



# **North Norfolk Local Plan Examination**

## **Schedule of Representations (Policies Map Changes)**

September 2025

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# Schedule of Representations (Policies Map Changes)

## Introduction

This document sets out the representations *as made* by respondents during the public consultation on the North Norfolk Local Plan Proposed Policies Map Changes, which took place between 6 August and 17 September 2025. In total 9 representations were received from 7 respondents. **This document also includes an officer summary and response to the comments made.**

This report is arranged in Policies Map Change order. You can navigate to specific sections using the Bookmarks menu. If not visible, this can be added by selecting: View > Show/Hide > Navigation Panes > Bookmarks

## Prescribed Consultation Response Form

The formal consultation response form prescribed key questions seeking specific views in relation to the **Schedule of Policies Map Changes to the North Norfolk Local Plan**. This followed standard practice and was necessary in order to encourage and enable feedback of the relevant information required by the inspector for consideration through the ongoing examination. The prescribed response form sought the completion of a separate response for each Policies Map Change proposed within the document. Guidance and support were provided in order to assist those wishing to respond.

A proportion of the responses received were not made using the prescribed consultation response form and were received in other formats, such as via email or letter. Many of these responses were not clearly defined, were related to multiple topic areas, or related to other documents which were not the focus of this consultation. In order to prepare this report, the Council undertook an exercise to split such comments and/or append them to the relevant section of the document.

## Blank Fields

There is one main reason for blank fields within this report:

- A response to the question was not provided (including in responses sent as emails or letters).

## Attachments

In many cases the representation was provided as an attachment, rather than using the prescribed consultation response form. Where attachments have been submitted these are highlighted '**SEE ATTACHED FILE**' and are available to view via a web link.

The original consultation responses can be viewed in full on the [Consultation Portal](https://consult.north-norfolk.gov.uk)<sup>1</sup>. All consultation and other supporting documents can be viewed in the [Examination Library](http://www.north-norfolk.gov.uk/localplanexamination)<sup>2</sup>.

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<sup>1</sup> <https://consult.north-norfolk.gov.uk>

<sup>2</sup> [www.north-norfolk.gov.uk/localplanexamination](http://www.north-norfolk.gov.uk/localplanexamination)

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# Schedule of Representations: Main Modifications

## MC1

<b>Question 1 - Document Selection</b> * Main Modifications * Policy Map Changes	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC1
<b>ID</b>	MMC145
<b>Response Date</b>	12/09/2025 10:19:00
<b>Full Name</b>	
<b>Organisation</b>	Glavenhill Strategic Land
<b>Agent Full Name</b>	Mr Philip Atkinson
<b>Agent Organisation</b>	Lanpro Services
<b>Question 3 - Legal Compliance</b> * Yes (Support) * No (Object) * No Comment / Unsure	No Comment / Unsure
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)
<b>Question 6 - Reasons Not Sound</b> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
<b>Question 7 - Explanation of Soundness Reasons</b>	<b>SEE ATTACHED FILE</b> Glavenhill supports the change (already previously made in error) to include additional Small Growth Villages on Figures 3, 5, 6, 7, 8, 9, 10, 11 and supports the change (MC5) to include a settlement boundary for Langham as an additional Small Growth Village.
<b>Attached File (where submitted)</b>	<a href="#">MMC145 - Representations Glavenhill Langham to NNDC LP 12 9 25.pdf</a>
<b>Officer Summary</b>	Glavenhill supports the change (already previously made in error) to include additional Small Growth Villages on Figures 3, 5, 6, 7, 8, 9, 10, 11 and supports the change (MC5) to include a settlement boundary for Langham as an additional Small Growth Village.
<b>Officer Response</b>	Support noted.

## MC2

<b>Question 1 - Document Selection</b> * Main Modifications * Policy Map Changes	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC2
<b>ID</b>	MMC193
<b>Response Date</b>	16/09/2025 13:44:00
<b>Full Name</b>	Mrs Debbie Mack
<b>Organisation</b>	Historic England
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Question 3 - Legal Compliance</b> * Yes (Support) * No (Object) * No Comment / Unsure	No Comment / Unsure
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * Yes (Support) * No (Object) * No Comment / Unsure	No (Object)
<b>Question 6 - Reasons Not Sound</b> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
<b>Question 7 - Explanation of Soundness Reasons</b>	<p>North Norfolk DC had agreed to add additional text to the key of Figure 5 to read: Suitable Wind Energy Areas (subject to site specific impact assessments) (See e-mail dated 21.5.24).</p> <p><b>Suggested change:</b></p> <p>Add the following text to the key 'Suitable Wind Energy Areas (subject to site specific impact assessments)'.</p>
<b>Attached File (where submitted)</b>	
<b>Officer Summary</b>	Requests additional text to the key of Figure 5 to read: Suitable Wind Energy Areas (subject to site specific impact assessments).
<b>Officer Response</b>	<p>Additional supporting text has been added as a modification with regard to Onshore Wind Energy, which states: ...'The LSA identifies sensitive landscapes and some heritage assets, which should be used as a starting point for more detailed supporting documents to accompany planning applications. These should include heritage impact assessments where the significance of heritage assets is likely to be affected, and landscape visual impact assessments, including visualisations.'</p> <p>As site-specific heritage impact assessments are not always required, it is not considered that the wording change being sought is explicitly required for the indicative map (Figure 5). No change considered necessary.</p>

## MC3

<b>Question 1 - Document Selection</b> * Main Modifications * Policy Map Changes	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC3
<b>ID</b>	MMC194
<b>Response Date</b>	16/09/2025 13:44:00
<b>Full Name</b>	Mrs Debbie Mack
<b>Organisation</b>	Historic England
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Question 3 - Legal Compliance</b> * Yes (Support) * No (Object) * No Comment / Unsure	No Comment / Unsure
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)
<b>Question 6 - Reasons Not Sound</b> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
<b>Question 7 - Explanation of Soundness Reasons</b>	We welcome the addition of the 'Suitable Wind Energy Areas' constraint layer to the Policies Map.
<b>Attached File (where submitted)</b>	
<b>Officer Summary</b>	Supports the addition of the 'Suitable Wind Energy Areas' constraint layer to the Policies Map.
<b>Officer Response</b>	Support noted.

## MC4

<b>Question 1 - Document Selection</b> * Main Modifications * Policy Map Changes	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC4
<b>ID</b>	MMC195
<b>Response Date</b>	16/09/2025 13:44:00
<b>Full Name</b>	Mrs Debbie Mack
<b>Organisation</b>	Historic England
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Question 3 - Legal Compliance</b> * Yes (Support) * No (Object) * No Comment / Unsure	No Comment / Unsure
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)
<b>Question 6 - Reasons Not Sound</b> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
<b>Question 7 - Explanation of Soundness Reasons</b>	We welcome the addition of Listed Buildings' and 'Scheduled Monuments' constraint layers to the Policies Map to provide additional context.
<b>Attached File (where submitted)</b>	
<b>Officer Summary</b>	Supports the addition of Listed Buildings' and 'Scheduled Monuments' constraint layers to the Policies Map to provide additional context.
<b>Officer Response</b>	Support noted.



## MC12

<b>Question 1 - Document Selection</b> * Main Modifications * Policy Map Changes	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC12
<b>ID</b>	MMC21
<b>Response Date</b>	17/09/2025 16:28:12
<b>Full Name</b>	Mrs Sarah Hurry
<b>Organisation</b>	Rudd Family (Mr & Mrs Rudd, Mr & Mrs Hurry, Mr & Mrs Bain and their children)
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Question 3 - Legal Compliance</b> * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)
<b>Question 6 - Reasons Not Sound</b> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
<b>Question 7 - Explanation of Soundness Reasons</b>	Further to submission of evidence and discussion at the independent examination session in March 2024, we support the deletion of the "open land area designation".
<b>Attached File (where submitted)</b>	
<b>Officer Summary</b>	Supports the deletion of the Open Land Area designation from land off Warren Road, High Kelling.
<b>Officer Response</b>	Support noted.

## MC24

<b>Question 1 - Document Selection</b> * Main Modifications * Policy Map Changes	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC24
<b>ID</b>	MMC137
<b>Response Date</b>	15/09/2025 08:54:15
<b>Full Name</b>	Mr T Brannstrom
<b>Organisation</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Question 3 - Legal Compliance</b> * Yes (Support) * No (Object) * No Comment / Unsure	No Comment / Unsure
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * Yes (Support) * No (Object) * No Comment / Unsure	No (Object)
<b>Question 6 - Reasons Not Sound</b> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified
<b>Question 7 - Explanation of Soundness Reasons</b>	Suggest deletion of MC24. Such a development of C10/1 would risk aggravating coastal erosion in the area. The Environment Agency and the two local authorities have consistently underdelivered on coastal erosion. As the NNDC and NCC are going to be replaced by a new local authority, it is hoped that the new authority will show greater commitment, consistency and expertise in the battle against coastal erosion linked to human activity. If this proves to be the case, C10/1 could appear in a future local plan, underpinned by solid policies, financial resources and measures to counteract coastal erosion linked to human activity. Until such policies, resources and measures are in place site ref. C10/1 needs to be removed from the draft plan.
<b>Attached File (where submitted)</b>	
<b>Officer Summary</b>	Suggest deletion of MC24. Such a development of C10/1 would risk aggravating coastal erosion in the area. The Environment Agency and the two local authorities have consistently underdelivered on coastal erosion. As the NNDC and NCC are going to be replaced by a new local authority, it is hoped that the new authority will show greater commitment, consistency and expertise in the battle against coastal erosion linked to human activity. If this proves to be the case, C10/1 could appear in a future local plan, underpinned by solid policies, financial resources and measures to counteract coastal erosion linked to human activity. Until such policies, resources and measures are in place site ref. C10/1 needs to be removed from the draft plan.
<b>Officer Response</b>	The representation appears to largely repeat representations made where and is not considered necessary. The government is yet to choose its preferred path in relation to Local Government reform and such considerations remain outside the parameters of this Local Plan. The Council and any future council will continue to have a statutory duty to plan to meet the needs of the community. The plan includes a range of policies that provide the necessary policy framework to guide proposals. The Council works through partnership and Coastwise in the delivery of the coastal transition challenge. This project is funded by Defra as part of the £200 million Flood and Coastal Innovation Programmes, which is managed by the Environment Agency.

<b>Question 1 - Document Selection</b> * Main Modifications * Policy Map Changes	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC34
<b>ID</b>	MMC246
<b>Response Date</b>	17/09/2025 08:11:00
<b>Full Name</b>	Amy Harrison
<b>Organisation</b>	Richborough Estates
<b>Agent Full Name</b>	Amy Harrison
<b>Agent Organisation</b>	Boyer Planning
<b>Question 3 - Legal Compliance</b> * Yes (Support) * No (Object) * No Comment / Unsure	No Comment / Unsure
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * Yes (Support) * No (Object) * No Comment / Unsure	No (Object)
<b>Question 6 - Reasons Not Sound</b> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
<b>Question 7 - Explanation of Soundness Reasons</b>	<p><b>NW16 Policy Map Modifications</b></p> <p>3.17 To accompany the inclusion of Policy NW16 Land at End of Mundesley Road, North Walsham, Section 14.4 of the Submission Version Local Plan (Tracked Changes Version incorporating Main Modifications) presents the policy map (figure 3.1) of the Land at End of Mundesley Road, North Walsham.</p> <p>3.18 The map highlights the land west of Paston Way as open space, to ensure this land is safeguarded for open space and is not used for dwellings.</p> <p>3.19 The policy map should be amended, or a clause should be provided to reflect the access which is required via roundabout from the B1145 and the bridge crossing Paston Way (paragraph 1, Policy NW16). Without this detail, the policy map is not consistent with the requirements of Policy NW16 of the Local Plan. With this clarification that the land west of Paston Way is to be used for open space and access, this will ensure the map is consistent with the policies within the Local Plan and allows for a safe access to be delivered from the B1145.</p>
<b>Attached File (where submitted)</b>	
<b>Officer Summary</b>	To ensure consistency with Policy NW16, the Policies Map should be amended, or a clause should be provided to reflect the access which is required via roundabout from the B1145 and the bridge crossing Paston Way (paragraph 1, Policy NW16) and to clarify that the land west of Paston Way is to be used for open space and access.
<b>Officer Response</b>	Criterion 3 of the policy references the north-western triangle being used for access and landscaping. The absence of the requested detail on the Policies Map would not prevent a safe access being delivered from the B1145. It is not considered necessary to provide this level of detail on the Policies Map as the precise location of access and bridge infrastructure will be determined at application stage. Providing this level of detail is also not in line with the approach taken by the Council in relation to the illustration of other site allocations. No change is considered necessary.

<b>Question 1 - Document Selection</b> * Main Modifications * Policy Map Changes	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC42
<b>ID</b>	MMC108
<b>Response Date</b>	08/09/2025 08:12:08
<b>Full Name</b>	Ms Jessica Simmons
<b>Organisation</b>	
<b>Agent Full Name</b>	Rory Baker
<b>Agent Organisation</b>	Ceres Property
<b>Question 3 - Legal Compliance</b> * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)
<b>Question 6 - Reasons Not Sound</b> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
<b>Question 7 - Explanation of Soundness Reasons</b>	SEE ATTACHED FILE
<b>Attached File (where submitted)</b>	<a href="#">MMC108 - NNDC Main Mods - ST04.pdf</a>
<b>Officer Summary</b>	<p>My clients strongly support the proposed Main Modification 56 (MM56), which confirms the allocation of Land at Brumstead Road, Stalham, together with the related Modification to the Policies Map (MC42). Both modifications are welcomed as positive, necessary, and sound. The allocation of this site is the product of a rigorous process of plan-making and examination, and it will make a timely and valuable contribution to meeting the district's identified housing needs. The landowners remain fully committed to working constructively with the Council to bring the site forward for development.</p> <p>The allocation of Land at Brumstead Road is an appropriate and necessary modification that will strengthen the overall strategy of the Plan. The site is well-related to the settlement of Stalham and can be sensitively integrated into the town's fabric through landscape-led design and the provision of green infrastructure. It is in the control of willing landowners who are committed to delivery and it is free from insurmountable constraints. The manageable scale of the site means that it can come forward early in the plan period, providing much-needed housing at a time when delivery is most critical. The draft policy for the site provides a proportionate and balanced framework, requiring appropriate measures in relation to design, access, landscape, biodiversity, and infrastructure. These safeguards will ensure that a high-quality scheme is delivered which both respects local character and brings forward positive benefits for the community. Soundness and Legal Compliance MM56 and MC42 are both sound and legally compliant. They respond directly to the Inspectors' findings on housing supply and ensure that the Plan is positively prepared and capable of meeting identified needs in a sustainable way. The modifications are justified, being based on robust evidence and a careful assessment of reasonable alternatives. They are also effective, introducing a site that is genuinely deliverable within the plan period, and consistent with national policy, particularly the National Planning Policy Framework's requirements for sustainable growth, housing delivery, and the achievement of sound local plans. Without these modifications, the Plan would fail to provide a sufficient and flexible housing land supply, undermining its effectiveness and risking a finding of unsoundness.</p>
<b>Officer Response</b>	Support noted.

## MC45

<b>Question 1 - Document Selection</b> * <b>Main Modifications</b> * <b>Policy Map Changes</b>	Policy Map Changes
<b>Question 2 - Map Change Reference Number</b>	MC45
<b>ID</b>	MMC26
<b>Response Date</b>	22/08/2025 14:14:15
<b>Full Name</b>	Neil Oxenbury
<b>Organisation</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Question 3 - Legal Compliance</b> * <b>Yes (Support)</b> * <b>No (Object)</b> * <b>No Comment / Unsure</b>	No Comment / Unsure
<b>Question 4 - Reasons Not Legally Compliant</b>	
<b>Question 5 - Soundness</b> * <b>Yes (Support)</b> * <b>No (Object)</b> * <b>No Comment / Unsure</b>	No (Object)
<b>Question 6 - Reasons Not Sound</b> * <b>Positively prepared</b> * <b>Justified</b> * <b>Effective</b> * <b>Consistent with national policy</b> * <b>Unsure / Not Specified</b>	Justified Consistent with national policy
<b>Question 7 - Explanation of Soundness Reasons</b>	
<b>Attached File (where submitted)</b>	
<b>Officer Summary</b>	No explanation for soundness reasons are given.
<b>Officer Response</b>	No change is considered necessary as no explanation for soundness reasons are given.