

Option/ paragraph number	Comments
L1 –L5	NSBA would welcome streamlining and simplification of BA procedures, coupled with a resultant reduction in resources and associated costs. We feel that policies L1 – L5 would tend to complicate procedures and, in the case of L2 – L5 are generally imprecise and difficult to enforce.
L6	NSBA would support this Option.
L7	NSBA would consider this policy too draconian and feel it should only be applied for extreme planning cases.
L8	As worded, this policy is too wide-ranging and non-specific.
L10	NSBA would have concerns about any tree planting (or indeed physical construction) which threatened to reduce available wind for sailing on the Broads Navigation. The removal of trees and scrub should be encouraged where it benefits sailing and wildlife – as well as restoring traditional Broadland landscapes. The recent work by, we believe, English Nature, opposite Horning Church is an excellent example and similar projects should be encouraged.
L14	NSBA would welcome restrictions on lighting sited in such a way as to pose potential hazards to navigation and/or to affect helms' night vision.
L31 – L32	The cultural heritage of the Broads includes events and activities which themselves rely on infrastructure support. NSBA would be concerned if the Authority sought to remove or discourage that infrastructure support, thus making the events and activities unviable.
2.3	NSBA would welcome a comment in this clause about lights which create navigational hazards or difficulties.
N7	The Authority should adopt a proactive stance for the re-instatement and maintenance of staites with public rights of way thereto and mooring rights for navigators.
N8, N10	NSBA would support these options.
N9	NSBA would strongly oppose this option and questions the basis for the opening statement.
N11	NSBA would welcome a policy option which required developers to maintain or provide suitable alternative arrangements for existing waterside facilities essential to the use of the navigation, e.g. toilet pump-out, fuel supply, water supply, etc.
N12	NSBA would oppose this option.
NR2 / NR3	NSBA suspects that these policies are neither practical nor deliverable and certainly not in keeping with the Authority's statutory duty to have regard to the economic and social interests of those who live or work in the Broads.
NR5, NR7	NSBA understand this is already BA policy in respect to the BESL works. We

	believe its effectiveness should be reviewed, for example in respect of the New Cut.
NR15	NSBA consider this option Luddite.
NR18 -21	NSBA are concerned that these policies are too restrictive, are in practical terms unworkable and will encourage a reliance on pseudo-science and “box-ticking” at the expense of common sense.
EP6	NSBA consider that 100 berths would be a more appropriate (and sustainable) threshold. The wording “unless adjacent facilities are within a quarter mile of the new marina” is well intentioned but unrealistic. It could result in several large marinas being established – without pump out facilities – on the basis that an existing facility could be found within a quarter mile. Result – lack of adequate capacity. Does “permanently moored” mean “never moved”? It is also important to protect the position (embodied in the BSS and elsewhere) of traditional Broads sailing craft exempted from the need to install holding tanks.
EP7	NSBA understands this to refer to “Elsan” type toilet waste. It is possible that only a limited number of craft make use of this type of toilet. It is important to ensure appropriate disposal without imposing unnecessary costs associated with unnecessary facilities.
EP13	NSBA consider that this policy might prevent otherwise acceptable proposals at places where mains power supplies are not available and would not necessarily be welcome. – for example a number of BA public moorings, certain sailing club facilities, wilderness moorings, etc. The use of the word “encouraged”, rather than “required”, might be preferable.
WM1 / WM2	NSBA consider that these two options can stand together and could be supported.
WM3	NSBA consider that such proposals should also not have any adverse effect on flood alleviation.
WM4	NSBA consider this option to be too restrictive.
WM6	NSBA would support this option. It would be up to the authority to show that provision of the moorings within the local context and in relation to other changes in the locality would result in increased boating.
WM7	NSBA consider this option to be too restrictive. We also oppose the assumption that there should be no increase in mooring provision for private boats or increase in the number of private boats. The trend in the Broads is for the number of commercial hire craft to reduce and for the number of private boats to increase. A policy preventing provision of moorings for those boats would not be practical and would damage and distort the local economy. It certainly should not be introduced without careful consideration of the likely consequences, including the implications for toll income.
WM8	While NSBA would support measures to maintain and where feasible increase the availability of visitor moorings, it feels that other approaches might achieve the same objective. E.g. the use of red/green flags to indicate the availability of temporary space on permanent moorings. It also questions the metrics proposed. How long are two moorings? Or how wide do they need to be? Who will police

	this policy and with what resources?
WM9	NSBA would support this option.
WM10	NSBA envisage potential problems with this option. When does a bankside mooring become a plot? Would the authority object to a wind generator or solar panel to provide sustainable battery recharging?
WM12	We suggest that a better approach would be to require developers to take all available practical measures to prevent any additional sediment input. In the event that additional input is caused, a contribution would be required towards the cost of additional navigation upkeep.
WM13	NSBA would support this policy.
WM14	NSBA would strongly oppose this option.
WM15	This option would seem better suited to the Sedimentation Management Strategy than to the current document.
WM16 / WM17	It might be better to merge these two policies. There is also a need to enable navigators to moor (between tides) as a right and mooring should only be limited in strictly justified cases. Historic mooring custom and practice should be sustained.
AT5 - 9	NSBA would support these options.
FR1	NSBA would support this policy.
FR2	We suspect that this would not make a significant difference to the decision outcome for the majority of Broadland.
FR3	We think not.
FR4	We would support this policy.
FR5	We would support this policy if “for any beneficial use” were replaced with “depending on the vulnerability classification for the proposed use”.
FR6	We would not support this policy.
FR7	We would suggest the addition of “subject to acceptable arrangements for access and escape routes in times of flood”.
FR8/FR9	We suggest replacing “as they meet” with “if they meet”.
FR10	We would support this policy.
FR11	We would support this policy.
FR12	We would not support this policy.
FR14	We doubt that agreement would be reached, but suggest 50 years.
General	It is important to foster a living community providing work and leisure

opportunities for all ages, backgrounds and interests with the infrastructure necessary to support that community (i.e. utilities, transport, education, social services, leisure facilities, legal framework, etc.). Development should be appropriate in scale, fitting in with the existing land- and townscapes and matching local vernacular styles.

Tourism is an important economic driver for the area and much of that tourism is generated by the facilities for boating and nature watching (which, in its turn, largely depends on boating as a means of access). Local businesses need to be encouraged to address the available markets and visitors need to feel welcome and be encouraged to return. That welcome is evidenced as much by the provision of adequate facilities as by public relations initiatives.

We would caution against planning policies written in too restrictive terms as we believe they are:

- a) unlikely to foresee all future eventualities, and
- b) more likely to stunt economic development, encouraging stagnation rather than investment.

We have some doubts about the consistency of the document (possibly due to the range of options presented) and we believe it will be important to check the final version for consistency to ensure that a development permitted or encouraged under one policy is not prevented by one elsewhere in the document.

Throughout the document there are references to "National Park". The document should be reviewed and recast to reflect the correct legal status of the area and the authority.