality when implemented.	Noted. Any advice given on a proposal is as presented and its conformity with current policies. It will remain relevant unless the policy or other material considerations or the details of the application itself change. Pre-application advice is an officer level opinion and given without prejudice.	No change to document.
#36	James Knight	Individual	Although the Guide is presented as a planning document for adoption, the majority of its content falls into the category of helpful guidance for operators hoping to provide residential moorings, and is not directly related to planning.	Noted.	No change to document.
#37	James Knight	Individual	<p>There is an over-riding tendency, both in the policy and in the Guide, to treat residential moorings as materially different to ordinary leisure moorings. In fact, the use of the land is identical - mooring a boat – and the risks are broadly the same, since people live & sleep aboard for many weeks at a time, regardless of whether the boat is their primary residence. The differences from a planning perspective are:</p> <p>a) the fact that the vessel is used as a primary, rather than temporary, residence – which could result in increased demand on local services;</p> <p>b) the fact that residential paraphernalia can accumulate around the moorings, potentially changing the character of the surroundings</p>	The policy treats them as different because the uses are different.	No change to document.
#38	James Knight	Individual	Whilst pleased to have the opportunity of providing input, this Guide ought more properly to be a living document which evolves over time to provide guidance to marina operators – not just as part of the planning process but for promoting ideas and best practice to all operators.	Noted. It will be used for both purposes. We will review guides over time, update and amend and re-consult as required.	No change to document.
#39	James Knight	Individual	The formal consultation process is really designed for strategic planning documents which are adopted for more than a few years, rather than for detailed guidance which, necessarily, should change over time.	The Broads Authority has undertaken consultation on many other guides that are used in planning and intends to produce more guides in future and intends to consult on them as well. We will review guides over time, update and amend and re-consult as required. The purpose of consultation is two fold. Firstly, people may have some really useful comments or observations that will improve the guide or correct it. Secondly, adoption reflects the fact that it has been through this process.	No change to document.
#40	James Knight	Individual	The relevant strategic planning policies for residential moorings are set out in policy DM37. By contrast, this Guide is largely concerned with providing opinions and guidance about current practices and has very little to do with planning.	The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful.	No change to document.

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

#51	James Knight	Individual	Planning conditions need to relate to planning and pass the NPPF para 55 tests. Amongst other things, they need to be specific, enforceable and not covered by other regulatory regimes. They should only be applied where they are necessary to make an unacceptable development acceptable. They can't simply be "nice to have".	Noted.	No change to document.
#52	James Knight	Individual	Boat safety certificates & insurance are matters for individual boat owners and are covered by the Broads Authority's own boat registration regulations. They cannot be turned into planning conditions imposed upon the mooring operator.	Noted. This is not the intention of the guide.	No change to document.
#53	James Knight	Individual	Similarly, noise pollution is covered by navigation byelaws as well as by district councils who are responsible for environmental protection - including waste management.	Noted. It is also addressed in the Local Plan as part of the Amenity policy, DM21.	No change to document.
#54	James Knight	Individual	Therefore, although the list is useful to an operator in terms of "things to consider", it would be inappropriate for any planning condition to require the existence of a management plan which featured such a list.	Noted and this will be considered on a case by case basis.	No change to document.
#55	James Knight	Individual	7.1. Where a planning condition restricts the number of residential moorings, it will be necessary to keep a register to ensure compliance with that planning condition. 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 helpful guidance to new and existing residential mooring operators.	The purpose of this guide, like the other adopted guides, is to provide advice and information. It will be updated as required.	No change to document.
#60	James Knight	Individual	Planning (and other) documents from the LPA should not seek to prescribe the operational practices of businesses unless they directly relate to planning and are necessary in planning terms.	Noted.	No change to document.
#61	James Knight	Individual	Planning conditions must be limited to matters which are within the lawful control of the marina operator. They should never require the operator to be responsible for the conduct or actions of boat owners or others. Planning conditions which impose requirements on the operator relating to noise, boat safety, insurance, payment of tolls or mooring techniques would all probably be unlawful.	Noted.	No change to document.
#62	James Knight	Individual	Clarity is required on the nature of personal information which the operator can reasonably be asked to provide relating to individual berth holders.	Noted.	See #96, 97, 98 and 99.
#63	James Knight	Individual	The Guide as it stands is a hybrid document containing a mixture of planning policy, guidance, links, and questions aimed at specific applicants. It isn't capable of being "adopted" in the formal sense.	The purpose of the guide is to provide information to support the policy and requirements and advice that may be useful. By undertaking consultation, we get wider views which will strengthen the document. Adoption reflects the fact that it has been through this process.	No change to document.
#64	James Knight	Individual	The majority of the guidance (as distinct from the policy) is applicable to all moorings (not just residential ones), and the document ought to be re-imagined as a means of providing evolving guidance and best practice for marina operators - rather than seeking to prescribe operational procedures under the guise of planning conditions.	Noted. The suggestion about the potential wider role of the document is noted. But at this point, it is intended to focus primarily on residential moorings.	No change to document.

#65	James Knight	Individual	I am a Fellow of the Royal Institution of Chartered Surveyors and I have lived and worked around the Broads for all of my life. In addition to enjoying recreational boating activities, I have worked in a professional capacity advising on planning matters. During the past 17 years, I have been a Director of three successful Broads tourism businesses, each employing over 60 people, and have engaged with the planning system as an applicant on numerous occasions. One of these businesses includes a marina which operates 10 residential moorings on the southern Broads. I am a former member of the RICS Governing Council, a South Norfolk District Councillor, and an appointed member of the Broads Authority and its Planning Committee. My response to this consultation is in my capacity as a private individual, property developer and company director. I am not responding in my capacity as a member of the Broads Authority or its Planning Committee.	Noted	No change to document.
#66	Hayley Goldson	Chedgrave Parish Clerk	The content of Marketing and Viability Supplementary Planning Document (SPD) and Residential Moorings Guide was considered by Chedgrave Parish Council on 7th May 2020. I can advise that councillors support the document as long as the guidelines described in the document are adhered to (particularly in relation to residential moorings).	Support noted.	No change to document.
#67	William Hollocks	Loddon Marina	Can you please give me some background on why these are being proposed as you have just produced an excellent document on the Broads Plan that went through an extensive review by every party and then the Inspector for the Secretary of State and then approved at the highest level of government.	Guides and SPDs provide more detail on certain policies in Local Plans. For example, the moorings and riverbank stabilisation guide that we adopted a few years back and the Flood Risk SPD we soon adopted all provide much more detail than would be appropriate in a Local Plan. Policies in the Local Plan provide the hooks for the guides and SPDs. SPDs and Guides help with the implementation of policies. A Local Planning Authority does not need to produce them, but can do.	No change to document.
#68	William Hollocks	Loddon Marina	With regards the residential moorings there is every kind of boat currently on the Broads many used as residential and the BA already has bye law on this so why are the Planning Department trying to be a dictator on a matter which is under another departments jurisdiction (Lucy). The criteria for our residential moorings is well covered in policy LOD1. Does this mean that every boat that does meet this policy will be excluded from the Broads.	The policies relate to the use of the land, not the use of the boat. The Guide elaborates on already adopted policy (the Local Plan for the Broads was adopted in May 2019).	No change to document.
#69	William Hollocks	Loddon Marina	Can you please confirm that any policy you end up will be approved by the Secretary of State 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: http://www.legislation.gov.uk/uksi/2012/767/part/5/made) and the Planning Inspector is not part of the process.	No change to document.
#70	William Hollocks	Loddon Marina	By copy of this e-mail to DR Packman, Lucy as the responsible manager for navigation and bye laws on boats and Marie as the boss of the out of control Planning Department I am asking to put a stop to these amendments as it is a complete waste of money and has no justification to be in the public interest.	Noted	No change to document.
#71	William Hollocks	Loddon Marina	I am more than happy to start a campaign of getting support not for comments to the policies but to get them stopped. We are happy to lobby every Parish Council, BA members, Councils, MP's etc. I have also copied Mr Tarry as he is working with various parties to contribute to the consultation process.	Noted. But guides and SDPs are not policies. They help with the implementation of adopted policies	No change to document.
#72	Thomas Foreman	Thorpe St Andrew Town Council	The Committee welcomed the consultation by the Broads Authority on its Residential Moorings Guide and felt it was a very well-considered document.	Support noted.	No change to document.
#73	Thomas Foreman	Thorpe St Andrew Town Council	The Committee noted the important difference between houseboats and residential moorings, however, it was queried how the policy would apply to mixed sites with both houseboats and residential mooring.	The Local Plan at page 118, second para says that we expect schemes for residential moorings to be occupied by vessels regarded as boats and that houseboats will be dealt with on a case by case basis. That would be the same for mixed schemes, if any were to come forward as a planning application.	No change to document but see rows #21 and 22.
#74	Thomas Foreman	Thorpe St Andrew Town Council	The Committee felt that the management plan was a positive step, particularly with site rules explaining who is resident and how waste will be managed. As part of this section, it was felt the need for an Emergency Evacuation Plan should be included. If safe access for emergency service vehicles is important, it is also important to consider how people might evacuate prior to (or when) the emergency services arrive.	Noted. Access by emergency services would be considered as part of determining the application as per criterion g of DM37.	No change to document.
#75	Alan Wildman	Residential Boat Owners' Association	RBOA is keen to work with the Broads Authority with a view to demonstrating how, with good management controls at site level, residential boaters are of considerable benefit to moorings operators, other berth holders, local communities and the Norfolk Broads as a whole. It is to be hoped that if demand for residential moorings exceeds the 63 already identified, then BA might consider increasing the figure in order to meet that demand.	If applications come forward, they will be determined against the policies of the local plan. The number of 63 is not a maximum and we would not deny applications because we have permitted 63 residential moorings.	No change to document.

#76	Alan Wildman	Residential Boat Owners' Association	Quite apart from the legal requirement and the many general benefits of having water based residents, to Navigation Authorities and to moorings providers, responsible residential boaters are particularly known to provide: • 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. • 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. • 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.	Noted.	No change to document.
#77	Alan Wildman	Residential Boat Owners' Association	We welcome the distinction between houseboats and other residential craft and would suggest a good, clear description be used to clarify what constitutes those other residential craft. RBOA suggests - traditional in that they would be identified as boats by "the man on the Clapham Omnibus".	The Local Plan described what is expected at these moorings in the supporting text of DM37. Any changes to that wording would need to be as part of the Local Plan review.	No change to document.
#78	Alan Wildman	Residential Boat Owners' Association	It is hoped that planning restrictions on houseboats might be negotiable with the applicants, rather than overly dictatorial, something that could be made clear in The Guide.	The Local Plan is clear that houseboats will be judged on a case by case basis.	No change to document. Also see comments #21 and 22.
#79	Alan Wildman	Residential Boat Owners' Association	Some marinas and boatyards already have on-line moorings. To locate a small number of residential slots in amongst those already existing moorings would impede neither navigation nor access to facilities. Perhaps this could be made clearer in The Guide.	Planning applications will be determined against relevant policies in the Local Plan. Policy SP13 will be relevant and impact on navigation is included on DM37 at criterion d. Again, the policy DM37 sets out where residential moorings will be acceptable and other than in Norwich, that is in marinas or boatyards rather than on line. if the RBOA wish for that to be changed, it is something to discuss as part of the review of the Local Plan.	No change to document.
#80	Alan Wildman	Residential Boat Owners' Association	Some residential boaters have little need for nearby access to most "key" services; for instance, BA acknowledges that many residential boaters are single, perhaps slightly older (without children on board) and/or even fully retired. It is hoped that BA will look favourably on applications for residential berths in areas that are a little remote from such services and could state that fact in The Guide.	The Local Plan for the Broads was adopted in 2019. The policy sets out the requirements for the location of residential moorings and this guide cannot change policy. DM37 is clear about where residential moorings will be deemed acceptable. Indeed, access to services was a key consideration when assessing the allocations in the Local Plan for residential moorings.	No change to document.
#81	Alan Wildman	Residential Boat Owners' Association	Flood Risk and Climate Change 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'. The RBOA ensure they liaise with Navigation Authorities like the Broads Authority. https://www.rboa.org.uk/
#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.	9.12 Low Impact Life on Board 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.
#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.

#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: ' 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 '.'
#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: ' and the RBOA also have information on Council Tax: https://www.rboa.org.uk/q-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 our aims, as declared at the head of this response paper – RBOA is dedicated solely to the protection, promotion, universal acceptance and continued development of “responsible” residential boating (living-aboard).	Noted. Consider the reference to the various organisations adequately addressed in the Guide.	No change to document.
#91	Jason Beck	East Suffolk Council	East Suffolk Council, Planning Policy Department has no comments to make on this document.	Noted	No change to document.
#92	Emily Curtis	Loddon Parish Council	Councillors welcomed a management plan for the sites with residential moorings. LPC believes that a management plan would ensure the site was is well managed and will help protect land and boat residents from anti-social behaviour.	Support noted.	No change to document.
#93	Emily Curtis	Loddon Parish Council	Councillors welcomed that consideration is being given to climate change, and agreed that it is important to consider the necessity for a site to have adequate provision for waste, sewage disposal and the prevention of pollution. How will these considerations be monitored?	The ability to meet these requirements will be part of the assessment and form part of planning conditions which are routinely monitored.	No change to document.
#94	Emily Curtis	Loddon Parish Council	Councillors consider it is important that a safety plan for flooding is taken into consideration for the safety of the residents on the boat.	Support noted.	No change to document.
#95	Emily Curtis	Loddon Parish Council	Councillors welcomed the policy regarding the necessity for facilities and services available for residential moorings, it is important for people living on land or water to have access to adequate services and facilities.	Support noted.	No change to document.
#96	Emily Curtis	Loddon Parish Council	Councillors raised concerns over the necessity of a register and have asked why it is necessary for this information to be held by the site owner?	The site owner will log who is on what mooring and whether they are residential moorings or other types of moorings they offer, just like any business would keep records. The Broads Authority would request to see this register from time to time to ensure that only the permitted number of boats are being lived on. It would be for the operator to ensure they kept their register in line with GDPR requirements. This approach is similar to the requirement that holiday accommodation operators have - to keep a log of those who stay, including the time period for periodic inspection by the Broads Authority, again to ensure the accommodation is being used as permitted.	Add some further explanatory text to this section: 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 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.
#97	Emily Curtis	Loddon Parish Council	What purpose does holding this register have for site owners?		
#98	Emily Curtis	Loddon Parish Council	Is this retention of register data inline with GDPR and should this information be held securely, and for what length of time the data be stored.		
#99	Emily Curtis	Loddon Parish Council	Why do the Broads Authority need to inspect this register?		
#100	Emily Curtis	Loddon Parish Council	We would note that management of any antisocial behaviour by occupants of residential boats is dependent on the quality of designated site manager and what further control measures could be put in place to help the site manager deal with anti-social behaviour?	Operators will no doubt use a contract that sets out the requirements of staying on a boat at their site, including why and how such contract could be terminated. Perhaps anti-social behaviour may be such a reason for termination of a contract. Also such behaviour can be reported to the police or Council just the same as one would if there was anti-social behaviour from those living in a house on land.	No change to document.

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

Appendix 2 - Revised draft Residential Moorings Guide - responses to second consultation

Ref	Name	Organisation	Comment	BA response	Amendments
#1	Philip Linnell	Individual	I thought the Guide very conclusive and well written. There are a few additional considerations that have come to light due to our situation:	Noted. General support welcomed.	No change to Guide.
#2	Philip Linnell	Individual	1. Insurance – I have seem more sunken residential boats that non-residential. I would suggest that the proposed boats register also contains insurance details, and this is also managed by the moorings manager. The Guide does refer to a specific policy for residential boats, you may want to consider specifying what specific events the insurance must cover.	The Guide does refer to insurance - at section 6 i and section 11. During the previous consultation, a respondent stated that reference to insurance should be removed, as it is not a planning issue. So to have the reference we do strikes a balance between that respondent's view and Mr Linnell's.	No change to Guide.
#3	Philip Linnell	Individual	2. Waste – the Guide is conclusive, however in the HOR6 site there would be no direct link to the mains waste service. The immediate neighbour is connected via a pump which he maintains himself. Your guide does not quite cover the scenario of the maintenance of a pumped waste collection facility.	Noted. All planning applications are assessed against all relevant policies of the Local Plan. In the Local Plan, the issue of foul water is addressed at policy DM2 (referenced in the Guide at line 249). We also have a joint position statement with the Environment Agency, Anglian Water and North Norfolk District Council that essentially prevents any development that results in more foul water to the Water Recycling Centre near Horning (Knackers Wood), until such time as the capacity of the Centre has improved. That is why HOR6 is scheduled for after 2024 after which is hoped the capacity issues will have been addressed.	No change to Guide.
#4	Philip Linnell	Individual	3. Fire Access – there needs to be an area large enough for a fire engine to turn around. I am not sure of when this stipulation is required, however there needs to be reference to fire access. I have seen a boat burn and it is pretty frightening.	Noted. The Local Plan adopted policy on residential moorings refers to emergency vehicle access at criterion g. As background, when this policy was being examined by the Planning Inspector, in response to comment by Thorpe St Andrew Town Council, who called for more text in this regard, the Inspector concluded the wording was adequate. When we review the Local Plan, we will look into if this wording can be improved. Turning to the guide, at line 310, there is reference to fire evacuation.	No change to Guide.
#5	Philip Linnell	Individual	4. Flooding – how far should the mooring be from the nearest dry land in the event of flooding? Is it easily reachable?	Noted. The actual residential moorings policy has a section in the supporting text relating to flood risk which sets out the various requirements. One of the issues that any application needs to address is the need for a flood response plan. There is information in the Guide about the issue of refuges. Also, any application would need to address the requirements of the recently adopted Flood Risk Supplementary Planning Document. We therefore consider the issue of flood risk adequately covered in the planning policy documents.	No change to Guide.
#6	Philip Linnell	Individual	5. Road access – although not really a planning issue, the land owner should ensure that there is sufficient right of way provision for this change of use.	Residential Moorings are the same as any other development in that we would expect the site plan to show that there is access to the public highway.	No change to Guide.
#7	Philip Linnell	Individual	6. Sound Nuisance – the Guide covers the boat owners creating noise, but not them suffering from noise already coming from the surrounding area. For example Horning Sailing Club start sailing early on Sundays all year around, have noisy children’s sessions, fire guns and hold late night parties, with their only access bridge very near to the proposed moorings. A check for noise and other existing disturbances (like busy roads) should be part of the suitability check.	Noted. As part of assessing any planning application, we consider the issue of Amenity. See policy DM21. So existing land uses will be considered in that assessment. I do note however that the proposed site for residential moorings at Horning is a similar distance from the sailing club as the dwellings like Heronshaw and Romany. Finally, the guide refers to amenity at lines 178, 509.	No change to Guide.
#8	Sarah Luff	LLFA, Norfolk County Council	In section 3 of the report, there is a discussion on the Environment Agency’s consideration of the flood risk vulnerability classes for houseboats and boats. Please can you clarify whether this perspective is a national or local perspective? In addition, please can you confirm what the supporting documentation is?	We asked the EA for their thoughts. They responded saying 'Planning law about residential moorings (including vulnerability classification) for boats is complex. Marinas are classified in the PPG as 'water compatible', but there is less certainty over moorings outside marinas. Generally it is considered that residential boats that are navigable are water compatible, however it is up to the LPA to make the final decision. The consideration of non-navigable houseboats as more vulnerable was a local opinion based on our understanding of the NPPF and PPG. It is the responsibility of the Broads Authority to determine the vulnerability classification of non-navigable houseboats. However it is acknowledged by internal EA guidance that purpose-built floating structures that cannot be used for navigation (e.g. floating mobile homes or chalets) are often attached to pontoons and therefore more susceptible to being damaged and swept away in a flood. This places their occupants and others at greater risk. If houseboats are to be sited in Flood Zone 3b then they would be considered an inappropriate development type unless they are classed as either water compatible or essential infrastructure. The only type of residential development that is classed as water compatible in the PPG is ‘ancillary accommodation for staff involved in water compatible land uses that are compatible with Flood Zone 3B’. So the LPA should take this into account when making their decisions on vulnerability'.	No change to Guide.

#9	Sarah Luff	LLFA, Norfolk County Council	<p>In section 5 of the report, the documentation introduces the need for a Flood Risk Assessment and a Flood Response Plan. However, there is no mention in this section of the supporting guidance on the preparation of these documents. Please ensure the inclusion of links to:</p> <ul style="list-style-type: none"> • The Environment Agency guidance on the preparation of a Flood Risk Assessment - https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications and https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3 • The Environment Agency's guidance on climate change for flood risk assessments - https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances • The LLFA's Developer Guidance - https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers • The latest ADEPT guidance on emergency flood plans for new development - https://www.adeptnet.org.uk/system/files/documents/ADEPT%20%26%20EA%20Flood%20risk%20emergency%20plans%20for%20new%20development%20September%202019.pdf <p>These links will need to be referenced in other sections throughout the report to ensure the reader or developer has every opportunity to understand the requirements.</p>	Noted. We have a recently adopted Flood Risk SPD that includes a template and guidance on producing a flood response plan.	No change to Guide.
#10	Sarah Luff	LLFA, Norfolk County Council	<p>It should be noted that the ADEPT guidance on emergency flood plans for new developments states that “the LPA will have to form an overall view of its adequacy and be satisfied it can be safely and reasonably achieved before determining the planning application. It is not appropriate to defer consideration of emergency planning matters using pre-commencement planning conditions.”</p> <p>In addition, the ADEPT guidance is clear that while the local authority emergency planners are not statutory consultees and have no explicit statutory requirement to approve or deliver Emergency Plans, the Planning Practice Guidance is clear that they should be consulted by the LPA to advise on proposals that have emergency planning implications for flood risk.</p>	Noted. We do not have Emergency Planners and at the moment we are discussing how our district Emergency Planners can be involved in our applications that have a flood response plan. Adept guidance is referred to in our SPD.	No change to Guide.
#11	Sarah Luff	LLFA, Norfolk County Council	<p>Further to this matter, does the Broads Authority have a map of where all the residential moorings are located and whether both a flood response plan and a management plan have been provided for the residential moorings? How will the Broads Authority ensure that these plans remain current?</p>	At the moment, only one scheme is in operation - at Waveney River Centre in South Norfolk. Permitted on appeal, before the policy of residential moorings was adopted. A condition on that permission was the production of a flood response plan. This was completed in 2018. Another scheme has been permitted - at Marina Quays in Great Yarmouth. The flood response plan formed part of the flood risk assessment and the scheme was approved. Regarding reviewing the flood response plan, this is mentioned in the guidance in the recently adopted Flood Risk SPD.	No change to Guide.
#12	Sarah Luff	LLFA, Norfolk County Council	<p>In section 5, line 143 to line 155, it is indicated that the Environment Agency have stated particular requirements of the FRA and mooring requirements during a time of flood. However, there is no reference as to where these stated Environment Agency requirements/guidance is derived from. Please can you include a reference in the revised version of the guide?</p>	<p>We asked the EA for their thoughts. They responded saying 'In terms of the Flood Risk Assessment requirements, the FRA should include information on;</p> <ul style="list-style-type: none"> • The nature of the flooding in the proposed location and the impact it could have on the development and its users • What needs to be done to ensure it is safe in the event of flooding in the proposed location in the context of its users • What needs to be done to ensure the floating structure will be adequately secured in the event of a flood in the proposed location, considering the risk if the proposed development becomes mobile in the event of a flood (for example, if downstream of the location there are bridges, if the structure became mobile it could cause a blockage and increase flood risk elsewhere) <p>It is a key policy of the NPPF that occupants should be safe in a flood, and that an extreme (0.1%) flood can be managed through evacuation in advance of a flood. Paragraph 40 of the NPPF PPG states 'To demonstrate to the satisfaction of the local planning authority that the development will be safe for its lifetime taking account of the vulnerability of its users, a site-specific flood risk assessment may need to show that appropriate evacuation and flood response procedures are in place to manage the residual risk associated with an extreme flood event'. It also states that 'Proposals that are likely to increase the number of people living or working in areas of flood risk require particularly careful consideration, as they could increase the scale of any evacuation required. To mitigate this impact it is especially important to look at ways in which the development could help to reduce the overall consequences of flooding in the locality, either through its design (recognising that some forms of development may be more resistant or resilient to floods than others) or through off-site works that benefit the area more generally.</p>	Following discussions with the EA, no changes required to the Guide.

				<p>Consequently we consider that it is preferable if the occupants can be safe within the development in the event of an extreme flood, to reduce the consequences of flooding in the locality and the reliance on prior evacuation. Therefore we prefer new more vulnerable development, such as dwellings, to have a refuge as a fall back measure should flood warnings not be received in time for evacuation, although we do advise that it is the LPA and Emergency Planner's role to ensure safety of occupants in absence of safe access and/or refuge and to determine whether the proposed Flood Response Plan can manage the safety of the occupants. Therefore we consider that similar requirements apply here as there will be people living on the residential boats. It is preferable for the residential boat to be able to rise high enough to provide refuge in the extreme event, should flood warnings not be received in time, to provide a fall back safety measure. If this refuge was not provided, then it would be up to the LPA and Emergency Planner to determine whether the development would be safe without a higher refuge.</p> <p>Also paragraph 060 if the NPPF PPG states that 'The first preference should be to avoid flood risk. Where it is not possible, a building and its surrounds (at site level) may be constructed to avoid it being flooded (e.g. by raising it above the design flood level).' While a residential boat might not be a building we consider that the same principles apply so the boat should be able to raise up so that it is not at risk of flooding from a design (and ideally extreme) flood'.</p>	
#13	Sarah Luff	LLFA, Norfolk County Council	In addition, the outcomes of the FRA need to be included in all aspects of the application from facilities location to flood resilient and resistant design.	Noted. The Flood Risk SPD, recently adopted, will be of relevance.	No change to Guide.
#14	Sarah Luff	LLFA, Norfolk County Council	Furthermore, in this section the notation of the flood events could be clearer. Please review and update how these are noted. For example, currently the text states "0.1% (1 in 1000) climate change flood level" which would be better written as "0.1% AEP (1 in 1,000 year) plus climate change", where AEP stands for Annual Exceedance Probability.	We asked the EA for their thoughts. They responded saying 'We agree that 0.1% AEP (1 in 1,000 year) plus climate change would be a better wording, and apologise that AEP or annual exceedance probability was missed out from our previous comments'.	Amend the wording to reflect the comment.
#15	Sarah Luff	LLFA, Norfolk County Council	Currently, the guide presents climate change as an isolated issue from flood risk and the proposed development management. Fundamentally climate change adaption and allowances should be integrated within all aspects of designs and developments for use in the future. The application of climate change allowance within flood risk assessment and design is compulsory to represent the future scenario. Therefore, please can the climate change check list be integrated within all aspects of the design and management requirements for residential moorings? For reference, this approach is in line with the developments on land within the county.	The climate change checklist is from the Local Plan which was adopted in May 2019. Other policies in the Local Plan will apply to schemes as well as the Flood Risk SPD. Both the Local Plan and SPD refer to a climate smart approach to development. The SPD also refers to the allowances.	No change to Guide.
#16	Sarah Luff	LLFA, Norfolk County Council	<p>Within both section 6 and 9, there is initial guidance regarding the requirement for storing waste, however there is no guidance on the consideration to pollution and water quality management in flood risk areas should be given during periods of high flows. Please can further information on this matter be included on the guidance?</p> <p>Follow up: We agree that the matter of the consideration to pollution and water quality management in flood risk areas should be given during periods of high flows is not just relevant to residential moorings. We would suggest that if you have guidance that applies to all sites that you cross reference to the relevant guidance within this (and others) guide as appropriate. Regarding noise, it is more a point of raising inconsistency within the guidance document. If it is raised as a specific concern associated with residential moorings, then it is appropriate to provide guidance even if it is only a cross reference to other guidance.</p>	Make change	Make change to section 6 and 9 to refer to location of waste storage near to water.
#17	Sarah Luff	LLFA, Norfolk County Council	The information in section 6 and 9 appears to be interlinked with section 9 looking at the policy and section 6 looking at the management plan. The section stating the policy would normally be presented first in a guidance document, then naturally lead to the section with the management measures relating to the policy. We would suggest that section 9 should come before section 6 or even for the two sections to be combined.	We are content with the order of the document.	No change to Guide.
#18	Sarah Luff	LLFA, Norfolk County Council	In section 9, the policy extract that is provided does not cross reference either internally or externally to the document. Please can this be addressed.	We will remove policy. It was useful for when consulting on the Guide, but reference to the policy in the final document is considered adequate.	Remove policy from guide and cross refer to Local Plan.

#19	Sarah Luff	LLFA, Norfolk County Council	The guidance document notes the importance of being able to provide a power supply to reduce pollution and noise issues, yet no mention of renewable energy facilities is made or encouraged within the guide. Please can further information and suitable cross referencing to other policy documents be made within the guide?	We do not have a policy relating to renewable energy for residential moorings. We do have a general renewable energy and energy efficiency policy in our recently adopted Local Plan (section 16 of the Local Plan). We could add reference when we refer to low impact living.	Add reference to renewable energy and our local plan policy: 9.3.4 Renewable/low carbon energy An operator may wish to consider renewable/low carbon energy. The Local Plan for the Broads has policies relating to this: see page 64 of the Local Plan for the Broads.
#20	Sarah Luff	LLFA, Norfolk County Council	With regard to the water supplies and the discussion on the Environment Agency's regulation of abstractions, the inclusion of a link to the Environment Agency's abstraction guidance would be useful to the readers.	Asked the EA for their guidance. They said they are not aware of a particular guide itself but that we could include guidance within the supporting text for applying for a licence here https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence or managing a licence here https://www.gov.uk/guidance/manage-your-water-abstraction-or-impoundment-licences-online	Add links to text at 9.1.2
#21	Sarah Luff	LLFA, Norfolk County Council	<p>The sewerage provision is a requirement at the proposed residential moorings. As these provisions are likely to be located in an area at flood risk, further guidance and appropriate cross references should be included with in this guidance to consider operation and pollution prevention during high flow conditions and flood events.</p> <p>Follow up: We agree that the matter of the consideration to pollution and water quality management in flood risk areas should be given during periods of high flows is not just relevant to residential moorings. We would suggest that if you have guidance that applies to all sites that you cross reference to the relevant guidance within this (and others) guide as appropriate. Regarding noise, it is more a point of raising inconsistency within the guidance document. If it is raised as a specific concern associated with residential moorings, then it is appropriate to provide guidance even if it is only a cross reference to other guidance.</p>	Asked the EA for their guidance. They said that 'in terms of covering flood risk off you could highlight that a Flood Risk Assessment may be required for these facilities. A permit will also be required for any development within 8m of the main river. You could reference that the sewerage provision for the residential moorings must have adequate pollution prevention measures in place at all times (and that would also cover any flood events)'.	Add text about flood risk assessments to section 5. Text about 8m is already in guide, so not change. Add text to 9.1.3 in relation to pollution prevention.
#22	Sarah Luff	LLFA, Norfolk County Council	Within the guidance document, there was an initial mention of noise within the guidance as a consideration, however, no further guidance was then provided on how to manage and address the issue. Please can further information and suitable cross referencing to other policy documents be made.	Whilst noise is a consideration, marinas and boatyards are areas where work is taken place, so those living on boats in those areas should expect a certain level of noise. We already refer to the amenity policy so noise pollution is a consideration. We would expect the terms and conditions the are signed up to by someone living on a boat at a marina or boatyard to have a clause relating to noise.	No change to Guide.
#23	Sarah Luff	LLFA, Norfolk County Council	The guidance indicates the provision of amenity space and landscaping is necessary, although it should be noted that any development of facilities should not reduce the flood storage capacity of the floodplain or impede flood flow routes. Further information regarding flood storage compensation and assessment is available in the LLFA's developer guidance.	Noted and agreed. Will amend text.	9.1.6 Amenity space and landscaping The Amenity policy of the Local Plan (DM21) requires schemes to provide a 'satisfactory and usable external amenity space to residential properties in keeping with the character of the surrounding development'. It may also be appropriate to provide landscape enhancements of the land associated with the Residential Mooring to improve the amenity of the area in connection with the development. Please note that development of facilities should not reduce the flood storage capacity of the floodplain or impede flood flow routes
#24	Sarah Luff	LLFA, Norfolk County Council	In addition, there may be the need for ordinary watercourse consenting depending on the status of the watercourses involved. Further information is available online at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management . The LLFA observes that information is provided on the Environment Agency's environmental permitting for flood risk activities however, no information is presented regarding the need for consenting on ordinary watercourses. Please could the guide include suitable mention and reference on these matters?	Noted and agreed. Will amend text.	9.3.1 Informative – Permits 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: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits . Anyone carrying out these activities without a permit where one is required, is breaking the law. Section 23 of The Land Drainage Act 1991 requires applicants who wish to affect the flow of an ordinary watercourse, for instance to culvert, dam, weir or install a headwall into a watercourse, to obtain consent from the drainage board concerned.

#25	Sarah Luff	LLFA, Norfolk County Council	Where new facilities are to be built, there is the potential to increase the area of impermeable surfaces. The LLFA will expect the use of sustainable drainage systems to be included in the proposals to prevent an increase in surface water runoff rate and volume. Further information is available in the LLFA's developer guidance online at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management	Noted and agreed. Other policies of the Local Plan will be used when assessing schemes. Policy DM6: Surface water run-off requires all development proposals will need to incorporate measures to attenuate surface water run-off in a manner appropriate to the Broads. Add reference to surface water in section 5.	At the start of section 9, add: The Local Plan also requires all development to consider and address surface water run off and this may be relevant to your scheme, especially if you plan to provide surfacing that may be impermeable.
#26	Sarah Luff	LLFA, Norfolk County Council	Facilities, such as storage lockers, are presented as possible solutions. Further guidance regarding the design of facilities is required to ensure that proposed structures are designed in a flood resilient or resistant manner. Furthermore, these features should be appropriately secured to prevent excessive movement that could cause blockages downstream should they become mobile.	Noted. We will make that point in the text.	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). It is also important that lockers are flood resilient and resistant to ensure that, at times of flood, they are not mobile and do not cause blockages in waterbodies.
#27	Sarah Luff	LLFA, Norfolk County Council	In section 9.3, there is mention of low impact boating, although no further information or guidance is provided. This is a missed opportunity to contribute towards net zero to require and direct developers and boaters towards low carbon or sustainable solutions, such as renewable energy supplies (windmills are intrinsic and historical features of this landscape), sustainable drainage and compensating flood storage areas where landward development would reduce it. Please include further information of how developers and residents can contribute to improving the suitability of their community.	Having consulted the RBOA, there is no guidance per se, it is about living on a boat in a low impact sort of way. It refers to how the person lives on the boat. That being said, we will improved reference to renewable energy as per row number 19 above.	No change to Guide.
#28	Sarah Luff	LLFA, Norfolk County Council	In relation to document structure and presentation there are a number of potential improvements that could be made. The questions and case studies are useful although the way they are structured within the report and their headings is confusing. Please can this be reconsidered and addressed? Follow up: As previously stated, the questions and case studies provide useful information. However, the as you have eluded the current document structure lacks flow and the location of these sections is means the information could be missed. The question and case study information is intertwined in an unclear way and our suggestion would be to have better separation between the guidance and the case studies. Perhaps there would be merit in having a case studies in boxes. Further maybe the sub-section title should not be posed as a question to give you more scope to discuss matters of concern within the section. In addition, you may want to review your document from an accessibility perspective too.	Noted, but we are content with the structure.	No change to Guide.
#29	Sarah Luff	LLFA, Norfolk County Council	The key messages section could be moved to the front of the document and used as a basis to prepare an executive summary.	Key messages - could be at the start of the document, but also acts as a conclusion. Do not intend to have an executive summary as the document is only around 20 pages long.	Move key messages to the start of the document.
#30	Sarah Luff	LLFA, Norfolk County Council	While the links section could be reduced so that all background information could be provided in an appendix and links to national and local policies should be woven into the document.	Regarding links and extra information - noted, but we are content with where it is.	No change to Guide.
#31	Sarah Luff	LLFA, Norfolk County Council	We would suggest that the text in lines 363 to 367 should be reconsidered. At present, it lacks strength. For example, the sentence on line 366 and 367 could be improved by being re-written as “We encourage you to contact the Broads Authority to discuss your application prior to submission.”	We consider the text robust and clear.	No change to Guide.
#32	Sarah Luff	LLFA, Norfolk County Council	Regarding the current appendices, some of these could be removed or reduced. For example, Appendix A could be presented as a link within the policy section as only one internal cross referencing to Appendix A has been made in the introduction, therefore it has no function in actively supporting the report. Appendix B is generic information that could be hosted outside of the report and referred to. While Appendix C and D could remain either as appendices (although better internal cross referencing would be needed) or alternatively the checklists could be included within the document text.	Appendix A - will consider removing this as yes, could just cross refer to the Local Plan. Appendix B is something we put in all our consultation documents. It will not be in place in the final version. Appendix C and D - it is appropriate to have these at appendices and it follows the other guides that we have in place.	Remove policy from guide and cross refer to Local Plan. Remove appendix B.

#33	Mark Norman	Highways England	The proposals are unlikely to affect the Strategic Road Network in any way and therefore, we have no comments to make on the proposed guidance.	Noted.	No change to guide.
#34	Liam Robson	Environment Agency	Treatment Hierarchy: We see that in response to our comments about sewerage management, there is now additional text added to explain the treatment hierarchy with a presumption to mains sewer network where possible. There is also text added stating that it is illegal to discharge sewage from boats direct into the river. Thank you for amending this. The new text added covers the points we previously raised, and we have no other water quality concerns	Support noted.	No change to Guide.
#35	Liam Robson	Environment Agency	Flood Risk: We are satisfied with the changes you have made to the original comments we raised in relation to flood risk. We have however added some comments to you in response to the LLFA as you requested as well as those requested for tourism houseboats. Overall, we are satisfied with the changes made to the draft document although you might want to change some of the wording once you have reviewed our response to the LLFA below. As always, please do get in touch should you have any questions.	Noted. See row 14.	No change to Guide.
#36	Paul Harris	South Norfolk DC	Thank you for consulting South Norfolk Council and considering our previous representations on this document. The Council remain of the opinion that the document could still benefit from more clearly emphasising the information that which would be used to determine a planning application, and that which is a useful resource to site promoters about good practice and achieving best quality outcomes. However, we recognise that you have previously considered our representation in this regard and the Council does not wish to add further comments at this point.	Noted.	No change to Guide.
#37	Paul Harris	South Norfolk DC	We note that the guide refers to the requirement for new residential moorings to be within 800m or 10 minutes' walk of at least three key services. We recognise that these distances are specified within the adopted policy but are concerned that these distances may be overly restrictive in a Broads landscape with its inherent physical and natural constraints.	The reference to walking distance from the key services was required by the Inspector to enable more areas to meet the locational criteria. As you rightly point out, that wording is in adopted policy and we cannot change policy through this guide. As and when we review the policy, discussions can be had about the locational criteria.	No change to Guide.
#38	Paul Harris	South Norfolk DC	The Council supports references to ensuring that adequate waste disposal facilities are provided.	Support noted.	No change to Guide.
#39	Paul Harris	Broadland DC	Thank you for consulting Broadland District Council and considering our previous representations on this document. The Council remain of the opinion that the document could still benefit from more clearly emphasising the information that which would be used to determine a planning application, and that which is a useful resource to site promoters about good practice and achieving best quality outcomes. However, we recognise that you have previously considered our representation in this regard and the Council does not wish to add further comments at this point.	Noted.	No change to Guide.
#40	Georgia Teague	Suffolk CC	At Section 5 text in the box under a), reference is made to vessel moorings being too tight or loose and consequences. It would be useful to add that vessels that come adrift from their moorings, either in flood conditions or in normal situations could give rise to an increase in flood risk if they drift and block or create a water flow restriction of a waterway on the Broads.	Noted. We could add this to the Guide as another reason for ensuring the boat is moored well.	Add reference to the potential for a boat to block water flow at times of flood: Regarding a) above, please note that vessels that come adrift from their moorings, either in flood conditions or in normal situations, could give rise to an increase in flood risk if they drift and block or create a water flow restriction of a waterway on the Broads.
#41	Georgia Teague	Suffolk CC	The residential moorings guide mentions that such moorings should avoid impacts on the local landscape character; it also requests storage facilities for residential paraphernalia, to maintain the local character and amenity value. It does not go into any detail.	The approach to storage facilities will be a local site-specific approach, proposed by the operator. We include an image to show how this has been done elsewhere. As for the detail of amenity and landscape, the other policies of the Local Plan will be of relevance.	No change to Guide.
#42	Georgia Teague	Suffolk CC	It is suggested that this document could include further detail as to how landscape will be protected, in order to retain local character.	All relevant policies of the Local Plan will be considered in determining residential moorings schemes, including the landscape section of the Local Plan.	No change to Guide.
#43	Georgia Teague	Suffolk CC	SCC would also like to raise the issue of would landscape be covered by other, standard, policies?	All relevant policies of the Local Plan will be considered in determining residential moorings schemes, including the landscape section of the Local Plan.	No change to Guide.
#44	Georgia Teague	Suffolk CC	As stated in the documents, any new parking provision should follow the local authorities parking guidance. For Suffolk there is no specific mention of mooring, but as they are so few it is not likely that SCC would change the current guidance. It is suggested that this could be covered by making contact with the DM team.	It is noted that there are no parking standards for moorings. Suffolk, as Highways Authority, will be consulted on schemes for residential moorings, in the usual way.	No change to Guide.
#45	Georgia Teague	Suffolk CC	SCC would also note that any new access to the public highway may need planning permission from the Local Planning Authority, and that no work can be done within the public highway and that includes verges and public rights of way without the permission of the highway authority.	Noted. All relevant policies in the Local Plan will be considered and our transport related policy will be of relevance. Suffolk, as Highways Authority, will also be consulted on schemes for residential moorings, in the usual way.	No change to Guide.
#46	Jessica Nobbs	Water Management Alliance	No comment	Noted.	No change to Guide.
#47	Rachel Bowden	Natural England	Natural England has no comments to make regarding the consultation on these guides.	Noted.	No change to Guide.

#48	Rachel Bowden	Natural England	<p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p> <p>Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.</p> <p>The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice</p>	Generic advice noted.	No change to Guide.
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Residential Moorings Guide

[Adopted March 2021](#)

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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 moorings¹ 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 [page 115 of the Local Plan](#)).

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.

The key messages of this Guide are:

- 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 A](#).
- 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 B](#).

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

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 Involvement². 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 House³.~~
- ~~• 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 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 8 weeks from 25 September to 20 November 2020. 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.~~

~~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),~~

² 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

³ 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.

~~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.~~

The Residential Moorings Guide was consulted on twice during the course of 2020. The first consultation ran from 12 March to 24 April 2020. The second consultation ran from 25 September to 20 November 2020. The comments that were received, the Broads Authority's response to the comments and the amendments which comments may have resulted in, can be found here: [xxxxxx](#)

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 Broads⁴ 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
 - 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

⁴ 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](#)

- 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 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 plan⁵. See policy DM5 of the Local Plan for the Broads as well as the Flood Risk SPD⁶.

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 through a site-specific flood risk assessment that will be required for residential moorings.

- 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.

Regarding a) above, please note that vessels that come adrift from their moorings, either in flood conditions or in normal situations, could give rise to an increase in flood risk if they drift and block or create a water flow restriction of a waterway on the Broads.

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 year) plus 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

⁵ 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

⁶ 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

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.

Turning to climate change, you will be required to fill out a [climate change checklist⁷](#). 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 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.

⁷ Climate Change checklist: https://www.broads-authority.gov.uk/_data/assets/word_doc/0033/259917/Climate20change20checklist20template.docx

- c) Waste management – sewerage and rubbish and recycling. Methods for storage and removal need to be clearly identified with particular consideration given to location of storage and proximity to water and the effect of high water flows.
- d) Management of increased vehicular movements.
- 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).

[The Local Plan also requires all development to consider and address surface water run off and this may be relevant to your scheme, especially if you plan to provide surfacing that may be impermeable.](#)

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 suitable to the Broads or may not be suitable 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 B](#) 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 which can cause light pollution so providing these at sites in more rural areas or on edge of settlements will need careful consideration.

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

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



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

9.1.2 Water

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 water to 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 from the Environment Agency. If the chosen site for the additional moorings already holds an abstraction licence, there would need to be consideration of the impacts from additional needs as a result of the new moorings. [Details on applying for a licence here https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence](https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence) or [managing a licence here https://www.gov.uk/guidance/manage-your-water-abstraction-or-impoundment-licences-online](https://www.gov.uk/guidance/manage-your-water-abstraction-or-impoundment-licences-online).

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

Case Study – Cowroast Marina

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

9.1.3 Sewerage

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. [The Environment Agency emphasise the need for adequate pollution prevention measures in place at all times.](#) We would assess this part of the application against policy DM2 and as set out in that policy and connection 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 (Water Resources Act 1963, Rivers (Prevention of Pollution) Acts, 1951-1961, BYELAWS Regulating the use of boats fitted with sanitary appliances).

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

Case Study – BWML moorings

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

9.1.4 Rubbish collection

You will need to address how waste arising from those living on the boats is dealt with, [with particular consideration given to location of storage and proximity to water and the effect of high water flows.](#) Your marina or boatyard may have a system or process to deal with rubbish already. We recommend that you contact your District/Borough/City Council to discuss waste management.

Q: How will you deal with rubbish (including recyclable materials) arising from the boats on residential moorings? [Where will you locate the store so it is not affected by high flows?](#)

9.1.5 Cycle and Car parking

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

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

9.1.6 Amenity space and landscaping

The Amenity policy of the Local Plan (DM21) requires schemes to provide a ‘satisfactory and usable external amenity space to residential properties in keeping with the character of the surrounding development’. It may also be appropriate to provide landscape enhancements of the land associated with the Residential Mooring to improve the amenity of the area in connection with the development. Please note that development of facilities should not reduce the flood storage capacity of the floodplain or impede flood flow routes.

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). It is also important that lockers are flood resilient and resistant to ensure that, at times of flood, they are not mobile and do not cause blockages in waterbodies.

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.

Case Study - Cowroast Marina

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

Case Study – Priory Marina

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

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



Post boxes

In relation to post boxes, Norfolk Police say that 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).

9.3 Other considerations

9.3.1 Informative – [Permits](#) [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: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

Section 23 of The Land Drainage Act 1991 requires applicants who wish to affect the flow of an ordinary watercourse, for instance to culvert, dam, weir or install a headwall into a watercourse, to obtain consent from the drainage board concerned.

9.3.2 Security

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

9.3.3 Low Impact Life on Board

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.

9.3.4 Renewable/low carbon energy

An operator may wish to consider renewable/low carbon energy. The Local Plan for the Broads has policies relating to this: see page 64 of the Local Plan for the Broads.

10. Key messages – reminder

- i) You need to consider flood risk through a flood risk assessment and flood response plan.
- j) You need to consider the impacts of Climate Change.
- k) A management plan is required that details how you will manage the residential moorings. A template is included at [Appendix A](#).
- l) You need to keep a register of those who are living on the residential moorings.
- m) You should contact your District Council to confirm the approach to Council Tax.
- n) You need to provide adequate facilities for those living at the residential moorings. You may already have many of these in place.
- o) 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.
- p) A template to address many of the requirements in the policy and guide is included at [Appendix B](#).

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.

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

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

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

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

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

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'. The RBOA ensure they liaise with Navigation Authorities like the Broads Authority. <https://www.rboa.org.uk/>

RBOA Code of Good Practice. The Association would encourage all boaters who live afloat to follow this Voluntary Code of Good Practice: <https://www.rboa.org.uk/code-of-good-practice/>

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

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>app>aweigh Or play.google.com>store>apps>details>id=com

BOAT SECURITY ADVICE - NORFOLK & SUFFOLK POLICE. Norfolk & Suffolk Police advice on water safety and boat security:
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~~

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

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

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

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

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

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

~~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).~~

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

~~(Note: Refer to www.gov.uk/guidance/pollution-prevention-for-businesses for information on pollution prevention measures)~~

Reasoned Justification

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

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

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

~~The key services referred to in the policy could be three or more of the following. These key services 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~~
 - ~~○ 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)~~

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

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

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

~~For the purposes of this policy, a 'residential mooring' is 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.~~

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

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

- ~~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.~~

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

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

~~Meeting the need for residential moorings~~

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

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

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

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

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

~~The Residential Moorings Topic Paper (revised 2017)⁸ and its addendum⁹ has more information on meeting the need for residential moorings.~~

⁸ ~~https://www.broads-authority.gov.uk/_data/assets/pdf_file/0019/1020475/Assessment-of-resi-moorings-nominations-update-and-topic-paper-july-2017.pdf~~

⁹ ~~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 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

~~e) to ask to have all or some of your data deleted or corrected~~

~~d) to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/> or telephone 0303 123 1113.~~

7. ~~Your personal data will not be used for any automated decision making.~~

Appendix A – 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 B – 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? How will the electricity unit impact on/add to light pollution? Please mark on a plan of the site.	
5. How will you provide the residential moorings with potable water? Please mark on a plan of the site.	
6. How will you deal with sewerage arising from the boats on residential moorings? Please mark on a plan of the site.	
7. How will you deal with rubbish (including recyclable materials) arising from the boats on residential moorings? <u>Where will you locate the store so it is not affected by high flows?</u> Please mark on a plan of the site.	
8. How will you address car and cycle parking for those who are using residential moorings? Please mark on a plan of the site.	
9. How will you address amenity space and landscaping? Please mark on a plan of the site.	
10. How will you provide storage for those who are using residential moorings? Please mark on a plan of the site.	
11. How does your scheme address light pollution? How does your scheme maintain dark skies?	