

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 seen more sunken residential boats than 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>	<p>Noted. We have a recently adopted Flood Risk SPD that includes a template and guidance on producing a flood response plan.</p>	<p>No change to Guide.</p>
#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>	<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.</p>	<p>No change to Guide.</p>
#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>	<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.</p>	<p>No change to Guide.</p>
#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>	<p>Following discussions with the EA, no changes required to the Guide.</p>

				<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	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. 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.	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)'. 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.	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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