

North Norfolk Local Plan Examination

Schedule of Representations (Main Modifications)

September 2025

BLANK

Schedule of Representations (Main Modifications)

Introduction

This document sets out the representations *as made* by respondents during the public consultation on the North Norfolk Local Plan Proposed Main Modifications, which took place between 6 August and 17 September 2025. In total 185 representations were received from 96 respondents. **This document also includes an officer summary and response to the comments made.**

This report is arranged in Main Modification 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 Main Modifications 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 Main Modification 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)¹. All consultation and other supporting documents can be viewed in the [Examination Library](http://www.north-norfolk.gov.uk/localplanexamination)².

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

² www.north-norfolk.gov.uk/localplanexamination

BLANK

Schedule of Representations: Main Modifications

MM1

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM1
ID	MMC112
Response Date	09/09/2025 18:16:35
Full Name	Mr T Brannstrom
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared
Question 7 - Explanation of Soundness Reasons	2026-2040 instead of 2024-2040, in order to align on future adoption date.
Attached File (where submitted)	
Officer Summary	Object: the plan period should be 2026-2040 instead of 2024-2040, in order to align with future adoption date.
Officer Response	Objection noted. The amended date reflects the submission dates and the updated base data No changes are considered necessary.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM1
ID	MMC236
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support)	Yes (Support)

<ul style="list-style-type: none"> * No (Object) * No Comment / Unsure * General Comment 	
Question 6 - Reasons Not Sound <ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	
Question 7 - Explanation of Soundness Reasons	<p>2.2 The Main Modifications consultation proposes to amend the plan period of the North Norfolk Local Plan in paragraph 1.0.1 from up to 2036, to between 2024 and 2040, in order to meet the needs of the residents of North Norfolk, whilst ensuring there is a 15 year plan period upon adoption of the Local Plan.</p> <p>2.3 Paragraph 22 of the National Planning Policy Framework (NPPF) (2021) requires strategic policies to look ahead over a minimum of 15 years upon adoption of the Local Plan in order to respond to long-term requirements. We agree the proposed modification of the amendment of the plan period to 2024 – 2040 will address this requirement and ensure there is a 15-year period available once the North Norfolk Local Plan has been adopted.</p>
Attached File (where submitted)	
Officer Summary	Support. The proposed modification of the amendment of the plan period to 2024 – 2040 will address the NPPF requirement (para.22, 2021) and ensure there is a 15-year period available once the North Norfolk Local Plan has been adopted.
Officer Response	Support noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM2
ID	MMC80
Response Date	05/09/2025 09:12:17
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>As written, the text in paragraph 3.2.7 does not give provision for protection of local wildlife sites (County Wildlife Sites). We recommend that local wildlife sites (County Wildlife Sites) are included in the list of designations given in the new text.</p> <p>This is in line with paragraph 192 of the NPPF which states: "To protect and enhance biodiversity and geodiversity, plans should:</p> <p>a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity</p>
Attached File (where submitted)	
Officer Summary	Object. Supporting text para. 3.2.7 does not give provision for protection of local wildlife sites (County Wildlife Sites). We recommend that local wildlife sites (County Wildlife Sites) are included in the list of designations given in the new text. This is in line with paragraph 192a) of the NPPF.
Officer Response	Objection noted. The requested change is not considered necessary. County Wildlife Sites are identified on the Policies Map and protected under Policy ENV4.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM2
ID	MMC167
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure

Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	1.1 MM2 Policy CC2 Renewable and Low Carbon Energy paragraph 3.2.7 Natural England welcomes the additional supporting text that includes the need to assess environmental impacts on European and nationally designated sites in relation to renewable energy development. We also support the use of the Landscape Sensitivity Assessment (LSA) SPD to identify sensitive landscapes.
Attached File (where submitted)	
Officer Summary	Support. Natural England welcomes the additional supporting text that includes the need to assess environmental impacts on European and nationally designated sites in relation to renewable energy development. We also support the use of the Landscape Sensitivity Assessment (LSA) SPD to identify sensitive landscapes.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM2
ID	MMC177
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILES Whilst Historic England is disappointed that not all the changes we sought have been included as proposed modifications and the map has not been amended to take account of potential heritage impacts, we recognise and welcome the significant improvements that have been made to the policy wording, supporting text and policies map in relation to renewable energy. We welcome the inclusion of the footnote to make it clear how the Suitable Wind Energy Areas have been derived. We welcome the reference to the need to take into account designated heritage assets and their settings.

	We welcome the change to the supporting text to give greater protection to the historic environment, including referencing designated heritage assets and the need for heritage impact assessments, visualisations and consideration of cross boundary impacts.
Attached File (where submitted)	MMC177 - 250915 Final letter Main Mods.pdf MMC177 - 250905 Table of Comments on Post EIP Mods.pdf
Officer Summary	<p>Comment. Whilst HE is disappointed that not all the changes we sought have been included as proposed modifications and the map has not been amended to take account of potential heritage impacts, we recognise and welcome the significant improvements that have been made to the policy wording, supporting text and policies map in relation to renewable energy.</p> <p>Support. We welcome the inclusion of the footnote to make it clear how the Suitable Wind Energy Areas have been derived, the reference to the need to take into account designated heritage assets and their settings, and the change to the supporting text to give greater protection to the historic environment, including referencing designated heritage assets and the need for heritage impact assessments, visualisations and consideration of cross boundary impacts.</p>
Officer Response	Comment and support noted. The matters raised were fully considered during the Further Consultation and recent EIP. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM2
ID	MMC217
Response Date	16/09/2025 16:55:00
Full Name	Chris Waldron
Organisation	Ministry Of Defence (Safeguarding)
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	MMC217 - 20250806_MOD_Response.pdf
Officer Summary	<p>Support and comments. Response in relation to MOD Safeguarding concerns only. North Norfolk Local Plan will both contain and be washed over by statutory safeguarding zones including RAF Neatishead, RAF Weyborne, RAF Trimingham and the Eastern 2 WAM (Wide Area Multilateration) Network. The MOD will notify DLUHC to initiate the withdrawal of those plans if any such assets or sites cease to operate. Additionally, it may be necessary in certain circumstances for MOD to require the removal of permitted development rights, where the use of these rights may introduce development/features that would not be compatible with MOD safeguarding requirements.</p> <p>Reference to Policy CC2, where the MOD has no in principle objection, although some infrastructure such as wind turbines and solar panels impact upon aviation activity in a number of ways. Detailed advice provided about when LPAs should consult with the MOD.</p> <p>A number of the site allocations are within statutory safeguarding zones – HV01/C, HV06/A, ST04/A and ST19/B, stating that any development exceeding 15.2 m in height above ground level will trigger statutory consultation requirement. The MOD recommends that any more policy wording for these sites makes clear that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.</p>

Officer Response	Support and comments noted. The representation appears to largely repeat previous commentary. Much of the detailed advice and recommendations for policy wording relate to matters at the planning application stage. No changes are considered necessary.
-------------------------	--

MM3

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM3
ID	MMC86
Response Date	05/09/2025 09:22:01
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	We object to the removal of the ambition that by 2035 all new dwellings and workplaces should be zero carbon ready (1c). We recommend that this is re-instated to be in line with the government's Future Homes Standard, starting from 2025, which mandates that new homes must be "zero carbon ready," meaning they will be highly energy-efficient and use low-carbon heating.
Attached File (where submitted)	
Officer Summary	Object. Object to the removal of the ambition that by 2035 all new dwellings and workplaces should be zero carbon ready (1c). We recommend this is re-instated to be in line with the government's Future Homes Standard, starting from 2025, which mandates that new homes must be "zero carbon ready," meaning they will be highly energy-efficient and use low-carbon heating.
Officer Response	Objection noted. The Council is keen to set a positive and proactive policy approach to ensure it is advancing the national commitment to reduce greenhouse gas emissions by 78% by 2035 and achieve net zero by 2050 in line with the Governments legal commitments. However, the government's Future Homes Standards are yet to be published and the policy has been pegged to align with current Building Regulations (in line with the approach set out in the PPG) which are expected to be updated to reflect the Future Homes Standard once the government publishes the final and full technical details which have been delayed for some time.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM3
ID	MMC88
Response Date	05/09/2025 09:27:36
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure

Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	We object to the change of wording from 'be required to' to 'should'. In UK planning policy, the word "should" implies a strong expectation or guidance, but is less binding than "will be required to", which signifies a mandatory obligation. This weakens this policy.
Attached File (where submitted)	
Officer Summary	Object. We object to the change of wording from 'be required to' to 'should'. In UK planning policy, the word "should" implies a strong expectation or guidance, but is less binding than "will be required to", which signifies a mandatory obligation. This weakens this policy.
Officer Response	<p>Objection noted. This specific matter of policy wording in relation to its use across the Plan was considered and discussed during the examination hearings and considered necessary for better alignment with the NPPF.</p> <p>The Council recognises the Inspector's discretion to amend policy wording to ensure soundness and clarity, however in this case the council would support the reversal of the modification put forward in policy CC3 criterion 4 with regards non-residential development so that it is clear the BREEAM stranded needs to be adhered to as a minimum. this better aligns with the objectives of the plan and national direction of travel and achieving legal commitments in relation to the ambitions around sustainable construction, energy efficiency and carbon reduction.</p>

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM4
ID	MMC77
Response Date	03/09/2025 11:22:00
Full Name	Chris Marsden
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>1. A local planning policy should not require proposals to meet the requirements of other legislation. In this case the Building Regulations. These exist separately from planning legislation and are administered separately. Building Control officers will determine whether or not proposed developments satisfy the standards set out in Part G.</p> <p>2. The proposed amendment clearly implies that proposals will have to meet not only the amended 2016 Part G, but any higher standard subsequently established nationally. How is this workable? This seems to suggest an element of crystal ball gazing. Once a development has been completed, it has already met the requirements of the Building Regulations and cannot be revisited in order to meet changed standards.</p> <p>This policy should be removed in its entirety. It is not a planning issue. The level of detail involved is not something planning development control officers should involve themselves with.</p>
Attached File (where submitted)	
Officer Summary	<p>Object. This policy should be entirely removed, as it is not a planning issue. The level of detail involved is not something planning officers should be involved with.</p> <ol style="list-style-type: none"> 1 A local planning policy should not require proposals to meet other legislation, in this case the Building Regulations. These exist separately from planning legislation and are administered by Building Control officers, who will determine whether developments satisfy the standards set out in Part G. 2 The proposed amendment clearly implies that proposals will have to meet not only the amended 2016 Part G, but any higher standard subsequently established nationally. How is this workable? Once a development has been completed, it has already met the requirements of the Building Regulations and cannot be revisited in order to meet changed standards.
Officer Response	Objection noted. No alternative wording has been provided for the main modifications. No changes considered necessary. The district is designated as under water stress by the Secretary of State and the policy evokes the lower but optional water use standard through Building Regulations as set out in the national Planning Practice Guidance, PPG. This can only be undertaken in relation to Plan review, and the approach is supported by the significant evidence, including across Norfolk through the duty to co-operate agreement with adjacent LPAs and Anglian Water and the Environment Agency.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM4
ID	MMC218

Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>Policy CC4, Criterion 1 & 2</p> <p>Anglian Water is disappointed that the modification removes the ability for the Council to set local standards for water efficiency in new residential development - an approach we supported through our representations to the local plan consultations and through examination. However, we understand that sufficient evidence may not have been available to support a tighter water efficiency standard for new residential development at the time.</p> <p>Anglian Water encourages water efficient use in all types of development and we will seek to work with the Council in the next iteration of the Local Plan to include more ambitious water efficiency policy requirements to help reduce demands on water resources which align with the recently published Shared Standards in Water Efficiency for Local Plans (June 2025) https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf - this document was prepared and supported by Natural England, Environment Agency, Affinity Water, Anglian Water, Cambridge Water, Essex & Suffolk Water, and endorsed by Water Resources East.</p> <p>The BREEAM "very good" water efficiency standard only requires 1 credit in the WAT 01 calculator (a 12.5% improvement on the baseline performance levels) to meet the minimum standard. The Shared Standards document recommends that all credits for the BREEAM WAT calculators are met, and as a minimum, 3 credits in WAT 01 which would require a 40% improvement on the baseline. The modification to clause 2, that changes "will" to "should" further weakens the policy, as something a developer ought to do, but isn't required to do. It is suggested that the policy wording is clear that it is an expectation and "must" is used instead of "should" or "will" to achieve at least the minimum benefit for water efficiency in non-householder development, which can be met through the installation of water efficient fixtures and fittings.</p> <p>Our Water Resources Management Plan 2025-2050 (WRMP24) clearly states that there are significant challenges across our region in terms of the reduction of water available for use due to abstraction licence caps, environmental destination (achieved by reducing the amount of water we abstract from the environment further), ensuring sufficient resources available for a 1:500 year drought, climate change, and population growth.</p> <p>As a result, the gap between the demand for water and our supply (aka headroom) has shrunk. This situation is reducing our ability to be flexible with new requests to supply non-domestic water connections (e.g. for manufacturing and processing) which were not planned for in the Water Resources Management Plan (WRMP). However, where our supplies allow, we will endeavour to help businesses in whatever way we can to meet their needs and continue to serve the communities and economies they support.</p> <p>Therefore, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d) (this may be less, dependent on the availability of water in that area) AW will need to decline the request for more water, in order to protect existing supplies and the environment (see Anglian Water's Non-Domestic Water Requests Policy https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/aws-non-domestic-demand-policy-sm-v2.pdf).</p> <p>As new Local Plans are progressed across our region, we are seeking to ensure that new policies on water resources and water management reflect our position when considering new or extended employment proposals that require significant non-domestic water use.</p>
Attached File (where submitted)	MMC218 - North Norfolk Local Plan Main Modifications - Anglian Water consultation response.pdf

<p>Officer Summary</p>	<p>Anglian Water is disappointed that the modification removes the ability for the Council to set local standards for water efficiency in new residential development - an approach we supported through our representations to the local plan consultations and through examination. However, we understand that sufficient evidence may not have been available to support a tighter water efficiency standard for new residential development at the time. Anglian Water encourages water efficient use in all types of development and we will seek to work with the Council in the next iteration of the Local Plan to include more ambitious water efficiency policy requirements to help reduce demands on water resources which align with the recently published Shared Standards in Water Efficiency for Local Plans (June 2025) - this document was prepared and supported by Natural England, Environment Agency, Affinity Water, Anglian Water, Cambridge Water, Essex & Suffolk Water, and endorsed by Water Resources East.</p> <p>The BREEAM "very good" water efficiency standard only requires 1 credit in the WAT 01 calculator (a 12.5% improvement on the baseline performance levels) to meet the minimum standard. The Shared Standards document recommends that all credits for the BREEAM WAT calculators are met, and as a minimum, 3 credits in WAT 01 which would require a 40% improvement on the baseline. The modification to clause 2, that changes "will" to "should" further weakens the policy, as something a developer ought to do, but isn't required to do. It is suggested that the policy wording is clear that it is an expectation and "must" is used instead of "should" or "will" to achieve at least the minimum benefit for water efficiency in non-householder development, which can be met through the installation of water efficient fixtures and fittings.</p> <p>Our Water Resources Management Plan 2025-2050 (WRMP24) clearly states that there are significant challenges across our region in terms of the reduction of water available for use due to abstraction licence caps, environmental destination (achieved by reducing the amount of water we abstract from the environment further), ensuring sufficient resources available for a 1:500 year drought, climate change, and population growth.</p> <p>As a result, the gap between the demand for water and our supply (aka headroom) has shrunk. This situation is reducing our ability to be flexible with new requests to supply non-domestic water connections (e.g. for manufacturing and processing) which were not planned for in the Water Resources Management Plan (WRMP). However, where our supplies allow, we will endeavour to help businesses in whatever way we can to meet their needs and continue to serve the communities and economies they support.</p> <p>Therefore, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d) (this may be less, dependent on the availability of water in that area) AW will need to decline the request for more water, in order to protect existing supplies and the environment (see Anglian Water's Non Domestic Water Requests Policy).</p> <p>As new Local Plans are progressed across our region, we are seeking to ensure that new policies on water resources and water management reflect our position when considering new or extended employment proposals that require significant non-domestic water use.</p>
<p>Officer Response</p>	<p>Comments noted. The policy position is based on that established through the Norfolk Strategic Planning Member Forum and the Duty to Co-operate document ref A8.1 May 2021 and specifically agreements 21 and 22 where it is recognised that Norfolk is identified as an area of serious water stress, and the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development (<i>as currently set out in Building regulations - my emphasis</i>). The approach set out in the submitted plan recognises that it is Anglian Water's aim to see residential developers go beyond the optional higher water efficiency standard (110 litres/per person/per day) and in time to move to water neutrality as outlined in their Green Recovery Plan as set out in page 74 of the D2C document.</p> <p>The Council recognises the Inspector's discretion to amend policy wording to ensure soundness and clarity, and the policy has been modified to align with current Building Regulations as a minimum in regard to residential development and the ambition to go further is still clear subject to compliance with national policy. The council would support the reversal of the modification put forward in policy CC4 criterion 2 with regards non-housing development so that it is clear the standard that needs to be adhered to.</p> <p>The Council are currently engaged in the development of AWs next WRMP however Higher standards will be matter for the next local plan.</p>

MM5

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM5
ID	MMC22
Response Date	19/08/2025 14:09:40
Full Name	Mr Paul Timewell
Organisation	Blue Sky Leisure
Agent Full Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Blue Sky Leisure (BSL) supports the inclusion of tourism uses in the list of development proposals that can be considered acceptable within the Coastal Change Management Area. BSL considers that tourism along the coast including within the Coastal Change Management Area remains an important part of the North Norfolk economy and confirmation that future planning proposals for tourism uses will be permitted (subject to other criteria) is welcomed. This change is considered to be sound.</p> <p>Blue Sky Leisure suggest that the policy could be enhanced to reflect the modification (MM6) to Policy CC6 to allow for the temporary roll back of pitches to less vulnerable sections of the Coastal Change Management Area confirm to confirm that such (temporary) proposals would not have to demonstrate substantial economic, social and environmental benefits to the community in the same way that new/permanent proposal would have too.</p>
Attached File (where submitted)	
Officer Summary	Support for the modification to Policy CC5 to include reference to leisure and tourism uses within the CCMA. Comment requests that Policy CC5 could be further enhanced to reflect the modification to Policy CC6 in relation to the favourable consideration of the phased rollback of touring and static caravan pitches within the CCMA.
Officer Response	<p>Support and comment noted.</p> <p>The requested change is not considered necessary as Policy CC6 specifically relates to the rollback and relocation of at-risk sites to areas outside of the CCMA. No change is considered necessary.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM5
ID	MMC269
Response Date	12/09/2025 10:28:00
Full Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Full Name	
Agent Organisation	

Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>Wind power section and maps (figure 5) – between the time the Local Plan was submitted to now, the requirements to identify land suitable for wind power is now no longer needed. That change is outside of the NPPF – it was put into place through a policy statement: Policy statement on onshore wind - GOV.UK (https://www.gov.uk/government/publications/policy-statement-on-onshore-wind/policy-statement-on-onshore-wind). This says the changes would take place immediately, from 8 July 2024. As such, does this Local Plan need to identify areas suitable for wind? This is in the context of our response to the MIQs eh015-e-broads-authority-response-to-miqs-matter-9.pdf (https://www.north-norfolk.gov.uk/media/9797/eh015-e-broads-authority-response-to-miqs-matter-9.pdf) where we query the appropriateness of identifying land right up to the Broads Authority Executive Area to be suitable for wind. Figure 5 now shows the Broads, but still says it is suitable for turbines up to the boundary; 1) why have our comments not been considered? 2) given the amended LUR Act 2024 which says that the purposes of the Broads should be furthered, how is enabling turbines up to the boundary of a protected landscape furthering this? 3) fundamentally, it seems identifying areas suitable for wind is no longer a requirement, so why do it? In terms of number 3, considering turbines on a case by case basis would enable impacts on the Broads to be considered. Identifying the entire area up to the boundary of the Broads means just that – NNDC thinks that turbines on the boundary of the Broads is acceptable.</p>
Attached File (where submitted)	
Officer Summary	<p>Object. Wind power section and maps (figure 5). Between the time the Local Plan was submitted to now, the requirements to identify land suitable for wind power is now no longer needed. That change is outside of the NPPF – it was put into place through a policy statement: Policy statement on onshore wind effected on 8 July 2024. Questions if the Local Plan now needs to identify areas suitable for wind.</p> <p>Reiteration of previous submission by the Broads Authority to MIQ Matter 9 [EH015(e)], which queries the appropriateness of identifying land right up to the Broads Authority Executive Area to be suitable for wind. 1) why have these comments not been considered? 2) given the amended LUR Act 2024, how is enabling turbines up to the boundary of a protected landscape furthering this? 3) identifying areas suitable for wind is no longer a requirement, so why do it? Also, considering turbines on a case by case basis would enable impacts on the Broads to be considered.</p>
Officer Response	<p>Objection noted. The representation appears to largely repeat representations at the Regulation 19 stage, which have already been considered through the EIP. The North Norfolk Local Plan has been examined under the 2021 NPPF, which requires the identification of Suitable Wind Energy Areas. The proposed main modification (MM5) encompasses changes to the policy wording and in particular, the new supporting text adds further clarity regarding the use of Figure 5 as a starting point, explains that it does not define the overall acceptability of individual sites for wind turbines and that any cross-boundary impacts should be considered and addressed at the planning application stage. No change considered necessary.</p>

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM6
ID	MMC23
Response Date	19/08/2025 14:37:27
Full Name	Mr Paul Timewell
Organisation	Blue Sky Leisure
Agent Full Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Blue Sky Leisure (BSL) supports the modifications to Policy CC6 to include tourism/leisure uses in the types of development proposals that can be considered acceptable within the Countryside Policy Area; and the acknowledgement that in the case of touring and static caravan pitches, the phased roll-back of pitches to less vulnerable sections of the Coastal Change Management Area on a temporary basis will be favourably considered. BSL suggest that such an acknowledgement might also be appropriately included in Policy CC5 Coastal Change Management Area, i.e. without having to demonstrate substantial economic, social and environmental benefits to the Local Community (as would be required for new permanent proposals). BSL assume that the relocation of touring and static caravan pitches are not confined to only areas within the Coastal Change Management Area (on a temporary basis); and areas of Countryside outside of the Coastal Change Management Area can be considered suitable for such uses. To aid clarity, it is suggested that the word "also", precedes the words "favourably considered" to read "c. in the case of touring and static caravan pitches, the phased roll-back of pitches to less vulnerable sections of the Coastal Change Management Area on a temporary basis will ALSO be favourably considered.</p> <p>If the intention of the Modification is to restrict relocated touring and static caravan pitches to only areas within the Coastal Change Management Area, then BSL object to this approach on the basis that it is too restrictive. BSL consider that it is important for relocated touring and static caravan pitches to be permissible in the Countryside Policy Area (outside of the Coastal Change Management Area), otherwise options for relocation from the Coastal Change Management Area would be too restrictive and likely unaffordable. The modification (if it is intended to not restrict static and touring pitches to only the Coastal Change Management Area), with the additional word as suggested above is considered to be sound.</p>
Attached File (where submitted)	
Officer Summary	<p>Support and comment. Supports the modifications to Policy CC6 to include tourism/leisure uses in the types of development proposals that can be considered acceptable within the Countryside Policy Area; and the acknowledgement that in the case of touring and static caravan pitches, the phased roll-back of pitches to less vulnerable sections of the CCMA on a temporary basis will be favourably considered.</p> <p>Suggests that such an acknowledgement might also be appropriately included in Policy CC5 Coastal Change Management Area, i.e. without having to demonstrate substantial economic, social and environmental benefits to the Local Community (as would be required for new permanent proposals).</p> <p>BSL assume that the relocation of touring and static caravan pitches are not confined to only areas within the Coastal Change Management Area (on a temporary basis); and areas of Countryside outside of the Coastal Change Management Area can be considered suitable for such uses. To aid clarity, it is suggested that the word "also", precedes the words "favourably considered" to read "c.</p>

	<p>in the case of touring and static caravan pitches, the phased roll-back of pitches to less vulnerable sections of the Coastal Change Management Area on a temporary basis will ALSO be favourably considered.</p> <p>If the intention of the Modification is to restrict relocated touring and static caravan pitches to only areas within the Coastal Change Management Area, then BSL object to this approach on the basis that it is too restrictive. BSL consider that it is important for relocated touring and static caravan pitches to be permissible in the Countryside Policy Area (outside of the Coastal Change Management Area), otherwise options for relocation from the Coastal Change Management Area would be too restrictive and likely unaffordable. The modification (if it is intended to not restrict static and touring pitches to only the Coastal Change Management Area), with the additional word as suggested above is considered to be sound.</p>
Officer Response	<p>Support and comment noted. These matters were fully considered during the Further Consultation process and at the resumed hearings. The proposed change relates to a different modification (MM5), which has been addressed in the response to MMC22. Policy E 7 Touring & Camping Sites relates to the overarching policy for such sites. No change is considered necessary.</p>

MM7

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM7
ID	MMC91
Response Date	05/09/2025 10:01:50
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	We believe that the change from 'will include' to 'should provide' weakens this policy. We object to the new text in point 4 about the impact on the viability of the scheme. We recommend that the previous text is used.
Attached File (where submitted)	
Officer Summary	Object: Consider that the change from 'will include' to 'should provide' weakens this policy. Objects to the new text in point 4 about the impact on the viability of the scheme. Recommend that the previous text is used.
Officer Response	Objection noted. The requested changes are not considered necessary. The modifications to MM7, including the change in policy language, better aligns with the NPPF.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM7
ID	MMC122
Response Date	11/09/2025 09:33:31
Full Name	Ms Emma Stannard
Organisation	Blakeney Hotel
Agent Full Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support)	Yes (Support)

<ul style="list-style-type: none"> * No (Object) * No Comment / Unsure * General Comment 	
Question 6 - Reasons Not Sound <ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	
Question 7 - Explanation of Soundness Reasons	The Blakeney Hotel supports the proposed main modifications to Policy CC8 concerning the provision of electric vehicle (EV) charging facilities at hotels. The inclusion of wording that acknowledges the need to consider the viability of installing additional charging points is particularly welcomed. Whilst the Hotel is committed to expanding its EV charging capacity, it recognises that current limitations in the local electricity supply and distribution network may constrain its ability to meet the policy's requirements in full. Until these infrastructure issues are addressed, the feasibility of installing further EV charging points remains uncertain. The Blakeney Hotel considers the proposed modifications to be sound and appreciates the pragmatic approach reflected in the modified policy.
Attached File (where submitted)	
Officer Summary	Support. Supports the main modification (MM7) to Policy CC8 criterion 4, that introduces consideration of viability. Appreciates the pragmatic approach reflected in the modified policy.
Officer Response	Support noted.
Question 1 - Document Selection <ul style="list-style-type: none"> * Main Modifications * Policy Map Changes 	Main Modifications
Question 2 - Modification Reference	MM7
ID	MMC237
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance <ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness <ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	Yes (Support)
Question 6 - Reasons Not Sound <ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	
Question 7 - Explanation of Soundness Reasons	<p>2.4 Within subparagraph 2 of Policy CC8 Electric Vehicle Charging, it is proposed to amend wording to require all new residential development to provide electric vehicle charging points in accordance with current and future building regulations.</p> <p>2.5 North Norfolk District Council published their Electric Vehicle Strategy in 2021 which expects charging infrastructure to be incorporated into all new developments. In regard to national guidance, from June 2022, the Government requires all new dwellings (with associated parking) to include electric vehicle charging points to be installed, as detailed within 'Taking Charge: The Electric Vehicle Infrastructure Strategy' as well as within current building regulations.</p> <p>2.6 We consider the requirement for provision of electric vehicle charging points for all dwellings to be consistent with local and national guidance, whilst also encouraging the use of sustainable design in future development. This will also assist in mitigating against the impacts of climate change and support sustainable modes of transport.</p>
Attached File (where submitted)	

Officer Summary	<p>Criterion 2 of Policy CC8 Electric Vehicle Charging, proposes to amend wording to require all new residential development to provide electric vehicle charging points in accordance with current and future building regulations.</p> <p>The Electric Vehicle (Infrastructure) Strategy in 2021 expects charging infrastructure to be incorporated into all new developments. From June 2022, the Government requires all new dwellings (with associated parking) to include electric vehicle charging points to be installed, as detailed within 'Taking Charge: The Electric Vehicle Infrastructure Strategy' as well as within current building regulations.</p> <p>We consider the requirement for provision of electric vehicle charging points for all dwellings to be consistent with local and national guidance, whilst also encouraging the use of sustainable design in future development. This will also assist in mitigating against the impacts of climate change and support sustainable modes of transport.</p>
Officer Response	Support noted.

MM8

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM8
ID	MMC168
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	1.2 MM8 Policy CC10 Biodiversity Net Gain and Table 2 Applying the Mitigation Hierarchy Natural England supports the reference to the small scales metric and the inclusion of Table 2 Applying the Mitigation Hierarchy which will aid developers when considering proposals.
Attached File (where submitted)	
Officer Summary	Support. Support for the reference to the small scale metric and the inclusion of Table 2 Applying the Mitigation Hierarchy which will aid developers when considering proposals.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM8
ID	MMC238
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)

Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>2.7 The Main Modifications consultation has proposed to amend the wording of Policy CC10 Biodiversity Net Gain. Subparagraph 1 of the Policy provides further clarification that a Biodiversity Net Gain (BNG) of 10% is required for all qualifying development, which has been expanded to include small scale sites. We consider this amendment to be appropriate as it reflects the contribution that small sites can make in delivering BNG across the District and reflects legislation.</p> <p>2.8 Further to the above, Policy CC10 specifies the details of the Mitigation Hierarchy within Table 1, as well as requiring proposals to comply with the Biodiversity Gain Hierarchy within Table 2. We consider the clarification of the Mitigation Hierarchy within Table 1 to be appropriate in addition to the Biodiversity Gain Hierarchy set out within Table 2.</p> <p>2.9 The inclusion of both hierarchy's allows for flexibility in the provision of BNG to be made on site, as well as offsite through purchasing of credits or provision of biodiversity offsite where development cannot deliver onsite BNG. This will in turn encourage development to come forwards in a viable manner. By allowing for flexibility in how BNG is delivered, this will allow for biodiversity to be increased, whilst also meeting the development needs of the District.</p>
Attached File (where submitted)	
Officer Summary	<p>Support. Policy CC10 Biodiversity Net Gain, Criterion 1. We consider this amendment to be appropriate as it reflects the contribution that small sites can make in delivering BNG across the District and reflects legislation.</p> <p>We consider the clarification of the Mitigation Hierarchy within Table 1 to be appropriate in addition to the Biodiversity Gain Hierarchy set out within Table 2.</p> <p>The inclusion of both hierarchy's allows for flexibility in the provision of BNG to be made on site, as well as offsite through purchasing of credits or provision of biodiversity offsite where development cannot deliver onsite BNG. This will in turn encourage development to come forwards in a viable manner. By allowing for flexibility in how BNG is delivered, this will allow for biodiversity to be increased, whilst also meeting the development needs of the District.</p>
Officer Response	Support noted.

MM9

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM9
ID	MMC92
Response Date	05/09/2025 10:03:43
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We support the new clause around nutrient neutrality, particularly the supporting text stating that nature based solutions which improve biodiversity will be particularly supported.
Attached File (where submitted)	
Officer Summary	Support: We support the new clause around nutrient neutrality, particularly the supporting text stating that nature based solutions which improve biodiversity will be particularly supported.
Officer Response	Support noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM9
ID	MMC169
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound	

* Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	1.3 MM9 Policy CC13 Protecting Environmental Quality clause 6 and paragraph 3.13.6 Natural England supports the new clause to the policy that development involving a net increase in overnight stays located within the catchments of the River Wensum Special Area of Conservation (SAC), Broads SAC or the Broadland Ramsar must provide evidence that plans or projects will not have an adverse effect on integrity of the designated sites.
Attached File (where submitted)	
Officer Summary	Support. Natural England supports the new clause to the policy that development involving a net increase in overnight stays located within the catchments of the River Wensum Special Area of Conservation (SAC), Broads SAC or the Broadland Ramsar must provide evidence that plans or projects will not have an adverse effect on integrity of the designated sites.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM9
ID	MMC220
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	Anglian Water supports the proposed modification to this policy and the supporting text. Anglian Water's role as the statutory sewerage undertaker is to meet the legislative requirements set out by the Levelling Up and Regeneration Act 2023 changes to the Water Industry Act, to reduce both nitrogen and phosphorus to technically achievable limits by 1 April 2030 at water recycling centres (nutrient significant plants) that serve a population equivalent of 2,000 or greater. This will reduce the amount of nutrient mitigation required to offset new developments in the associated WRC catchments. Anglian Water continues to investigate the feasibility of opportunities to provide additional nutrient mitigation measures that go beyond our legislative requirements, including nature-based solutions.
Attached File (where submitted)	
Officer Summary	Support. Anglian Water supports the proposed modification to this policy and the supporting text. Anglian Water's role as the statutory sewerage undertaker is to meet the legislative requirements set out by the Levelling Up and Regeneration Act 2023 changes to the Water Industry Act, to reduce both nitrogen and phosphorus to technically achievable limits by 1 April 2030 at water recycling centres (nutrient significant plants) that serve a population equivalent of 2,000 or greater. This will reduce the amount of nutrient mitigation required to offset new developments in the associated WRC catchments. Anglian Water continues to investigate the feasibility of opportunities to provide additional nutrient mitigation measures that go beyond our legislative requirements, including nature-based solutions.

Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM9
ID	MMC239
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>2.10 Within Policy CC13 Protecting Environmental Quality it is proposed to include a new clause setting out the requirement for all development proposals which increase overnight stays and are located within the catchment areas of the River Wensum SAC, the Broads SAC, or the Broadland Ramsar to submit a Shadow HRA.</p> <p>2.11 We agree the requirement for a Shadow HRA for developments increasing overnight stays in these locations will assist in protecting these Conservation Areas as well as the integrity of the habitats in these areas. However, further detail should be provided in the policy to be clear proposals for development of new dwellings will also be required to provide a Shadow HRA when located in the River Wensum SAC, the Broads SAC, or the Broadland Ramsar.</p>
Attached File (where submitted)	
Officer Summary	<p>Support and Object. Within Policy CC13 Protecting Environmental Quality it is proposed to include a new clause setting out the requirement for all development proposals which increase overnight stays and are located within the catchment areas of the River Wensum SAC, the Broads SAC, or the Broadland Ramsar to submit a Shadow HRA.</p> <p>We agree the requirement for a Shadow HRA for developments increasing overnight stays in these locations will assist in protecting these Conservation Areas as well as the integrity of the habitats in these areas. However, further detail should be provided in the policy to be clear proposals for development of new dwellings will also be required to provide a Shadow HRA when located in the River Wensum SAC, the Broads SAC, or the Broadland Ramsar.</p>
Officer Response	Support and comment noted. The wording of the modification is aligned to the SoCG between the Council and Natural England in relation to Nutrient neutrality.[EX009] The approach includes all residential and tourism development as being the qualifying development t No change is considered necessary.

MM10

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC14
Response Date	07/08/2025 16:51:17
Full Name	Carol Pickering
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified
Question 7 - Explanation of Soundness Reasons	Reference MM10.3.E Please provide justification for the removal of this clause. Sustainable communities need the infrastructure necessary to support them.
Attached File (where submitted)	
Officer Summary	Object. Justification requested for removal of clause 3e (Policy SS1), with comment that sustainable communities need the infrastructure necessary to support them.
Officer Response	Objection noted. No alternative wording has been provided for consideration. The matter was discussed during the EIP on the basis that the delivery of proportionate facilities and infrastructure associated with a specific site proposal is adequately covered by Policy HC 4. No change is considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC15
Response Date	07/08/2025 17:00:13
Full Name	Carol Pickering
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support)	No (Object)

<ul style="list-style-type: none"> * No (Object) * No Comment / Unsure * General Comment 	
Question 6 - Reasons Not Sound <ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	Justified
Question 7 - Explanation of Soundness Reasons	MM10.3.F Giving favourable consideration to developments with more than 50% social housing is not the same as offering land to local registered social landlords for development. Please justify this amendment and provide evidence to support the argument that sufficient affordable homes will be built.
Attached File (where submitted)	
Officer Summary	Object. Relates to Policy SS1 criterion 3f. Giving favourable consideration to developments with more than 50% social housing is not the same as offering land to local registered social landlords for development. Justification and provision of evidence requested for this amendment and to support that sufficient affordable homes will be built.
Officer Response	Objection noted. No alternative wording has been provided for consideration. The policy wording and operation of Policy SS1, Criteria 3 (as modified) including the relationship with affordable housing, was discussed during the EIP. No change is considered necessary.
Question 1 - Document Selection <ul style="list-style-type: none"> * Main Modifications * Policy Map Changes 	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC63
Response Date	01/09/2025 14:13:39
Full Name	Ms Sasha Walton
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance <ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness <ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	No (Object)
Question 6 - Reasons Not Sound <ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	Positively prepared Effective
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE Unacceptable consideration and conclusion on increased development in Neatishead (ie increased the number of units but not justified where they will be deliverable and built). See accompanying statement where I have set out my reasons in further detail.
Attached File (where submitted)	2025 Sept Sasha Walton's NNDC Consultation.pdf (1)
Officer Summary	Object. Unacceptable consideration and conclusion on increased development in Neatishead (ie increased the number of units but not justified where they will be deliverable and built). I attended and made representations at the resumed hearing sessions in respect of the soundness of the Local Plan, in relation to both Neatishead and Catfield. In the case of Neatishead, I asked the Inspector to agree that in the emerging Local Plan it should have a re-instated larger settlement boundary, which has not been agreed after the hearing. Neatishead is now listed as a Small Growth Village, but it is the Council's opinion that the settlement boundary should continue to be tightly drawn around only part of the village (southwestern side). The boundary has not been enlarged by the

	<p>Inspector as part of the modification, but the indicative housing allowance has been increased to 21 dwellings within this confined settlement boundary, which is seriously questionable.</p> <p>The areas for development within the boundary comprise three areas (NEA03, NEA02 & NEA03), which are likely to have access difficulties, be unpopular with adjoining residents and fall within Neatishead Conservation Area. What would the Parish Council Can think about losing the village hall to housing and can these allocated sites deliver 21 units.</p> <p>The consultation response includes a map showing a proposed amended settlement boundary for Neatishead, which extends the Council's designated settlement boundary further to the south. The revised settlement boundary would link to the services and facilities south of Street Hill Farm, which would allow sustainable access to them and, is logical, practical and achievable. The amended settlement boundary incorporates a caravan and camping site that I would like to propose as a housing allocation in the Local Plan. The site sits within the village, is previously developed land and is suitable, available and deliverable.</p>
Officer Response	Objection noted. The representation largely repeats representations made at the resumed hearings EIP and shows a level of misunderstanding in relation to the proposed revisions to the settlement boundary as being site allocations and the operation of criteria 3 (as modified). The inclusion of the promoted additional land within any amended settlement boundary is not supported.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC109
Response Date	08/09/2025 14:22:32
Full Name	Mr Christopher John Bridgman
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>I am concerned about section 3b</p> <p>The Runtons are listed as having 64 dwellings, approved.</p> <p>The proposed land at C10 is in East Runtton (though this has been deliberately disguised by saying that it is next to Clifton Park) this is inaccurate and should be corrected.</p> <p>If permission is given for C10 this will already be 70 dwellings and this is already more than has been allocated for the whole of the Runttons.</p> <p>This is a shameless attempt to foist these properties on to the village of East Runtton.</p>
Attached File (where submitted)	
Officer Summary	Object. Concerned that The Runttons have been approved to have 64 dwellings, but there is a housing allocation (C10) which is also within the Runtton Parish. It is described as being next to Clifton Park in Cromer, which is inaccurate and should be corrected. If the site allocation is given permission, this will provide 70 dwellings, which is more than the 64 dwellings that have been allocated for The Runttons.
Officer Response	Objection noted. The representation appears to largely repeat representations put forward at the Further Consultation stage which have already been considered through the examination and does not directly relate to the proposed Main Modification. No change is considered necessary.
Question 1 - Document Selection * Main Modifications	Main Modifications

* Policy Map Changes	
Question 2 - Modification Reference	MM10
ID	MMC113
Response Date	09/09/2025 18:40:59
Full Name	Mr T Brannstrom
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified
Question 7 - Explanation of Soundness Reasons	All references to 9% in MM10 to be changed to 4%, due to the addition of 11 more small growth villages.
Attached File (where submitted)	
Officer Summary	Object. All references to 9% in MM10 should be changed to 4%, due to the addition of 11 more small growth villages.
Officer Response	Objection noted. No change is considered necessary. The approach is not to spread the same amount of growth over a greater number of selected growth settlements but to increase the supply of housing in order to address the concerns raised at the first examination hearings, facilitate growth, support the rural economy and ensure the plan addresses the higher identified needs calculated through the use of the standard methodology as set out in the NPPF(under transitional arraignment's).
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC131
Response Date	13/09/2025 17:44:21
Full Name	Mr Alan Smith
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared	Justified

* Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>It is my view that, in terms of the simple Desk-Top Study exercise that was used by the Council, in terms of arriving at a decision to include the settlement of Langham as a new Small Growth Village location, the metric that has been applied in general, across-the-board, is seriously flawed in the specific circumstances of Langham itself.</p> <p>It appears to have been a very simplistic tick-box approach in terms of assessment, and it does not in any way represent the actual situation on-the-ground in the village of Langham itself.</p> <p>In the first instance, and of great importance, is the fact that the Langham Village Primary School is currently (over-) full to capacity - having now got a total of 106 pupils on the School Role there; and, therefore, with no spaces available at all for any more new pupils now. Additionally, there is already considerable traffic congestion at busy school times on a daily basis in a 20mph SPEED LIMIT AREA, where levels of speeding traffic have been recorded as being excessive and frequent; and where no speed enforcement measures at all are being applied.</p> <p>The village Public House, the Blue Bell Pub, is actually mostly being run as a satellite restaurant to the nearby commercial business of The Harper hotel (which itself is marketed to a strictly external audience). Therefore, this pub also mostly attracts outside visitors and tourists to the area, and also a range of other non-local customers, who all arrive by car to a premises which has no designated car parking area provided to it. In addition, it is only open at limited hours too. The Blue Bell is not at all a community-facing pub, does nothing to proactively engage the local village residents, and is therefore not, currently, any type of a social asset to the village.</p> <p>There is indeed a Village Hall in Langham, but it is of a relatively small size, and that fact, taken together with it having no significant adjacent dedicated parking area provision, means that its potential functionality and practical usability is limited (as compared to many other similar venues in surrounding settlements).</p> <p>So, the Council's current / latest assessment and rating of Langham as qualifying as a new Small Growth Village location is NOT JUSTIFIED, and, therefore, this proposed decision to include it in the new Local Plan as such is NOT SOUND.</p> <p>Therefore, NNDC must re-consider this proposed decision and must instead leave the village of Langham, which is located in the Norfolk Coast National Landscape area, and also in a Dark Skies area too, in the category of the Countryside Policy Area.</p> <p>Thank You.</p>
Attached File (where submitted)	
Officer Summary	<p>Object. Respondent considers that the Council's Desk-Top Study exercise for the identification of Small Growth Villages is seriously flawed and in the specific circumstances of Langham, does not represent the situation on the ground. The primary school is at full capacity, and there is considerable traffic congestion and speeding traffic, particularly at busy school times. The Blue Bell pub and hotel are not community assets, as they mainly operate for visitors/ tourists and the village is relatively small with limited parking.</p> <p>Therefore, the rating of Langham as a Small Growth Village is not justified or sound. Langham should be left in the Countryside Policy Area, being located in the Norfolk Coast National Landscape and a Dark Skies area.</p>
Officer Response	<p>Objection noted. The representation appears to largely repeat representations at the Further Consultation stage and discussed at the resumed hearing sessions, and therefore, the matter has already been considered through the examination process and does not directly relate to the proposed Main Modification (MM10). No change is considered necessary.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC143
Response Date	17/09/2025 17:07:17
Full Name	Mr Robert Hetherington MBE
Organisation	Tunstead Parish Council
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 4 - Reasons Not Legally Compliant	

Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>The proposals in relation to Tunstead becoming SGV are unsound as they are based upon incorrect information and lack of any genuine, objective, assessment of the services currently available within the village to support existing residents let alone increasing this number. The rationale for the designation of Tunstead as SGV is outlined in Examination document Reference EX034(a) Matter 2, Question 2.2 -Additional Information Requested Regarding Small Growth Villages (attached)</p> <p>This paper outlines an assesement process that identifies existing services in parishes as either Green:- Service Provided Amber:- Limited, Infrequent or Remote Red:- No Service. The requirement for parishes to be designated as SGV is identified as 1 key service and 3 secondary or desirable services. The assessment was made by NNDC through a desk top process without any contact being made to any of the service managers in Tunstead i.e. the owner/tenant of the public house; the committee of the village hall or the parochial church council. The parish council was not consulted either. The Parish Council agrees with the assessment of the school as Service Provided. As a result of this lack of consultation NNDC have used incorrect information regarding the delivery of these three, and only, services in the village at the time of the assessment and have thereby incorrectly classified the services as Green; Sevice Provided, instead of them all being classified as at least Amber: Limited/Infrequent/Remote, if not Red. If any one of these services had been classified as amber/red we would have remained a village designated as Countryside for development purposes.</p> <p>It is interesting to note that in part A of the paper, following a table detailing the assessments of all villages under consideration for a change of designation, and the rationale as to why this should happen, NNDC have added a table of "notes" that provide a list of villages and the limitations some of them have regarding the service delivery in their location, which they use to support their designation. However, they only show 15 out of a total of a total of 53 villages affected by their process and decision making. Tunstead is not shown within the notes despite the fact that all of our secondary/desirable services had, at the time of assessment and still do now, limitations regarding their service delivery that at least match some of the examples of restricted service NNDC have outlined for the ones shown in the notes. This clearly identifies some form of "selection" on their part and immediately raises issues regarding the "soundness" of their actions. It also identifies the inappropriate classification they have given to our services as follows:</p> <p>Settlement: The villages of Antingham, Colby, Ryburgh and Southrepps have been identified as having some services "not within the village settlement" and all are thefore classified as Amber:-Limited/Infrequent/Remote. Our church is outside of the settlement areas within Tunstead but has been classified as Green:- Service Provided by NNDC. This is clearly inconsistent, and obviously incorrect, and we believe that the church should be classified as Amber (at best) as other services have been that are identified by NNDC as being outside the settlement boundary of other villages. If this had been the situation we would not be designated as SGV.</p> <p>Service Hours: The notes identify the villages of Bacton, Bodham, Erpingham, Hickling, Stibbard, Sutton, Walsingham and Worsted as having limited service delivery in terms of days/hours they are open. The amount of time services are open is shown to range from 1 hour a week for a mobile post office to 4 mornings a week for a GP Surgery. All of the classifications for these villages are again Amber:- Limited/Infrequent/Remote. All three of the services provided within Tunstead are less than full time. The church has a service once a month; the village hall only has bingo once/twice a month with no other function/service available and the public house, at the time of "assessment", was open on a Thursday and Friday evening; Saturday from 12.00 until 22.00 and Sunday from 12.00 until 18.00, although these were often reduced without any notice to residents. I have attached a letter from the Chair of the Village Hall Committee to confirm the hours and you will note his concern that the village hall committee had not been consulted on this issue. If the classification process was used correctly by NNDC then each of these services should have been classified at least as Amber:- Limited/Infrequent/Remote and again Tunstead would not have been designated as SGV. At present the public house is closed completely with no sign of reopening.</p> <p>It seems clear to the residents of Tunstead, and the Parish Council, that Tunstead has been treated differently, subjectively and unfairly in the way that this process has been used by NNDC. There are clear inconsistencies within the process itself as well as in the way that NNDC have applied the process they have developed. Fairness, reasonableness, objectivity and consistency should be at the centre of any process designed to lead to decision making that significantly affects our residents lives and these traits should also be seen to be demonstrated, not only in the process but in the way that it is managed, and we do not believe this to be the situation. Applying the process fairly and reasonably, as we and others such as our MP and District Councillor have done, would clearly lead to Tunstead remaining as a Parish designated as Countryside for development purposes, as other Parishes have been. It is clear from the evidence so far that this MM has not been positively prepared and the outcome cannot be justified and therefore must conflict with current planning policy under which it has been prepared and, due to the process failings in relation to Tunstead it may well be illegal and open to challenge.</p>

	<p>There are other issues affecting this MM change which should be reviewed to help reach an effective and reasonable decision and these are:</p> <p>We are currently in the process of preparing a Neighbourhood Plan which is being part funded by NNDC. We anticipate the completed plan being passed to NNDC for adoption in March 2026. As part of this we have our own HNA produced by AECOM and funded by MHCLG (full document attached) which is based upon future population sizes, and not the number of properties, as was the original assessment made by NNDC. This is in accord with the change of methodology identified in the changes to the MM and is therefore more accurate. The assessment in this HNA identifies a need for 1.5 affordable homes in Tunstead per annum over the period of the plan, equating to 23.8 over the Local Plan period substantially less than the "notional allocation" of 42 imposed by NNDC under current proposals.</p> <p>Addendum to Background Paper 11: Settlement Boundary Review (Small Growth Villages) also attached, details changes to our settlement boundaries and identifies, in para 1.8 and 1.9 new boundaries "within which there is a presumption in favour of development" and "Areas outside of settlement boundaries are considered as open countryside, where a different policy approach applies regarding the types of development that may be considered ..." The paper also shows the changes that have been made as a result of the review for villages and 2.10 shows that for Tunstead, with one exception for a school building, they are made "to accommodate existing dwellings and their curtilages". In other words there is no increase in the land available for development within the new settlement areas and, as the area outside is "open countryside" development will only be permitted if certain conditions are met within policies SS1/SS2 which will only offer very limited opportunities for development which, experience shows, are unlikely to be met. Interestingly NNDC's own assessment of site availability shows that no sites are available as a result of the boundary changes. Therefore the changes proposed will clearly not deliver the sites required and as such cannot be said to be effective, one of the other criteria to be met for implementing MM changes.</p> <p>Finally, it is interesting to note the Inspector's letter to NNDC dated 8th May 2025 where in para 24 he identifies a requirement of "8900 dwellings over the revised plan period" he also adds "With the Further Consultation changes and other adjustments the new figure would be about 9880 dwellings (will be delivered). This makes the necessary provision with some scope or flexibility and slippage." So in reality there is no requirement for Tunstead and Sco Ruston to be targeted to have an "indicative allocation" of 42 homes that we do not have the services in place to support or the land available to deliver without significant speculative development applications that not are very unlikely be allowed given the fact that whatever land is available is in "open countryside where a different policy approach applies regarding the types of development that may be permitted."</p> <p>Taking all of facts into consideration it is obvious that there are significant weaknesses in NNDC's approach to Tunstead and Sco Ruston in the production of the new Local Plan and as such the MM cannot be said to be positively prepared, justified or indeed effective and as such must conflict with policy and therefore subject to legal challenge. We therefore request that Tunstead and Sco Ruston retains our current planning designation as "open countryside" and the "notional allocation of 42 properties" is removed from the new Local Plan. This will have little, if any, impact on the delivery of the plan but will allow the parish council to complete its Neighbourhood Plan through which it can address the need for development in a way which reflects the actual situation we currently face especially regarding the lack of services and development land within the parish to support potential further development.</p> <p>There will of course be changes required to the policy maps if this objection is successful.</p>
Attached File (where submitted)	MMC143 - TUNSTEAD VILLAGE HALL COMMITTEE.pdf MMC143 - Tunstead and Sco Ruston HNA Review.docx.pdf MMC143 - ex034-a-response-to-inspectors-information-request-to-the-council-small-growth-villages.pdf
Officer Summary	<p>The proposals in relation to Tunstead becoming SGV are unsound as they are based upon incorrect information and lack of any genuine, objective, assessment of the services currently available within the village to support existing residents let alone increasing this number. The rationale for the designation of Tunstead as SGV is outlined in Examination document Reference EX034(a) Matter 2, Question 2.2 -Additional Information Requested Regarding Small Growth Villages (attached).</p> <p>This paper outlines an assessment process that identifies existing services in parishes as either Green:- Service Provided Amber:- Limited, Infrequent or Remote Red:- No Service. The requirement for parishes to be designated as SGV is identified as 1 key service and 3 secondary or desirable services. The assessment was made by NNDC through a desk top process without any contact being made to any of the service managers in Tunstead i.e. the owner/tenant of the public house; the committee of the village hall or the parochial church council. The parish council was not consulted either. The Parish Council agrees with the assessment of the school as Service Provided. As a result of this lack of consultation NNDC have used incorrect information regarding the delivery of these three, and only, services in the village at the time of the assessment and have thereby incorrectly classified the services as Green; Service Provided, instead of them all being classified as at least Amber: Limited/Infrequent/Remote, if not Red. If any one of these services had been classified as amber/red we would have remained a village designated as Countryside for development purposes.</p> <p>NNDC have added a table of "notes" that provide a list of villages and the limitations some of them have regarding the service delivery in their location, which they use to support their designation. However, they only show 15 out of a total of 53 villages affected by their process and decision making. Tunstead is not shown within the notes despite the fact that all of our secondary/desirable services had, at the time of assessment and still do now, limitations regarding their service delivery that at least match some of the examples of restricted service NNDC have outlined for the ones shown in the notes. This clearly identifies some form of "selection" on their part and immediately raises issues regarding the "soundness" of their actions. It also identifies the inappropriate classification they have given to our services as follows:</p>

All three of the services provided within Tunstead are less than full time. The church has a service once a month; the village hall only has bingo once/twice a month with no other function/service available and the public house, at the time of "assessment", was open on a Thursday and Friday evening; Saturday from 12.00 until 22.00 and Sunday from 12.00 until 18.00, although these were often reduced without any notice to residents. I have attached a letter from the Chair of the Village Hall Committee to confirm the hours and you will note his concern that the village hall committee had not been consulted on this issue. If the classification process was used correctly by NNDC then each of these services should have been classified at least as Amber:- Limited/Infrequent/Remote and again Tunstead would not have been designated as SGV. At present the public house is closed completely with no sign of reopening. It seems clear to the residents of Tunstead, and the Parish Council, that Tunstead has been treated differently, subjectively and unfairly in the way that this process has been used by NNDC.

There are other issues affecting this MM change which should be reviewed to help reach an effective and reasonable decision and these are:

We are currently in the process of preparing a Neighbourhood Plan which is being part funded by NNDC. We anticipate the completed plan being passed to NNDC for adoption in March 2026. As part of this we have our own HNA produced by AECOM and funded by MHCLG (full document attached) which is based upon future population sizes, and not the number of properties, as was the original assessment made by NNDC. This is in accord with the change of methodology identified in the changes to the MM and is therefore more accurate. The assessment in this HNA identifies a need for 1.5 affordable homes in Tunstead per annum over the period of the plan, equating to 23.8 over the Local Plan period substantially less than the "notional allocation" of 42 imposed by NNDC under current proposals.

Settlement Boundary Review (Small Growth Villages) also attached, details changes to our settlement boundaries and identifies, in para 1.8 and 1.9 new boundaries "within which there is a presumption in favour of development" and "Areas outside of settlement boundaries are considered as open countryside, where a different policy approach applies regarding the types of development that may be considered ..." The paper also shows the changes that have been made as a result of the review for villages and 2.10 shows that for Tunstead, with one exception for a school building, they are made "to accommodate existing dwellings and their curtilages". In other words there is no increase in the land available for development within the new settlement areas and, as the area outside is "open countryside" development will only be permitted if certain conditions as are met within policies SS1/SS2 which will only offer very limited opportunities for development which, experience shows, are unlikely to be met. Interestingly NNDC's own assessment of site availability shows that no sites are available as a result of the boundary changes. Therefore the changes proposed will clearly not deliver the sites required and as such cannot be said to be effective, one of the other criteria to be met for implementing MM changes.

Finally, it is interesting to note the Inspector's letter to NNDC dated 8th May 2025 where in para 24 he identifies a requirement of "8900 dwellings over the revised plan period" he also adds "With the Further Consultation changes and other adjustments the new figure would be about 9880 dwellings (will be delivered). This makes the necessary provision with some scope or flexibility and slippage." So in reality there is no requirement for Tunstead and Sco Ruston to be targeted to have an "indicative allocation" of 42 homes that we do not have the services in place to support or the land available to deliver without significant speculative development applications that not are very unlikely be allowed given the fact that whatever land is available is in "open countryside" where a different policy approach applies regarding the types of development that may be permitted."

Taking all of facts into consideration it is obvious that there are significant weaknesses in NNDC's approach to Tunstead and Sco Ruston in the production of the new Local Plan and as such the MM cannot be said to be positively prepared, justified or indeed effective and as such must conflict with policy and therefore subject to legal challenge. We therefore request that Tunstead and Sco Ruston retains our current planning designation as "open countryside" and the "notional allocation of 42 properties" is removed from the new Local Plan. This will have little, if any, impact on the delivery of the plan but will allow the parish council to complete its Neighbourhood Plan through which it can address the need for development in a way which reflects the actual situation we currently face especially regarding the lack of services and development land within the parish to support potential further development.

Officer Response

The representation appears to largely repeat representations at Further Consultation stage and presented/discussed at the Examination in Public, and which have already been considered through the examination. It is not considered that any changes are necessary.

The response references various evidence documents but fails to draw on the updated distribution of growth paper, [FC003] which was prepared to inform the Further Consultation and supported the examination in public. The detailed paper updates the methodology in relation to the revised criteria and the options available in order to identify a further tranche of small growth villages to positively address the soundness issues previously raised through the hearings in relation to meeting the identified housing need and supporting the rural economy.

The settlement does meet the criteria of a 'Small Growth Village', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services and notwithstanding the limited hrs of operation which is typical of many rural services. The confirmation contained in the response of these services is welcomed.

The production of the Tunstead neighbourhood plan is welcome and supported by NNDC as long as it itself is positively prepared to facilitate growth and support the wider objectives of the Development Plan and national planning policy Framework. Its production offers the community the opportunity (should they wish) to identify suitable and deliverable sites in order to help meet both the local, affordable and wider strategic needs of the district as a designated SGV. The TNP also

	<p>offers the opportunity to bring forward suitable policies that address housing type and tenure however any NP needs to be examined as in "general conformity" with the strategic policies of the LPA and meet the basic condition tests as set out in the appropriate legislation. It is recognised that without such site allocations delivery will be through more speculative approaches and remain market driven.</p> <p>Although no sites were included in earlier 2017 HELAA, that does not mean no land is suitable available and deliverable – the document is only one source of potential sites. It should be noted that within responses to the Further Consultation others supported the designation of Tunstead as a SGV and advised of local residential developers who are keen to develop small sites in the locality.</p> <p>In terms of the operation of the policy SS1 as modified and in relation to criteria 3 the response repeats a level of misunderstanding that officers have corrected through the EIP and also in further direct discussions. For clarity the approach supports suitable proposals for growth that are immediately adjacent to the settlement boundary where they meet all of the criteria set out in policy SS1(3) as modified. Dwellings that come forward which are on sites that are already inside the settlement boundary will not count to the indicative growth target as set out in table 3. The intention is that the policy facilitates growth outside of the settlement which in turn has the opportunity to support and maintain services for the local community.</p> <p>Lastly, in order for a Plan to be sound and effective it is best practice to build in a lapse rate in the delivery of sites and allow for flexibility not least due to changing market conditions by ensuring the supply of sites is greater than the identified need. This flexibility does not provide the justification for non-designation.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC146
Response Date	12/09/2025 10:19:00
Full Name	
Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>Proposed modification reference MM10 relating to Policy SS1</p> <p>Glavenhill still objects to the wording "The number of new dwellings granted planning permission (less any lapsed) since the adoption of the Plan is not significantly more than the Indicative growth figures for each settlement as set out in Table 3." This is on the basis that it is accepted by all involved in the Examination in Public that certain settlements listed as Small Growth Villages had no practical ability to expand and therefore it is very unlikely that the overall housing targets for the Small Growth Villages will be met. This is highlighted in paragraph 19 of the Inspectors post-hearing letter dated 8th May 2025 that states "...given its criteria are open to interpretation and there are obvious limits to the expansion of some villages (e.g. Beeston Regis) the effectiveness of the policy to deliver housing is currently unproven." Glavenhill is therefore seeking a further modification to the wording proposed to "The number of new dwellings granted planning permission should meet and where possible exceed the Indicative growth figures for each settlement as set out in Table 3." This is because it has already been demonstrated that the Small Growth Villages listed have an appropriate range of facilities to accommodate additional growth and this change is therefore justified and effective in meeting overall housing targets.</p>
Attached File (where submitted)	MMC146 - Representations Glavenhill Langham to NNDC LP 12 9 25.pdf

Officer Summary	Object. Objects to the wording “The number of new dwellings granted planning permission (less any lapsed) since the adoption of the Plan is not significantly more than the Indicative growth figures for each settlement as set out in Table 3.” It is accepted by all at the EIP that some of the Small Growth Villages had no practical ability to expand and therefore it is very unlikely that the overall housing targets for the Small Growth Villages will be met – as highlighted in paragraph 19 of the Inspectors post-hearing letter dated 8th May 2025. Therefore a further modification is sought to the wording proposed to “The number of new dwellings granted planning permission should meet and where possible exceed the Indicative growth figures for each settlement as set out in Table 3.” As it has already been demonstrated that the Small Growth Villages have an appropriate range of facilities to accommodate additional growth and this change is therefore justified and effective in meeting overall housing targets.
Officer Response	Objection noted. The representation appears to largely repeat representations at Further Consultation stage and EIP, which have already been considered through the examination and where Policy SS1, criteria 3 and Table 3 have been subsequently modified. Housing numbers are indicative and the policy wording as modified across all relevant criteria need to be taken into account. when done so flexibility in numbers is clear as long as proposals accord with the policy as a whole. In particular criteria 3a and 3c for example reference the suitable location of sites and appropriate scale. The proposed change is not considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC147
Response Date	12/09/2025 10:19:00
Full Name	
Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE Proposed modification reference MM10 relating to Policy SS1 Glavenhill does however support the addition of the new criterion wording in Policy SS1 that “ New dwellings on suitable sites within the defined settlement boundary, along with dwellings built under Policy SS 3 'Community-Led Development', building conversions and dwelling subdivisions within the defined settlement boundary, and those provided through Policy HOU 3 'Affordable Homes in the Countryside (Rural Exceptions Housing)' will not count towards the 9% indicative growth figure; ” This approach ensures that every effort is made to deliver much needed private and affordable housing in sustainable locations within the rural area.
Attached File (where submitted)	MMC147 - Representations Glavenhill Langham to NNDC LP 12 9 25.pdf
Officer Summary	Supports the addition of the new criterion wording in Policy SS1 that “New dwellings on suitable sites within the defined settlement boundary, along with dwellings built under Policy SS 3 'Community-Led Development', building conversions and dwelling subdivisions within the defined settlement boundary, and those provided through Policy HOU 3 'Affordable Homes in the Countryside (Rural Exceptions Housing)' will not count towards the 9% indicative growth figure;” This approach ensures that every effort is made to deliver much needed private and affordable housing in sustainable locations within the rural area.

Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC148
Response Date	12/09/2025 10:19:00
Full Name	
Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>Proposed modification reference MM10 relating to Table 2</p> <p>Glavenhill still objects to the housing allowance for Langham on the basis the new modifications to Policy SS1 require “The number of new dwellings granted planning permission (less any lapsed) since the adoption of the Plan is not significantly more than the Indicative growth figures for each settlement as set out in Table 3.” This is because Langham had a confirmed population of 377 residents in the 2011 Census. The Council will recall that it was demonstrated through the debate that occurred at the Examination in Public that there are currently 235 existing dwellings in Langham (hand counted by Lanpro representing Glavenhill) at a typical occupancy rate of 1.6 people per dwelling. Therefore, growing Langham by 9% equates to at least 34 new residents entering the village at an expected current dwelling occupation rate of 1.6 people per dwelling that would equate to a new growth requirement in Table 3 of an additional 21 new dwellings and certainly not the 15 dwellings suggested. As such the Table 2 indicative growth figure for Langham is wrong and being unsound should be amended in line with the 9% methodology used across the other Small Growth Villages. This is on the basis that new housing sites within the settlement boundary for Langham will not count towards this figure as required by the Inspector in his post-hearing letter dated 8th May 2025.</p>
Attached File (where submitted)	MMC148 - Representations Glavenhill Langham to NNDC LP 12 9 25.pdf
Officer Summary	Object. Objects to the housing allowance for Langham. As debated at the EIP, the number of dwellings listed as the indicative housing growth for Langham is wrong and therefore unsound. A different calculation method has been evidenced using population, existing dwelling numbers and an occupation rate of 1.6 people per dwelling. 9% growth equates to at least 34 dwellings, not 15 dwellings. As such, the indicative growth figure for Langham in Table 2 is wrong and unsound and should be amended in line with the 9% methodology used across the other Small Growth Villages. This is on the basis that new housing sites within the settlement boundary for Langham will not count towards this figure as required by the Inspector in his post-hearing letter dated 8th May 2025.
Officer Response	Objection noted. The representation appears to largely repeat representations at the Further Consultation stage and discussions at the EIP, and which have already been considered through the examination. As the Council confirmed at the EIP, the calculation for all of the Small Growth Villages indicative housing allowances is set out in the Background Paper 2 and is not as described by the respondent. The proposed change is not considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications

Question 2 - Modification Reference	MM10
ID	MMC151
Response Date	15/09/2025 16:00:12
Full Name	Ms Sasha Walton
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	2025 Second representation on 15 Sept Sasha Walton's NNDC Consultation.pdf
Officer Summary	<p>Object. Second representation in respect of modifications to the Local Plan providing more detail in relation to the sites shown for growth in Neatishead being impractical, undeliverable and unachievable. Photographs provided in the response showing - the village hall site (Photo 1) and Anglian Water Vacuum Pumping Station (Photo 2) for Neatishead. How will the tightly constrained settlement boundary be able to accommodate 21 dwellings?</p> <p>Re-iteration of proposed amended settlement boundary (map provided) extending boundary to the south to include promoted Street Hill Farm (residential) and campsite.</p>
Officer Response	Objection noted. The representation largely repeats representations made at the resumed hearings EIP and shows a level of misunderstanding in relation to the proposed revisions to the settlement boundary being site allocations and the operation of Criteria 3 (as modified) of Policy SS 1. The inclusion of the promoted additional land within any amended settlement boundary is not supported.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC152
Response Date	12/09/2025 10:21:00
Full Name	
Organisation	Glavenhill Strategic Land
Agent Full Name	Mr Philip Atkinson
Agent Organisation	Lanpro Services
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object)	Yes (Support)

	<p>In summary, Stibbard only has two services that could be classified as "essential and desirable," both of which are severely compromised by poor highway infrastructure, lack of adequate footways, and absence of public transport. Therefore, the Parish Council objects to Stibbard's inclusion as an SGV and calls for the suspension of the proposed boundary review.</p> <p>Highways: The existing highway infrastructure in Stibbard is inadequate for housing development. NNDC's Highways Department previously objected to a planning appeal in the village, highlighting the unsuitability of the local roads. The issues remain unchanged since that objection in 2019, and the bus service has declined further. Details provided of key points from Appeal Highways Statement.</p> <p>Housing Requirement: Potential development in Stibbard is likely to be for infill development of single houses, which would not meet the local low cost or social housing need. Therefore, Stibbard does not meet the criteria set for these types of housing (10 dwellings or more), nor does it satisfy the necessary conditions for SGV status. The PC therefore calls for the boundary review to be suspended.</p> <p>Flooding: Stibbard village and the nearby hamlet of Moor End are prone to flooding due to inadequate runoff drainage, limited natural watercourse drainage, and sporadic connectivity to mains drainage. The Parish Council has raised concerns with water and planning authorities and is working to address these issues. Any housing development would exacerbate drainage problems and increase the risk of flooding, making Stibbard an unsuitable location for sustainable development.</p>
Officer Response	Objection noted. The proposed additional eleven Small Growth Villages were assessed in accordance with the revised methodology as set out in the Further Consultation Distribution of Growth (Small Growth Villages) Addendum [FC003], and where each village, including Stibbard, was considered at the resumed hearings. The proposed change is not supported.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC164
Response Date	16/09/2025 14:37:41
Full Name	Mr Gavin Paterson
Organisation	Worstead Estate
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>Worstead Estate supports the proposed modifications contained in MM10. As stated in Paragraph 83 of the NPPF 'housing should be located where it will enhance or maintain the vitality of rural communities'.</p> <p>The movement of people from the countryside to the cities has led to a steady trend of rural depopulation, and this has been accelerated in recent years by planning policies that increasingly centralise residential growth into existing larger population centres. These have created an imbalance in housing availability, with younger people and families forced to move away from their home villages to access suitable accommodation. The justification for these policies is that rural settlements do not have access to services and facilities, but this justification becomes self-fulfilling as existing services and facilities fade as populations decline. This is true of Worstead, a village that has lost most of its former services over the last 150 years.</p> <p>Worstead Estate believes that Worstead must grow to ensure its future sustainability and to protect and enhance its existing services and facilities. The document included with this response explains the assessment that has led to this conclusion and how the estate believes that the proposed local plan policies can be utilised to achieve this aim.</p>
Attached File (where submitted)	037 Worstead Development Project Version6_compressed.pdf

Officer Summary	Support. Worstead Estate supports the proposed modifications contained in MM10. Worstead Estate believes that Worstead must grow to ensure its future sustainability and to protect and enhance its existing services and facilities. Attached document Worstead Development Project Supporting Statement explains the assessment that has led to this conclusion and how the estate believes that the proposed local plan policies can be utilised to achieve this aim.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC221
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Small Growth Villages</p> <p>Felmingham</p> <p>Anglian Water notes that Felmingham has been included in the list of Small Growth Villages, with an indicative growth figure of 23 dwellings over the Local Plan period (Table 3). As indicated by our response to the North Norfolk Local Plan Further Consultation in December 2024, Anglian Water would object to development in this settlement if it seeks to connect to a small WRC with a descriptive permit (serving Highfields housing estate) unless the developer can demonstrate there is headroom to accommodate the wastewater flow from the proposed development OR alternative wastewater treatment provision is proposed.</p> <p>Horning</p> <p>Anglian Water supports the modification to the supporting text (4.1.10) to indicate that Horning is similarly constrained for additional housing growth given the environmental capacity constraints identified, and the indicative growth figure of zero (Table 3) is justified based on the evidence currently available.</p> <p>Roughton</p> <p>As indicated in our response to the Local Plan Further Consultation in December 2024, the increased indicative growth figure for Roughton will need to be delivered later in the Local Plan period to allow for further investment at Roughton WRC to accommodate wastewater flows. Current data indicates there is no capacity to accommodate further growth beyond any existing commitments that have a 'right to connect' to our networks, until a growth scheme is proposed in subsequent asset management periods (AMPs).</p>
Attached File (where submitted)	
Officer Summary	<p>Support. Reiteration of advice from Further Consultation response, regarding Felmingham as a SGV and objection to development that would be seeking to connect to the WRC with a descriptive permit (serving Highfields housing estate) unless the developer can demonstrate there is headroom to accommodate the wastewater flow from the proposed development OR alternative wastewater treatment provision is proposed.</p> <p>Horning - AW supports the modification to the supporting text (4.1.10) and the indicative growth figure of zero (Table 3) is justified based on the evidence currently available.</p>

	Reiteration of advice from Further Consultation response, regarding Roughton. Current data indicates there is no capacity to accommodate further growth beyond any existing commitments that have a 'right to connect' to our networks, until a growth scheme is proposed in subsequent asset management periods (AMPs). Growth will need to be delivered later in the local plan period.
Officer Response	Support and comments noted. The delivery of the Small Growth Villages have taken account of the advice from Anglian Water in the housing trajectory. No change is considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM10
ID	MMC240
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>2.12 This Main Modifications consultation proposes amendments to Policy SS1 Spatial Strategy to reflect the increased housing and growth within the Small Growth Villages. Previously, Policy SS1 proposed to allocate 6% of growth to the Small Growth Villages to meet housing needs.</p> <p>2.13 Within the Inspectors Post Hearing Letter (May 2024), it was found that further growth was required. The Council was required to increase their housing supply to meet the needs of North Norfolk, of which, further allocations were required to be made in the Small Growth Villages to support local communities at a local scale.</p> <p>2.14 We agree the increase of growth within Small Growth Villages to 9% to be an appropriate level of growth for these smaller settlements in the District. The additional 3% of growth in Small Villages will be able to support the local communities whilst not impacting on the local characteristics of villages. Furthermore, due to the larger constraints across the District (National Landscapes, nutrient neutrality, and coastal erosion), high levels of growth in the Small Growth Villages would be unsustainable, and harmful to the environment in North Norfolk, and if development were to come forwards, these developments may be rendered unviable due to the costs associated with mitigating impacts due to these constraints. The Council's spatial strategy of directing the majority of growth to larger settlements is sensible and will ensure that housing is delivered in the right locations with access to existing services and facilities.</p>
Attached File (where submitted)	
Officer Summary	Support. We agree the increase of growth within SGVs to 9% to be an appropriate level of growth for these smaller settlements in the District. The additional 3% of growth in SGVs will be able to support the local communities whilst not impacting on the local characteristics of villages. Furthermore, due to the larger constraints across the District (National Landscapes, nutrient neutrality, and coastal erosion), high levels of growth in the SGVs would be unsustainable, and harmful to the environment in North Norfolk, and if development were to come forwards, these developments may be rendered unviable due to the costs associated with mitigating impacts due to these constraints. The Council's spatial strategy of directing the majority of growth to larger settlements is sensible and will ensure that housing is delivered in the right locations with access to existing services and facilities.
Officer Response	Support noted.
Question 1 - Document Selection	Main Modifications

* Main Modifications * Policy Map Changes	
Question 2 - Modification Reference	MM10
ID	MMC253
Response Date	17/09/2025 16:03:47
Full Name	Mrs Sarah Martin
Organisation	Ashmanhaugh Parish Council
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE Ashmanhaugh Parish Council OBJECT to the changes and detail their response in the attached file. Please see attached file for comment/response.
Attached File (where submitted)	Representations from Ashmanhaugh Parish Council re Local Plan consultation.pdf (1)
Officer Summary	<p>Object. Hoveton is identified as one of the settlements where the majority of development is to be located. There are key services in the village, although a far distance from these areas, and these services are already under strain, including the medical centre, primary school, secondary school. There is no NHS dentist within the village. It is therefore objected that Hoveton has the capacity to accommodate sustainable growth. The site Land at Stalham Road (HV06/A) is within Flood Zone 1.</p> <p>Contrary to Policy SS1 Spatial Strategy for North Norfolk for the amount of housing in Hoveton and will have a negative effect on surrounding Parishes. Hoveton defined as a secondary settlement in which a more limited amount of additional development will be accommodated (approximately 25% of employment land allocations and 20% of new homes).</p> <p>Tunstead has an indicative growth figure of 42 dwellings as a proposed change in the Local Plan. Tunstead has limited services in the village, and therefore this will add to the strains on services, highways and infrastructure (Wroxham bridge), water and drainage in the wider surrounding area.</p>
Officer Response	<p>Objections noted. The representations have already been considered through the examination process and set out in various evidence documents in the Local Plan examination library. The objection regarding Hoveton does not directly relate to a proposed Main Modification and refers to the policy approach SS1 as set out in the adopted Core Strategy and not the policies of this Plan.</p> <p>The identification of Tunstead as a Small Growth Village was considered at the EIP resumed hearings. No changes to the policy wording are being suggested or considered necessary.</p>

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM11
ID	MMC241
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>2.15 The requirements set out within Policy HC1 Health & Wellbeing are proposed to be amended to require development proposals of 250 dwellings or more to provide a Health Impact Assessment, a decrease of 250 dwellings from the previous requirement of 500 dwellings or more.</p> <p>2.16 Within national guidance, there is no specific threshold in scale of development which requires the submission of a Health Impact Assessment and it is down to each individual local planning authority to set its own threshold.</p> <p>2.17 The Policy does not provide clarity if the required Health Impact Assessment is to be a rapid Health Impact Assessment, or a comprehensive Health Impact Assessment.</p> <p>2.18 In addition to clarifying whether a rapid or comprehensive Health Impact Assessment is required, we consider Policy HC1 should set the threshold for provision of the Assessment to be 375 dwellings. This is the midpoint between the previous requirement of 500 dwellings and the new requirement of 250 dwellings. This threshold of 375 dwellings would provide a balance between ensuring health impacts are appropriately considered on the those larger sites that are of a strategic scale where they may be greater impacts and opportunities for mitigation. No housing allocations below the threshold of 375 dwellings are proposed that are likely to pose impacts from a health impact perspective which is reinforced by the Council's Local Plan evidence base.</p>
Attached File (where submitted)	
Officer Summary	<p>The requirements set out within Policy HC1 Health & Wellbeing are proposed to be amended to require development proposals of 250 dwellings or more to provide a Health Impact Assessment, a decrease of 250 dwellings from the previous requirement of 500 dwellings or more.</p> <p>Within national guidance, there is no specific threshold in scale of development which requires the submission of a Health Impact Assessment and it is down to each individual local planning authority to set its own threshold.</p> <p>The Policy does not provide clarity if the required Health Impact Assessment is to be a rapid Health Impact Assessment, or a comprehensive Health Impact Assessment.</p> <p>In addition to clarifying whether a rapid or comprehensive Health Impact Assessment is required, we consider Policy HC1 should set the threshold for provision of the Assessment to be 375 dwellings. This is the midpoint between the previous requirement of 500 dwellings and the new requirement of 250 dwellings. This threshold of 375 dwellings would provide a balance between ensuring health impacts are appropriately considered on the those larger sites that are of a strategic scale where they may be greater impacts and opportunities for mitigation. No housing allocations below the threshold of 375 dwellings are proposed that are likely to pose impacts from a health impact perspective which is reinforced by the Council's Local Plan evidence base.</p>

Officer Response	<p>Comments noted: This matter was put forward by the Council and discussed during the first round of examination hearings. No justification or evidence has been provided to support the suggested amendment and increasing the threshold. It is not considered appropriate given the scale of developments / allocations the age profile and rapid growth projections of the over 65s and available health services across the District. The supporting text in para 5.1.6 of the Local Plan under Policy HC2 links to guidance issued by Public Health England on undertaking HIAs. This is also available in the councils Planning document library and details the type of HIA that would be required by type of application and the starting point for an application and provides the clarity of what is being asked for.</p>
-------------------------	--

MM12

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM12
ID	MMC119
Response Date	11/09/2025 09:14:17
Full Name	Ms Emma Stannard
Organisation	Blakeney Hotel
Agent Full Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	The Blakeney Hotel is disappointed that there are no main modifications proposed to remove the Open Land Area designation from hotel land at The Pastures in Blakeney. While it is acknowledged that objections cannot be made to the absence of a main modification, the Hotel would have done so if permitted. Nonetheless, the Hotel welcomes the proposed amendment to Policy HC2: Provision & Retention of Open Spaces, which introduces greater flexibility into the policy. The revised policy wording allows for development on designated Open Land where specific criteria are met, including where the land is deemed surplus to requirements, considering all its potential functions. Blakeney Hotel considers this modification to be sound and supports its inclusion. Furthermore, the Hotel suggests that the policy would be strengthened by adding an additional criterion: permitting development where the land no longer serves the purpose for which it was originally designated (i.e., as open space). The Hotel believes such an addition would also constitute a sound modification.
Attached File (where submitted)	
Officer Summary	Support and comment. Welcomes the proposed amendment to Policy HC2: Provision & Retention of Open Spaces, which introduces greater flexibility into the policy. Suggests additional policy criterion, permitting development where the land no longer serves the purpose for which it was originally designated (i.e. as open space). Such an addition would constitute a sound modification. Reference to Policy E 6 (MM32).
Officer Response	Support and comment noted. The requested change to Policy HC2 is not considered necessary as it implies that potential unauthorised uses or changes to designated open land areas could be treated as a means to remove the status of Open Land Areas. The objection to another main modification (MM32) for Policy E 6 has been addressed under the respondent's representation MMC120.

MM14

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM14
ID	MMC170
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	1.4 MM14 Policy HC4 Infrastructure Provision, Developer Contributions & Viability, Paragraph 4h Natural England supports the policies reference to the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS).
Attached File (where submitted)	
Officer Summary	Support. Natural England supports the policies reference to the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS).
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM14
ID	MMC242
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)

* General Comment	
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>2.19 The Main Modifications consultation proposes to amend subparagraph 4b of Policy HC4 Infrastructure Provision, Developer Contributions & Viability to alter the requirement for affordable housing from the highest viable level, to provision in accordance with Policy HOU2 Delivering the Right Mix of Homes.</p> <p>2.20 We support the amendment of the wording which is proposed within subparagraph 4b. This modification ensures that the policies of the North Norfolk Local Plan are consistent with the requirements which are set out within other policies elsewhere within the Local Plan. This will also see that a suitable level of affordable housing is brought forwards across the District to meet the housing needs of North Norfolk.</p>
Attached File (where submitted)	
Officer Summary	Support. We support the amendment of the wording which is proposed within Policy HC 4, criterion 4b. This modification ensures that the policies of the North Norfolk Local Plan are consistent with the requirements which are set out within other policies elsewhere within the Local Plan. This will also see that a suitable level of affordable housing is brought forwards across the District to meet the housing needs of North Norfolk.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM14
ID	MMC254
Response Date	17/09/2025 11:57:00
Full Name	
Organisation	Norfolk Constabulary (Estates)
Agent Full Name	Mr James Lawson
Agent Organisation	James Lawson Planning Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>1. Norfolk Constabulary submitted representations in response to the North Norfolk Local Plan Publication Stage (Regulation 19) consultation in February 2022.</p> <p>2. The Constabulary considered that insufficient recognition had been given to the police as a key social infrastructure provider delivering community safety, cohesion and policing to contribute to creating sustainable new communities, whose service capacity would be significantly impacted by planned housing/ population growth, requiring developer funded mitigation in the form of police infrastructure/ facilities.</p> <p>3. The Constabulary considered this approach to be inconsistent with National Planning Policy Framework (NPPF) advice, which requires plans to be shaped by early, proportionate and effective</p>

	<p>engagement between plan makers and infrastructure providers, in order to set out the infrastructure contributions expected from development.</p> <p>4. The Constabulary therefore raised 'Soundness Objections' in respect of the omission to incorporate reference to 'police infrastructure' in the following table/text and policy in the draft Local Plan;</p> <ul style="list-style-type: none"> Chapter 5 (Delivering Well Connected, Healthy Communities), Section 5.4 (Infrastructure Provision, Developer Contributions & Viability), Table 4 - Planning obligation: Indicative Infrastructure Types; Chapter 5 (Delivering Well Connected, Healthy Communities), Section 5.4 (Infrastructure Provision, Developer Contributions & Viability), Policy HC4 – Infrastructure Provision, Developer Contributions & Viability; <p>Main Modification Omission – Table 4 Planning Obligations: Indicative Infrastructure Types</p> <p>5. It is noted that the Constabulary's objection to the omission in Table 4 is not addressed by either the main or additional modifications currently the subject of this consultation.</p> <p>6. With this in mind, and in order to provide for consistency in the draft local plan's approach to infrastructure provision (as Table 4 & Policy HC4 are complementary) it is requested that a modification is made as follows;</p> <p>In Table 4 insert a new row after 'Health provision/services' entitled "Police provision/services"</p>
Attached File (where submitted)	MMC254 - NNLPE - Main
Officer Summary	<p>Object. Reiterates previous soundness objection at Regulation 19 stage regarding the plan's insufficient recognition of the police (Norfolk Constabulary) as a key social infrastructure provider delivering community safety, cohesion and policing to contribute to creating sustainable new communities, whose service capacity would be significantly impacted by planned housing/ population growth, requiring developer funded mitigation in the form of police infrastructure/ facilities. The objection requested inclusion of 'police infrastructure' to Policy HC4 and Table 4.</p> <p>Requests that a new row is inserted in Table 4 after 'Health provision/services' entitled "Police provision/services".</p>
Officer Response	<p>Objection noted. The representation appears to largely repeat representations at Regulation 19 and which have already been considered during the EIP and police infrastructure has been added to the indicative list as a result under criteria 4 of the policy through the main modification. This is not considered to be a soundness issue and no further change is considered necessary. The support for this change under rep ID MMC255 is welcomed.</p> <p>The policy wording is deliberate in that the policy highlights that the focus for contributions will be on those infrastructure items which are prioritised in North Norfolk, but the wording does not rule out contributions were necessary for other infrastructure and a case can be made to justify at application stage. It should be noted that no request for or case has been made for site specific infrastructure in line with the allocations put forward thought out the making of the Plan and on the ground the organisation is closing stations rather than opening. Uniquely, the police service already benefits from planning gain in perpetuity annually through council tax precept and also receive direct funding from central government. It is not considered appropriate or a soundness issue to include the funding of the day-to-day police service as a priority for development contributions in North Norfolk. It is considered no change is necessary.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM14
ID	MMC255
Response Date	17/09/2025 11:57:00
Full Name	
Organisation	Norfolk Constabulary (Estates)
Agent Full Name	Mr James Lawson
Agent Organisation	James Lawson Planning Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)

Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>1. Norfolk Constabulary submitted representations in response to the North Norfolk Local Plan Publication Stage (Regulation 19) consultation in February 2022.</p> <p>2. The Constabulary considered that insufficient recognition had been given to the police as a key social infrastructure provider delivering community safety, cohesion and policing to contribute to creating sustainable new communities, whose service capacity would be significantly impacted by planned housing/ population growth, requiring developer funded mitigation in the form of police infrastructure/ facilities.</p> <p>3. The Constabulary considered this approach to be inconsistent with National Planning Policy Framework (NPPF) advice, which requires plans to be shaped by early, proportionate and effective engagement between plan makers and infrastructure providers, in order to set out the infrastructure contributions expected from development.</p> <p>4. The Constabulary therefore raised 'Soundness Objections' in respect of the omission to incorporate reference to 'police infrastructure' in the following table/text and policy in the draft Local Plan;</p> <ul style="list-style-type: none"> Chapter 5 (Delivering Well Connected, Healthy Communities), Section 5.4 (Infrastructure Provision, Developer Contributions & Viability), Table 4 - Planning obligation: Indicative Infrastructure Types; Chapter 5 (Delivering Well Connected, Healthy Communities), Section 5.4 (Infrastructure Provision, Developer Contributions & Viability), Policy HC4 – Infrastructure Provision, Developer Contributions & Viability; <p>Main Modification MM14 – Policy HC4: Infrastructure Provision, Developer Contributions & Viability</p> <p>7. The Constabulary notes that the policy wording under criterion 4c is now amended to incorporate reference to police infrastructure as follows:</p> <p>"4c the delivery of community infrastructure, including but not limited to education, healthcare, libraries, community facilities, telecommunications and police infrastructure"</p> <p>8. Main Modification MM14 is therefore welcomed and supported.</p>
Attached File (where submitted)	MMC255 - NNLPE - Main
Officer Summary	<p>The Constabulary notes that the policy wording under criterion 4c is now amended to incorporate reference to police infrastructure as follows:</p> <p>"4c the delivery of community infrastructure, including but not limited to education, healthcare, libraries, community facilities, telecommunications and police infrastructure"</p> <p>Main Modification MM14 is therefore welcomed and supported.</p>
Officer Response	<p>Support noted.</p>

MM17

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM17
ID	MMC171
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	1.5 MM17 Policy ENV1 Norfolk Coast National Landscape and the Broads, Paragraph 2 We support that the 'seek to further' duty has been referenced in the policy in relation to the Norfolk Coast and Broads National Landscapes.
Attached File (where submitted)	
Officer Summary	Support. We support that the 'seek to further' duty has been referenced in the policy in relation to the Norfolk Coast and Broads National Landscapes.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM17
ID	MMC268
Response Date	12/09/2025 10:28:00
Full Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)

Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>Footnote 79 in tracked change document and footnote 1 in MM document - if you refer to the special qualities of the National Landscape, you need to refer to the special qualities of the Broads. You can find the list here in the Broads Plan: Introduction (https://www.broads-authority.gov.uk/about-us/how-we-work/strategy/broads-plan-2022/introduction) or successor document. They are also listed in the Local Plan.</p> <p>Footnote 80 in tracked change document and footnote 2 in MM document – as this refers to major development in terms of protected landscape, and then refers to the footnote in the NPPF, then it should also refer to the fact that the Local Plan for the Broads has a policy relating to Major Development – DM1.</p> <p>As we have stated elsewhere, the Levelling-up and Regeneration Act 2023 amended Section 17A of the Norfolk and Suffolk Broads Act 1988 to replace 'shall have regard to' with 'must seek to further' the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads, promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and protecting the interests of navigation. Indeed Policy ENV 1 has been amended by the inspector to now say 'further'. For consistency, they should amend 6.1.1. to say: "Local authorities have a legal duty to seek to further the statutory purpose of conserving and enhancing the natural beauty of National Landscapes, and National Parks and the Broads during plan-making and decision-taking on individual developments".</p>
Attached File (where submitted)	
Officer Summary	<p>Object. Footnote 79 in tracked change document and footnote 1 in MM document - if you refer to the special qualities of the National Landscape, you need to refer to the special qualities of the Broads. You can find the list here in the Broads Plan: Introduction (https://www.broads-authority.gov.uk/about-us/how-we-work/strategy/broads-plan-2022/introduction) or successor document. They are also listed in the Local Plan.</p>
Officer Response	Objection noted. The requested change is not a matter of legal compliance or soundness. No change is considered necessary.

MM20

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM20
ID	MMC178
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome the additional wording to policy ENV7, bullet 7 to clarify the appropriate NPPF tests for non-designated heritage assets.
Attached File (where submitted)	
Officer Summary	Support. HE welcomes the additional wording to policy ENV7, bullet 7 to clarify the appropriate NPPF tests for non-designated heritage assets.
Officer Response	Support noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM22
ID	MMC117
Response Date	11/09/2025 08:28:02
Full Name	Mr T Brannstrom
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified
Question 7 - Explanation of Soundness Reasons	"16-year local plan period" in 7.1.2 is at odds with MM1. Change to "15-year", followed by 2026 -2040 instead of 2024-2040. Change 9% in 7.1.5 to 4% to account for addition of 11 more small growth villages.
Attached File (where submitted)	
Officer Summary	Object. Supporting text to Policy HOU1 "16-year local plan period" in 7.1.2 is at odds with MM1. Change to "15-year", followed by 2026-2040 instead of 2024-2040. Change 9% in 7.1.5 to 4% to account for addition of 11 more small growth villages.
Officer Response	Objection noted. Disagree, No change is considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM22
ID	MMC222
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)

Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water welcomes the supporting text in paragraph 7.1.5 which explains the indicative growth figures for Small Growth Villages and given the potential constraints to growth in these settlements, the land supply is appropriately set at 80% of potential yield.</p> <p>As identified in our response to the Local Plan Further Consultation, one of the constraints for some Small Growth Villages is insufficient capacity at the receiving WRC. Further investment would need to be identified through the next Drainage and Wastewater Management Plan (DWMP), which will inform investments proposed in future Price Reviews - the next being scheduled for 2029 (PR29).</p>
Attached File (where submitted)	
Officer Summary	<p>Anglian Water welcomes the supporting text in paragraph 7.1.5 which explains the indicative growth figures for Small Growth Villages and given the potential constraints to growth in these settlements, the land supply is appropriately set at 80% of potential yield.</p> <p>As identified in our response to the Local Plan Further Consultation, one of the constraints for some Small Growth Villages is insufficient capacity at the receiving WRC. Further investment would need to be identified through the next Drainage and Wastewater Management Plan (DWMP), which will inform investments proposed in future Price Reviews - the next being scheduled for 2029 (PR29).</p>
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM22
ID	MMC243
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>2.21 The Main Modifications consultation as updated the housing requirement figures in order to reflect the needed housing across the District within the plan period. Further to this, Policy HOU1 has been updated with a new clause setting out the requirement for NNDC to update and publish its five-year housing land supply position by the 1st October per annum. The Policy confirms where the Council is unable to demonstrate a five-year housing land supply, the presumption in favour of sustainable development will apply.</p> <p>2.22 Paragraph 74 of the NPPF (2021) requires local authorities to identify and update their supply of deliverable sites annually, in order to provide a minimum of five-years' worth of housing. Furthermore, footnote 8 of the NPPF states the presumption in favour of sustainable development applies where of the local authority cannot demonstrate a five-year supply of deliverable sites.</p> <p>2.23 We agree with the approach which has been set out within Policy HOU1 Delivering Sufficient Homes. We consider it to be important that North Norfolk are able to demonstrate a suitable supply of deliverable sites due to the constraints that the District faces, such as coastal erosion, nutrient neutrality, and the National Landscape. If the Council are unable to demonstrate a five year housing</p>

	land supply, the presumption in favour of sustainable development will allow for needed housing to continue to be brought forwards in a sustainable manner.
Attached File (where submitted)	
Officer Summary	We agree with the approach which has been set out within Policy HOU1 Delivering Sufficient Homes. We consider it to be important that North Norfolk are able to demonstrate a suitable supply of deliverable sites due to the constraints that the District faces, such as coastal erosion, nutrient neutrality, and the National Landscape. If the Council are unable to demonstrate a five year housing land supply, the presumption in favour of sustainable development will allow for needed housing to continue to be brought forwards in a sustainable manner.
Officer Response	Support noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM23
ID	MMC16
Response Date	07/08/2025 17:06:30
Full Name	Carol Pickering
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified
Question 7 - Explanation of Soundness Reasons	<p>MM23.7.2.5</p> <p>Please justify why the proportion of affordable housing is not higher than 35% if there is a high level of need for affordable housing in the given area? Surely the priority should be to meet these needs?</p> <p>MM23.7.2.12</p> <p>Please define the minimum requirement for the proportion of specialised elderly/ care provision within larger developments.</p>
Attached File (where submitted)	
Officer Summary	Object. Relates to supporting text for Policy HOU2 at paras. 7.2.5 and 7.2.12. Para. 7.2.5 - Justification requested for why the proportion of affordable housing is not higher than 35% if there is a high level of need for affordable housing in the given area. Priority should be to meet these needs. Para. 7.2.12 – request for a definition of the minimum requirement for the proportion of specialised elderly/care provision within larger developments.
Officer Response	Objection noted. The comments do not propose alternative wording to that set out in MM22 regarding Policy HOU2. The details relating to proportions of affordable housing and elderly/ care accommodations have been locally evidenced and clearly set out in policy HOU2. Evidence documents including those relating to viable levels of affordable housing are available in the Local Examination Library on the Council's website and have been examined during the Local Plan Hearing sessions. No change is considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM23
ID	MMC127
Response Date	12/09/2025 09:02:43
Full Name	Mr T Brannstrom
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance	No Comment / Unsure

* Yes (Support) * No (Object) * No Comment / Unsure * General Comment	
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Effective
Question 7 - Explanation of Soundness Reasons	<p>In July 2025, the Council approved a planning application for a conversion. The application did not fulfil the requirements set out in the columns Affordable Homes, Required Market Housing Mix, Required Affordable Housing Mix, or Number of Serviced Self-Build Plots. The Council went ahead anyway (the applicant undertook to make financial contributions to various projects to the tune of 82k). If Council is so easily persuaded to disregard requirements such as those in the table in MM23, do those requirements actually serve a purpose? Suggest either deletion of the table, or expressing the requirements therein as aspirational guidelines.</p> <p>(And the typists should correct the typo "rual".)</p>
Attached File (where submitted)	
Officer Summary	<p>Object. A recent planning permission (July 2025) for a conversion did not fulfil the requirements set out in the table in Policy HOU 2. Do the requirements serve any purpose of the Council are going to ignore them where financial contributions have been made? Suggest deletion of the table or for the table to be expressed as aspirational.</p> <p>Spelling in table 'rual' in first column should be corrected.</p>
Officer Response	<p>Objection noted. The requested change is not considered necessary. A planning consent for a conversion granted in July would have been primarily assessed against the relevant planning policies in the current North Norfolk Core Strategy as the adopted local plan. Spelling noted in table of Policy HOU 2.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM23
ID	MMC244
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	

Question 7 - Explanation of Soundness Reasons	<p>2.24 Within the Main Modifications, paragraph 7.2.5 seeks to amend the wording from 'highest proportion of affordable homes that is viable' to requesting affordable housing to be delivered in line with the Affordable Housing Zones, unless these proportions are shown to be unviable on particular sites.</p> <p>2.25 We consider this modification to be appropriate and allows for flexibility in the delivery of sites. The Council should allow for flexibility in the submission of Viability Assessments, as the Council risks being unable to meet the housing needs of the District if residential development is unable to be delivered due to viability in providing required levels of affordable housing. This will also allow for lower levels of affordable housing to be delivered which will assist in meeting some of the affordable housing needs of North Norfolk.</p>
Attached File (where submitted)	
Officer Summary	<p>Support. We consider this modification to be appropriate and allows for flexibility in the delivery of sites. The Council should allow for flexibility in the submission of Viability Assessments, as the Council risks being unable to meet the housing needs of the District if residential development is unable to be delivered due to viability in providing required levels of affordable housing. This will also allow for lower levels of affordable housing to be delivered which will assist in meeting some of the affordable housing needs of North Norfolk.</p>
Officer Response	<p>Support noted.</p>

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM29
ID	MMC103
Response Date	02/09/2025 16:44:00
Full Name	Josie Jennings
Organisation	Chaplin Farrant
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILES
Attached File (where submitted)	MMC103 - 7091 Mill Cottage,upper sheringham local plan reps.pdf MMC103 - 7091-CF-ZZ-XX-DR-A-0010_ProposedSitePlan-S3-P1.pdf
Officer Summary	Object: Response seeks changes to Policy E1 through the allocation of an additional employment site following submission of a recent pre application enquiry seeking to promoted additional employment land and infrastructure and as such questions the methodology used as ascertaining the overall quantity of employment land and delivery.
Officer Response	Objection noted. This site has not been promoted at any stage of the local plan process and is contra to the spatial strategy as set out in SS1 and SS2. The quantum of employment land designated in the Local Plan exceeds the best case projections (40ha) and is seen as appropriate through the LP examination to meeting needs. The local plan makes additional provision for further employment development outside designated sites through policy E3. No change is put forward with regards the approach and any additional allocation is not considered necessary.

MM32

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM32
ID	MMC24
Response Date	19/08/2025 14:54:11
Full Name	Mr Paul Timewell
Organisation	Blue Sky Leisure
Agent Full Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	Blue Sky Leisure (BSL) supports the modification to Policy E6 to enable proposals for new tourist accommodation, static holiday caravans and holiday lodges to be considered acceptable and supportable outside of settlement boundaries subject to their scale and locational relationship to a settlement or an established tourism business. This modification overcomes the previous very restrictive nature of the policy which would have restricted new tourist accommodation to only sites within settlement boundaries, thereby rendering most potential tourist accommodation sites either unsuitable or unviable/unaffordable (when competing against residential land purchasers). The modification to include additional locational flexibility within the policy will provide for more potential tourist accommodation opportunities in appropriate and suitable locations well related to a settlement or a tourism business. Also, the proposed modification to confirm that the expansion and extension of static caravan and holiday lodge sites (rather than individual units) will be supported is welcomed. BSL consider the proposed modifications to be sound.
Attached File (where submitted)	
Officer Summary	Supports modification to Policy E6 to enable proposals for new tourist accommodation, static caravans and holiday lodges to be supported outside of settlement boundaries subject to their scale and locational relationship to a settlement or an established tourism business. The modification will add flexibility to provide for more potential tourist accommodation opportunities. Also, the proposed modification to confirm that the expansion and extension of static caravan and holiday lodge sites (rather than individual units) will be supported is welcomed.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM32
ID	MMC93
Response Date	05/09/2025 10:09:03
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	

Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>We object to the insertion of the new clause stating '5. In all cases, any adverse impact of proposals will be weighed against the economic benefits of the sustainable growth and expansion of all types of tourism businesses in the rural area.' This implies that adverse impacts on aspects such as the environment could be ignored if there are economic benefits. The National Planning Policy Framework (NPPF) in England requires development to be economically viable while also protecting and enhancing biodiversity; the two are not mutually exclusive but are balanced through the planning system's overarching aim of delivering sustainable development, which involves securing measurable net gains for biodiversity from development and integrating ecological considerations into design. Policies should facilitate development while ensuring that biodiversity improvements are integrated into the design of projects, demonstrating that economic prosperity can go hand-in-hand with environmental protection and enhancement.</p>
Attached File (where submitted)	
Officer Summary	<p>Object. Object to the insertion of the new clause 5, Policy E6. This implies that adverse impacts on aspects such as the environment could be ignored if there are economic benefits. The NPPF requires development to be economically viable while also protecting and enhancing biodiversity; the two are not mutually exclusive but are balanced through the planning system's overarching aim of delivering sustainable development, which involves securing measurable net gains for biodiversity from development and integrating ecological considerations into design. Policies should facilitate development while ensuring that biodiversity improvements are integrated into the design of projects, demonstrating that economic prosperity can go hand-in-hand with environmental protection and enhancement.</p>
Officer Response	<p>Objection noted. The requested change is not considered necessary. The modification ensures that all three strands of sustainable development are considered in line with the NPPF. No change is considered necessary.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM32
ID	MMC120
Response Date	11/09/2025 09:24:06
Full Name	Ms Emma Stannard
Organisation	Blakeney Hotel
Agent Full Name	Mr John Long
Agent Organisation	John Long Planning Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure	No (Object)

* General Comment	
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>The Blakeney Hotel has no objection to the proposed main modifications to Policy E6 as they relate to new hotel developments. However, it strongly opposes the inclusion of enhancements to existing hotels within the scope of the policy. It is neither logical nor practical to require proposals for enhancing existing hotels to comply with the sequential test outlined in Policy E4: Retail and Town Centre Development. For instance, under the modified policy, any proposal to improve the Blakeney Hotel, such as adding car parking/electric vehicle charging spaces, expanding dining facilities, or increasing accommodation would need to demonstrate that no suitable sites exist in the main towns or villages like Holt, Hoveton, Sheringham, Stalham, or Wells-next-the-Sea before being considered appropriate at the Hotel's current location. This requirement is unworkable and would effectively prevent meaningful enhancements at the Blakeney Hotel. The Blakeney Hotel therefore considers the proposed approach to be unsound. It is not positively prepared, justified, effective or consistent with National Planning Policy particularly NPPF sections 88 and 89 which require planning policies to support rural tourism development (i.e. outside of town centres). Requiring established hotels, particularly those whose appeal is closely tied to their specific location to meet the sequential test undermines their ability to evolve and meet market demand.</p> <p>To make the policy sound, the Blakeney Hotel recommends removing the words "and enhanced" from the policy. Alternatively, the policy could be amended to exempt enhancements to existing hotels where: The hotel serves a distinct market in which location is integral to its offer; or The proposed enhancements must be located at the hotel for reasons of feasibility, viability, or operational practicality.</p>
Attached File (where submitted)	
Officer Summary	Object. Opposes the inclusion of enhancements to existing hotels within the scope of policy E6. It is neither logical nor practical to require proposals for enhancing existing hotels to comply with the sequential test outlined in Policy E4: Retail and Town Centre Development. This requirement is unworkable and would effectively prevent meaningful enhancements at the Blakeney Hotel. Considers the proposed approach to be unsound, as it is not positively prepared, justified, effective or consistent with the NPPF, particularly paras. 88 and 89. which require planning policies to support rural tourism development (i.e. outside of town centres). Recommends removing the words "and enhanced" from the policy. Alternatively, the policy could be amended to exempt enhancements to existing hotels where The hotel serves a distinct market in which location is integral to its offer; or The proposed enhancements must be located at the hotel for reasons of feasibility, viability, or operational practicality.
Officer Response	Objection noted. A further modification to remove the words 'and enhance' from criterion 2 could be considered for reasons of clarity and to improve interpretation.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM32
ID	MMC172
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	General Comment
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective	

* Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	1.6 MM32 Paragraph 8.65 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites Natural England welcomes the supporting text that recognises that tourist accommodation proposals will be subject to GIRAMS for all development that results in additional overnight accommodation.
Attached File (where submitted)	
Officer Summary	Support. Natural England welcomes the supporting text that recognises that tourist accommodation proposals will be subject to GIRAMS for all development that results in additional overnight accommodation.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM32
ID	MMC270
Response Date	12/09/2025 10:28:00
Full Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	MM32 introduces new wording relating to location of tourist accommodation. It adds 'or is small scale and well related to such a settlement or established tourist business'. Whereas the original wording directed such development to within the boundary of selected settlements and given that we were concerned about the potential impact on the Broads and its setting as originally worded, this MM32 change without referring to impact on the Broads and its setting is even more of a concern. Given that the Broads is a protected landscape and part of the family of national parks, and that the policy includes a presumption against touring caravan and camping sites in the National Landscape, (presumably because of concerns about the impact on the landscape (although there is no mention about this in the supporting text)), it is not clear why the impact on the Broads is not mentioned in this policy. The best thing, in order to meet the LUR Act 2024 provisions to further the purposes of the Broads, is to mention the Broads in this policy. This is a very simple amendment and it is not clear why this has not been done – we made this comment as part of the MIQs - eh014-b-broads-authority-response-to-miqs-matter-8.pdf (https://www.north-norfolk.gov.uk/media/9880/eh014-b-broads-authority-response-to-miqs-matter-8.pdf). And as mentioned above, the change to location criteria makes the need for this change more pertinent. Furthermore, 'well related' and 'small scale' are not defined in the supporting text. Proposed change: Explain what is meant by 'well related'. Explain what is meant by 'small scale'. Refer to impact on the Broads and its setting.
Attached File (where submitted)	
Officer Summary	Object. MM32 introduces new wording relating to location of tourist accommodation 'or is small scale and well related to such a settlement or established tourist business'. Concern was raised about the potential impact on the Broads and its setting based on the original wording, and this proposed change which does not refer to impact on the Broads and its setting is even more of a concern. It is

	<p>not clear why the impact on the Broads is not mentioned in this policy, given its status as a national park. Given the LURA 2024, and the changes to the policy wording it is even more pertinent that the Broads is mentioned in the Policy alongside the Norfolk Coast National Landscape.</p> <p>In addition, 'small scale' and 'well related' need to be defined in the supporting text.</p>
Officer Response	<p>Objection noted. The representation appears to largely repeat representations at Regulation 19 stage, and which have already been considered through the examination. The Local Plan applies to the North Norfolk district outside of the Broads Executive area, where the entire suite of policies in the plan should be considered, including Policy ENV 1, which provides the highest degree of protection to the Norfolk Coast National Landscape and The Broads including their setting. No change considered necessary.</p>

MM33

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM33
ID	MMC94
Response Date	05/09/2025 10:10:02
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	We object to the insertion of the new clause stating '5. In all cases, any adverse impact of proposals will be weighed against the economic benefits of the sustainable growth and expansion of all types of tourism businesses in the rural area.' This implies that adverse impacts on aspects such as the environment could be ignored if there are economic benefits. The National Planning Policy Framework (NPPF) in England requires development to be economically viable while also protecting and enhancing biodiversity; the two are not mutually exclusive but are balanced through the planning system's overarching aim of delivering sustainable development, which involves securing measurable net gains for biodiversity from development and integrating ecological considerations into design. Policies should facilitate development while ensuring that biodiversity improvements are integrated into the design of projects, demonstrating that economic prosperity can go hand-in-hand with environmental protection and enhancement.
Attached File (where submitted)	
Officer Summary	Object. Object to the insertion of the new clause 5, Policy E7. This implies that adverse impacts on aspects such as the environment could be ignored if there are economic benefits. The NPPF requires development to be economically viable while also protecting and enhancing biodiversity; the two are not mutually exclusive but are balanced through the planning system's overarching aim of delivering sustainable development, which involves securing measurable net gains for biodiversity from development and integrating ecological considerations into design. Policies should facilitate development while ensuring that biodiversity improvements are integrated into the design of projects, demonstrating that economic prosperity can go hand-in-hand with environmental protection and enhancement.
Officer Response	Objection noted. The requested change is not considered necessary. The modification ensures that all three strands of sustainable development are considered in line with the NPPF. No change is considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM33
ID	MMC173
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England

Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	1.6 MM33 Paragraph 8.75 Touring Caravan & Camping Sites Natural England welcomes the supporting text that recognises that tourist accommodation proposals will be subject to GIRAMS for all development that results in additional overnight accommodation.
Attached File (where submitted)	
Officer Summary	Support. Natural England welcomes the supporting text that recognises that tourist accommodation proposals will be subject to GIRAMS for all development that results in additional overnight accommodation.
Officer Response	Support noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM34
ID	MMC95
Response Date	05/09/2025 10:10:36
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	We object to the insertion of the new clause stating '5. In all cases, any adverse impact of proposals will be weighed against the economic benefits of the sustainable growth and expansion of all types of tourism businesses in the rural area.' This implies that adverse impacts on aspects such as the environment could be ignored if there are economic benefits. The National Planning Policy Framework (NPPF) in England requires development to be economically viable while also protecting and enhancing biodiversity; the two are not mutually exclusive but are balanced through the planning system's overarching aim of delivering sustainable development, which involves securing measurable net gains for biodiversity from development and integrating ecological considerations into design. Policies should facilitate development while ensuring that biodiversity improvements are integrated into the design of projects, demonstrating that economic prosperity can go hand-in-hand with environmental protection and enhancement.
Attached File (where submitted)	
Officer Summary	Object. Object to the insertion of the new clause 5 (4), Policy E8. This implies that adverse impacts on aspects such as the environment could be ignored if there are economic benefits. The NPPF requires development to be economically viable while also protecting and enhancing biodiversity; the two are not mutually exclusive but are balanced through the planning system's overarching aim of delivering sustainable development, which involves securing measurable net gains for biodiversity from development and integrating ecological considerations into design. Policies should facilitate development while ensuring that biodiversity improvements are integrated into the design of projects, demonstrating that economic prosperity can go hand-in-hand with environmental protection and enhancement.
Officer Response	Objection noted. The requested change is not considered necessary. The modification ensures that all three strands of sustainable development are considered in line with the NPPF. No change is considered necessary.

MM36

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM36
ID	MMC135
Response Date	15/09/2025 08:41:51
Full Name	Mr T Brannstrom
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified
Question 7 - Explanation of Soundness Reasons	In the table, delete addition "Cromer C10/1". Such a development 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.
Attached File (where submitted)	
Officer Summary	In the table, delete addition "Cromer C10/1". Such a development 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.
Officer Response	Objections noted. The representation appears to largely repeat representations. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are considered necessary
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM36
ID	MMC209
Response Date	17/09/2025 10:43:43
Full Name	Mrs Gemma Harrison
Organisation	Holt Town Council
Agent Full Name	
Agent Organisation	

Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	Local Plan Comments HTC Sep 25.pdf
Officer Summary	<p>Thank you for re-consulting with Holt Town Council on the Emerging Local Plan. Cllrs are disappointed to see that no further sites in Holt have been allocated for development in the Emerging Plan.</p> <p>Whilst Holt lends itself to more growth, other areas identified in the plan, such as small growth villages, do not have the infrastructure and most importantly the need for new housing. High Kelling is one example (which is adjacent to Holt) and finds itself allocated 20 new homes, when existing new homes such as the Warren Barn site could not sell and instead eventually had to be rented out. These smaller rural sites will not deliver housing in sustainable locations and will not deliver the affordable housing which larger developments will offer. For this reason, Cllrs believe the Emerging Plan is flawed and will not meet the needs of the residents and future residents of North Norfolk.</p> <p>The plan lacks evidence to support its proposals; there has been no transport evidence provided on the impact the proposed developments will have on the local and wider road networks. Without this evidence how is it possible to identify where development should and shouldn't take place. There is no justification within the plan to why Holt has not been allocated an employment site. Holt is in desperate need to hold onto its younger generation but with no new employment opportunities they find themselves with no choice but to relocate elsewhere.</p>
Officer Response	<p>Comments and objections noted. These matters largely repeat matters previously raised and which were fully considered during the recent Examination in Public and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested. Holt has two allocations identified in the Local Plan, H17 and H20 and a commitment to deliver 495 homes during the Plan period as set out in policy HOU1 as modified. 4.45 ha of employment land remain as set out in modified policy E1. The Council considered, as part of the Further Consultation last year, additional sites in Holt but there were none that were considered suitable at the time, this evidence is available to view in the Examination Library. With regards to employment support outside designated employment areas, Policy E3 is modified through MM30 (as discussed with representatives from HTC at the EIP) to ensure there is greater flexibility and favourable consideration to employment proposals that are well-related to the selected growth settlements, and in particular, Holt, in order to meet any "local" need. Similarly, the Plan makes provision for a significant amount of growth from Windfall development that complies with the policies set out in the Plan. Such development can come forward outside and in addition to Local Plan allocations through market led development. Additional employment land and further sites can be included in any updated Neighbourhood plan as long as evidenced, appropriately justified and the town council's approach is in general conformity with the Local Plan. Policy HOU2 sets out the type and size of new housing. New developments should be of a size and type that best reflects the market need (as evidenced). No further changes are considered necessary.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM36
ID	MMC212
Response Date	17/09/2025 16:00:24
Full Name	Mrs Sarah Martin
Organisation	Ashmanhaugh Parish Council
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance	No Comment / Unsure

* Yes (Support) * No (Object) * No Comment / Unsure * General Comment	
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE Ashmanhaugh Parish Council OBJECTS to the changes and have detailed their response in the attached file. Please see the attached comment/documentation.
Attached File (where submitted)	Representations from Ashmanhaugh Parish Council re Local Plan consultation.pdf
Officer Summary	MM36 – object to the increased housing proposed from 120-150 on the Hoveton Land East of Tunstead Road (HV01/C) and the 50 dwellings Land at Stalham Road (HV06/A) Both of these sites are prime agricultural land. This would be an overdevelopment of a Small Growth Town (Hoveton). There have already been built 50 additional houses since the last local plan (2022). There are key services in the village, although a far distance from these areas, and these services are already under strain, including the medical centre, primary school, secondary school. There is no NHS dentist within the village. It is therefore objected that Hoveton has the capacity to accommodate sustainable growth. The site Land at Stalham Road (HV06/A) is within Flood Zone 1. The Belaugh Waste Water Treatment Works is almost at capacity. This will create more discharge into the River Bure and therefore goes against Nutrient Neutrality requirements. Anglian Water advised upgrades to the local foul water drainage network, however there is no guarantee of these upgrades/improvements by Anglian Water. • This increased housing would have significant Highway and Transport impacts on roads which are currently under strain, especially over Wroxham Bridge, and the plan does not take into account the volume of tourism traffic which greatly affects this also. • Linking with a cut-through from Tunstead Road to Stalham Road will create a rat-run and safety issues. • There is great harm to local Heritage Assets including St Peters Church (which is a Grade 2 listed building), Hoveton Hall and the Ice House. The view of these historic assets will be lost.
Officer Response	Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EIP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary. Hoveton is designated as a small growth town in policy SS1 and as such it is appropriate to allocate sites to meet both the local need and the required strategic need (557dpa) over the plan period. The majority of available and suitable sites are on the edge of the settlement and the NPPF does not prevent development on BMV agricultural land and development can (is directed to) occur in Flood Zone 1, the Local Plan conducted an SFRA as part of its evidence base to support site allocations, any required mitigation is already included in the site-specific policy. The detailed site assessments are published as part of the evidence base and available on line.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM36
ID	MMC245
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure	No Comment / Unsure

* General Comment	
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>2.26 The Main Modifications has amended Policy DS1 Development Site Allocations to include the additional site allocations which have been made through the examination of the Local Plan.</p> <p>2.27 We support the amendments which have been made to Policy DS1 to include the additional site allocations. The inclusion of these allocations will support North Norfolk District Council in meeting their housing needs throughout the plan period to 2040. Land at End of Mundesley Road, North Walsham (site reference: NW16) will be able to make a meaningful contribution of 330 dwellings and 60 units/40 dwellings equivalent of elderly care towards the housing needs of North Norfolk.</p>
Attached File (where submitted)	
Officer Summary	<p>2.26 The Main Modifications has amended Policy DS1 Development Site Allocations to include the additional site allocations which have been made through the examination of the Local Plan.</p> <p>2.27 We support the amendments which have been made to Policy DS1 to include the additional site allocations. The inclusion of these allocations will support North Norfolk District Council in meeting their housing needs throughout the plan period to 2040. Land at End of Mundesley Road, North Walsham (site reference: NW16) will be able to make a meaningful contribution of 330 dwellings and 60 units/40 dwellings equivalent of elderly care towards the housing needs of North Norfolk.</p>
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM36
ID	MMC256
Response Date	17/09/2025 17:31:26
Full Name	Mrs Gemma Harrison
Organisation	Cley Parish Council
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified Effective Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>Cley Parish Council have concerns over the proposed 30 new dwellings in Blakeney as the sewage would be processed at the Cley Sewage works which is at full capacity. Already Cley residents experience problems with odour and HGV's with the constant tankering in peak season. Blakeney has just closed its doctors surgery, more houses in this area will put further pressure on the local services. Therefore Cllrs disagree with the large growth village status and believe the factors as described above have not been considered and therefore the plan is unsound.</p>

Attached File (where submitted)	
Officer Summary	Cley Parish Council have concerns over the proposed 30 new dwellings in Blakeney as the sewage would be processed at the Cley Sewage works which is at full capacity. Already Cley residents experience problems with odour and HGV's with the constant tankering in peak season. Blakeney has just closed its doctors surgery, more houses in this area will put further pressure on the local services. Therefore Cllrs disagree with the large growth village status and believe the factors as described above have not been considered and therefore the plan is unsound.
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary. Anglian Water have been consulted on throughout the Local Plan process and did not raise any objections, where necessary mitigation has been identified within the site-specific policy.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM39
ID	MMC102
Response Date	05/09/2025 14:11:23
Full Name	Mr Steve Self
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Effective
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILES</p> <p>Policy C22/4 - Land West of Pine Tree Farm, Norwich Road</p> <p>On page 45, item 9 states:</p> <p>"The existing public footpath through the site should be retained and upgraded to a surfaced route within a green corridor and a new route should be provided from the site to connect with Roughton Road"</p> <p>This statement is vague and open to interpretation which would cause serious consequences for existing residents of neighbouring residential estates. A new route through the Burnt Hills cul-de-sac with its twisty roads and very steep entrance gradient would be very unsuitable as a linking route. It would cause reduced security for existing residents and is against police guidelines. There would be disturbances to existing residents from people passing through the estate and additional traffic using Burnt Hills to access the sports facilities. Burnt Hills roads can not safely handle any increase in traffic.</p> <p>A route directly linking the new development to Roughton Road south of the existing houses as shown in the associated map, forming a natural continuation of the existing footpath would provide the majority of the residents of the new development with a more direct route to Roughton Road and the railway station avoiding the twisty roads and very steep gradients of Burnt Hills. A new pavement along the east side of Roughton Road would be required but that is long overdue to make it safer to walk along that section of road and would benefit existing residents.</p> <p>Item 9 should read:</p> <p>The existing public footpath through the site must be retained and upgraded to a surfaced route within a green corridor and a new route must be provided from the site to provide a cycle/pedestrian link directly connecting with Roughton Road. An improved pedestrian footway will be required on Roughton Road. The cycle/pedestrian link must not go via existing neighbouring residential estates to avoid disturbances to residents of those estates from additional people and vehicle movements.</p> <p>On page 44, item 1 states:</p> <p>"The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision"</p> <p>For the reasons given above for item 9, for clarity, item 1 must refer to a route directly linking the new development to Roughton Road and not using an existing residential estates.</p> <p>The developers have already provided an assessment document of walking and cycling routes but it is biased and very flawed and does not stand up to scrutiny. A lot of relative information is missing and it contains a lot of misleading information in an attempt to avoid a new crossing of the railway</p>

	<p>beside the A149, Norwich Road. Norfolk Highways has identified a need for a new railway crossing at that point. A new crossing of the railway must be provided as part of any new development. If not done now it will probably have to be provided at a later date after a serious accident and at the expense of the local authority. This new railway crossing is essential for residents and anyone visiting the sports pitches so the "get-out" for the developer must be removed.</p> <p>Item 1 should read:</p> <p>The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian directly linking to Roughton Road.</p> <p>The attached files show the inaccuracies in the walking and cycling policy document provided by the developer and the comments I sent to North Norfolk District Council concerning the outline planning application for the Pine Tree Farm development explaining problems that it will cause for existing residents mainly in the Burnt Hills Cul-de-sac.</p>
Attached File (where submitted)	walking_and_cycling_route_strategy_comments.pdf (2) objection.pdf (1)
Officer Summary	<p>SEE ATTACHED FILES</p> <p>Policy C22/4 - Land West of Pine Tree Farm, Norwich Road</p> <p>On page 45, item 9 states:</p> <p>"The existing public footpath through the site should be retained and upgraded to a surfaced route within a green corridor and a new route should be provided from the site to connect with Roughton Road"</p> <p>This statement is vague and open to interpretation which would cause serious consequences for existing residents of neighbouring residential estates. A new route through the Burnt Hills cul-de-sac with its twisty roads and very steep entrance gradient would be very unsuitable as a linking route. It would cause reduced security for existing residents and is against police guidelines. There would be disturbances to existing residents from people passing through the estate and additional traffic using Burnt Hills to access the sports facilities. Burnt Hills roads can not safely handle any increase in traffic.</p> <p>A route directly linking the new development to Roughton Road south of the existing houses as shown in the associated map, forming a natural continuation of the existing footpath would provide the majority of the residents of the new development with a more direct route to Roughton Road and the railway station avoiding the twisty roads and very steep gradients of Burnt Hills. A new pavement along the east side of Roughton Road would be required but that is long overdue to make it safer to walk along that section of road and would benefit existing residents.</p> <p>Item 9 should read:</p> <p>The existing public footpath through the site must be retained and upgraded to a surfaced route within a green corridor and a new route must be provided from the site to provide a cycle/pedestrian link directly connecting with Roughton Road. An improved pedestrian footway will be required on Roughton Road. The cycle/pedestrian link must not go via existing neighbouring residential estates to avoid disturbances to residents of those estates from additional people and vehicle movements.</p> <p>On page 44, item 1 states:</p> <p>"The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision"</p> <p>For the reasons given above for item 9, for clarity, item 1 must refer to a route directly linking the new development to Roughton Road and not using an existing residential estates.</p> <p>The developers have already provided an assessment document of walking and cycling routes but it is biased and very flawed and does not stand up to scrutiny. A lot of relative information is missing and it contains a lot of misleading information in an attempt to avoid a new crossing of the railway beside the A149, Norwich Road. Norfolk Highways has identified a need for a new railway crossing at that point. A new crossing of the railway must be provided as part of any new development. If not done now it will probably have to be provided at a later date after a serious accident and at the expense of the local authority. This new railway crossing is essential for residents and anyone visiting the sports pitches so the "get-out" for the developer must be removed.</p> <p>Item 1 should read:</p> <p>The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian directly linking to Roughton Road.</p> <p>The attached files show the inaccuracies in the walking and cycling policy document provided by the developer and the comments I sent to North Norfolk District Council concerning the outline planning application for the Pine Tree Farm development explaining problems that it will cause for existing residents mainly in the Burnt Hills Cul-de-sac.</p>
Officer Response	<p>Objections noted. The comments are in relation to the live application which is not pertinent to this consultation. Criterion 9 of the site-specific policy is not in reference to Burnt Hills but references footpaths within the site's boundary. The Policy does not allow pedestrian/cycle or vehicle access onto Roughton Road. Proposed amendments to the policy are not considered necessary for the soundness of the Local Plan and the site-specific policy.</p>

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM39
ID	MMC128
Response Date	12/09/2025 09:07:17
Full Name	Mr Richard Doleman
Organisation	Norfolk County Council - Highway Authority
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified Effective Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>Norfolk County Council as Highway Authority (HA) objects to MM39 that relates to policy C22/2 Mixed-Use: Land West of Pine Tree Farm.</p> <p>Specifically, the objection relates to the site-specific requirements as set out points 1 and 2 of the proposed modified policy C22/2.</p> <ol style="list-style-type: none"> 1 The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision; 2 Provision of two vehicle access points onto the A149. The provision of a roundabout at the southern access should be provided prior to occupation of dwellings on the site; <p>For the policy to be sound the HA requires the following amendments to policy C22/2:</p> <ol style="list-style-type: none"> 1 The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision; <p>Background</p> <p>The HA has a long-term involvement with the proposed allocation of this site and consideration of a planning application (Ref: PO/25/0492) that has been assessed as the plan making process has progressed.</p> <p>The Bittern Line segregates the proposed allocation from the town centre. At the earliest stages of plan making, it was a clear requirement of the HA that the active travel provision over the rail line along the A149 corridor needed to be improved for the HA to support the allocation.</p> <p>Alongside the plan making process the promoters of the site have been progressing a planning application and have failed to show an improvement on the A149 nor robust evidence to show why such a provision is not possible. Alternatives along Roughton Road have been proposed but none of these have been acceptable highway solutions and the HA maintains an objection to the current application. The HA remains in discussion with the applicant to identify suitable highway solutions.</p> <p>Responses to previous plan making consultation stages</p> <p>At the Reg 19 stage no objection was raised to point 1 of the proposed policy as it met the HA requirements and has sufficient flexibility for the promoter to explore an alternative active travel crossing of the rail line if a dedicated footbridge solution on Norwich Road was proved undeliverable.</p> <p>December 2024, Further Consultation</p> <p>Wording</p> <p>Unless alternative routes are agreed by the Local Planning Authority in consultation with the Highway Authority, the provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway;</p>

	<p>HA Response</p> <p>C22/4 Cromer– No objection subject to the following changes to the proposed policy C22/4: ‘Unless alternative routes are agreed by the Local Planning Authority in consultation with the Highway Authority,†The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway.</p> <p>The submission, approval and implementation of a Transport Impact Assessment, to be publicly consulted on, to include analysis of the impact of the development on the local roadtransport networks, including during construction, and to identify the mitigation and solutions that may be required.’</p> <p>Main Modifications Consultation August 2025</p> <p>The current modifications do not take account of views expressed by the HA at the Reg 19 and Further Consultation stages.</p> <p>The change seek to introduce a further weakening of the need to provide a pedestrian/cycling improvement over the railway line adjacent to the A149.</p> <p>Wording for the Pine Trees farm policy C22/2 in Cromer as in the main modifications consultation: <i>The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision;</i></p> <p>The HA Objects to the proposed modification and considers it unsound. However, the objection can be overcome if the modification is amended as follows: <i>The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision;</i></p> <p>The reasons the proposed modification is unsound are:</p> <p>Justified– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>Policy C22/2 point 1 is not justified. Extensive work has not identified any reasonable alternatives to that proposed in the original C22/2 policy as set out in the Reg 19 submission version. The addition of the wording suggests an alternative that has not proven to be acceptable or reasonable.</p> <p>Effective– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>The views expressed to the proposed modifications are consistent with the views of the highway authority throughout this process and at no time has further evidence been introduced to the plan making system change the technical highway view. Therefore, the issue has not been addressed and there is no agreed resolution to the delivery of walking and cycling links over the rail line.</p> <p>Consistent with national policy– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.</p> <p>The A149 is a strong, if not the strongest, pedestrian and cycling desire line to local schools, healthcare and town centre facilities. Furthermore, the site is proposed to include community sports facilities, so attractive active travel routes to from the town is important to meet policy to minimise reliance on the private car and promote active travel.</p> <p>In summary, Norfolk County Council as Highway Authority (HA) objects to MM39 that relates to policy C22/2 Mixed-Use: Land West of Pine Tree Farm.</p> <p>For the policy to be sound the HA requires the following amendments to point 1 of policy C22/2: The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision;</p>
Attached File (where submitted)	
Officer Summary	<p>Norfolk County Council as Highway Authority (HA) objects to MM39 that relates to policy C22/2 Mixed-Use: Land West of Pine Tree Farm.</p> <p>Specifically, the objection relates to the site-specific requirements as set out points 1 and 2 of the proposed modified policy C22/2.</p> <p>1. The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision;</p> <p>2. Provision of two vehicle access points onto the A149. The provision of a roundabout at the southern access should be provided prior to occupation of dwellings on the site;</p> <p>For the policy to be sound the HA requires the following amendments to policy c22/2</p> <p>1. The provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway and a cycle/pedestrian link to Roughton Road unless proven to be unnecessary by a detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision;</p>

	Alongside the plan making process the promoters of the site have been progressing a planning application and have failed to show an improvement on the A149 nor robust evidence to show why such a provision is not possible. Alternatives along Roughton Road have been proposed but none of these have been acceptable highway solutions and the HA maintains an objection to the current application. The HA remains in discussion with the applicant to identify suitable highway solutions.
Officer Response	<p>Objection and proposed amendment noted. The modified policy, and in particular Criterion 1, is put forward so as to promote the strategic and optimum position i.e. a new segregated cycle/pedestrian footway along the Norwich Road / dedicated footbridge, but also to ensure that alternatives can be explored to facilitate the delivery of one of the most sustainable sites in the District following detailed discussions at the recent examination In public. At the same time, it is recognised that in writing the modified policy it is important to not create a ransom with the absolute requirement for pedestrian access improvements over the railway bridge and it is considered that the policy should not be amended as suggested.</p> <p>Officer's are encouraged with the more recent dialogue on the promoters updated evidence and updated proposals from NCC around solutions as part of the ongoing determination of the application and understand that discussions remain ongoing and have the potential to now pave the way for an alternative highway solution. It is worth noting that this is a process that sits outside of the Local Plan and that in part this headway is attributed to the policy wording as set out in the modified plan and informed by discussions at the hearings, and in particular criterion 1 as written to date. It is not considered appropriation or necessary to amend the policy as proposed.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM39
ID	MMC160
Response Date	17/09/2025 08:07:00
Full Name	Mr Patrick A'Hern
Organisation	Innova Consulting Services
Agent Full Name	Louise Follett
Agent Organisation	Corylus Planning & Environmental Ltd
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	<p>SEE ATTACHED FILE</p> <p>Corylus on behalf of our client, Innova Consulting Services, consider that proposed MM39 is legally compliant.</p> <p>MM39 increases the capacity of the draft allocation to 44 hectares with a capacity of approximately 500 dwellings plus 100 units/67 dwellings equivalent of specialist elderly persons accommodation, sport and recreational facilities and associated on and off-site infrastructure.</p> <p>Our client is totally supportive of the increased capacity at the site.</p>
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>Paragraph 36 of the NPPF (Dec 2024) provides guidance on the criteria by which plans are considered to be 'sound'.</p> <p><u>MM39 is positively prepared.</u> The increased housing numbers at the site assist the local planning authority in meeting their local housing needs over the plan period at one of the main towns within the District. The local planning authority are therefore increasing the capacity of an existing draft allocation in accordance with the proposed spatial strategy of the emerging Local Plan.</p> <p>The site, C22/4, is situated in a sustainable location to the south of Cromer in close proximity to a range of services and facilities that are accessible by sustainable modes of transport including walking and cycling. Roughton Road train station is located to the northwest of the site and existing bus services travel along Norwich and Roughton Roads.</p>

	<p>MM39 proposes sustainable development at a main town within the District that provides a large range of services and facilities which will be accessible by a range of sustainable travel options including public transport and active travel.</p> <p><u>MM39 is justified.</u> The provision and location of large new allocations for residential development at Cromer is constrained by the North Norfolk Coast National Landscape, heritage assets and their settings and the North Sea which is situated immediately to the north of the town.</p> <p>MM39 proposes an enhanced allocation at an appropriate site to the south of Cromer. The local planning authority having considered the reasonable alternatives and basing the main modification on proportionate evidence.</p> <p><u>MM39 is effective.</u> Site C22/4 is deliverable, it is wholly within the control of our client and an outline planning application for the site was submitted to the Council in February 2025 and validated on 20th March 2025. Effective and positive negotiations with the District and County, including the Highway Authority, are ongoing to ensure that matters raised through the statutory application consultation process are being actively and constructively addressed.</p> <p><u>MM39 is consistent with national policy</u></p> <p>Paragraph 36(d) of the NPPF (Dec 2024) states the following;</p> <p><i>“Consistent with national policy– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”</i></p> <p>Notwithstanding the constructive ongoing negotiations that have been taking place, especially with the Highways Authority, around bringing the site forward and the role of walking and cycling, it is suggested that Criteria 1 of MM39 could be rephrased to provide greater clarity for a decision maker.</p> <p>Paragraph 16(d) of the NPPF (Dec 2024) states that Plans should;</p> <p><i>“d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;”</i></p> <p>It is considered that Criteria 1 of MM39 is currently rather ambiguous, open to interpretation and lacks clarity, such that it is not clear to a decision maker exactly what the policy requires.</p> <p>It is understood that the Inspector is looking for a form of words that is facilitative with regard to the matters being addressed in Criteria 1, with the outworking of the Criteria to fall to the development management process. To that end it was considered prudent to obtain Counsels Opinion on a form of words that may assist.</p> <p>Counsels Opinion is attached to these representations at Appendix 1 with the following form of words suggested as a modification (replacement) to Criteria 1 of MM39.</p> <p><i>“The provision of a new cycle/pedestrian link to Cromer which may include;</i></p> <p><i>(1) a crossing of the railway (which might be through a dedicated footbridge or suitable alternative) and/or</i></p> <p><i>(2) a cycle/pedestrian link along Roughton Road - unless either or both are proven to be unnecessary by a detailed assessment of walking and cycling routes to and from Cromer which identifies desire lines and any remedies to existing gaps in provision that are necessary to make the development acceptable in planning terms.”</i></p> <p>Our client has provided extensive evidence as part of the application process on walking and cycling links to Cromer and on how the application can provide enhanced, quiet and safe routes for walking and cycling to schools and onwards into Cromer.</p> <p>While it is understood that the County maintain a position where their <u>optimum solution</u> is to provide a new footbridge over the railway alternative solutions are currently being actively explored with their support, therefore it is requested that Criteria 1 of MM39 provide flexibility to allow for alternative solutions as suggested above.</p>
Attached File (where submitted)	Counsels Opinion 15.09.25.pdf
Officer Summary	<p><u>MM39 is positively prepared.</u> The increased housing numbers at the site assist the local planning authority in meeting their local housing needs over the plan period at one of the main towns within the District. The local planning authority are therefore increasing the capacity of an existing draft allocation in accordance with the proposed spatial strategy of the emerging Local Plan.</p> <p><u>MM39 is justified.</u> The provision and location of large new allocations for residential development at Cromer is constrained by the North Norfolk Coast National Landscape, heritage assets and their settings and the North Sea which is situated immediately to the north of the town.</p> <p><u>MM39 is effective.</u> Site C22/4 is deliverable, it is wholly within the control of our client and an outline planning application for the site was submitted to the Council in February 2025 and validated on 20th March 2025. Effective and positive negotiations with the District and County, including the Highway Authority, are ongoing to ensure that matters raised through the statutory application consultation process are being actively and constructively addressed.</p> <p>Notwithstanding the constructive ongoing negotiations that have been taking place, especially with the Highways Authority, around bringing the site forward and the role of walking and cycling, it is suggested that Criteria 1 of MM39 could be rephrased to provide greater clarity for a decision maker.</p> <p>Paragraph 16(d) of the NPPF (Dec 2024) states that Plans should;</p> <p><i>“d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;”</i></p> <p>It is considered that Criteria 1 of MM39 is currently rather ambiguous, open to interpretation and lacks clarity, such that it is not clear to a decision maker exactly what the policy requires.</p>

	<p>It is understood that the Inspector is looking for a form of words that is facilitative with regard to the matters being addressed in Criteria 1, with the outworking of the Criteria to fall to the development management process. To that end it was considered prudent to obtain Counsels Opinion on a form of words that may assist.</p> <p>Counsels Opinion is attached to these representations at Appendix 1 with the following form of words suggested as a modification (replacement) to Criteria 1 of MM39.</p> <p><i>“The provision of a new cycle/pedestrian link to Cromer which may include;</i></p> <p><i>(1) a crossing of the railway (which might be through a dedicated footbridge or suitable alternative) and/or</i></p> <p><i>(2) a cycle/pedestrian link along Roughton Road - unless either or both are proven to be unnecessary by a detailed assessment of walking and cycling routes to and from Cromer which identifies desire lines and any remedies to existing gaps in provision that are necessary to make the development acceptable in planning terms.”</i></p> <p>Our client has provided extensive evidence as part of the application process on walking and cycling links to Cromer and on how the application can provide enhanced, quiet and safe routes for walking and cycling to schools and onwards into Cromer.</p> <p>While it is understood that the County maintain a position where their <u>optimum solution</u> is to provide a new footbridge over the railway alternative solutions are currently being actively explored with their support, therefore it is requested that Criteria 1 of MM39 provide flexibility to allow for alternative solutions as suggested above.</p>
Officer Response	Support and comments noted. The modified policy, and in particular Criterion 1, is put forward so as to encourage dialogue and facilitate the delivery of one of the most sustainable sites in the District following detailed discussions at the recent examination in public. At the same time it is recognised that in writing the modified policy it is important to not create a ransom with the absolute requirement for pedestrian access improvements over the railway bridge, and the Council is encouraged with recent dialogue on the proposals with NCC and NNDC officers on solutions in the ongoing determination of the application - a process that sits outside of this Local Plan. In part this is attributed to the policy as written to date. Consideration could be given to the suggested amendment, however as suggested it would potentially dilute the strategic and optimum position.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM39
ID	MMC174
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>MM39 Cromer, Mixed-Use: Land West of Pine Tree Farm, Policy C22/4</p> <p>Natural England welcome the biodiversity improvements to Beckett's Plantation, improved access and additional green infrastructure onsite. Potential impacts to nearby Felbrigg Woods Site of Special Scientific Interest (SSSI) will need to be considered, possibly through a SSSI Impact Assessment at a planning application stage.</p>
Attached File (where submitted)	
Officer Summary	MM39 Cromer, Mixed-Use: Land West of Pine Tree Farm, Policy C22/4

	Natural England welcome the biodiversity improvements to Beckett's Plantation, improved access and additional green infrastructure onsite. Potential impacts to nearby Felbrigg Woods Site of Special Scientific Interest (SSSI) will need to be considered, possibly through a SSSI Impact Assessment at a planning application stage.
Officer Response	Comments and support noted. Matter to be addressed through the application process.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM39
ID	MMC179
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome the reference to the listed building in the supporting text. We welcome the additional words at the end of bullet point 15 to provide additional protection to the GII listed Pine Tree Farmhouse.
Attached File (where submitted)	
Officer Summary	We welcome the reference to the listed building in the supporting text. We welcome the additional words at the end of bullet point 15 to provide additional protection to the GII listed Pine Tree Farmhouse.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM39
ID	MMC223
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	

Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water supports the policy clauses 11, 12, and 13 requiring the submission, approval and implementation of a Surface Water Management Plan, Foul Drainage Strategy, and enhancement to sewerage infrastructure to prevent detriment to the environment.</p> <p>It is noted that an outline planning application has been submitted for the erection of 550 dwellings plus additional accommodation for the elderly. Anglian Water has provided a consultee response to this application which states there is currently capacity to accommodate wastewater flows from the development at Cromer (Runton-Middlebrook Way) WRC. Anglian Water has also advised that a condition is applied to any grant of planning consent to ensure the sustainable point of connection to our wastewater network is complied with and identified in a strategic foul water strategy - this is to reduce the impacts of flooding and potential pollution risk.</p>
Attached File (where submitted)	
Officer Summary	<p>Anglian Water supports the policy clauses 11, 12, and 13 requiring the submission, approval and implementation of a Surface Water Management Plan, Foul Drainage Strategy, and enhancement to sewerage infrastructure to prevent detriment to the environment.</p> <p>It is noted that an outline planning application has been submitted for the erection of 550 dwellings plus additional accommodation for the elderly. Anglian Water has provided a consultee response to this application which states there is currently capacity to accommodate wastewater flows from the development at Cromer (Runton-Middlebrook Way) WRC. Anglian Water has also advised that a condition is applied to any grant of planning consent to ensure the sustainable point of connection to our wastewater network is complied with and identified in a strategic foul water strategy - this is to reduce the impacts of flooding and potential pollution risk.</p>
Officer Response	Support and comments noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC60
Response Date	01/09/2025 06:22:00
Full Name	Mr Paul Warner
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>We wish to stress our continued objections to the inclusion of this land within the Local Plan.</p> <p>We regularly walk our dog along the rights of way across this land and have done for decades. The odour from the water treatment works is dreadful and has on occasions made us gag. The smell is there most days due to the prevailing wind direction being from the direction of the treatment works.</p> <p>We are concerned about the impact of the development on the nearby cliffs. The cliffs have slipped many times over the years and the development could increase the rate of the slippage. This could eventually mean that the coast road is impassable and the option would be to send traffic from this development up over the hill and down Central Road which is already very busy.</p> <p>Central Road / Howards Hill are already very busy with traffic and people from the west of the town park there to go shopping at Morrisons, walk into town or use the train which means that residents struggle to find anywhere to park. The proposed development will likely cause even more problems for residents of this road and have a knock on effect on the other nearby streets. If this development does go ahead there will be an even greater need for a residents parking scheme to be considered for the area.</p> <p>Re the biodiversity net gain, the land is a rich haven for wildlife and will be lost forever along with the natural gap between Cromer and East Runton. If the land has to be built on surely the replacement land should be close to Cromer and not in another part of the County.</p> <p>With all the additional homes being proposed for Cromer we still have concerns on the aged infrastructure. There are often roadworks to address gas leaks and water leaks. There have also been several power outages recently. There are currently two water leaks on Central Road and others not far away. There have been gas leaks in the area too. Whilst we appreciate that new properties are unlikely to have gas, all the additional housing will put pressure on a system which currently struggles to cope.</p> <p>The other impact of the additional housing in the area will be on burial space. Cemeteries and churchyards across the country are filling up and whilst it is not mandatory, there does not seem to be any provision for extra cemetery land within the local plan. Whilst 80% of people opt for cremation, many religions and cultures still call for burial. Some families prefer to inter ashes in a cemetery so that they have a place to go to pay their respects and grieve. Whilst cemeteries should not be near places where there is a foul odour such as the water treatment works behind Clifton Park, will any cemetery provision be included in the local plan?</p>
Attached File (where submitted)	
Officer Summary	We are concerned about the impact of the development on the nearby cliffs. The cliffs have slipped many times over the years and the development could increase the rate of the slippage. This could eventually mean that the coast road is impassable and the option would be to send traffic from this development up over the hill and down Central Road which is already very busy.

	<p>Central Road / Howards Hill are already very busy with traffic and people from the west of the town park there to go shopping at Morrisons, walk into town or use the train which means that residents struggle to find anywhere to park. The proposed development will likely cause even more problems for residents of this road and have a knock on effect on the other nearby streets. If this development does go ahead there will be an even greater need for a residents parking scheme to be considered for the area.</p> <p>Re the biodiversity net gain, the land is a rich haven for wildlife and will be lost forever along with the natural gap between Cromer and East Runton. If the land has to be built on surely the replacement land should be close to Cromer and not in another part of the County.</p> <p>With all the additional homes being proposed for Cromer we still have concerns on the aged infrastructure. There are often roadworks to address gas leaks and water leaks. There have also been several power outages recently. There are currently two water leaks on Central Road and others not far away. There have been gas leaks in the area too. Whilst we appreciate that new properties are unlikely to have gas, all the additional housing will put pressure on a system which currently struggles to cope.</p> <p>The other impact of the additional housing in the area will be on burial space. Cemeteries and churchyards across the country are filling up and whilst it is not mandatory, there does not seem to be any provision for extra cemetery land within the local plan. Whilst 80% of people opt for cremation, many religions and cultures still call for burial. Some families prefer to inter ashes in a cemetery so that they have a place to go to pay their respects and grieve. Whilst cemeteries should not be near places where there is a foul odour such as the water treatment works behind Clifton Park, will any cemetery provision be included in the local plan?</p>
Officer Response	Objections noted. These matters largely repeat representations at the Further Consultation stage and were fully considered during the recent examination in public and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC65
Response Date	03/09/2025 14:37:00
Full Name	Mrs Hazel Fleming
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	MMC65 - Aug 2025 Consultation.pdf
Officer Summary	I realise that this planning application has been agreed and that residents' objections will not be considered any more. However, in the Inspector's post hearings letter and required main modifications of 8th May 2025 to the North Norfolk District Council, he says "the Council is invited to consider whether the site capacity of approximately 70 dwellings is still appropriate for the site and, if not, to put forward an alternative figure in the draft MMs." I can see no alteration to the figure of 70 dwellings in the Consultation on Main Modifications to the North Norfolk Local Plan (08) sent to me by email on 6th August. Does this mean that the 70 dwellings will be crammed into a smaller area, or is this figure going to be revised

Officer Response	Comments noted. No application has been granted planning permission on this site at this time. The site is included as an allocation in the Local Plan. The Council has considered the site's capacity to accommodate 70 dwellings in line with the inspector's letter and consider the site still capable of delivering approximately 70 dwellings in addition to the other policy requirements as set out in the site-specific policy.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC72
Response Date	01/09/2025 20:48:00
Full Name	Carolyn Jackson
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>I am writing to raise objections to the proposed plan to build 70 new (unaffordable)homes on the land West of Clifton Park for 4 reasons:</p> <ol style="list-style-type: none"> 1. Drainage and the impacts of sustainable urban drainage systems on cliff stability and resulting economic impacts. 2. Odour issues arising from the proximity to Cromer Water Treatment Works and the potential for complaints for years to come. 3. Loss of biodiversity with inland mitigation/replacement being unsuitable for the needs of local wildlife. 4. The impact on perception of East Runton as a place with the loss of settlement boundary. <p>I do not feel that this land should be allocated in the emerging development plan. In addition to these 4 critical issues there is the matter of a lack of road, education and medical support infrastructure to support the number one potential residents this might attract. Our services are already unable to cope with the existing population. Furthermore the stagnation of the housing market currently s unlikely to improve with many homes languishing on the open market unsold for over a year. It is likely this development would add to these woes and further devalue the house prices of existing residents leading to further economic plight.</p>
Attached File (where submitted)	
Officer Summary	<ol style="list-style-type: none"> 1. Drainage and the impacts of sustainable urban drainage systems on cliff stability and resulting economic impacts. 2. Odour issues arising from the proximity to Cromer Water Treatment Works and the potential for complaints for years to come. 3. Loss of biodiversity with inland mitigation/replacement being unsuitable for the needs of local wildlife. 4. The impact on perception of East Runton as a place with the loss of settlement boundary. <p>I do not feel that this land should be allocated in the emerging development plan. In addition to these 4 critical issues there is the matter of a lack of road, education and medical support infrastructure to support the number one potential residents this might attract. Our services are already unable to cope with the existing population. Furthermore the stagnation of the housing market currently s unlikely to improve with many homes languishing on the open market unsold for over a year. It is likely this development would add to these woes and further devalue the house prices of existing residents leading to further economic plight.</p>
Officer Response	Objections noted. These matters largely repeat representations at the Further Consultation stage and were fully considered during the recent examination in public, and set out in various evidence

	documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC73
Response Date	02/09/2025 06:51:00
Full Name	Ms Evie Anderson
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	I would like to once again to raise my concerns and dismay at the proposed plans to wreck a stretch of green belt, rewilded land to the west of Cromer. This beautiful place has been enjoyed and is still enjoyed by generations of families. It is one of the few, easily accessible (by foot from the town) places to engage with and observe nature. It also provides a delineation between parishes. Without it we start to resemble a suburban sprawl with a huge loss of green space and biodiversity. It is also a concern that such a huge development so close to our eroding cliffs will cause major drainage issues. Land that is held together efficiently by plants, roots and undisturbed, will become a hazard and its future will not be secure. Its also right next to Cromer water treatment works. Seems totally unsuitable and will be taking away something very treasured.
Attached File (where submitted)	
Officer Summary	Object. It is one of the few, easily accessible (by foot from the town) places to engage with and observe nature. It also provides a delineation between parishes. Without it we start to resemble a suburban sprawl with a huge loss of green space and biodiversity. It is also a concern that such a huge development so close to our eroding cliffs will cause major drainage issues. Land that is held together efficiently by plants, roots and undisturbed, will become a hazard and its future will not be secure. Its also right next to Cromer water treatment works. Seems totally unsuitable and will be taking away something very treasured.
Officer Response	Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC74
Response Date	02/09/2025 13:49:00
Full Name	Wynne Ashlin
Organisation	
Agent Full Name	
Agent Organisation	

Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>As a resident of East Runton for 18 years I would like you to read my comments.</p> <p>I have walked around the area regularly as a dog walker, with my grandson, as a member of a nordic walking group and when I do the monthly litter pick along the main road for East Runton.</p> <p>1. There is a foul smell and not occasionally but often. It was regularly commented upon by members in the walking group.</p> <p>2. I have recorded no end of bird species using the app Merlin and have talked to bird enthusiasts looking at migratory birds as they come over from the continent.</p> <p>3. As a member of Coastwatch I am well aware of the damage and danger to the cliffs that more surface water soakaway would do.</p> <p>4. East Runton is a village with its own identity and community. I love Cromer but don't want to become a suburb.</p> <p>That land should not be built on. It is a treasure that would be lost forever and for what. Large houses for more people either pensioners or those well off enough to pay such high prices. My daughter, son in law and baby had to live with me in my 2 bed bungalow for a year before they could get a house in North Walsham and then only with the help of parents.</p> <p>Leave it as it is and continue to let locals and wildlife have its use.</p>
Attached File (where submitted)	
Officer Summary	<p>1. There is a foul smell and not occasionally but often. It was regularly commented upon by members in the walking group.</p> <p>2. I have recorded no end of bird species using the app Merlin and have talked to bird enthusiasts looking at migratory birds as they come over from the continent.</p> <p>3. As a member of Coastwatch I am well aware of the damage and danger to the cliffs that more surface water soakaway would do.</p> <p>4. East Runton is a village with its own identity and community. I love Cromer but don't want to become a suburb.</p> <p>That land should not be built on. It is a treasure that would be lost forever and for what. Large houses for more people either pensioners or those well off enough to pay such high prices. My daughter, son in law and baby had to live with me in my 2 bed bungalow for a year before they could get a house in North Walsham and then only with the help of parents.</p> <p>Leave it as it is and continue to let locals and wildlife have its use.</p>
Officer Response	<p>Objections noted. These matters largely repeat representations at the Further Consultation stage and were fully considered during the recent Examination in Public, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested.</p> <p>Concerns regarding odour were discussed with Anglian Water and appropriate mitigation identified through the site-specific policy.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC75
Response Date	03/09/2025 11:45:00
Full Name	Stuart Filmer
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure	No Comment / Unsure

* General Comment	
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>I am emailing my concerns regarding this development. For the record, I live on Clifton Park, but the development would not directly affect my property., i.e. my line of sight etc would not be affected. Unless there is poor parking management for the new homes, I would not expect people to park on Clifton Park, who live on the new housing estate. However, this is concern as most new housing developments do not cater for more than 1 car, even though everyone has at least 2 these days and the cut-through would make it easy for people to park they cars in our area.</p> <p>1. Biodiversity. The perception is that with new shrub and tree planting the biodiversity will increase after the housing will be built. I wish dispute this.</p> <p>a. The birds that come offshore will go directly to the site, as they have been for years. At the time of construction and with the new houses, the birds will have to travel further and may not realise they can go over the houses to the new 'open area'. Most birds only stop because they tired and hungry.</p> <p>b. Has there been a study of which birds come and feed in the area now? We are all aware of the Siberian Stonechat that visited in 2024, but many other species must of visited. Will the 'new biodiversity area' cater for these birds? Or as I suspect, just some standard trees and bushes will be put in that helps very little wildlife. In the end, the housing development is created, everyone leaves, no one maintains the 'biodiversity area' and the net gain is no longer a net gain. But no-one cares except for the local people and the birds. Who is caring for the new green area? The council, the developer?</p> <p>c. In the Labour government's last manifesto for the 2024 election, it was stated 'Labour will deliver for nature, taking action to meet our Environment Act targets, and will work in partnership with civil society, communities and business to restore and protect our natural world' and 'Labour will expand nature-rich habitats such as wetlands, peat bogs and forests so families can explore and wildlife can thrive, including on public land.'. Does this land not represent nature? Therefore it should be protected.</p> <p>2. Water Treatment works</p> <p>a. During the summer the smell, especially at peak holiday season, is pretty awful. We are some way away from the works, but it will be far worse for the new owners on the new development. We have complained to Anglian Water, my last reference number is BD/60905339. This was last week, and as yet, bar the confirmation email, I haven't heard anything back. If Anglian Water are not taking action, as it seems, these new owners will be regretting the move as the smell will be 10 times worse.</p> <p>b. The treatment works are also noisy. Not 24 hours, but every so often, when it is, I presume, performing a certain procedure. Again this noise will be much higher for the new owners.</p> <p>c. Is it fair that these people be subjected to awful smells and noise? I suspect the company selling the houses will not be putting this on the brochure!</p> <p>3. Drainage</p> <p>a. I couldn't find details, but we would need to know where the rain drainage from the houses and roads would go? At the moment the rain is evenly spread across the site and the land is very absorbent. When the land is tiles and tarmac the water will form mini streams and this water will need to go somewhere.</p> <p>As I suspect it will be gravity that takes the water, this will mean that the water will head for the shoreline and therefore the cliff edge. This is by far the worst thing can happen. Those cliffs are fragile as it is and water coming from the sea or from inland will break the cliff and cause landslips. Over the years that will mean the static caravan site will disappear, the road will need to moved and ultimately the new houses will be forced to demolished. Ok, this will not happen over night. But again, are we not suppose to protect our land and nature? Did we as a country did spend millions of pounds trying to save further damage to Cromer on the front? Is it right we sell houses to people when we know eventually it will be worth nothing?</p>
Attached File (where submitted)	
Officer Summary	<p>1. Biodiversity. The perception is that with new shrub and tree planting the biodiversity will increase after the housing will be built. I wish dispute this.</p> <p>a. The birds that come offshore will go directly to the site, as they have been for years. At the time of construction and with the new houses, the birds will have to travel further and may not realise they can go over the houses to the new 'open area'. Most birds only stop because they tired and hungry.</p> <p>b. Has there been a study of which birds come and feed in the area now? We are all aware of the Siberian Stonechat that visited in 2024, but many other species must of visited. Will the 'new biodiversity area' cater for these birds? Or as I suspect, just some standard trees and bushes will</p>

	<p>be put in that helps very little wildlife. In the end, the housing development is created, everyone leaves, no one maintains the 'biodiversity area' and the net gain is no longer a net gain. But no-one cares except for the local people and the birds. Who is caring for the new green area? The council, the developer?</p> <p>c. In the Labour government's last manifesto for the 2024 election, it was stated 'Labour will deliver for nature, taking action to meet our Environment Act targets, and will work in partnership with civil society, communities and business to restore and protect our natural world' and 'Labour will expand nature-rich habitats such as wetlands, peat bogs and forests so families can explore and wildlife can thrive, including on public land.'. Does this land not represent nature? Therefore it should be protected.</p> <p>2. Water Treatment works</p> <p>a. During the summer the smell, especially at peak holiday season, is pretty awful. We are some way away from the works, but it will be far worse for the new owners on the new development. We have complained to Anglian Water, my last reference number is BD/60905339. This was last week, and as yet, bar the confirmation email, I haven't heard anything back. If Anglian Water are not taking action, as it seems, these new owners will be regretting the move as the smell will be 10 times worse.</p> <p>b. The treatment works are also noisy. Not 24 hours, but every so often, when it is, I presume, performing a certain procedure. Again this noise will be much higher for the new owners.</p> <p>c. Is it fair that these people be subjected to awful smells and noise? I suspect the company selling the houses will not be putting this on the brochure!</p> <p>3. Drainage</p> <p>a. I couldn't find details, but we would need to know where the rain drainage from the houses and roads would go? At the moment the rain is evenly spread across the site and the land is very absorbent.</p>
Officer Response	Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC81
Response Date	04/09/2025 09:35:00
Full Name	Julie Filmer
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>I would like to put in my objections to the planned development west of Clifton Park. I am a Clifton Park resident so will be directly affected by the proposed development. My objections are as follows:</p> <p>1) The area supports a vast array of wildlife -plants, insects, birds and animals. We regularly see a huge variety of wildlife including bats, rare birds and deer. A full environmental impact survey should be undertaken before any development is considered. I understand that a builder would need to mitigate the loss of this by buying environmental credits, but the replacement of this could be sited out of the local area. How can the biodiversity of this unique piece of land be reproduced elsewhere? For example, if migrating birds use this land as a pitstop, the loss of this could not be replicated elsewhere.</p>

	<p>2) The development site is very close to the cliff edge which is unprotected from sea defences. Most of our coastal erosion is caused by moisture in the cliffs, causing them to crumble and be susceptible to high seas. Drainage from the site naturally heads towards the cliff and housing would put huge pressure on this. The carnival field opposite is a source of revenue for the town and is well used and loved. Any land loss to this site should be avoided.</p> <p>3) Currently we have a clear boundary between Cromer and East Runton. This would be lost by developing the land.</p> <p>4) Odours from the water treatment plant - as a resident, we regularly experience sewage smells from the water treatment plant. Sometimes we can smell it inside our house if a window is open. We put in regular complaints to Anglian Water as a result of this. The smells are even stronger on the land west of Clifton Park. This would be a huge issue if houses were to be built here.</p>
Attached File (where submitted)	
Officer Summary	<p>1) The area supports a vast array of wildlife -plants, insects, birds and animals. We regularly see a huge variety of wildlife including bats, rare birds and deer. A full environmental impact survey should be undertaken before any development is considered. I understand that a builder would need to mitigate the loss of this by buying environmental credits, but the replacement of this could be sited out of the local area. How can the biodiversity of this unique piece of land be reproduced elsewhere? For example, if migrating birds use this land as a pitstop, the loss of this could not be replicated elsewhere.</p> <p>2) The development site is very close to the cliff edge which is unprotected from sea defences. Most of our coastal erosion is caused by moisture in the cliffs, causing them to crumble and be susceptible to high seas. Drainage from the site naturally heads towards the cliff and housing would put huge pressure on this. The carnival field opposite is a source of revenue for the town and is well used and loved. Any land loss to this site should be avoided.</p> <p>3) Currently we have a clear boundary between Cromer and East Runton. This would be lost by developing the land.</p> <p>4) Odours from the water treatment plant - as a resident, we regularly experience sewage smells from the water treatment plant. Sometimes we can smell it inside our house if a window is open. We put in regular complaints to Anglian Water as a result of this. The smells are even stronger on the land west of Clifton Park. This would be a huge issue if houses were to be built here.</p>
Officer Response	Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC82
Response Date	04/09/2025 11:02:00
Full Name	Mrs Kathryn Sault
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>I am writing to strongly object about the proposed development on the above mentioned land.</p> <p>The planned catchment area for the Suds at the bottom of the field, adjacent to the road and not far from the clifftop, even though it is said water will be pumped away, will house thousands of gallons</p>

	<p>of water within the area heading towards the sea as it soaks through the ground. Water will always find its way through to the bottom of the cliff. A mechanical pump would not cope with the amount of water in the winter. This will only serve to speed up the erosion which hasn't been calculated – if it has, what are the calculations? There is no other area for catchment water within Cromer so why is this thought to be suitable at Cromer? At least once in every 25 years we have extremely heavy downpours of rain. The gradient of the land to the left and right and to the far back of the land will all be sloping towards the Suds. In severe downpours this water is going to run naturally towards the Suds as gravity takes it to the lowest point which would flood onto the road towards the cliff and weaken it. The water can also weaken the road. There is evidence of roads collapsing because of water leaks and massive holes appearing. Has it been considered how the roads will be reinforced?</p> <p>With our hotter summers and the ground drying, shrinking and moving, evidence of foundations moving is apparent by insurance companies. With the wetter winters, and the vast amount of water soaking into the ground as it soaks through and under the road will shift the soil and it will not be too long a time before the road collapses. If the building gets the go ahead, there would be thousands upon thousands of gallons of water at any one time going into the ground eventually at an angle coming through the clifftop as already evidenced by the council with water running through and causing soil to shift, weakening the face of the cliff. This is going to greatly speed up the erosion of the clifftop which has not been taken into account. This can only be disastrous for the clifftop eventually eroding completely away. Why has such an important and crucial matter been overlooked? There needs to be some proper calculations to see what time left we have before damage to the clifftop leads to collapse happening at magnitude.</p> <p>When one stands on the path adjacent to the road overlooking the area of the Suds catchment that has been suggested; to the left and the right and immediately in front as far as the eye can see, the land all slopes towards this point of the catchment area with a steep gradient – at least a 1 in 4 gradient. Not only will the Suds catchment take surface water from the buildings and the roads, it will take it from the land and fields beside that as it naturally slopes towards it. In heavy downpours of rain, naturally with gravity and the ground sloping it will go to the lowest point which will be the Suds catchment area proposed. In heavy downpours this will flood onto the road also doing great damage to the clifftop as water soaks into the ground continuously, also soaking under the road weakening it and eventually causing it to fail and collapse.</p> <p>Why would the government want to risk losing the cliffs as they are already eroding at a fast pace – strongly evidenced by many areas along the Norfolk coastline? What evidence is there to show that the method to be used - ie the Suds close to a clifftop and by a road - works ?</p> <p>A Suds design should not be by a clifftop and by a road where the water is going to soak through the ground and underneath; thereby undermining the road; and crucial services, such as water and gas pipes, underneath.</p> <p>Cromer and it's cliffs are so important – and vital to it's tourism industry not to mention all the residents. We must protect this valuable and vulnerable land. Do the government really want to lose something so valuable and contribute even more to climate change by building on it in a way that has not been properly thought out?</p> <p>Has contamination of land from the dis-assembling of military vehicles during the war been considered? Has the soil been tested in this respect?</p>
Attached File (where submitted)	
Officer Summary	<p>The planned catchment area for the Suds at the bottom of the field, adjacent to the road and not far from the clifftop, even though it is said water will be pumped away, will house thousands of gallons of water within the area heading towards the sea as it soaks through the ground. Water will always find its way through to the bottom of the cliff. The gradient of the land to the left and right and to the far back of the land will all be sloping towards the Suds. In severe downpours this water is going to run naturally towards the Suds as gravity takes it to the lowest point which would flood onto the road towards the cliff and weaken it.</p> <p>If the building gets the go ahead, there would be thousands upon thousands of gallons of water at any one time going into the ground eventually at an angle coming through the clifftop as already evidenced by the council with water running through and causing soil to shift, weakening the face of the cliff. This is going to greatly speed up the erosion of the clifftop which has not been taken into account.</p> <p>Has contamination of land from the dis-assembling of military vehicles during the war been considered? Has the soil been tested in this respect?</p>
Officer Response	<p>Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in public. These matters were considered during the recent examination in public, and are set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary. The site-specific policy includes requirements approved by the relevant statutory consultees in relation to surface water management to mitigate the issues mentioned. No changes to the policy are being suggested. Potential contamination, any works to remediate and details around Suds are matter for the application determination.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC84

Response Date	04/09/2025 21:48:38
Full Name	Mrs Sue Dyke
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>I live near to the edge of Clifton Park, and the area under question is part of the boundary between Cromer and East Runton. The loss of this boundary would be a huge impact on the identity of East Runton, currently a village in its own right, and any development on this land would be detrimental to the village.</p> <p>Any development would be subject to year round odours from the close proximity to Cromer Water Treatment Works - a problem that already exists with the current volume of water treated, and any development here would add to the volume, increasing an already regular stench in the air.</p> <p>There would be issues with the current drainage systems, in an area already experiencing instability from the eroding cliffs, and its not an area very far from the cliffs already - any new developments could cause even further cliff erosion. How long before any buildings would find themselves near to the cliff edge ? This would all prove costly resulting in economic impact locally.</p> <p>Any development would also have a severe and major impact on the biodiversity, with he loss of habitat for many species of animal and plants, many alrady under threat. It is also a natural open corridor for migrating birds coming in or leaving across the sea. We have walked across this area many times in the past, and there is an abundance of wildlife, flora and fauna, the loss of which would be catastrophic. Any replacement considered would be unsuitable for the needs of local wildlife in a coastal area. It is also an area that helps with human wellbeing, as people can enjoy the atmosphere it creates.</p> <p>We feel that there are other far more suitable areas to place a like development, that would have less damaging impact on the environment, and these need to be considered to enable the individuality of Cromer/ Clifton Park/East Runton to be preserved.</p>
Attached File (where submitted)	
Officer Summary	<p>Any development would be subject to year round odours from the close proximity to Cromer Water Treatment Works - a problem that already exists with the current volume of water treated, and any development here would add to the volume, increasing an already regular stench in the air.</p> <p>There would be issues with the current drainage systems, in an area already experiencing instability from the eroding cliffs, and its not an area very far from the cliffs already - any new developments could cause even further cliff erosion. How long before any buildings would find themselves near to the cliff edge ? This would all prove costly resulting in economic impact locally.</p> <p>Any development would also have a severe and major impact on the biodiversity, with he loss of habitat for many species of animal and plants, many alrady under threat. It is also a natural open corridor for migrating birds coming in or leaving across the sea. We have walked across this area many times in the past, and there is an abundance of wildlife, flora and fauna, the loss of which would be catastrophic. Any replacement considered would be unsuitable for the needs of local wildlife in a coastal area. It is also an area that helps with human wellbeing, as people can enjoy the atmosphere it creates.</p> <p>We feel that there are other far more suitable areas to place a like development, that would have less damaging impact on the environment, and these need to be considered to enable the individuality of Cromer/ Clifton Park/East Runton to be preserved.</p>
Officer Response	Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary.

	The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the resumed EiP hearings in April 2025, and the requirements within the site-specific policy as modified.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC96
Response Date	05/09/2025 10:20:08
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>The inclusion of this site goes against paragraph 192 of the NPPF "To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation". This site is valuable for wildlife and is known to be a very valuable site for migratory and passage birds due to the mosaic of scrub and grassland. We recommend that this site should be excluded from any housing allocation in the Local Plan, preserving the gap between Cromer and East Runton and providing a corridor for wildlife to move through the landscape.</p> <p>This area is currently lowland dry acid grassland, which is a priority habitat and there is potential for a negative biodiversity impact. It is also in close proximity CWSs (Cromer Sea Front, Hall Wood & Cromer Old Cemetery), SSSI & local geodiversity site (East Runton Cliffs). The area also provides a green corridor between the coast and the wider countryside to the south. The merging of Cromer and East Runton, which this housing allocation would create would also result in a significant barrier to wildlife movement between the coast and the countryside inland. This would contravene clause 2e in the new local plans which that's that all development proposals will be expected to: "avoid the net loss or fragmentation of habitats and support the creation of coherent ecological networks in urban and rural areas and through Nature Recovery Networks".</p> <p>In addition to this, the northern part of the site falls within one of the Lawton Zones, as identified in the Norfolk Habitat Atlas. These areas are helping inform the upcoming Local Nature Recovery Strategy and as such, should be kept free from development.</p> <p>We object to the inclusion of this site as a housing allocation and recommend instead it is safeguarded as permanent green open space in its entirety.</p> <p>Should this allocation be adopted, we recommend an additional clause within the policy text similar to that in other policies: "Retention and enhancement of hedgerows and trees around and within the site including the protection of existing woodland within the site;"</p>
Attached File (where submitted)	
Officer Summary	<p>This site is valuable for wildlife and is known to be a very valuable site for migratory and passage birds due to the mosaic of scrub and grassland. We recommend that this site should be excluded from any housing allocation in the Local Plan, preserving the gap between Cromer and East Runton and providing a corridor for wildlife to move through the landscape.</p> <p>This area is currently lowland dry acid grassland, which is a priority habitat and there is potential for a negative biodiversity impact. It is also in close proximity CWSs (Cromer Sea Front, Hall Wood & Cromer Old Cemetery), SSSI & local geodiversity site (East Runton Cliffs). The area also provides a green corridor between the coast and the wider countryside to the south. The merging of Cromer</p>

	<p>and East Runton, which this housing allocation would create would also result in a significant barrier to wildlife movement between the coast and the countryside inland.</p> <p>We object to the inclusion of this site as a housing allocation and recommend instead it is safeguarded as permanent green open space in its entirety.</p> <p>Should this allocation be adopted, we recommend an additional clause within the policy text similar to that in other policies: "Retention and enhancement of hedgerows and trees around and within the site including the protection of existing woodland within the site;"</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. Proposed change is not necessary to make the Local Plan sound, the built development within the allocation is not located within a woodland and there is no requirement to protect hedgerows and woodlands that lie outside of the allocation's boundary.</p> <p>The draft Norfolk LNRS states that the document should not be used to place new restrictions on developing land, act as a specific barrier or blocker for proposals or identify areas to be given legal nature protections that create restrictions on how land can be used or managed.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC105
Response Date	05/09/2025 15:04:58
Full Name	Mrs Teresa Cole
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Effective
Question 7 - Explanation of Soundness Reasons	<p>MM40 – Residential : Land at Runton Road/Clifton Park (C10/1):</p> <p>Although this land has been put forward for development it was rejected in 2004, 2009 and discounted in the Site Assessments for Cromer - Regulation 19 Stage in January 2022 following hundreds of representations which have been documented over the years for inspection and are still valid. I therefore list the following issues from the last Local Plan Examination in April 2025, and the Schedule of the Main Modifications published in August 2025 for consideration:</p> <ul style="list-style-type: none"> • Site Capacity: The site is stated as being allocated for residential development of approximately 70 dwellings. However, the Inspector's letter of 8th May 2025, states that following his requirements for this site in para 9, 10 and 11 that the Council be invited to consider this site number and put forward an alternative figure in the draft MM. This seems to have been ignored which is concerning as although the land is approximately 8 hectares, a provision of approximately 4.6 hectare is stated as being of designated open space, with strategic landscaping between housing and the public footpaths/ bridlepaths etc., and the requirement for a deep landscaped frontage along the Runton Road, thus leaving only 3.4 hectares to build 70 houses, which the Pigeon Vision Statement document clearly shows with front/back gardens and garages. • Site Access: The provision of a convenient and safe vehicular access being provided via Clifton Park is very concerning. This access point should be reconsidered in light of the following:

- It is at a junction where the road surface is already affected by heavy rain, traffic and flooding issues.
- The junction is only a few yards from residential dwellings occupied by older residents and is currently used as a turning point for waste and delivery vehicles.
- The junction is directly opposite and within a few yards of the pedestrian entrance to Runton Road open field space (with signposted public footpath entrance) and the only entrance to a large caravan park – both used all year round by the local community and holidaymakers and those walking public footpath coastal routes.
- The access will directly cross two public footpaths/rights of way entrances which will make it very unsafe for these to be used during development work and in the future.
- The impact of having a building site access on this coastal site needs to be carefully considered, especially with the traffic and pedestrian use of this part of the East Runton coastal road.
- **Urban Drainage System:** This land currently acts as a natural sponge during heavy rainfall, providing some protection to the local area. As the land slopes towards Runton Road there is great concern that any re-surfacing of the land through development will have a direct impact on the cliff top stability opposite this site which has already suffered from recent landslides. The cliff edge fencing has already been moved back due to coastal erosion and any new housing developments opposite this coastline seems to be completely ignoring this known fact.
- **Cromer Water Treatment Works:** This proposed development completely ignores the ongoing issue of many years, relating to the noise and pungent odours that waft across this land from the Water Treatment Works. This is a very regular occurrence which despite complaints being made has not improved over the many years I have lived here. To even consider building homes in such close proximity and in direct line of this treatment works is madness and will be very unpleasant for new owners and current residents as there will also be the extra pressure of a new housing development requiring the services of a treatment works that cannot cope with the existing capacity.
- **East Runton Settlement Boundary (The Runton Gap):** This site is in East Runton and has historically provided a visual openness and a boundary 'gap' between East Runton Village and Cromer Town approaches. The two areas provide separate holiday experiences and the loss of such a distinctive settlement boundary means that village and town will appear joined together in an urban sprawl of housing developments along this coastal road. The land is a coastal site and concerns about the implications to holidaymakers visiting the area should not be under-estimated. They are the bread and butter of this community.
- **Biodiversity:** The loss of biodiversity is worrying, even with all the assurances and promises of high-quality landscaping and the retaining and enhancing of wildlife habitats. One would be foolish to think that a housing development will not have an impact on the local and migratory wildlife and damage the natural habitat that already exists – any biodiversity gain will not replace what is already thriving on this land. The land continues to be of ecological interest to several wildlife organisations who all support its protection i.e. Wildlife Trust, Cromer Green Spaces, Norfolk Norwich Naturalists Society, Walk Cromer etc.
- **Public Right of Way Footpaths/Bridlepath:** The area for development is bordered by several footpaths, some having been registered from user evidence provided by many local people. A recent laying of just one new gas pipe along part of the border of Clifton Park meant these were blocked for several weeks. There is concern that the proposed development of 30 houses in 2027/28 and 40 in 2028/29 will mean access to these paths will be severely affected. It is obvious that all aspects of a housing construction development will need to cross these pathways during the building process. This will mean another much-loved community asset will be lost due to this development despite there being over 20 years of user evidence enjoyment.

As well as all the concerns advised above, I note that Cromer is expected to accommodate 897 new developments over the plan period, which is significantly higher than the 249 required in the other local seaside town of Sheringham. Local and national news has advised a drop in birth rates in the Norfolk area, as well as reporting reductions in population figures for local areas which raises the concern that any development will mean this land is lost forever to another area of holiday lets, of which Cromer, as a tourist town, already has many.

Unfortunately, public confidence and community trust in the planning system itself has obviously been affected, as many people have given their time to engage in the processes of the draft local plan, and having had this land rejected several times for the reasons they provided, it really feels that local voices have now been excluded with the current urge to build build build – no matter what the consequence to the community is in the coming years.

Attached File (where submitted)

Officer Summary

Although this land has been put forward for development it was rejected in 2004, 2009 and discounted in the Site Assessments for Cromer - Regulation 19 Stage in January 2022 following hundreds of representations which have been documented over the years for inspection and are still valid. I therefore list the following issues from the last Local Plan Examination in April 2025, and the Schedule of the Main Modifications published in August 2025 for consideration:

The site is stated as being allocated for residential development of approximately 70 dwellings. However, the Inspector's letter of 8th May 2025, states that following his requirements for this site in para 9, 10 and 11 that the Council be invited to consider this site number and put forward an alternative figure in the draft MM. **This seems to have been ignored.**

- The provision of a convenient and safe vehicular access being provided via Clifton Park is very concerning. This access point should be reconsidered in light of the following:
- It is at a junction where the road surface is already affected by heavy rain, traffic and flooding issues.

	<p>Urban Drainage System: This land currently acts as a natural sponge during heavy rainfall, providing some protection to the local area. As the land slopes towards Runton Road there is great concern that any re-surfacing of the land through development will have a direct impact on the cliff top stability opposite this site which has already suffered from recent landslides.</p> <p>Cromer Water Treatment Works: This proposed development completely ignores the ongoing issue of many years, relating to the noise and pungent odours that waft across this land from the Water Treatment Works.</p> <p>East Runton Settlement Boundary (The Runton Gap): This site is in East Runton and has historically provided a visual openness and a boundary 'gap' between East Runton Village and Cromer Town approaches.</p> <p>Biodiversity: The loss of biodiversity is worrying, even with all the assurances and promises of high-quality landscaping and the retaining and enhancing of wildlife habitats.</p> <p>Public Right of Way Footpaths/Bridlepath: The area for development is bordered by several footpaths, some having been registered from user evidence provided by many local people. A recent laying of just one new gas pipe along part of the border of Clifton Park meant these were blocked for several weeks.</p>
Officer Response	Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent examination in public, and set out in various evidence documents in the Local Plan examination library. The site-specific policy as modified includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested or considered necessary. The Council has considered the site's capacity to accommodate 70 dwellings as requested and consider the site still capable of delivering 70 dwellings in addition to the requirements set out in the site-specific policy. The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the resumed EiP in April 2025, and the requirements within the site-specific policy.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC115
Response Date	08/09/2025 15:30:00
Full Name	Mr Steven Salisbury
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>I am very concerned and disheartened by the nature and scale of housing throughout the country, particularly when the present housing structure is very often not being properly utilised. However, I am especially highlighting Cromer, my home town, and the awful effect the current housing proposals would have.</p> <p>Like every where else, more housing would clearly put further strain on our roads, schools, GP's and dentists, and these essential infrastructure elements are obviously not in place. But I especially dislike and feel saddened by the 70+ houses being considered near Clifton Park.</p> <p>I love our countryside. It is essential for peace and quiet - something that is getting more and more difficult to obtain - and its importance for our general wellbeing. Once it is built on, it is gone forever! This area is a 'green' site - it has an ecological richness and diversity - good for walking, birds, insects and a host of other wildlife.</p> <p>The site would essentially fill the gap between East Runton and Cromer, affecting both communities and local campsites as well.</p>

	<p>Essentially, too, it is very near a water treatment works, and I believe Anglian Water objected to housing here previously. There is a very distinct odour coming from here, which would surely put people off from buying a house here!</p> <p>Another very important issue is concerning the drainage. Soak ways would go towards the cliffs very nearby. This would cause more erosion! A fortune has, quite rightly, been spent on coastal defences around Cromer, yet this housing would create the opposite effect, causing much more erosion of our unstable cliffs.</p> <p>Overall, this site is in no way suitable, and I can't believe it is being considered for development.</p>
Attached File (where submitted)	
Officer Summary	<p>Like every where else, more housing would clearly put further strain on our roads, schools, GP's and dentists, and these essential infrastructure elements are obviously not in place. But I especially dislike and feel saddened by the 70+ houses being considered near Clifton Park.</p> <p>I love our countryside. It is essential for peace and quiet - something that is getting more and more difficult to obtain - and its importance for our general wellbeing. Once it is built on, it is gone forever! This area is a 'green' site - it has an ecological richness and diversity - good for walking, birds, insects and a host of other wildlife.</p> <p>The site would essentially fill the gap between East Runton and Cromer, affecting both communities and local campsites as well.</p> <p>Essentially, too, it is very near a water treatment works, and I believe Anglian Water objected to housing here previously. There is a very distinct odour coming from here, which would surely put people off from buying a house here!</p> <p>Another very important issue is concerning the drainage. Soak ways would go towards the cliffs very nearby. This would cause more erosion! A fortune has, quite rightly, been spent on coastal defences around Cromer, yet this housing would create the opposite effect, causing much more erosion of our unstable cliffs.</p> <p>Overall, this site is in no way suitable, and I can't believe it is being considered for development.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC116
Response Date	05/09/2025 16:06:00
Full Name	Mr Howard & Katarzyna White & Trojan
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>We write to you as very concerned and very local residents regarding the emerging Development Plan that may include land to the west of Clifton Park.</p> <p>We live at [REDACTED] Clifton Park and back onto the land being proposed for future development.</p>

Over the years we have enjoyed not only a peaceful environment but also have had the benefit of enjoying walks across this land as well as being able to observe the varied wildlife that inhabits it and migrates to and from it.

Earlier this year we took time out to not only object to the proposals to include this land into the Development Plan but also to attend the inspectors public hearing in April this year at the NNDC offices

Since then we have heard nothing from NNDC nor the inspectors team, but have had to rely on a social media post by Tim Adams and rumour to obtain an update that further representation needs to be made by 17th September - this we feel is extremely bad in the fact that nobody has informed us, the surrounding neighbours nor the wider public.

Our objections are as follows:-

1. Loss of biodiversity - during 2024 the owners of the land destroyed a great deal of the trees, bushes and general undergrowth with blatant disregard for the wildlife that was not only present but which also seasonally migrate to this piece of land. They tried to take away the heart of this area by almost totally clearing it. The damage to the fauna and flora was devastating. The owners also fenced off the land and had further disrespect for the local people and visitors in the fact that well trodden public footpaths and bridleways had been closed off. Despite the dramatic loss, we are not aware of any action taken by NNDC despite birds being disturbed and ultimately having their nests destroyed, hedges and trees being uprooted and various other animals and insects being harmed or killed. We noted that some of the fencing was almost immediately taken down, presumably by local people, and over time most of the undergrowth has come back quite well. However the cut down trees have not shown any signs of rebirth. It is extremely important that the fauna is permanently retained so as the wildlife can continue to thrive. We understand from representations made to the planning inspector that the developer predicts to a 10% gain in biodiversity, however, this will take many, many years and maybe a decade to achieve and in the meantime the biodiversity will greatly suffer and we may well lose some of it such as migratory birds who depend on this land for food and refuge when arriving and before flying out of Cromer. Furthermore, I noted at the inspectors meeting that there was no mention of bats which clearly exist in the local vicinity. There was no conversation about how they would be protected following the devastation of their environment last year. No mention was made of light pollution which would also affect birds and insects and the dark skies we enjoy generally here in North Norfolk.

2. Closing the gap between East Runton and Cromer - I understand from the planning inspectors report he considers that Clifton Park represents a 'harsh edge' when entering Cromer. This is somewhat true but that is what defines East Runton from Cromer and is nothing worse than many other local coastal towns who enjoy that defined division. To add more development between two defined towns simply closes the gap and somewhat joins the two towns together or at least merges them which simply waters down their independent identities.

3. Sewerage treatment works - these works exist to the southwest of the site. At the public meeting in April the inspector was informed by the owners that smell was not an issue. This was met by laughter from those attending and this was acknowledged by the inspector. As a very local resident, I can advise that the smell emanating from the works, especially on hot days is distinct to say the least. Any homes built on the land will lead to complaints to NNDC and cause them time and possibly money, to sort out. This should have been taken more seriously by the inspector at the meeting.

4. Drainage - the site is within a few hundred meters of the cliff face which has, over the years, suffered from some quite severe failures. The failures have not come about from coastal erosion from the sea but from inland water running from the cliff and in to the sea. Any increase from water run off from roads, roofs, via soakways etc. would cause further erosion and certainly 'difficulties' for the local caravan parks known as Wyndham Caravan Park and Hazelbury Caravan Park, located north of the A149, both of which have static caravans sited close to the cliff edge. If there were to be any further cliff falls, what is known locally as the Carnival Fields would also suffer in terms of ending up as a reduced piece of land on which the public park their vehicles and enjoy the annual carnival and other social events as well as watching the marvellous sunsets throughout the year.

5. Landscaping - I note that the inspectors report he suggests that the site needs to have a deep landscape frontage. This area is heavily contaminated due to dismantling of vehicles during world war 2 and therefore any works in this area would need to be carefully dealt with through planning condition and the environment agency, ensuring materials taken off site are legally transported and disposed of. This would be in addition to the imported soils being certified as 'clean'. The inspector also states that 'the western edge of the housing area should also be set back into the site to allow strategic landscaping along that boundary and a requirement for a landscaped buffer between the housing and the public footpaths/bridleway running through the site to maintain attractive recreational routes'. He either means the eastern side, where numerous houses back onto the site from Clifton Park or no provision has been made for ourselves or our neighbours. Certainly a buffer zone would be required to prevent overlooking from any new development. Furthermore, any buffer/footpath in any part of the site would need to be litter picked and landscaping be watered and tended to in accordance with a robust hard and soft landscaping plan, approved through planning condition. If this exercise falls to NNDC, then they need to be compensated via a suitable section agreement attached to the planning consent.

6. Access - when turning in to Clifton Park from the A149 there is a significant drop in road levels and the road width is narrow. This area more often than not, floods after heavy rainfall and in times of snow, it is difficult to access/egress due to the angle of the junction. I understand that the entrance to the proposed site is likely to be off Clifton Park and directly in from of number 20. This would be positioned on a tight bend where almost daily there are near misses where driver cut the corner. There is no road marking on this bend and thus no immediate visual indication of the centre of the road. Any further traffic movements in and out of Clifton Park would represent a careless disregard for drivers and pedestrians by those that approve such a development. The space in front of No. 20 is a turning head for refuse vehicles, delivery vehicles and the public, by taking this away there would

	<p>be further highway problems as there would be no alternative. We are also concerned at the devastating effect on the owner of No. 20, who we are sure will be making their own representation.</p> <p>7. Overlooking - unless a suitable distance is provided between any development and the houses that back onto the site from Clifton Park, then overlooking will be a particular issue.</p> <p>8. Public footpaths and bridleways - should these need to be rerouted or shortened due to development, then this should be properly and legally advertised, providing the public adequate time to comment regardless of any planning application being made or ongoing at the time.</p> <p>We trust our concerns will be taken into consideration when this site is next considered for development.</p>
Attached File (where submitted)	
Officer Summary	<p>1. Loss of biodiversity - during 2024 the owners of the land destroyed a great deal of the trees, bushes and general undergrowth with blatant disregard for the wildlife that was not only present but which also seasonally migrate to this piece of land. It is extremely important that the fauna is permanently retained so as the wildlife can continue to thrive. We understand from representations made to the planning inspector that the developer predicts to a 10% gain in biodiversity, however, this will take many, many years and maybe a decade to achieve and in the meantime the biodiversity will greatly suffer and we may well lose some of it such as migratory birds who depend on this land for food and refuge when arriving and before flying out of Cromer.</p> <p>Closing the gap between East Runton and Cromer - I understand from the planning inspectors report he considers that Clifton Park represents a 'harsh edge' when entering Cromer. This is somewhat true but that is what defines East Runton from Cromer and is nothing worse than many other local coastal towns who enjoy that defined division.</p> <p>Sewerage treatment works - these works exist to the southwest of the site. At the public meeting in April the inspector was informed by the owners that smell was not an issue.</p> <p>Drainage - the site is within a few hundred meters of the cliff face which has, over the years, suffered from some quite severe failures. Any increase from water run off from roads, roofs, via soakways etc. would cause further erosion and certainly 'difficulties' for the local caravan parks known as Wyndham Caravan Park and Hazelbury Caravan Park.</p> <p>Landscaping - I note that the inspectors report he suggests that the site needs to have a deep landscape frontage. This area is heavily contaminated due to dismantling of vehicles during world war 2 and therefore and works in this area would need to be carefully dealt with through planning condition and the environment agency,</p> <p>Access - when turning in to Clifton Park from the A149 there is a significant drop in road levels and the road width is narrow. This area more often than not, floods after heavy rainfall and in times of snow, it is difficult to access/egress due to the angle of the junction.</p> <p>Overlooking - unless a suitable distance is provided between any development and the houses that back onto the site from Clifton Park, then overlooking will be a particular issue.</p> <p>Public footpaths and bridleways - should these need to be rerouted or shortened due to development, then this should be properly and legally advertised, providing the public adequate time to comment regardless of any planning application being made or ongoing at the time.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP. The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the April EiP and the requirements withing the site-specific policy.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC126
Response Date	11/09/2025 20:18:00
Full Name	Mr Tom Fleming
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness	No (Object)

* Yes (Support) * No (Object) * No Comment / Unsure * General Comment	
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	MMC126 - Aug 2025 Consultation TOM.pdf
Officer Summary	<p>Anglian Water, Cromer Water Treatment Works: There are a lot of strong, unpleasant smells that regularly come from this plant (denied by Anglian Water). Any new houses would bear the brunt of these smells and will result in complaints to the local authority.</p> <p>Erosion of the cliff by excess water: I have noticed that in the seven years I have lived at this address that the cliff by the Carnival Field has eroded away, reducing the size of the field. If housing was built on the land at Runton Road/Clifton Park, the area for drainage will be greatly reduced, leading to an increase in the amount of run-off water exiting at the cliff edge, taking away valuable soak-away land and causing it to erode at a faster pace. Biodiversity: There is a lot of wildlife which uses this land (deer, rabbits, foxes, birds) and losing this land would mean loss of habitat for the wildlife. There are also plants and bushes here which provide seeds and berries for the wildlife. We have seen birds of prey hunting here. In the last few years, a rare bird was seen here on a stop-over, resulting in groups of birdwatchers gathering to see it. Maintaining the gap between Cromer and East Runton: The land in question is in East Runton, not Cromer. Building here would blur the boundary between Cromer and East Runton, with people assuming that a development here was situated in Cromer. There would be a loss of separation between Cromer and East Runton.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP. The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the resumed EiP in April 2025, and the requirements within the site-specific policy.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC133
Response Date	13/09/2025 10:25:00
Full Name	Mrs Jill Salisbury
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	I believe this land should not be allocated in the emerging development plan.

	<p>The biodiversity of this area of land is important and valuable for the existing wildlife and plant life. The land also provides an important resting place for migratory birds.</p> <p>Any so-called 'credits' bought by any developer of the land could be miles inland, potentially the other side of Norwich, and would not provide habitat for the local wildlife around the locality of East Runton and Cromer.</p> <p>Any development here would close the gap between East Runton and Cromer, resulting in a continuous mixed development with no 'breathing space' between the two places.</p> <p>The area is currently also used for walking and running by many local people - and it is important this remains available for people's mental health.</p> <p>There are already unpleasant odours on some days from the sewage treatment works adjoining this land, and there is potential for more complaints arising from occupants of any new housing.</p> <p>All rain water on this land drains north towards the cliff, across the Runton Road car park/carnival field. The cliffs are already being eroded and are crumbling due to this drainage. More homes being built there will only exacerbate this problem, resulting in faster erosion.</p> <p>In summary, the land should remain a protected open space for the benefit and well-being of both wildlife and human population.</p>
Attached File (where submitted)	
Officer Summary	<p>The biodiversity of this area of land is important and valuable for the existing wildlife and plant life. The land also provides an important resting place for migratory birds.</p> <p>Any so-called 'credits' bought by any developer of the land could be miles inland, potentially the other side of Norwich, and would not provide habitat for the local wildlife around the locality of East Runton and Cromer.</p> <p>Any development here would close the gap between East Runton and Cromer, resulting in a continuous mixed development with no 'breathing space' between the two places.</p> <p>The area is currently also used for walking and running by many local people - and it is important this remains available for people's mental health.</p> <p>There are already unpleasant odours on some days from the sewage treatment works adjoining this land, and there is potential for more complaints arising from occupants of any new housing.</p> <p>All rain water on this land drains north towards the cliff, across the Runton Road car park/carnival field. The cliffs are already being eroded and are crumbling due to this drainage. More homes being built there will only exacerbate this problem, resulting in faster erosion.</p> <p>In summary, the land should remain a protected open space for the benefit and well-being of both wildlife and human population.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP. The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the resumed EiP in April 2025, and the requirements within the site-specific policy.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC136
Response Date	15/09/2025 08:48:36
Full Name	Mr T Brannstrom
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified	Positively prepared Justified

<ul style="list-style-type: none"> * Effective * Consistent with national policy * Unsure / Not Specified 	
Question 7 - Explanation of Soundness Reasons	Suggest deletion of MM40. Such a development of site 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 C10/1 needs to be removed from the draft plan.
Attached File (where submitted)	
Officer Summary	Suggest deletion of MM40. Such a development of site 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 C10/1 needs to be removed from the draft plan.
Officer Response	Objections noted. The representation appears to largely repeat representations made elsewhere. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No change is considered necessary.
Question 1 - Document Selection	Main Modifications
<ul style="list-style-type: none"> * Main Modifications * Policy Map Changes 	
Question 2 - Modification Reference	MM40
ID	MMC161
Response Date	16/09/2025 11:16:00
Full Name	Michael & Catherine Burke
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance	No Comment / Unsure
<ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness	No (Object)
<ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	
Question 6 - Reasons Not Sound	Unsure / Not Specified
<ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	
Question 7 - Explanation of Soundness Reasons	<p>It was not that long ago that the residents and local community were horrified by the flailing of this piece of land resulting in the killing of the wildlife and destruction of the flora within. Thankfully it has virtually regrown to it's former state and although a few fence post's and wiring have been constructed it has not prevented the locals and visitors alike from walking with and without their dogs to enjoy the rural setting.</p> <p>It is a much loved area that clearly defines the town of Cromer and the village of East Runton. Were there to be a housing estate it would be an eyesore in the views from all sides and both caravan sites.</p> <p>We cant imagine that the choice of view from your caravan of a lovely green area in a seaside setting or the sight of dozens of unattractive, regimental boxes with gardens the size of matchboxes as we are now seeing every time we drive away from this area.</p> <p>Clifton Park and surrounding roads tend to have an older age group of residents in the main, and when they chose to live here one of the reasons was because of the quiet and peaceful way</p>

	<p>that we live in this area, we do not have noisy or troublesome neighbours and would like it to stay that way, which brings us on to who exactly is going to be living in these new homes? And there will of course be an increase in traffic from all directions.</p> <p>Cromer so far has survived what a lot of this country has not, it is still a little piece of unspoilt old England. Please can we keep it this way.</p>
Attached File (where submitted)	
Officer Summary	<p>It was not that long ago that the residents and local community were horrified by the flailing of this piece of land resulting in the killing of the wildlife and destruction of the flora within. Thankfully it has virtually regrown to it's former state and although a few fence post's and wiring have been constructed it has not prevented the locals and visitors alike from walking with and without their dogs to enjoy the rural setting.</p> <p>It is a much loved area that clearly defines the town of Cromer and the village of East Runton.</p> <p>Were there to be a housing estate it would be an eyesore in the views from all sides and both caravan sites.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC166
Response Date	16/09/2025 14:52:00
Full Name	Susan & Rachel Shillcock
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>We wish to raise the following:</p> <p>1. The proposed site is a prime, unique and bio diverse plot of land. This area is rich and bursting with flowers, plant life, wild life and birds. This natural and thriving habitat, if developed, will be lost forever displacing and harming all of those animals.</p> <p>This area of land was cleared and all vegetation destroyed leaving a barren landscape of just brown earth. This cruel decision was taken over two years ago, however nature fought back and revived itself proving that this land should be left to nature, to be able to restore itself to what it is meant to be and has long been labelled as 'an area of outstanding natural beauty'. This is not the right area for a newly built housing estate. There are many other potential sites that could fulfil this objective causing significantly less damage to nature.</p> <p>Cromer is a holiday town, people return to holiday here year after year because of its natural beauty and bio diverse environment. This piece of land is the epitome of this and is completely irreplaceable. It also provides a distinct boundary between the beautiful pretty village of East Runton and the gateway to Cromer town. The caravan park opposite will also be affected, their views of this beautiful seaside location will inevitably be ruined due to the outlook of housing development.</p> <p>2. Erosion</p> <p>The proposed development site is right near to the Cliff edge. This fragile headland is supposed to be protected. We are continually told and made aware of the importance of caring for our cliffs. A large amount of financial resources have been allocated to sea defences in order to help keep our cliffs stable. It's therefore extremely concerning to think of the adverse effect a proposed building site using heavy plant machinery to excavate, will have on our threatened cliff tops. The ground is</p>

	<p>simply not strong enough to withstand this building activity, especially the depths that will have to be reached to begin the foundations.</p> <p>3. Sewage</p> <p>Are the developers fully aware of the continuing sewage problem that blights the proposed area. The foul and unbearable smells that come from the sewage works continue despite being reported on numerous occasions. This problem will only be made worse with more homes being built. This also seems extremely wrong to sell brand new homes at a premium price in the knowledge that these knew home owners would suffer this foul drain smell, meaning it is often so bad that windows could not be left open and any time outside in the garden would be greatly compromised.</p> <p>4. Flooding and drainage</p> <p>The bottom of Clifton Park floods like a lake with any heavy rainfall. Traffic gets stuck, the road is impassible. Extra traffic from a new estate would add to this problem. The water from the road drains through and on to the field. There is no guarantee that this would not leave the new houses liable for damp and potential flooding.</p> <p>5. Will the Clifton Park road be widened? This is not a quiet side road. It is already a busy and well used road, used as a cut through to the alternative route and to miss outgoing through Cromer town, which is already a bottle neck and suffers from severe congestion at peak times of the day and during seasonal peaks. Clifton Park is quite narrow in places and is used like a race track with many drivers greatly exceeding the speed limit. This will be made worse with more traffic, making an already bad situation extremely more dangerous. It is also reported that this road is itself not strong enough to take the weight of heavy building machinery.</p> <p>6. Concerns that are personal to me and my house number [REDACTED].</p> <p>I need clarification on the entrance to this estate. If the lay by is to be part of this proposed entrance this is directly in front of my lounge window. If this road is to be widened as it would need to be to take the increased volume of two way traffic, this will be literally be on my front garden. This will take away every bit of privacy I am entitled to in my own home. This can not be allowed to happen.</p> <p>All of the above are not minor inconveniences, these are major issues, which will have irreversible consequences.</p> <p>Planning has been rejected for this area on many occasions and the valid reasons for this still remain. Nature needs to be protected as does Cromer's boundaries, appeal and unique heritage, which this land represents. Please I urge you strongly to give this matter your upmost integrity, not to put profit, government targets and the pressure of the short term to distract from the right decision for Cromer and the people who live here and know the town. The wrong decision will cause untold harm for the area and its future.</p>
Attached File (where submitted)	
Officer Summary	<p>The proposed site is a prime, unique and bio diverse plot of land. This area is rich and bursting with flowers, plant life, wild life and birds. This natural and thriving habitat, if developed, will be lost forever displacing and harming all of those animals.</p> <p>This area of land was cleared and all vegetation destroyed leaving a barron landscape of just brown earth. This cruel decision was taken over two years ago, however nature fought back and revived itself proving that this land should be left to nature, to be able to restore itself to what it is meant to be and has long been labelled as 'an area of outstanding natural beauty'. This is not the right area for a newly built housing estate. There are many other potential sites that could fulfil this objective causing significantly less damage to nature.</p> <p>Cromer is a holiday town, people return to holiday here year after year because of its natural beauty and bio diverse environment. This piece of land is the epitome of this and is completely irreplaceable. It also provides a distinct boundary between the beautiful pretty village of East Runton and the gateway to Cromer town. The caravan park opposite will also be affected, their views of this beautiful seaside location will inevitably be ruined due to the outlook of housing development.</p> <p>2. Erosion</p> <p>The proposed development site is right near to the Cliff edge. This fragile headland is supposed to be protected. We are continually told and made aware of the importance of caring for our cliffs. A large amount of financial resources have been allocated to sea defences in order to help keep our cliffs stable. It's therefore extremely concerning to think of the adverse effect a proposed building site using heavy plant machinery to excavate, will have on our threatened cliff tops. The ground is simply not strong enough to withstand this building activity, especially the depths that will have to be reached to begin the foundations.</p> <p>3. Sewage</p> <p>Are the developers fully aware of the continuing sewage problem that blights the proposed area. The foul and unbearable smells that come from the sewage works continue despite being reported on numerous occasions. This problem will only be made worse with more homes being built. This also seems extremely wrong to sell brand new homes at a premium price in the knowledge that these knew home owners would suffer this foul drain smell, meaning it is often so bad that windows could not be left open and any time outside in the garden would be greatly compromised.</p> <p>4. Flooding and drainage</p> <p>The bottom of Clifton Park floods like a lake with any heavy rainfall. Traffic gets stuck, the road is impassible. Extra traffic from a new estate would add to this problem. The water from the road drains through and on to the field. There is no guarantee that this would not leave the new houses liable for damp and potential flooding.</p> <p>5. Will the Clifton Park road be widened? This is not a quiet side road. It is already a busy and well used road, used as a cut through to the alternative route and to miss outgoing through Cromer town, which is already a bottle neck and suffers from severe congestion at peak times of the day and during seasonal peaks. Clifton Park is quite narrow in places and is used like a race track with many drivers</p>

	<p>greatly exceeding the speed limit. This will be made worse with more traffic, making an already bad situation extremely more dangerous. It is also reported that this road is itself not strong enough to take the weight of heavy building machinery.</p> <p>6. Concerns that are personal to me I need clarification on the entrance to this estate. If the lay by is to be part of this proposed entrance this is directly in front of my lounge window. If this road is to be widened as it would need to be to take the increased volume of two way traffic, this will be literally be on my front garden. This will take away every bit of privacy I am entitled to in my own home. This can not be allowed to happen.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP. The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the April EiP and the requirements within the site-specific policy. The access from Clifton Park will be designed in consultation with the Highway Authority through the application process.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC196
Response Date	16/09/2025 17:14:35
Full Name	Mrs Sarah King
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified
Question 7 - Explanation of Soundness Reasons	<p>Residential Land at Runton Road / Clifton Park (C10/1)</p> <p>This land is not suitable for the proposed development for several reasons, firstly the drainage system will not support the amount of extra housing proposed. Anglian water already has issues dealing with surface water when the weather is wet. They consistently dump sewage into the sea as the treatment plant cannot cope with the amount of sewage from existing properties. Extra pressure will result in more hazardous waste being dumped which in turn will affect the economic security of this popular tourist town and also cause potential erosion of the already insecure cliffs. Further more the issue of odour that regularly pervades the area will directly affect the proposed development and result in significant complaints for years to come.</p> <p>This proposed development would give rise to a huge loss in local biodiversity, the area was significantly harmed a couple of years ago but the flora and fauna has fought back and re-established itself very firmly. It must not be further impacted again as the replacement site is not suitable for the species on this rare coastal habitat.</p> <p>Another major impact would be the loss of the settlement boundary between Cromer and East Runton, this would have significant impact on the perception of the area especially given that both places are tourist holiday destinations. To merge the currently distinct boundaries would be a mistake that can never be rectified and as such should have bearing on this decision.</p>
Attached File (where submitted)	
Officer Summary	This land is not suitable for the proposed development for several reasons, firstly the drainage system will not support the amount of extra housing proposed. Anglian water already has issues dealing

	<p>with surface water when the weather is wet. They consistently dump sewage into the sea as the treatment plant cannot cope with the amount of sewage from existing properties. Extra pressure will result in more hazardous waste being dumped which in turn will affect the economic security of this popular tourist town and also cause potential erosion of the already insecure cliffs. Further more the issue of odour that regularly pervades the area will directly affect the proposed development and result in significant complaints for years to come.</p> <p>This proposed development would give rise to a huge loss in local biodiversity, the area was significantly harmed a couple of years ago but the flora and fauna has fought back and re-established itself very firmly. It must not be further impacted again as the replacement site is not suitable for the species on this rare coastal habitat.</p> <p>Another major impact would be the loss of the settlement boundary between Cromer and East Runton, this would have significant impact on the perception of the area especially given that both places are tourist holiday destinations. To merge the currently distinct boundaries would be a mistake that can never be rectified and as such should have bearing on this decision.</p>
Officer Response	<p>Objections noted. The representation appears to largely repeat representations previously received. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC197
Response Date	16/09/2025 18:41:27
Full Name	Mr Paul Stowe
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified
Question 7 - Explanation of Soundness Reasons	<p>I believe the modification to be unsound. The section that I am commenting on is C10/1.</p> <p>This piece of land is currently used every day for exercise/wellbeing by many people, as well as a natural habitat for many species of flora and fauna, it provides a necessary break between Cromer and East Runton, I notice that it is referred to as being in Cromer when it is actually East Runton.</p> <p>There are so many reasons why this area is unsuitable for development and so many people who object to it that I cannot understand why it has been allowed to get this far, the only positive reason that I can see mentioned is that the owner is happy to get it developed as soon as possible.</p> <p>This site is situated between the railway line and water treatment works at one end and the cliffs at the other, surely these should raise major concerns. The southern end will generate noise, danger and smell, the Northern end, the cliffs will suffer greatly from the increased water run off caused by this development. As a former member of the local Coastguard Cliff Rescue team, I have seen the consequences of mans actions on the cliffs, increased water run off will cause cliff falls, apart from the obvious danger to life, this will also significantly impact on the viability of the many clifftop caravan parks, which we as a small coastal town rely on.</p> <p>The end result of this development will not help to improve the housing situation in Cromer, which is desperate, because it will not provide the type of housing that people who live and work in Cromer can afford, it will just become another source of second and holiday homes for the well off, Cromer</p>

	is a poor town and requires social housing, not another opportunity for the rich to make huge profit at the town's expense.
Attached File (where submitted)	
Officer Summary	<p>This piece of land is currently used every day for exercise/wellbeing by many people, as well as a natural habitat for many species of flora and fauna, it provides a necessary break between Cromer and East Runton, I notice that it is referred to as being in Cromer when it is actually East Runton.</p> <p>There are so many reasons why this area is unsuitable for development and so many people who object to it that I cannot understand why it has been allowed to get this far, the only positive reason that I can see mentioned is that the owner is happy to get it developed as soon as possible.</p> <p>This site is situated between the railway line and water treatment works at one end and the cliffs at the other, surely these should raise major concerns. The southern end will generate noise, danger and smell, the Northern end, the cliffs will suffer greatly from the increased water run off caused by this development. As a former member of the local Coastguard Cliff Rescue team, I have seen the consequences of man's actions on the cliffs, increased water run off will cause cliff falls, apart from the obvious danger to life, this will also significantly impact on the viability of the many clifftop caravan parks, which we as a small coastal town rely on.</p>
Officer Response	<p>Objections noted. The representation appears to largely repeat representations previously made. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP. No change is considered necessary.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC198
Response Date	16/09/2025 20:54:37
Full Name	Mrs Michelle Uddin
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 4 - Reasons Not Legally Compliant	<p>I am still continuing to object to the inclusion of the land west of Clifton Park in the local plan.</p> <p>This land is in <i>continual use</i> by local residents for dog walking, rambling running, cycling, wild life spotting and foraging among other activities. These activities are good for physical and mental health. It is used by many as a footpath route between Cromer and East Runton, used by locals and tourists.</p> <p>On this biodiverse land there is a <i>plethora of flora and fauna</i> in the area including, but not limited to self set oak, blackberry bushes, sloe trees/bushes which provide food and shelter for the local wildlife which includes (but not limited to) butterflies, bees (including bumble and honey), insects, foxes, deer, toads, lizard, rabbits, thrush, wren, robin, tits, prey birds. (I have personally seen all of these.)</p> <p>Building on this land would <i>disturb the ecosystem</i> resulting in the possibility of these diverse flora and fauna to leave permanently. The construction site would disturb the wildlife and the ensuing housing development with it's physical presence, noise and smells would severely impact any chance of wildlife repopulating the area.</p> <p>The gap/settlement boundary between Cromer and East Runton should be maintained to mark the parish boundaries and stop Cromer engulfing the neighbouring villages.</p> <p>The traffic caused by 100+ extra vehicles (assuming most houses will have 1+ cars which is not uncommon) would put pressure on the town's infrastructure. The one way system would be at a <i>stand still</i> more often due to the fact that all amenities are accessed by driving down Runton Road, then either Beach Road or the town centre. The other alternative access would be via Central Road, which is not wide enough to take the traffic and also feeds into the same roads. This in turn will <i>impact tourism negatively</i> as many holiday makers will not want to sit in traffic on holiday and choose an alternate destination.</p> <p>The planned <i>vehicular access</i> via Clifton Park would be problematic, especially in peak season, with an additional 100+ cars. This road is not designed to cope with the extra traffic.</p> <p>The land west of Clifton Park is adjacent to the train tracks, providing <i>noise pollution</i>, and the water treatment works. These works have been there a number of years and serve the community well, however they are <i>frequently smelly</i> - the odours travelling over the proposed housing development 99% of the time. The smells are pungent and not good for new housing, and with additional houses</p>

	<p>the treatment work would have more pressure. These inevitable odours have the potential of future complaints.</p> <p>Drainage would also be impacted as the housing, driveways and roads would impede natural drainage so would impact greatly on the surrounding land not developed on. The extra water use by people living on the site would also cause problems as ultimately the water would be going through the underground waterways towards the cliffs. The area is known for <i>cliff erosion</i> this development would add more stress to the ever crumbling coastline which in turn has economic ramifications.</p>
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>I am still continuing to object to the inclusion of the land west of Clifton Park in the local plan.</p> <p>This land is in <i>continual use</i> by local residents for dog walking, rambling running, cycling, wild life spotting and foraging among other activities. These activities are good for physical and mental health. It is used by many as a footpath route between Cromer and East Runton, used by locals and tourists.</p> <p>On this biodiverse land there is a <i>plethora of flora and fauna</i> in the area including, but not limited to self set oak, blackberry bushes, sloe trees/bushes which provide food and shelter for the local wildlife which includes (but not limited to) butterflies, bees (including bumble and honey), insects, foxes, deer, toads, lizard, rabbits, thrush, wren, robin, tits, prey birds. (I have personally seen all of these.)</p> <p>Building on this land would <i>disturb the ecosystem</i> resulting in the possibility of these diverse flora and fauna to leave permanently. The construction site would disturb the wildlife and the ensuing housing development with it's physical presence, noise and smells would severely impact any chance of wildlife repopulating the area.</p> <p>The gap/settlement boundary between Cromer and East Runton should be maintained to mark the parish boundaries and stop Cromer engulfing the neighbouring villages.</p> <p>The traffic caused by 100+ extra vehicles (assuming most houses will have 1+ cars which is not uncommon) would put pressure on the town's infrastructure. The one way system would be at a <i>stand still</i> more often due to the fact that all amenities are accessed by driving down Runton Road, then either Beach Road or the town centre. The other alternative access would be via Central Road, which is not wide enough to take the traffic and also feeds into the same roads. This in turn will <i>impact tourism negatively</i> as many holiday makers will not want to sit in traffic on holiday and choose an alternate destination.</p> <p>The planned <i>vehicular access</i> via Clifton Park would be problematic, especially in peak season, with an additional 100+ cars. This road is not designed to cope with the extra traffic.</p> <p>The land west of Clifton Park is adjacent to the train tracks, providing <i>noise pollution</i>, and the water treatment works. These works have been there a number of years and serve the community well, however they are <i>frequently smelly</i> - the odours travelling over the proposed housing development 99% of the time. The smells are pungent and not good for new housing, and with additional houses the treatment work would have more pressure. These inevitable odours have the potential of future complaints.</p> <p>Drainage would also be impacted as the housing, driveways and roads would impede natural drainage so would impact greatly on the surrounding land not developed on. The extra water use by people living on the site would also cause problems as ultimately the water would be going through the underground waterways towards the cliffs. The area is known for <i>cliff erosion</i> this development would add more stress to the ever crumbling coastline which in turn has economic ramifications.</p>
Attached File (where submitted)	
Officer Summary	<p>On this biodiverse land there is a <i>plethora of flora and fauna</i> in the area including, but not limited to self set oak, blackberry bushes, sloe trees/bushes which provide food and shelter for the local wildlife which includes (but not limited to) butterflies, bees (including bumble and honey), insects, foxes, deer, toads, lizard, rabbits, thrush, wren, robin, tits, prey birds. (I have personally seen all of these.)</p> <p>Building on this land would <i>disturb the ecosystem</i> resulting in the possibility of these diverse flora and fauna to leave permanently. The construction site would disturb the wildlife and the ensuing housing development with it's physical presence, noise and smells would severely impact any chance of wildlife repopulating the area.</p> <p>The gap/settlement boundary between Cromer and East Runton should be maintained to mark the parish boundaries and stop Cromer engulfing the neighbouring villages.</p> <p>The traffic caused by 100+ extra vehicles (assuming most houses will have 1+ cars which is not uncommon) would put pressure on the town's infrastructure. The one way system would be at a <i>stand still</i> more often due to the fact that all amenities are accessed by driving down Runton Road, then either Beach Road or the town centre. The other alternative access would be via Central Road,</p>

	<p>which is not wide enough to take the traffic and also feeds into the same roads. This in turn will <i>impact tourism negatively</i> as many holiday makers will not want to sit in traffic on holiday and choose an alternate destination.</p> <p>The planned <i>vehicular access</i> via Clifton Park would be problematic, especially in peak season, with an additional 100+ cars. This road is not designed to cope with the extra traffic.</p> <p>The land west of Clifton Park is adjacent to the train tracks, providing <i>noise pollution</i>, and the water treatment works. These works have been there a number of years and serve the community well, however they are <i>frequently smelly</i> - the odours travelling over the proposed housing development 99% of the time. The smells are pungent and not good for new housing, and with additional houses the treatment work would have more pressure. These inevitable odours have the potential of future complaints.</p> <p>Drainage would also be impacted as the housing, driveways and roads would impede natural drainage so would impact greatly on the surrounding land not developed on. The extra water use by people living on the site would also cause problems as ultimately the water would be going through the underground waterways towards the cliffs. The area is known for <i>cliff erosion</i> this development would add more stress to the ever crumbling coastline which in turn has economic ramifications.</p>
Officer Response	<p>Objections noted. The representation appears to largely repeat previously representations. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP. The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the resumed EiP in April 2025, and the requirements within the site-specific policy. No change is considered necessary.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC215
Response Date	17/09/2025 09:54:00
Full Name	Jeff & Jayne Bowyer
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>We write as concerned local residents regarding the proposed inclusion of land to the west of Clifton Park within the Development Plan. We live directly opposite the site and have a long-standing connection to it through local walks, enjoyment of the natural environment, and observation of the wildlife it supports.</p> <p>Our objections are on the following grounds:</p> <p>1. Settlement Identity</p> <p>Development here would erode the natural gap between East Runton and Cromer. Filling this space with housing would blur the boundaries of both towns, weakening their independent character.</p> <p>2. Drainage and Cliff Stability</p> <p>The site lies close to a vulnerable cliff line, which has suffered serious failures in the past due to inland water runoff. The regression of the cliff line has required on at least two occasions the safety fencing having to be replaced and moved to a more southerly direction. Additional hard surfacing and drainage from housing would increase the risk of further collapse. This would endanger nearby</p>

	<p>caravan parks and reduce the land known locally as the Carnival Field, which is a vital community space.</p> <p>3. Biodiversity The landowners destroyed large areas of trees, hedgerows, and undergrowth, causing significant harm to wildlife habitats. This included disturbance to nesting birds, loss of hedgerows, and displacement of other animals (including deer and bats) and insects. Public access was also blocked without consultation. Some vegetation has recovered since that time, but the biodiversity loss was severe and will take decades to restore. Migratory birds and bats, which rely on this land, may not return. The developer's claim of a 10% net gain in biodiversity is unrealistic in the short term and does not account for impacts such as light pollution.</p> <p>4. Sewage Works The sewage treatment works to the southwest already cause strong odours. At the April hearing this issue was downplayed, but as local residents we can confirm it is real and ongoing, and a source of complaints. Adding more homes nearby would only worsen the problem.</p> <p>5. Access and Highways Safety The proposed access via Clifton Park is wholly unsuitable as it is on a tight bend with frequent near-misses and would remove a turning head used by service and delivery vehicles. The junction with the A149 is steep, narrow, and prone to flooding. Increased traffic here would significantly compromise road and pedestrian safety, as well as severely impacting the residents at No's 19 and 20.</p> <p>6. Overlooking and Privacy Any new homes would overlook existing Clifton Park properties which would be unacceptable and create a loss of privacy.</p> <p>7. Landscaping and Contamination We note that there are proposed deep landscape buffers, but the land is contaminated from World War II vehicle dismantling. Any work would require strict environmental oversight and safe disposal of soil. A robust landscaping and maintenance plan would also be essential, with long-term responsibility secured through a planning agreement.</p> <p>Conclusion This site plays a vital role in supporting biodiversity, protecting settlement identity, and providing valued community space. Its development would cause lasting environmental, landscape, and infrastructure harm. We therefore respectfully request that this land is excluded from the Development Plan.</p>
Attached File (where submitted)	
Officer Summary	<p>1. Settlement Identity Development here would erode the natural gap between East Runton and Cromer. Filling this space with housing would blur the boundaries of both towns, weakening their independent character.</p> <p>2. Drainage and Cliff Stability The site lies close to a vulnerable cliff line, which has suffered serious failures in the past due to inland water runoff. The regression of the cliff line has required on at least two occasions the safety fencing having to be replaced and moved to a more southerly direction. Additional hard surfacing and drainage from housing would increase the risk of further collapse. This would endanger nearby caravan parks and reduce the land known locally as the Carnival Field, which is a vital community space.</p> <p>3. Biodiversity The landowners destroyed large areas of trees, hedgerows, and undergrowth, causing significant harm to wildlife habitats. This included disturbance to nesting birds, loss of hedgerows, and displacement of other animals (including deer and bats) and insects. Public access was also blocked without consultation. Some vegetation has recovered since that time, but the biodiversity loss was severe and will take decades to restore. Migratory birds and bats, which rely on this land, may not return. The developer's claim of a 10% net gain in biodiversity is unrealistic in the short term and does not account for impacts such as light pollution.</p> <p>4. Sewage Works The sewage treatment works to the southwest already cause strong odours. At the April hearing this issue was downplayed, but as local residents we can confirm it is real and ongoing, and a source of complaints. Adding more homes nearby would only worsen the problem.</p> <p>5. Access and Highways Safety The proposed access via Clifton Park is wholly unsuitable as it is on a tight bend with frequent near-misses and would remove a turning head used by service and delivery vehicles. The junction with the A149 is steep, narrow, and prone to flooding. Increased traffic here would significantly compromise road and pedestrian safety, as well as severely impacting the residents at No's 19 and 20.</p> <p>6. Overlooking and Privacy Any new homes would overlook existing Clifton Park properties which would be unacceptable and create a loss of privacy.</p> <p>7. Landscaping and Contamination We note that there are proposed deep landscape buffers, but the land is contaminated from World War II vehicle dismantling. Any work would require strict environmental oversight and safe disposal of soil. A robust landscaping and maintenance plan would also be essential, with long-term responsibility secured through a planning agreement.</p>

Officer Response	Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP. The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the resumed EiP in April 2025, and the requirements within the site-specific policy. Access has already been considered safe and achievable by the Highway Authority but detail access arrangements will be agreed with the HA through any future application.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC219
Response Date	17/09/2025 12:28:06
Full Name	Mr William Page
Organisation	Pigeon Investment Management Limited
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	SEE ATTACHED FILE
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	MMC219 - Pigeon NN Main Modifications Representation - Cromer.pdf
Officer Summary	<p>We, on behalf of Pigeon and the Landowners, write in support of the proposed allocation of Land West of Langham Road, Blakeney ("the Site") as set out under Policy BLA01/B / MM58 within the Main Modifications to the emerging North Norfolk Local Plan. The allocation is for approximately 30 dwellings, public open space and associated on and off-site infrastructure. This representation confirms that the Site is in single ownership, is not subject to any technical constraints and is suitable, achievable, and available for development within the first 5 years following adoption of the Local Plan. This submission supports the detailed representations provided throughout the Local Plan process.</p> <p>Pigeon is fully committed to delivering a landscape and design-led sustainable scheme in accordance with the requirements of Policy BLA01/B and the wider Local Plan. The proposals will respect the local character and landscape, carefully integrating new homes with the existing built form and enhancing natural features. A safe and convenient access will be provided, along with highways improvements which support sustainable travel</p>
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC224
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders

Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water welcomes the references in the supporting text regarding the protection of our existing assets within the proposed site allocation and to safeguard against noise and odour issues arising from proximity to the Cromer (Runton-Middlebrook Way) WRC.</p> <p>It is advised that in the "Deliverability" paragraph of the supporting text "our" is replaced with "their".</p> <p>Anglian Water supports the policy clauses 7, 10, 11, and 13 which require careful attention to site layout to mitigate amenity impacts from Cromer WRC, the submission, approval and implementation of a Surface Water Management Plan and Foul Drainage Strategy, and submission of details to demonstrate the safeguarding of access for the maintenance of our assets.</p>
Attached File (where submitted)	
Officer Summary	<p>Anglian Water welcomes the references in the supporting text regarding the protection of our existing assets within the proposed site allocation and to safeguard against noise and odour issues arising from proximity to the Cromer (Runton-Middlebrook Way) WRC.</p> <p>It is advised that in the "Deliverability" paragraph of the supporting text "our" is replaced with "their".</p> <p>Anglian Water supports the policy clauses 7, 10, 11, and 13 which require careful attention to site layout to mitigate amenity impacts from Cromer WRC, the submission, approval and implementation of a Surface Water Management Plan and Foul Drainage Strategy, and submission of details to demonstrate the safeguarding of access for the maintenance of our assets.</p>
Officer Response	Support and comments noted. The proposed change is a minor amendment to the supporting text, and is not a matter of Soundness. This could be included as part of a further additional modification.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM40
ID	MMC248
Response Date	17/09/2025 09:40:00
Full Name	
Organisation	Crocus Homes Ltd
Agent Full Name	Katie Leeder
Agent Organisation	Bidwells
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object)	Yes (Support)

* *	No Comment / Unsure General Comment	
Question 6 - Reasons Not Sound * * * * *	Positively prepared Justified Effective Consistent with national policy Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE LAND AT RUNTON ROAD / CLIFTON PARK, CROMER (POLICY C10/1) On behalf of Crocus Homes Limited, Bidwells strongly support the allocation of Land at Runton Road / Clifton Park, Cromer, under Policy C10/1 for residential development of approximately 70 dwellings. As demonstrated within previous Representations made on behalf of the landowner in support of this site, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Since the Hearing Sessions held in April 2025, Crocus Homes have entered into an Option Agreement to bring forward the site for development of approximately 70 dwellings, with the intention to submit a planning application by the end of 2025. We fully support the Council's proposed Main Modification (ref. MM40) which inserts new Policy C10/1 and supporting text into the Local Plan. Furthermore, we support the Council's amendments to the criteria of Policy C10/1 recommended by the Inspector; for clarify, these are set out below. We fully support the Council's proposed amendments to the Policies Map (ref. MM39) to reflect the amendments to the criteria of Policy C10/1. These amendments ensure that Policy C10/1 is justified and effective, and therefore, sound. Amended Criteria 1: Provision of a convenient and safe vehicular access from the adjacent Clifton Park development. Amended Criteria 3: Development should be located to the north of the site, but with a deep landscaped frontage along Runton Road (as a minimum no development proud of No.19 Clifton Park) to ensure an open frontage to the site. Amended Criteria 4: High-quality landscaping should be provided to the rear of the built development and adjacent to the railway line, and the western edge of housing should also be set back into the site to allows strategic landscaping along that boundary. New Criteria (Criterion 9): Existing footpaths/bridleways running through the housing area should be provided with adjacent landscaping to maintain attractive recreational routes. On this basis, we consider Policy C10/1 to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, should be allocated in the Local Plan. The allocation enables Crocus Homes to bring forward the site for residential development.	
Attached File (where submitted)	MMC248 - NNDC Main Modifications Consultation - Policy C10-1.pdf	
Officer Summary	On behalf of Crocus Homes Limited, Bidwells strongly support the allocation of Land at Runton Road / Clifton Park, Cromer, under Policy C10/1 for residential development of approximately 70 dwellings. As demonstrated within previous Representations made on behalf of the landowner in support of this site, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Since the Hearing Sessions held in April 2025, Crocus Homes have entered into an Option Agreement to bring forward the site for development of approximately 70 dwellings, with the intention to submit a planning application by the end of 2025. We fully support the Council's proposed Main Modification (ref. MM40) which inserts new Policy C10/1 and supporting text into the Local Plan. Furthermore, we support the Council's amendments to the criteria of Policy C10/1 recommended by the Inspector; for clarify, these are set out below. We fully support the Council's proposed amendments to the Policies Map (ref. MM39) to reflect the amendments to the criteria of Policy C10/1. These amendments ensure that Policy C10/1 is justified and effective, and therefore, sound. Amended Criteria 1: Provision of a convenient and safe vehicular access from the adjacent Clifton Park development. Amended Criteria 3: Development should be located to the north of the site, but with a deep landscaped frontage along Runton Road (as a minimum no development proud of No.19 Clifton Park) to ensure an open frontage to the site. Amended Criteria 4: High-quality landscaping should be provided to the rear of the built development and adjacent to the railway line, and the western edge of housing should also be set back into the site to allows strategic landscaping along that boundary. ew Criteria (Criterion 9): Existing footpaths/bridleways running through the housing area should be provided with adjacent landscaping to maintain attractive recreational routes. On this basis, we consider Policy C10/1 to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, should be allocated in the Local Plan. The allocation enables Crocus Homes to bring forward the site for residential development.	
Officer Response	Comments and supported noted.	
Question 1 - Document Selection	Main Modifications	

* Main Modifications * Policy Map Changes	
Question 2 - Modification Reference	MM40
ID	MMC257
Response Date	17/09/2025 19:32:19
Full Name	Mrs Julie Bell
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>East Runton isn't Cromer. If this development goes ahead it will become part of Cromer. It has its own independence of being a village and should remain so.</p> <p>The wildlife will be gone. The muntjaks, foxes, birds, insects, hares etc are lovely to see going about their day.</p> <p>The plant life ie flowers, ferns, trees, grasses, blackberries will be gone forever. It would be such a shame as it will take away the lovely area that many, many people spend time walking and sitting in.</p> <p>On damp days the sewage treatment works smells which can be smelt on Clifton Park now so not very enjoyable for the people if this goes ahead. It will only get worse.</p> <p>Drainage - the urban soak aways goes to the cliffs. Drainage erodes it here and the development will not help.</p> <p>There is no infrastructure to take on an additional 70 homes. The doctors are full already, there are no dentists - the development will not help this.</p> <p>There is a fairground in Jonas field next to the proposed development area which is very noisy for 2 weeks of the year and will be worse for those on the development as they will be closer to it. This is going to cause complaints that NNDC will have to deal with so more added problems.</p> <p>I purchased my property because of this area being very close by and I make full use of the area by walking on there as do many others. This area is currently very quiet and I feel that this development will ruin that. I also think it will devalue my property as the lovely views I currently have will be gone and replaced with bricks and mortar.</p> <p>Please rethink this and stop it from happening.</p>
Attached File (where submitted)	
Officer Summary	<p>East Runton isn't Cromer. If this development goes ahead it will become part of Cromer. It has its own independence of being a village and should remain so.</p> <p>The wildlife will be gone. The muntjaks, foxes, birds, insects, hares etc are lovely to see going about their day.</p> <p>The plant life ie flowers, ferns, trees, grasses, blackberries will be gone forever. It would be such a shame as it will take away the lovely area that many, many people spend time walking and sitting in.</p> <p>On damp days the sewage treatment works smells which can be smelt on Clifton Park now so not very enjoyable for the people if this goes ahead. It will only get worse.</p> <p>Drainage - the urban soak aways goes to the cliffs. Drainage erodes it here and the development will not help.</p> <p>There is no infrastructure to take on an additional 70 homes. The doctors are full already, there are no dentists - the development will not help this.</p>

Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The allocation is not located within any identified countryside gaps and does not contribute towards coalescence, as discussed during the EiP. The Council has engaged with Anglian Water regarding water and odour issues, no objections were raised that have not been resolved through the resumed EiP in April 2025, and the requirements within the site-specific policy.</p>
-------------------------	--

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM41
ID	MMC50
Response Date	19/08/2025 08:56:00
Full Name	Ms Clare Howe
Organisation	Sport England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>INTRODUCTORY COMMENTS</p> <p>Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.</p> <p>Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Planning for Sport Guidance ('Guidance').</p> <p>The overall thrust of the Guidance is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:</p> <p>PROTECT the right opportunities in the right places ENHANCE opportunities through better use of existing provision PROVIDE new opportunities to meet the needs of current and future generations.</p> <p>Sport England's aim in working with the planning system is to help provide active environments that maximise opportunities for sport and physical activity for all, enabling the already active to be more so and the inactive to become active. The importance of sport should be recognised as a key component of local plans and not considered in isolation.</p> <p>The following comments are provided within the context of:</p> <ul style="list-style-type: none"> • National Planning Policy Framework (NPPF, 2024). • Sport England's Planning for Sport webpages including Planning for Sport Guidance https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport <p>COMMENTS ON THE LOCAL PLAN MODIFICATIONS</p> <p>Sport England have reviewed the modifications to the Local Plan and have the following comments: <u>MM Reference MM41 (Policy F01/B)</u></p> <p>Sport England supports the policy wording for Policy F01/B which requires the retention or replacement of existing sport facilities including the rugby club and sports centre.</p> <p>However, Sport England has concerns regarding the additional sentence 'Replacement facilities should be of equal or added value and suitable to serve the needs of Fakenham.' The concern is that it lacks clarity on how "value" will be assessed.</p> <p>To better align with paragraph 104 of the NPPF and Sport England's Playing Fields Policy and Guidance, we recommend the sentence is rewording the sentence as follows:</p> <p>'Replacement facilities should be of replaced, prior to the commencement of development, and must be of equivalent or better quality, equivalent or greater quantity, in a suitable location, and subject to equivalent or better accessibility and management arrangements.'</p>

	<p>This wording reflects Exception 4 of Sport England's Playing Fields Policy and Guidance and is consistent with the requirements of paragraph 104(b) in the NPPF.</p> <p><u>Closing Remarks</u></p> <p>It is important to note that Sport England shall be a statutory consultee if the plan includes allocations that proceed to a planning application affecting existing playing fields. By addressing any related issues and concerns during the Local Plan stage, greater certainty can be provided, helping to prevent delays and uncertainty when the allocations reach the planning application stage.</p> <p>If Sport England has missed any sport facility that falls within any land allocation, then this does not mean the facility is surplus to current or future need. As stated in the NPPF, sport facilities should be protected unless they are surplus to current or future needs, replaced or lost to another sport facility the benefits of which outweighs the harm caused by the loss.</p>
Attached File (where submitted)	
Officer Summary	<p>MM Reference MM41 (Policy F01/B)</p> <p>Sport England supports the policy wording for Policy F01/B which requires the retention or replacement of existing sport facilities including the rugby club and sports centre.</p> <p>However, Sport England has concerns regarding the additional sentence 'Replacement facilities should be of equal or added value and suitable to serve the needs of Fakenham.' The concern is that it lacks clarity on how "value" will be assessed.</p> <p>To better align with paragraph 104 of the NPPF and Sport England's Playing Fields Policy and Guidance, we recommend the sentence is rewording the sentence as follows:</p> <p>'Replacement facilities should be of replaced, prior to the commencement of development, and must be of equivalent or better quality, equivalent or greater quantity, in a suitable location, and subject to equivalent or better accessibility and management arrangements.'</p> <p>This wording reflects Exception 4 of Sport England's Playing Fields Policy and Guidance and is consistent with the requirements of paragraph 104(b) in the NPPF.</p> <p><u>Closing Remarks</u></p> <p>It is important to note that Sport England shall be a statutory consultee if the plan includes allocations that proceed to a planning application affecting existing playing fields. By addressing any related issues and concerns during the Local Plan stage, greater certainty can be provided, helping to prevent delays and uncertainty when the allocations reach the planning application stage.</p> <p>If Sport England has missed any sport facility that falls within any land allocation, then this does not mean the facility is surplus to current or future need. As stated in the NPPF, sport facilities should be protected unless they are surplus to current or future needs, replaced or lost to another sport facility the benefits of which outweighs the harm caused by the loss.</p>
Officer Response	<p>Comments noted. The proposed change largely says the same as the modification put forward, with the exception of not detailing the timing of replacement and is considered to be in line with para 104 of the NPPF. The timing of any replacement is considered a matter for the Planning application. Policy HC2 Provision and retention of Open space also covers the matter.</p>

MM44

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM44
ID	MMC180
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome bullet points 2 and 3 which provide for a substantial landscape buffer and need for Heritage Impact Assessment.
Attached File (where submitted)	
Officer Summary	We welcome bullet points 2 and 3 which provide for a substantial landscape buffer and need for Heritage Impact Assessment.
Officer Response	Support noted.

MM46

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM46
ID	MMC51
Response Date	26/08/2025 14:41:00
Full Name	Mr Geoff Cook
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	MMC51 - Email objections to NNDC Local plan Aug25.pdf
Officer Summary	<p>I am a resident of Brook Park and the proposed allocations for residential development will destroy any view from Brook Park to the historic St Peter's Church as well as views over grade 2 agricultural land. The proposed through route will significantly increase the volume of traffic through Brook Park and create a 'rat-run' through the development potentially risking injury to children and adults who are residents or visitors to it. The proposed sewage and flood water mitigation of a new pipe to Belaugh Water Treatment Works will prove to be significantly more expensive than suggested and will not stop discharges into the River Bure as Belaugh WTW is currently at or near capacity. I realise that most of the points raised have been raised before and dismissed, however with the potential doubling of the size of the development, I am writing again to object in the strongest possible terms to the proposed allocation and/or any planning application for HV01/C and/or HV06/A in Hoveton, as set out in the Main Modifications to the North Norfolk Local Plan (August 2025) and the accompanying Policies Map changes.</p> <p>Failure to demonstrate compliance with nutrient neutrality requirements for the Broads SAC and Broadland Ramsar sites (Policy CC13; Conservation of Habitats and Species Regulations 2017). 2. Unacceptable highway and transport impacts, particularly cumulative effects with the neighbouring allocation. 3. Harm to heritage assets and settlement character contrary to Policies ENV7, SS1, and the NPPF. 4. Drainage and infrastructure constraints, including foul drainage capacity and surface water management. 5. Biodiversity Harm – Lack of clear demonstration of 10% Biodiversity Net Gain, habitat loss and corridor disruption. (Policy CC10 and NPPF paragraphs 180-182) 6. Over-concentration of housing in Hoveton, contrary to balanced growth objectives of Policy SS1.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM46
ID	MMC182
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack

Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome the additional reference to heritage assets on paragraph 13.1.5. We welcome bullet point 4 of the policy which highlights the nearby heritage assets and need for landscaping to mitigate potential impacts on those assets.
Attached File (where submitted)	
Officer Summary	We welcome the additional reference to heritage assets on paragraph 13.1.5. We welcome bullet point 4 of the policy which highlights the nearby heritage assets and need for landscaping to mitigate potential impacts on those assets.
Officer Response	Supported noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM46
ID	MMC225
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	Anglian Water welcomes the inclusion of the constraints on the wastewater network and the need for a foul water strategy to provide suitable mitigation measures to avoid any detriment to the environment or existing residents within the Belaugh WRC network - particularly lower-lying areas of Hoveton. It is agreed that a separate conveyance will be required to mitigate these risks, and early engagement with Anglian Water is essential.

	Anglian Water supports the modifications to clauses 8 and 9 of Policy HV01/C to ensure the appropriate wastewater infrastructure is delivered prior to first occupation of any dwelling on the site.
Attached File (where submitted)	
Officer Summary	<p>Anglian Water welcomes the inclusion of the constraints on the wastewater network and the need for a foul water strategy to provide suitable mitigation measures to avoid any detriment to the environment or existing residents within the Belaugh WRC network - particularly lower-lying areas of Hoveton. It is agreed that a separate conveyance will be required to mitigate these risks, and early engagement with Anglian Water is essential.</p> <p>Anglian Water supports the modifications to clauses 8 and 9 of Policy HV01/C to ensure the appropriate wastewater infrastructure is delivered prior to first occupation of any dwelling on the site.</p>
Officer Response	Support noted. NNDC and the promoter have engaged throughout the production of the Local Plan with AW and in particular this site and proposals included the above.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM46
ID	MMC251
Response Date	17/09/2025 09:40:00
Full Name	Mr Julian Wells
Organisation	FW Properties
Agent Full Name	Lewis Matthews
Agent Organisation	Bidwells
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>LAND EAST OF TUNSTEAD ROAD (HV01/C) AND LAND AT STALHAM ROAD (HV06/A), HOVETON</p> <p>On behalf of FW Properties, Bidwells continue to strongly support the allocation of Land East of Tunstead Road, Hoveton, under Policy HV01/C for residential development of approximately 150 dwellings and Land at Stalham Road, Hoveton under Policy HV06/A for residential development of approximately 50 dwellings.</p> <p>As demonstrated within previous Representations and throughout the Examination process, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Since the hearing sessions, North Norfolk District Council have provided a pre-application response on the proposals and FW Properties are currently targeting an application submission covering both HV01/C and HV06/A later this year.</p> <p>We fully support the Council's proposed Main Modification (ref. MM46) which amends Policy HV01/B to HV01/C, and alters the policy wording to allow for the delivery of approximately 150 dwellings, in addition to 60 units of specialist elderly persons accommodation. Furthermore, we support the Council's introduction of new Policy HV06/A under Main Modification reference MM47 along with the supporting text. Other amendments made under modifications MM46 and MM47 are generally in accordance with the amendments suggested within FW Properties' Hearing Statement.</p> <p>On this basis, we consider Policies HV01/C and HV06/A to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, both should be allocated in the Local Plan. The allocation enables FW Properties to continue to bring forward the site for residential development.</p>

Attached File (where submitted)	MMC251 - NNDC Main Modifications Consultation - Policy HV01C and HV06A.pdf
Officer Summary	<p>On behalf of FW Properties, Bidwells continue to strongly support the allocation of Land East of Tunstead Road, Hoveton, under Policy HV01/C for residential development of approximately 150 dwellings and Land at Stalham Road, Hoveton under Policy HV06/A for residential development of approximately 50 dwellings.</p> <p>As demonstrated within previous Representations and throughout the Examination process, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Since the hearing sessions, North Norfolk District Council have provided a pre-application response on the proposals and FW Properties are currently targeting an application submission covering both HV01/C and HV06/A later this year.</p> <p>We fully support the Council's proposed Main Modification (ref. MM46) which amends Policy HV01/B to HV01/C, and alters the policy wording to allow for the delivery of approximately 150 dwellings, in addition to 60 units of specialist elderly persons accommodation. Furthermore, we support the Council's introduction of new Policy HV06/A under Main Modification reference MM47 along with the supporting text. Other amendments made under modifications MM46 and MM47 are generally in accordance with the amendments suggested within FW Properties' Hearing Statement.</p> <p>On this basis, we consider Policies HV01/C and HV06/A to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, both should be allocated in the Local Plan. The allocation enables FW Properties to continue to bring forward the site for residential development.</p>
Officer Response	Comments and Support noted. we welcome the acknowledgement of pre application advice and the advancement of the planning application

MM47

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM47
ID	MMC52
Response Date	26/08/2025 14:41:00
Full Name	Mr Geoff Cook
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	MMC52 - Email objections to NNDC Local plan Aug25.pdf
Officer Summary	<p>I am a resident of Brook Park and the proposed allocations for residential development will destroy any view from Brook Park to the historic St Peter's Church as well as views over grade 2 agricultural land. The proposed through route will significantly increase the volume of traffic through Brook Park and create a 'rat-run' through the development potentially risking injury to children and adults who are residents or visitors to it. The proposed sewage and flood water mitigation of a new pipe to Belaugh Water Treatment Works will prove to be significantly more expensive than suggested and will not stop discharges into the River Bure as Belaugh WTW is currently at or near capacity. I realise that most of the points raised have been raised before and dismissed, however with the potential doubling of the size of the development, I am writing again to object in the strongest possible terms to the proposed allocation and/or any planning application for HV01/C and/or HV06/A in Hoveton, as set out in the Main Modifications to the North Norfolk Local Plan (August 2025) and the accompanying Policies Map changes.</p> <p>Failure to demonstrate compliance with nutrient neutrality requirements for the Broads SAC and Broadland Ramsar sites (Policy CC13; Conservation of Habitats and Species Regulations 2017). 2. Unacceptable highway and transport impacts, particularly cumulative effects with the neighbouring allocation. 3. Harm to heritage assets and settlement character contrary to Policies ENV7, SS1, and the NPPF. 4. Drainage and infrastructure constraints, including foul drainage capacity and surface water management. 5. Biodiversity Harm – Lack of clear demonstration of 10% Biodiversity Net Gain, habitat loss and corridor disruption. (Policy CC10 and NPPF paragraphs 180-182) 6. Over-concentration of housing in Hoveton, contrary to balanced growth objectives of Policy SS1.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM47
ID	MMC183
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack

Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome the additional supporting text referencing heritage assets. We welcome bullet point 5 of the policy which highlights the nearby heritage assets and need for landscaping to mitigate potential impacts on those assets.
Attached File (where submitted)	
Officer Summary	We welcome the additional supporting text referencing heritage assets. We welcome bullet point 5 of the policy which highlights the nearby heritage assets and need for landscaping to mitigate potential impacts on those assets.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM47
ID	MMC226
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	Anglian Water welcomes the inclusion of the constraints on the wastewater network and the need for a foul water strategy to provide suitable mitigation measures to avoid any detriment to the environment or existing residents within the Belaugh WRC network - particularly lower-lying areas of Hoveton. It is agreed that a separate conveyance will be required to mitigate these risks, and early engagement with Anglian Water is essential.

	<p>Anglian Water supports clauses 9 and 10 of Policy HV06/A which are identical to the modifications to clauses 8 and 9 of Policy HV01/C, to ensure the appropriate wastewater infrastructure is delivered prior to first occupation of any dwelling on the site. This provides an opportunity for the developers of these sites to coordinate their foul drainage strategies for the delivery of the necessary wastewater infrastructure to support the quantum of growth in this area.</p>
Attached File (where submitted)	
Officer Summary	<p>Anglian Water welcomes the inclusion of the constraints on the wastewater network and the need for a foul water strategy to provide suitable mitigation measures to avoid any detriment to the environment or existing residents within the Belaugh WRC network - particularly lower-lying areas of Hoveton. It is agreed that a separate conveyance will be required to mitigate these risks, and early engagement with Anglian Water is essential.</p> <p>Anglian Water supports clauses 9 and 10 of Policy HV06/A which are identical to the modifications to clauses 8 and 9 of Policy HV01/C, to ensure the appropriate wastewater infrastructure is delivered prior to first occupation of any dwelling on the site. This provides an opportunity for the developers of these sites to coordinate their foul drainage strategies for the delivery of the necessary wastewater infrastructure to support the quantum of growth in this area.</p>
Officer Response	Support noted. NNDC and the promoter have engaged throughout the production of the Local Plan with AW and in particular this site and proposals included the above.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM47
ID	MMC252
Response Date	17/09/2025 09:40:00
Full Name	Mr Julian Wells
Organisation	FW Properties
Agent Full Name	Lewis Matthews
Agent Organisation	Bidwells
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>LAND EAST OF TUNSTEAD ROAD (HV01/C) AND LAND AT STALHAM ROAD (HV06/A), HOVETON</p> <p>On behalf of FW Properties, Bidwells continue to strongly support the allocation of Land East of Tunstead Road, Hoveton, under Policy HV01/C for residential development of approximately 150 dwellings and Land at Stalham Road, Hoveton under Policy HV06/A for residential development of approximately 50 dwellings.</p> <p>As demonstrated within previous Representations and throughout the Examination process, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Since the hearing sessions, North Norfolk District Council have provided a pre-application response on the proposals and FW Properties are currently targeting an application submission covering both HV01/C and HV06/A later this year.</p> <p>We fully support the Council's proposed Main Modification (ref. MM46) which amends Policy HV01/B to HV01/C, and alters the policy wording to allow for the delivery of approximately 150 dwellings, in addition to 60 units of specialist elderly persons accommodation. Furthermore, we support the Council's introduction of new Policy HV06/A under Main Modification reference MM47 along with the supporting text. Other amendments made under modifications MM46 and MM47 are generally in accordance with the amendments suggested within FW Properties' Hearing Statement.</p>

	<p>On this basis, we consider Policies HV01/C and HV06/A to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, both should be allocated in the Local Plan. The allocation enables FW Properties to continue to bring forward the site for residential development.</p>
Attached File (where submitted)	MMC252 - NNDC Main Modifications Consultation - Policy HV01C and HV06A.pdf
Officer Summary	<p>On behalf of FW Properties, Bidwells continue to strongly support the allocation of Land East of Tunstead Road, Hoveton, under Policy HV01/C for residential development of approximately 150 dwellings and Land at Stalham Road, Hoveton under Policy HV06/A for residential development of approximately 50 dwellings.</p> <p>As demonstrated within previous Representations and throughout the Examination process, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Since the hearing sessions, North Norfolk District Council have provided a pre-application response on the proposals and FW Properties are currently targeting an application submission covering both HV01/C and HV06/A later this year.</p> <p>We fully support the Council's proposed Main Modification (ref. MM46) which amends Policy HV01/B to HV01/C, and alters the policy wording to allow for the delivery of approximately 150 dwellings, in addition to 60 units of specialist elderly persons accommodation. Furthermore, we support the Council's introduction of new Policy HV06/A under Main Modification reference MM47 along with the supporting text. Other amendments made under modifications MM46 and MM47 are generally in accordance with the amendments suggested within FW Properties' Hearing Statement.</p> <p>On this basis, we consider Policies HV01/C and HV06/A to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, both should be allocated in the Local Plan. The allocation enables FW Properties to continue to bring forward the site for residential development.</p>
Officer Response	<p>Comments and support noted. We welcome the acknowledgement of pre application advice and the advancement of the planning application.</p>

MM48

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM48
ID	MMC184
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome the new criterion relating to landscaping along the boundaries.
Attached File (where submitted)	
Officer Summary	We welcome the new criterion relating to landscaping along the boundaries.
Officer Response	Support noted.

MM50

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM50
ID	MMC47
Response Date	06/08/2025 12:08:00
Full Name	Mrs Julie Kelleher
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE <p>I feel that with the congestion that is occurring around the village of Coltishall and future developments in and around North Walsham consideration should be possibly given to by-passing the village of Coltishall.</p> <p>I suggest that the RAF Coltishall runway is utilised as per the attached screenshot.</p> <p>I have no idea if this is possible BUT, congestion, speed restrictions being ignored, plus the amount of HGV's and PSV's currently travelling through the village, which has serious issues with road layout and cars parked along the village main road, something needs to be seriously thought about going forward to the future.</p>
Attached File (where submitted)	MMC47 - Suggsted Coltishall Bypass Route.png
Officer Summary	<p>I feel that with the congestion that is occurring around the village of Coltishall and future developments in and around North Walsham consideration should be possibly given to by-passing the village of Coltishall.</p> <p>I suggest that the RAF Coltishall runway is utilised as per the attached screenshot.</p> <p>I have no idea if this is possible BUT, congestion, speed restrictions being ignored, plus the amount of HGV's and PSV's currently travelling through the village, which has serious issues with road layout and cars parked along the village main road, something needs to be seriously thought about going forward to the future.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Policy requirements for both sites in North Walsham require the provision of a Transport Assessment to be conducted as part of any application, this assessment will consider the site's impact on North Walsham, mitigation has already been identified in the site-specific policies for both sites and a SoCG (signed May 2025) now exists between all relevant parties which ensures these requirements are delivered through proportionate funding.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM50
ID	MMC49
Response Date	11/08/2025 08:59:00

Full Name	Mr Robert Simmons
Organisation	The Battlefields Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	The Battlefields Trust supports Main Modification ref.MM50, Policy NW62/A, Land West of North Walsham, Environmental Mitigation, 6. where the revised text states: 'Proposals should appropriately use design, layout and landscaping to protect and enhance heritage assets and their settings including designated and non-designated heritage assets including the 'Battlefield site'. Landscape buffering and open space should be used to protect the Listed Buildings at Bradmoor Farm.
Attached File (where submitted)	
Officer Summary	The Battlefields Trust supports Main Modification ref.MM50, Policy NW62/A, Land West of North Walsham, Environmental Mitigation, 6. where the revised text states: 'Proposals should appropriately use design, layout and landscaping to protect and enhance heritage assets and their settings including designated and non-designated heritage assets including the 'Battlefield site'. Landscape buffering and open space should be used to protect the Listed Buildings at Bradmoor Farm.
Officer Response	Support noted and welcomed.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM50
ID	MMC125
Response Date	11/09/2025 11:23:00
Full Name	Ben Wright
Organisation	South Norfolk and Broadland Councils
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	

Question 7 - Explanation of Soundness Reasons	<p>At an officer level response, Broadland District Council acknowledges the inclusion of the changes made in relation to Policy NW62/A resulting from the Statement of Common Ground and supports their inclusion in the Policy. These include traffic and speed management and capacity improvements on the B1150, pedestrian safety improvements in Coltishall and Horstead, improvements to the signalised junction at Norwich Road, North Walsham and provision of off-site pedestrian and cycle improvements to North Walsham town centre.</p> <p>The Council acknowledges that the mitigation measures included in the Policy are not exhaustive and the final suite of mitigation measures will be determined through the required Transport Assessments.</p> <p>The Council does also acknowledge the need for further measures relating to HGV traffic through Coltishall and supports the work being conducted by the B1150 Action Group in relation to this.</p>
Attached File (where submitted)	
Officer Summary	<p>At an officer level response, Broadland District Council acknowledges the inclusion of the changes made in relation to Policy NW62/A resulting from the Statement of Common Ground and supports their inclusion in the Policy. These include traffic and speed management and capacity improvements on the B1150, pedestrian safety improvements in Coltishall and Horstead, improvements to the signalised junction at Norwich Road, North Walsham and provision of off-site pedestrian and cycle improvements to North Walsham town centre.</p> <p>The Council acknowledges that the mitigation measures included in the Policy are not exhaustive and the final suite of mitigation measures will be determined through the required Transport Assessments.</p> <p>The Council does also acknowledge the need for further measures relating to HGV traffic through Coltishall and supports the work being conducted by the B1150 Action Group in relation to this.</p>
Officer Response	Comments noted. The Council will continue to engage with Broadland District Council to ensure effective collaboration.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM50
ID	MMC159
Response Date	16/09/2025 09:10:00
Full Name	Jo Copplestone
Organisation	B1150 Special Interest Group
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>Response to NNDC Consultation re: Main Modifications Local Plan, on behalf of the Coltishall & Horstead B1150 Special Interest Group.</p> <p>Coltishall & Horstead B1150 Special Interest Group objects to the number of homes planned for North Walsham, a total of 2757. The cumulative effect of this development has not been properly assessed, the previous traffic study by Aecom was undertaken in October 2022, by the Consortium of Developer's for allocation NW62/A, the scope of which was modelled on 2000 new homes, and traffic mitigation measures were agreed in the Statement of Common Ground, signed by Broadland District Council in early 2024, and we support these measures inclusion in the Planning Policy.</p> <p>In addition, we would like to request the text is slightly changed to: 'Measures to discourage the use of Aylsham Road by motor vehicles, to be confined within the boundary of the proposed link road'.</p>

	<p>Furthermore, the B1150 Special Interest Group do not accept the statement on proportionate costs and request an additional £100,000 to pay for further traffic mitigation measures to address traffic congestion in Coltishall, which could include but would not be limited to, funding to scope a relief road or a 7.5 tonne weight restriction for HGV's in Coltishall.</p> <p>Protecting pedestrian safety is the foremost priority of our action group, local police have already confirmed there is a risk to pedestrians using the pavements, and there is also the danger of gridlock causing issues for emergency vehicles trying to navigate the section of road to attend emergencies. We believe further development in North Walsham will exacerbate this dangerous traffic situation, and we would like the opportunity to work with North Norfolk District Council to help resolve these cross-border traffic problems.</p>
Attached File (where submitted)	
Officer Summary	<p>Coltishall & Horstead B1150 Special Interest Group objects to the number of homes planned for North Walsham, a total of 2757. The cumulative effect of this development has not been properly assessed, the previous traffic study by Aecom was undertaken in October 2022, by the Consortium of Developer's for allocation NW62/A, the scope of which was modelled on 2000 new homes, and traffic mitigation measures were agreed in the Statement of Common Ground, signed by Broadland District Council in early 2024, and we support these measures inclusion in the Planning Policy.</p> <p>In addition, we would like to request the text is slightly changed to: 'Measures to discourage the use of Aylsham Road by motor vehicles, to be confined within the boundary of the proposed link road'.</p> <p>Furthermore, the B1150 Special Interest Group do not accept the statement on proportionate costs and request an additional £100,000 to pay for further traffic mitigation measures to address traffic congestion in Coltishall, which could include but would not be limited to, funding to scope a relief road or a 7.5 tonne weight restriction for HGV's in Coltishall.</p> <p>Protecting pedestrian safety is the foremost priority of our action group, local police have already confirmed there is a risk to pedestrians using the pavements, and there is also the danger of gridlock causing issues for emergency vehicles trying to navigate the section of road to attend emergencies. We believe further development in North Walsham will exacerbate this dangerous traffic situation, and we would like the opportunity to work with North Norfolk District Council to help resolve these cross-border traffic problems.</p>
Officer Response	<p>Part support and objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. The site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. A further SoCG (signed May 2025) has been signed between all relevant parties in relation to the provision of highways mitigation and costs in association with both North Walsham and Coltishall/Horstead improvements to ensure funding is proportionate between relevant site allocations and reflects and requirements. This can be viewed on the Local Plan's examination library. The Highway Authority have been consulted on throughout the Local Plan process, pedestrian safety has always been a key consideration throughout. The Proposed further suggested change to policy with regard Aylsham Rd is acknowledged however, the additional wording lacks clarity, is not evidenced or justified, and does not relate to the proposals or wider objection nor to the soundness of this Local Plan or site-specific policy. The additional measures and costs now being put forward are seen as unjustified aspiration by B1150 action group which is not supported by any evidence and would fall foul of the test put forward for Planning conditions and obligations as set out in the NPPF para 58.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM50
ID	MMC185
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound	

<ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	
Question 7 - Explanation of Soundness Reasons	We welcome bullet points 6 and 7 which seek to protect and enhance heritage assets and their settings and provide appropriate landscaping.
Attached File (where submitted)	
Officer Summary	We welcome bullet points 6 and 7 which seek to protect and enhance heritage assets and their settings and provide appropriate landscaping.
Officer Response	Support noted.
Question 1 - Document Selection	Main Modifications
<ul style="list-style-type: none"> * Main Modifications * Policy Map Changes 	
Question 2 - Modification Reference	MM50
ID	MMC250
Response Date	17/09/2025 09:40:00
Full Name	
Organisation	ESCO Developments, Flagship Housing Group & Lovell Partnerships
Agent Full Name	Sarah Hornbrook
Agent Organisation	Bidwells LLP
Question 3 - Legal Compliance <ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness <ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	Yes (Support)
Question 6 - Reasons Not Sound <ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>LAND WEST OF NORTH WALSHAM (POLICY NW62/A)</p> <p>On behalf of ESCO Prospect, Flagship Housing Developments Ltd and Lovell Partnerships Ltd (hereafter "The Consortium"), Bidwells continue to strongly support the allocation of Land West of North Walsham, under Policy NW62/A for residential-led mixed use development of approximately 1,800 dwellings, 200 dwelling equivalent of specialist elderly accommodation, 7ha of employment land, green infrastructure community facilities and other associated infrastructure.</p> <p>As demonstrated within previous Representations and throughout the Examination process, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. The Consortium are continuing to make good progress with the preparation of a hybrid planning application, which will seek outline planning permission for the whole site and detailed permission for a first phase of development.</p> <p>We fully support the Council's proposed Main Modification (ref. MM50) which amends the wording of Policy NW62/A. The amendments to the wording in relation to highways/transport requirements are generally in line with the Statement of Common Ground between North Norfolk District Council (NNDC), Norfolk County Council (NCC), Broadland District Council and the Consortium which was signed on 17th January 2024.</p> <p>Other wording revisions, which amongst other things provide clarity on the quantity of development and open space, as well as the requirements for approval of the Development Brief, Design Code, GI Strategy and Drainage Strategy, are generally in accordance with the amendments suggested in the Consortium's Matter 5 Hearing Statement. The introduction of a section on Proportionate Funding is in accordance with the Funding of Infrastructure Statement of Common Ground signed by NNDC, NCC, the Consortium and Richborough Estates on 30th April 2025, and whilst the wording differs slightly from that in the Statement of Common Ground, the Consortium support the proposed</p>

	<p>modifications. We also support the inclusion of the same wording on Proportionate Funding within Policy NW16 (Main Modification reference MM51).</p> <p>On this basis, we consider Policy NW62/A to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, should be allocated in the Local Plan.</p>
Attached File (where submitted)	MMC250 - 20250912 NNDC Main Modifications Consultation - Policy NW62A - Final.pdf
Officer Summary	<p>On behalf of ESCO Prospect, Flagship Housing Developments Ltd and Lovell Partnerships Ltd (hereafter "The Consortium"), Bidwells continue to strongly support the allocation of Land West of North Walsham, under Policy NW62/A for residential-led mixed use development of approximately 1,800 dwellings, 200 dwelling equivalent of specialist elderly accommodation, 7ha of employment land, green infrastructure, community facilities and other associated infrastructure.</p> <p>As demonstrated within previous Representations and throughout the Examination process, the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. The Consortium are continuing to make good progress with the preparation of a hybrid planning application, which will seek outline planning permission for the whole site and detailed permission for a first phase of development.</p> <p>We fully support the Council's proposed Main Modification (ref. MM50) which amends the wording of Policy NW62/A. The amendments to the wording in relation to highways/transport requirements are generally in line with the Statement of Common Ground between North Norfolk District Council (NNDC), Norfolk County Council (NCC), Broadland District Council and the Consortium which was signed on 17th January 2024.</p> <p>Other wording revisions, which amongst other things provide clarity on the quantity of development and open space, as well as the requirements for approval of the Development Brief, Design Code, GI Strategy and Drainage Strategy, are generally in accordance with the amendments suggested in the Consortium's Matter 5 Hearing Statement. The introduction of a section on Proportionate Funding is in accordance with the Funding of Infrastructure Statement of Common Ground signed by NNDC, NCC, the Consortium and Richborough Estates on 30th April 2025, and whilst the wording differs slightly from that in the Statement of Common Ground, the Consortium support the proposed modifications. We also support the inclusion of the same wording on Proportionate Funding within Policy NW16 (Main Modification reference MM51).</p> <p>On this basis, we consider Policy NW62/A to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, should be allocated in the Local Plan.</p>
Officer Response	Comments and support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM50
ID	MMC264
Response Date	17/09/2025 21:52:00
Full Name	Mr Berni Marfleet
Organisation	Save Our Streets (North Walsham)
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified

Question 7 - Explanation of Soundness Reasons	<p>New policy NW62/A: 10 should reinstate the proposed deletion of "and provide a suitable route over the railway for access to the Lyngate/Folgate Road industrial estate together with appropriate junctions". It should also include specifically a link onto the B1145.</p> <p>The removal of traffic from Aylsham and Mundesley Roads, especially HGVs, is essential, given the expected increase in traffic with the growth of the Town. This is to prevent a serious deterioration to the environment and pedestrian safety as well as structural damage to the highway infrastructure and underground services and to buildings along the routes and in particular the historic core of Town centre.</p> <p>Original policy NW62/A: 13..."Delivery of appropriate restrictions on the amount of private traffic (including HGV vehicles) that can travel along Aylsham Road and Skeyton Road" needs to be reinstated and not replaced by the weaker wording proposed in 1V..."Measures to discourage the use of Aylsham Road and Skeyton Road, North Walsham by motor vehicles". It should also include Skeyton New Road and Cherry Tree Lane to prevent "rat running".</p> <p>Given the response above to the change policy 10 above, there needs to be restriction both physical and in the form of Traffic Orders to contain the expected growth and in particular in regard to the part of Aylsham Road where pedestrians share the highway without any protection. Without that, the existing serious pedestrian safety issues here will become even worse.</p>
Attached File (where submitted)	
Officer Summary	<p>New policy NW62/A: 10 should reinstate the proposed deletion of "and provide a suitable route over the railway for access to the Lyngate/Folgate Road industrial estate together with appropriate junctions". It should also include specifically a link onto the B1145.</p> <p>The removal of traffic from Aylsham and Mundesley Roads, especially HGVs, is essential, given the expected increase in traffic with the growth of the Town. This is to prevent a serious deterioration to the environment and pedestrian safety as well as structural damage to the highway infrastructure and underground services and to buildings along the routes and in particular the historic core of Town centre.</p> <p>Original policy NW62/A: 13..."Delivery of appropriate restrictions on the amount of private traffic (including HGV vehicles) that can travel along Aylsham Road and Skeyton Road" needs to be reinstated and not replaced by the weaker wording proposed in 1V..."Measures to discourage the use of Aylsham Road and Skeyton Road, North Walsham by motor vehicles". It should also include Skeyton New Road and Cherry Tree Lane to prevent "rat running".</p> <p>Given the response above to the change policy 10 above, there needs to be restriction both physical and in the form of Traffic Orders to contain the expected growth and in particular in regard to the part of Aylsham Road where pedestrians share the highway without any protection. Without that, the existing serious pedestrian safety issues here will become even worse.</p>
Officer Response	<p>Comments noted. Proposed change to Criterion 10 is not necessary to ensure the Local Plan's soundness, as discussed during the EiP hearing sessions, this requirement is no longer necessary as this provision is not deemed viable or deliverable at the present time, therefore an access onto the B1145 in the north is unachievable.</p> <p>Proposed change to Criterion 13 is not necessary to ensure the Local Plan's soundness, the exact measures determined relevant to discouraging vehicular use on Aylsham Road and Skeyton Road will be considered through a future application in conjunction with the Highway Authority. The Council's revision to Criterion 13 allows flexibility in choices to discourage vehicular use. No changes are considered necessary.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM50
ID	MMC265
Response Date	17/09/2025 19:01:00
Full Name	Mr Jerome Mayhew MP
Organisation	Member of Parliament for Broadland and Fakenham
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)

Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p><i>I object to the increased number of homes planned for North Walsham. The new figure of 2,757 is far higher than previous figures and the cumulative effect of this development has not been properly assessed.</i></p> <p><i>The previous traffic study by Aecom was undertaken in October 2022, and was modelled on 2000 new homes and traffic mitigation measures were agreed in early 2024, these would need to be revisited; I would lend my support to the B1150 Special Interest Group's request for an additional £100,000 to pay for further traffic mitigation measures to address traffic congestion in Coltishall and pedestrian safety.</i></p> <p><i>Local police have already confirmed there is a risk to pedestrians using the pavements, and there is also the danger of gridlock causing issues for emergency vehicles trying to navigate the section of road to attend emergencies.</i></p> <p><i>Further development in North Walsham will exacerbate this dangerous traffic situation.</i></p>
Attached File (where submitted)	
Officer Summary	<p><i>I object to the increased number of homes planned for North Walsham. The new figure of 2,757 is far higher than previous figures and the cumulative effect of this development has not been properly assessed.</i></p> <p><i>The previous traffic study by Aecom was undertaken in October 2022, and was modelled on 2000 new homes and traffic mitigation measures were agreed in early 2024, these would need to be revisited; I would lend my support to the B1150 Special Interest Group's request for an additional £100,000 to pay for further traffic mitigation measures to address traffic congestion in Coltishall and pedestrian safety.</i></p> <p><i>Local police have already confirmed there is a risk to pedestrians using the pavements, and there is also the danger of gridlock causing issues for emergency vehicles trying to navigate the section of road to attend emergencies.</i></p> <p><i>Further development in North Walsham will exacerbate this dangerous traffic situation.</i></p>
Officer Response	<p>Objections and comments noted. These matters were fully considered during the recent examination in public and set out in various evidence documents in the Local Plan examination library. The site-specific policy includes requirements approved by relevant statutory consultees, site promoters and LPA's in association with the required off site mitigation considered necessary. Two Statement of Common ground detailing the mitigation requirements and proportional funding have been used to inform the policy position. The representation repeats earlier objections in relation to growth numbers and no changes to the policy are being suggested.</p> <p>Policy requirements for both site allocations in North Walsham require the provision of a further Transport Assessment to support any proposal to be conducted as part of any application however additional measures and costs now being suggested are seen as unjustified aspiration by B1150 action group which is not supported by any evidence and have the potential to fall foul of the tests put forward for Planning conditions and obligations as set out in the NPPF para 58.</p>

MM51

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC18
Response Date	10/08/2025 14:28:25
Full Name	John Ford
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Effective
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILES</p> <p>The Site does NOT have reasonable connectivity to the Town Centre ~ all facilities are in excess of 1.1 kilometers from the site and very poor bus service. vast majority of journeys would be by car.</p> <p>The existing employment area has very few jobs available and average pay grades would not support the average mortgage and current rent precludes ability to save deposit</p> <p>The timing of the Access Road from B1145 over proposed Bridge is not made clear. The development is scheduled to take up to 8 years to complete. No firm commitment to timing of construction of access is given. The MM51 makes clear the timing of the Horstead and Coltishall traffic management schemes but leaves the NW16 access arrangements very unclear. This is an essential part of the development ~ without it access to site would be dangerous down the Lyngate Road (down to 1 lane because of parked cars always in place)which is the main access to Mundesley Road at the end of which is the proposed site. This part of the Mundesley Road already has an "Unsuitable for HGV" sign in place.</p> <p>NEW POLICY NW16 item 1: timing of building access road is critical to safe access to the site and should not be left to the developer</p> <p>item 3: timing of building the bridge is critical to safe access for construction and should not be left to the developer</p> <p>item 5: no provision for sensible landscaping buffer between existing residences and new build to the South of the site (5 metres proposed is far too small ~ air source heat pump noise etc)</p> <p>item 6: Infiltration basin in groundwater drainage solution is unsound. See www.epa.gov/npdes</p> <p>Item 11: Policy specific for NW62/A but not for NW16</p> <p>Item 12: A long delivery time of development of 8 years leaves far too much leeway for developer to delay building safe access to site during the Phasing and Delivery Plan</p> <p>item 13: as above for item 12 ~ although Legal Agreements in place would be re-assuring but timing of access construction should be during Phase 1 of development</p> <p>DELIVERABILITY: Anglian Water are concerned about capacity of both existing foul drainage network (hugely increased foul water spills to Mundesley beach in 2024) ~ unable to demonstrate just how much headroom to supply clean drinking water ~ this development alone will consume 1 million extra litres from a hard pressed Aquifer EVERY 9 DAYS.</p>
Attached File (where submitted)	EDP ~ Article ~ pushed to the brink.pdf SOAK PITS INFORMATION.doc SYNOPSIS 06.07.25.pdf
Officer Summary	The Site does NOT have reasonable connectivity to the Town Centre ~ all facilities are in excess of 1.1 kilometers from the site and very poor bus service. vast majority of journeys would be by car.

	<p>The timing of the Access Road from B1145 over proposed Bridge is not made clear. The development is scheduled to take up to 8 years to complete. No firm commitment to timing of construction of access is given. The MM51 makes clear the timing of the Horstead and Coltishall traffic management schemes but leaves the NW16 access arrangements very unclear. This is an essential part of the development ~ without it access to site would be dangerous down the Lyngate Road (down to 1 lane because of parked cars always in place) which is the main access to Mundesley Road at the end of which is the proposed site. This part of the Mundesley Road already has an "Unsuitable for HGV" sign in place.</p> <p>no provision for sensible landscaping buffer between existing residences and new build to the South of the site (5 metres proposed is far too small ~ air source heat pump noise etc)</p> <p>1 item 6: Infiltration basin in groundwater drainage solution is unsound. See www.epa.gov/npdcs Item 11; Policy specific for NW62/A but not for NW16</p> <p>Item 12: A long delivery time of development of 8 years leaves far too much leeway for developer to delay building safe access to site during the Phasing and Delivery Plan</p> <p>item 13: as above for item 12 ~ although Legal Agreements in place would be re-assuring but timing of access construction should be during Phase 1 of development</p> <p>DELIVERABILITY: Anglian Water are concerned about capacity of both existing foul drainage network (hugely increased foul water spills to Mundesley beach in 2024) ~ unable to demonstrate just how much headroom to supply clean drinking water ~ this development alone will consume 1 million extra litres from a hard pressed Aquifer EVERY 9 DAYS.</p>
Officer Response	Objection noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. Any details on the precise phasing of the access will be determined through the application and any required phasing plans. Policy already includes mitigation requirements provided in consultation with Anglian Water.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC19
Response Date	12/08/2025 15:57:28
Full Name	Paul Heinrich
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	SEE ATTACHED FILE
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	Final consultation response_MM51.docx
Officer Summary	<p>The inclusion of this site remains unacceptable given the quantum of development already agreed for North Walsham, in particular the proposals under NW62/A for the sustainable urban extension to the west of the town and projected population growth across the district.</p> <p>1 Despite the mitigations proposed under MM51 there remain considerable concerns regarding:</p> <ul style="list-style-type: none"> • Highways infrastructure • Health and social care infrastructure • Water supply and foul water drainage

	<ul style="list-style-type: none"> Environmental damage <p>The mitigations set out in the detailed policy matters do, however, go some way to making the inclusion of the site more acceptable. The following observations are offered within the attachment, general support and acceptance with concerns also highlighted for each policy requirement is provided within the attachment also.</p> <p>Suggested change highlighted below:</p> <p>1 <i>Provision of convenient and safe vehicular access via a roundabout onto the B1145 and additional access provided onto Mundesley Road/Lyngate Road;</i></p> <p>This is essential. However the policy requires further strengthening by re-wording it as follows: <i>Provision of convenient and safe vehicular access via a roundabout onto the B1145 and additional access provided onto Mundesley Road/Lyngate Road to be provided before further development commences.</i></p>
Officer Response	Support and objections noted. The requested change is not considered necessary as the Council should not at this stage be making adjustments that are not related to the soundness of the Local Plan. The exact details that many of the comments relate to will be determined through the application process.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC28
Response Date	25/08/2025 05:47:05
Full Name	Mrs Sophia Jackman
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Effective
Question 7 - Explanation of Soundness Reasons	<p>I feel that it should stipulate that the roundabout for access on the bypass MUST be built before any building work begins. Having construction traffic using the Lyngate and Mundesley road is unsafe. Lyngate road is effectively a single carriage way as residents have to park on the road. There is already a great amount of traffic using the road with many hold ups at peak times. Any more traffic (especially construction traffic) will pose a significant risk to the safety of pedestrians also. Please also bear in mind the residents who live at the top of Mndesley Road, who will be greatly affected by this development anyway, let alone when traffic is allowed to use an access point there (which will be opposite my house!). My concern is that any developer who promises to build the round about/access from the bypass part way through the development, will then say it's not viable/too expensive and it will never happen. Therefore all traffic will come down the Mundesley Road/ Lyngate Road. It must be a firm stipulation that the roundabout happens before any development happens.</p>
Attached File (where submitted)	
Officer Summary	<p>feel that it should stipulate that the roundabout for access on the bypass MUST be built before any building work begins. Having construction traffic using the Lyngate and Mundesley road is unsafe. Lyngate road is effectively a single carriage way as residents have to park on the road. There is already a great amount of traffic using the road with many hold ups at peak times. Any more traffic (especially construction traffic) will pose a significant risk to the safety of pedestrians also. Please also bear in mind the residents who live at the top of Mndesley Road, who will be greatly affected by this development anyway, let alone when traffic is allowed to use an access point there (which will be opposite my house!). My concern is that any developer who promises to build the</p>

	round about/access from the bypass part way through the development, will then say it's not viable/too expensive and it will never happen. Therefore all traffic will come down the Mundesley Road/ Lyngate Road. It must be a firm stipulation that the roundabout happens before any development happens.
Officer Response	Objections noted. The requested change is not considered necessary as the Council should not at this stage be making adjustments that are not related to the soundness of the Local Plan. The exact details that many of the comments relate to will be determined through the application process.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC29
Response Date	26/08/2025 12:07:29
Full Name	Matthew Starling
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Effective
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>The route out of the proposed development recognises that most journeys undertaken will be by car, if that was not the case then the exit would be through the existing residential area to the south. In recognising this the applicant recognises that the site isn't really suitable, but I suppose the same can be said for most developments in rural areas and we must accept that houses must be built somewhere, if they are needed.</p> <p>However, the planned exit will encourage the use of Little London Road as rat run for access to the east side of the town and the services that part of the town plays host to. If the development is to go ahead, measures need to be in place to protect this rural lane and its users that includes walkers and cyclists, numbers that will increase if the development is to go ahead.</p> <p>The best way to enforce this is for the road to become a no through road with a physical barrier in the centre around the junction with the PAston Way footpath.</p>
Attached File (where submitted)	New Policy NW16.pdf
Officer Summary	<p>The route out of the proposed development recognises that most journeys undertaken will be by car, if that was not the case then the exit would be through the existing residential area to the south. In recognising this the applicant recognises that the site isn't really suitable, but I suppose the same can be said for most developments in rural areas and we must accept that houses must be built somewhere, if they are needed.</p> <p>However, the planned exit will encourage the use of Little London Road as rat run for access to the east side of the town and the services that part of the town plays host to. If the development is to go ahead, measures need to be in place to protect this rural lane and its users that includes walkers and cyclists, numbers that will increase if the development is to go ahead.</p> <p>The best way to enforce this is for the road to become a no through road with a physical barrier in the centre around the junction with the PAston Way footpath.</p>
Officer Response	Comments noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. The use of existing development access such as Acorn Way is unacceptable in highways terms for vehicular access.
Question 1 - Document Selection * Main Modifications	Main Modifications

* Policy Map Changes	
Question 2 - Modification Reference	MM51
ID	MMC54
Response Date	21/08/2025 08:50:00
Full Name	Paul Johnson
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Concern:</p> <p>I live on Lyngate Road and my overwhelming concern is the increased level of traffic along a minor road. The current level of traffic is unbearable with continual traffic 24 hours a day and the road appears to be used as a race track even though its is a single lane with cars parked on the road for residents. Heavy goods lorries use it all day and through the night, even though I understand there are restrictions on this type of use. Our houses shake with the speed of the lorries and cars. Nobody keeps to the speed limit and it seems to be a race to get from one end to the other, no matter who the driver is. The pavements were built along with the road for a different more peaceful time and its extremely dangerous to walk as a pedestrian due to proximity of the cars and lorries to the pavements and their speed.</p> <p>Even with the building of an access road further along the bypass I and the local residents do not believe it will deter traffic to continue to use Lyngate Road as a cut through and the volumes of traffic and speed will make life unbearable. It is the first access point to the proposed new estate when you are arriving in North Walsham from anywhere other than Mundesley...its not acceptable and naive to think otherwise.</p> <p>Lyngate Road needs action taking. It needs traffic calming and a deterrence.</p> <p>The road has become so dangerous that someone will get seriously injured or killed. Cars race along the bypass and see Lyngate Road as an extension of the bypass and continue at speed.</p> <p>I do not believe the proposed housing should be approved as the impact on the road where I live and the health (Physical and mental) of the residents is being totally disregarded. The proposal will make a bad situation worse and the main access road will be an under used folly at the expense of Lyngate Road and its residents.</p> <p>I do not believe any consideration has been taken into account of the damage the increase in traffic will have for peoples property and how we will be compensated. Will the Council cover the subsidence claims and associated repairs?</p> <p>Whatever the outcome of the consultation, Lyngate Road needs protecting along with the residents. Traffic calming/deterrence/speed camera is a must. Lives are at risk.</p>
Attached File (where submitted)	
Officer Summary	<p>The current level of traffic is unbearable with continual traffic 24 hours a day and the road appears to be used as a race track even though its is a single lane with cars parked on the road for residents. Heavy goods lorries use it all day and through the night, even though I understand there are restrictions on this type of use. Our houses shake with the speed of the lorries and cars.</p> <p>Nobody keeps to the speed limit and it seems to be a race to get from one end to the other, no matter who the driver is. The pavements were built along with the road for a different more peaceful time and its extremely dangerous to walk as a pedestrian due to proximity of the cars and lorries to the pavements and their speed.</p> <p>Even with the building of an access road further along the bypass I and the local residents do not believe it will deter traffic to continue to use Lyngate Road as a cut through and the volumes of traffic and speed will make life unbearable. It is the first access point to the proposed new estate when you</p>

	<p>are arriving in North Walsham from anywhere other than Mundesley...its not acceptable and naive to think otherwise.</p> <p>Lyngate Road needs action taking. It needs traffic calming and a deterrence.</p> <p>The road has become so dangerous that someone will get seriously injured or killed. Cars race along the bypass and see Lyngate Road as an extension of the bypass and continue at speed.</p> <p>I do not believe the proposed housing should be approved as the impact on the road where I live and the health (Physical and mental) of the residents is being totally disregarded. The proposal will make a bad situation worse and the main access road will be an under used folly at the expense of Lyngate Road and its residents.</p> <p>I do not believe any consideration has been taken into account of the damage the increase in traffic will have for peoples property and how we will be compensated. Will the Council cover the subsidence claims and associated repairs?</p> <p>Whatever the outcome of the consultation, Lyngate Road needs protecting along with the residents. Traffic calming/deterrence/speed camera is a must. Lives are at risk.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Policy requirements for both sites in North Walsham require the provision of a Transport Assessment to be conducted as part of any application, this assessment will consider the site's impact on North Walsham, mitigation has already been identified in the site-specific policies for both sites and a SoCG (signed May 2025) now exists between all relevant parties which ensures these requirements are delivered through proportionate funding.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC56
Response Date	30/08/2025 16:08:52
Full Name	Mrs Tanya Adams
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILES</p> <p>An addition to the original plan, providing more houses which were already covered in the original plan. Population growth is not as large as original expected and with the removal of the Employment area on Bradfield Road from the original plan, there will be no new jobs. Area is quality farmland with environmental importance due to closeness to the Dilham canal.</p> <p>Mention if new Road access, however we know this will not be built until 60% of properties are built. Roads around this land are not suitable for increased traffic.</p> <p>This area suffers from frequent flooding on Little London Road which will be made worse if this area is built on (photos attached from 2 random days- 21st July 2025 and 26 Feb 2025)</p>
Attached File (where submitted)	IMG_9514.jpeg 0CAA27B4-3DED-4DD5-8C66-8B2A8C99488C2025-02-26_17-06-28_652.jpeg
Officer Summary	<p>An addition to the original plan, providing more houses which were already covered in the original plan. Population growth is not as large as original expected and with the removal of the Employment</p>

	<p>area on Bradfield Road from the original plan, there will be no new jobs. Area is quality farmland with environmental importance due to closeness to the Dilham canal.</p> <p>Mention if new Road access, however we know this will not be built until 60% of properties are built. Roads around this land are not suitable for increased traffic.</p> <p>This area suffers from frequent flooding on Little London Road which will be made worse if this area is built on (photos attached from 2 random days- 21st July 2025 and 26 Feb 2025)</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. No access is being provided onto Little London Road.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC64
Response Date	01/09/2025 15:45:03
Full Name	Mr Alan Juggins
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	The primary access onto the B1145 Must be constructed prior to the development of the site to allow construction traffic to safely and not use the Lyngate road and old Munsley road , which has a restriction to access for HGV (blue traffic sign opposite shop on Munsley road)
Attached File (where submitted)	
Officer Summary	The primary access onto the B1145 Must be constructed prior to the development of the site to allow construction traffic to safely and not use the Lyngate road and old Munsley road , which has a restriction to access for HGV (blue traffic sign opposite shop on Munsley road)
Officer Response	Objection noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. The exact phasing and delivery of the site will be determined through the application.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC76
Response Date	04/09/2025 15:58:52
Full Name	Mr Rob Knee
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance	No Comment / Unsure

* Yes (Support) * No (Object) * No Comment / Unsure * General Comment	
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective
Question 7 - Explanation of Soundness Reasons	<p>Adding to land identified for new housing to the North of North Walsham is unsound in my opinion because:</p> <ol style="list-style-type: none"> 1. The proposed housing will create greater pressure on existing roads in the town (perhaps around at least 1000 extra car movements per day - 500 houses with one car per household, 2 journeys per day) as traffic seeks routes to and from Norwich. Further pressure will also be added to the already problematic B1151 Coltishall river crossing and approach. Greater mitigations are needed - for example additional incentives to use the train and bus services. Restrictions to heavy traffic needed on the B1151 and encouragement to use the route south via Acle. Also, vehicle access to both the current doctors' surgeries and to the local schools from the proposed sites will result in more traffic in the town centre. 2. The developments are very close to the River Ant and the likelihood of pollution to the Norfolk Broads from run off is inevitably increased by the proposals for extra housing in the vicinity. This issue should have a greater priority with substantial proposals for mitigation. 3. The extra development will inevitably further increase the pressure on water supply and sewage disposal in this area - an area where such factors are already at a critical level. Nutrient Neutrality issues should surely not be further exacerbated. There does not appear to be an independent advanced assessment of such considerations. 4. There does not appear to have been a review of the proposed housing model to provide additional accommodation without adding further land allocations. Higher housing densities through energy, water and space efficient terraced housing might have been achieved by imaginative design approaches as an alternative to the current developer driven space wasting models. Provision for traffic and services mitigations do not appear to have been sufficiently 'tied down' in advance to ensure their effective implementation.. 5. I can find no estimate of the extra economic costs of the proposals in relation to the negative impacts of increased traffic delays, extra sewage disposal, additional water supply, infrastructure strain and collapse. There have been a number of incidents of damage to gas and water pipes under roads in North Walsham recently. Sink holes have appeared in several places. The identification of such costs would allow for proper budgeting by those who need to fund these things.
Attached File (where submitted)	
Officer Summary	<ol style="list-style-type: none"> 1. The proposed housing will create greater pressure on existing roads in the town (perhaps around at least 1000 extra car movements per day - 500 houses with one car per household, 2 journeys per day) as traffic seeks routes to and from Norwich. Further pressure will also be added to the already problematic B1151 Coltishall river crossing and approach. Greater mitigations are needed - for example additional incentives to use the train and bus services. Restrictions to heavy traffic needed on the B1151 and encouragement to use the route south via Acle. Also, vehicle access to both the current doctors' surgeries and to the local schools from the proposed sites will result in more traffic in the town centre. 2. The developments are very close to the River Ant and the likelihood of pollution to the Norfolk Broads from run off is inevitably increased by the proposals for extra housing in the vicinity. This issue should have a greater priority with substantial proposals for mitigation. 3. The extra development will inevitably further increase the pressure on water supply and sewage disposal in this area - an area where such factors are already at a critical level. Nutrient Neutrality issues should surely not be further exacerbated. There does not appear to be an independent advanced assessment of such considerations. 4. There does not appear to have been a review of the proposed housing model to provide additional accommodation without adding further land allocations. Higher housing densities through energy, water and space efficient terraced housing might have been achieved by imaginative design approaches as an alternative to the current developer driven space wasting models. Provision for traffic and services mitigations do not appear to have been sufficiently 'tied down' in advance to ensure their effective implementation.. 5. I can find no estimate of the extra economic costs of the proposals in relation to the negative impacts of increased traffic delays, extra sewage disposal, additional water supply, infrastructure strain and collapse. There have been a number of incidents of damage to gas and water pipes under

	roads in North Walsham recently. Sink holes have appeared in several places. The identification of such costs would allow for proper budgeting by those who need to fund these things.
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. The site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. All allocations in North Walsham fall outside Nutrient Neutrality zones and as such are not required to provide nutrient neutrality mitigation. Foul water does not drain into the River Bure catchment, instead it discharges to NW Wastewater Treatment Works and then pumped to Mundesley and then out to sea.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC97
Response Date	05/09/2025 10:24:13
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>The inclusion of this site goes against paragraph 192 of the NPPF "To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation". This site includes land in the Paston Way trail and Knapton Cutting County Wildlife Site (CWS) and we recommend that it should be excluded from any housing allocation in the Local Plan. The site includes mature trees / hedgerow along the majority of boundary and the Sustainability Appraisal states that there is a potential negative biodiversity impact.</p> <p>We have concerns regarding the potential impact on Paston Way CWS. County Wildlife Sites are a critical component in the safeguarding of Norfolk's wildlife. Development of this site would likely result in impacts on the CWS during construction (vegetation removal and disturbance) and operation – there would likely be increased recreational pressure on the CWS leading to habitat degradation and potential nutrient enrichment from dog walking as well as carriageway lights and traffic headlights along the access road impacting on nocturnal wildlife such as bats. Direct loss of habitat as a consequence of the new access will be the removal of tree cover within the areas of woodland and also substantial removal of the hedgerow. Both the woodland and the hedgerow are Habitats of Principal Importance. The Hedgerow is also an Important Hedgerow.</p> <p>Paston Way/Knapton Cutting CWS is an established barbastelle bat commuting and foraging route, as established through radiotracking work by the Norfolk Barbastelle Study Group. Any impacts upon Paston Way through increases in recreational disturbance leading to habitat degradation, or increased artificial light spill would therefore have the potential to reduce its suitability for foraging/commuting bats. This is especially important for barbastelle bats given the recent report by Natural England (March 2024) finding the species to not be in favourable conservation status. The site lies approximately 5km from Paston Great Barn SAC and is therefore within the core sustenance zone of the maternity roost it supports, in addition to two other maternity colonies in woodlands to the east and south-east of North Walsham.</p> <p>The Paston Way CWS is likely to act as a wildlife corridor for a wide range of species and this connectivity extends to the adjacent wooded habitat bordering the southern boundary of the CWS.</p>

	<p>A new road crossing has the potential to fragment this corridor and reduce species movement and dispersal.</p> <p>We also have concerns about potential impacts on Pigneys Wood, a small yet diverse nature reserve located under 1km from the proposed development site. This reserve features a selection of habitats from reedbed and fen through to wet and dry woodland, open grassland and heathland. It sits along a green corridor that features the North Walsham and Dilham Canal, County Wildlife Sites like Purdy's Meadow, and Bacton Woods. Due to its close proximity to North Walsham the site is a popular nature reserve and is already experiencing the effects of visitor pressure through high levels of disturbance.</p> <p>In addition to this, the western part of the site falls within one of the Lawton Zones, as identified in the Norfolk Habitat Atlas. These areas are helping inform the upcoming Local Nature Recovery Strategy and as such, should be kept free from development to reduce pressure on these areas.</p> <p>We object to the inclusion of this site as a housing allocation.</p>
Attached File (where submitted)	
Officer Summary	<p>The inclusion of this site goes against paragraph 192 of the NPPF.</p> <p>This site includes land in the Paston Way trail and Knapton Cutting County Wildlife Site (CWS) and we recommend that it should be excluded from any housing allocation in the Local Plan. The site includes mature trees / hedgerow along the majority of boundary and the Sustainability Appraisal states that there is a potential negative biodiversity impact.</p> <p>We have concerns regarding the potential impact on Paston Way CWS. County Wildlife Sites are a critical component in the safeguarding of Norfolk's wildlife. Development of this site would likely result in impacts on the CWS during construction (vegetation removal and disturbance) and operation – there would likely be increased recreational pressure on the CWS leading to habitat degradation and potential nutrient enrichment from dog walking as well as carriageway lights and traffic headlights along the access road impacting on nocturnal wildlife such as bats.</p> <p>The Paston Way CWS is likely to act as a wildlife corridor for a wide range of species and this connectivity extends to the adjacent wooded habitat bordering the southern boundary of the CWS. A new road crossing has the potential to fragment this corridor and reduce species movement and dispersal.</p> <p>We also have concerns about potential impacts on Pigneys Wood</p> <p>In addition to this, the western part of the site falls within one of the Lawton Zones, as identified in the Norfolk Habitat Atlas. These areas are helping inform the upcoming Local Nature Recovery Strategy and as such, should be kept free from development to reduce pressure on these areas.</p> <p>We object to the inclusion of this site as a housing allocation.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The policy already includes provision for enhancement of the Paston Way Trail with the addition of safeguarding land in the north-west of the site for landscaping and vehicle access only.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC130
Response Date	12/09/2025 15:38:05
Full Name	Miss Gina Lui
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified	Effective

* Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>I cannot understand why this site is still being considered for inclusion in the local plan, do we really need this additional housing on top of all of the other agreed allocations?</p> <p>I disagree with the comment that the site has reasonable connectivity to town centre services and facilities. It would be a lengthy walk to the town, even longer to schools and surgeries and there is a very limited bus service. Access to and from this location will primarily be via car and will create a huge traffic overhead.</p> <p>If the site is included, as a minimum, primary access onto the B1145 must be built as part of the first phase of construction, this is not specified in the modifications. Also, there should be no vehicular access via Mundesley Road, anyone who uses this road would agree that it would not cope with the additional traffic.</p>
Attached File (where submitted)	
Officer Summary	<p>I cannot understand why this site is still being considered for inclusion in the local plan, do we really need this additional housing on top of all of the other agreed allocations?</p> <p>I disagree with the comment that the site has reasonable connectivity to town centre services and facilities. It would be a lengthy walk to the town, even longer to schools and surgeries and there is a very limited bus service. Access to and from this location will primarily be via car and will create a huge traffic overhead.</p> <p>If the site is included, as a minimum, primary access onto the B1145 must be built as part of the first phase of construction, this is not specified in the modifications. Also, there should be no vehicular access via Mundesley Road, anyone who uses this road would agree that it would not cope with the additional traffic.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. The council is required to plan to meet the districts needs identified as 557dpa. The site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC144
Response Date	15/09/2025 10:27:00
Full Name	Mr Nigel Lloyd
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	

Question 7 - Explanation of Soundness Reasons	<p>I wish to comment on the following:</p> <p>In general I cannot support this proposed development because the provisions for access are totally inadequate, there is insufficient affordable housing to meet the local need, impact upon traffic pinch point at Coltishall Village, loss of prime farmland and impact upon the countryside amenity.</p> <p>In particular</p> <p>Item 1 - Access roads must be improved and the proposed roundabout built at the start of this development. Failure to do so will cause traffic chaos on Lynfield road - an already very busy thoroughfare. No construction traffic should use either Mundesley Road or Lynfield Road.</p> <p>Item 3 - Maintaining the wild life corridor that is Paston Way. This path is used by hundreds of people daily and must be kept open. The proposed bridge over Paston Way must be built and negotiated away by Developers. Measures to protect (and enhance) the existing wildlife must be taken as part of the proposed bridge design. Minimise the impact during construction.</p> <p>Item 12 - I was held up for 10 minutes in Coltishall last week when a lorry struggled to get through. The traffic jam was huge in both directions. Improvements to ease the severity of the traffic pinch point must be included. It is unfair to simply pass traffic problems created by this unneeded development onto another Village.</p>
Attached File (where submitted)	
Officer Summary	<p>Item 1 - Access roads must be improved and the proposed roundabout built at the start of this development. Failure to do so will cause traffic chaos on Lynfield road - an already very busy thoroughfare. No construction traffic should use either Mundesley Road or Lynfield Road.</p> <p>Item 3 - Maintaining the wild life corridor that is Paston Way. This path is used by hundreds of people daily and must be kept open. The proposed bridge over Paston Way must be built and negotiated away by Developers. Measures to protect (and enhance) the existing wildlife must be taken as part of the proposed bridge design. Minimise the impact during construction.</p> <p>Item 12 - I was held up for 10 minutes in Coltishall last week when a lorry struggled to get through. The traffic jam was huge in both directions. Improvements to ease the severity of the traffic pinch point must be included. It is unfair to simply pass traffic problems created by this unneeded development onto another Village.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The exact phasing of delivery in relation to the access onto the B1145 will be determined through the application and in consultation with the Highway Authority.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC154
Response Date	15/09/2025 16:44:02
Full Name	Mrs Wendy Murphy
Organisation	North Walsham Town Council
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective
Question 7 - Explanation of Soundness Reasons	<p>At the resumed Local Plan Examination on April 8th the Town Council argued along with others that this site was unacceptable for residential development given the size of such developments already taking place in the town and proposed in the new Local Plan to the west of the town (NW62A). In the light of these developments there are genuine concerns about the impact of further residential development at NW16 on our Highways, Health and Social Care infrastructure, Water supply/foul drainage and Environmental damage.</p>

	<p>However, given the Inspector's decision on NW16 in his letter to the District Council on May 8th 2025 the Town Council recognises that the mitigations to be inserted in the proposed new policy on NW16 seek to find ways to address the challenges raised by this site. However, we would like to suggest they be strengthened in some areas as follows:</p> <p>1) Provision of a convenient and safe vehicular access via a roundabout onto the B1145 is welcomed but it should be added that it needs to be provided at the beginning of the first phase of development. This is to minimise the period construction traffic is using Lyngate Rd/Mundesley Rd as an access to the site. We would argue this complies with the Inspector's wish to minimise traffic using these roads as a result of the development.</p> <p>2) An internal layout that minimises traffic utilising Lyngate Rd/Mundesley Rd is supported but it needs needs to quantify that only a small number of houses should have this access.</p> <p>3) The provision of a bridge over the Paston Way trail that facilitates access to the B1145 and the rest of the site plus the proposed design and environmental safeguards is welcomed but as set out and for the reasons given in para 1 this needs to be done at the beginning of the first phase of development.</p> <p>4) The proposed policies as set out in paras 4,5,6,7,8,9,10,11,12,13 and 14 plus proposed safeguards on sand and gravel extraction are supported.</p> <p>Finally the Town Council continues to have concerns about the capacity of the B1150 between North Walsham and Norwich to handle the increased traffic arising from the actual and planned growth in North Walsham. This was particularly highlighted at the April 8th hearing at Coltishall. Therefore the Town Council would welcome any further strengthening of policy to address this issue.</p>
Attached File (where submitted)	
Officer Summary	<p>At the resumed Local Plan Examination on April 8th the Town Council argued along with others that this site was unacceptable for residential development given the size of such developments already taking place in the town and proposed in the new Local Plan to the west of the town (NW62A). In the light of these developments there are genuine concerns about the impact of further residential development at NW16 on our Highways, Health and Social Care infrastructure, Water supply/foul drainage and Environmental damage.</p> <p>However, given the Inspector's decision on NW16 in his letter to the District Council on May 8th 2025 the Town Council recognises that the mitigations to be inserted in the proposed new policy on NW16 seek to find ways to address the challenges raised by this site. However, we would like to suggest they be strengthened in some areas as follows:</p> <p>1) Provision of a convenient and safe vehicular access via a roundabout onto the B1145 is welcomed but it should be added that it needs to be provided at the beginning of the first phase of development. This is to minimise the period construction traffic is using Lyngate Rd/Mundesley Rd as an access to the site. We would argue this complies with the Inspector's wish to minimise traffic using these roads as a result of the development.</p> <p>2) An internal layout that minimises traffic utilising Lyngate Rd/Mundesley Rd is supported but it needs needs to quantify that only a small number of houses should have this access.</p> <p>3) The provision of a bridge over the Paston Way trail that facilitates access to the B1145 and the rest of the site plus the proposed design and environmental safeguards is welcomed but as set out and for the reasons given in para 1 this needs to be done at the beginning of the first phase of development.</p> <p>4) The proposed policies as set out in paras 4,5,6,7,8,9,10,11,12,13 and 14 plus proposed safeguards on sand and gravel extraction are supported.</p> <p>Finally the Town Council continues to have concerns about the capacity of the B1150 between North Walsham and Norwich to handle the increased traffic arising from the actual and planned growth in North Walsham. This was particularly highlighted at the April 8th hearing at Coltishall. Therefore the Town Council would welcome any further strengthening of policy to address this issue.</p>
Officer Response	<p>Objections and comments noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned.</p> <p>Proposed change to Criterion1 - The exact phasing of delivery in relation to the access onto the B1145 will be determined through the application and in consultation with the Highway Authority, this proposed change is therefore not required for the soundness of the Local Plan.</p> <p>Proposed change to Criterion 2 - As referred to above, the exact phasing and how delivery will be achieved will be determined through the application and in consultation with the Highway Authority who will determine if such a restriction is required, this is not necessary to determine for the soundness of the Local Plan.</p> <p>Proposed change to Criterion 3 - Same point as made to Criterion 1.</p> <p>Policy requirements for both sites in North Walsham require the provision of a Transport Assessment to be conducted as part of any application, this assessment will consider the site's impact on North Walsham, mitigation has already been identified in the site-specific policies for both sites and a SoCG (signed May 2025) now exists between all relevant parties which ensures these requirements are delivered through proportionate funding.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications

Question 2 - Modification Reference	MM51
ID	MMC156
Response Date	15/09/2025 20:44:16
Full Name	Miss Heidi Dine
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 4 - Reasons Not Legally Compliant	<p>I write to object to elements of the <i>Schedule of Proposed Main Modifications to the North Norfolk Local Plan (August 2025)</i> on the grounds that they would cause irreversible harm to a Listed Building.</p> <p>The proposed development would undermine and potentially destroy the structural foundations of an eighteenth-century property dating from the 1700s [Lokeside House, Mundesley Road, North Walsham - a Grade II listed property]. This contravenes the protections enshrined in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66(1) is explicit:</p> <p><i>"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority... shall have special regard to the desirability of preserving the building or its setting."</i></p> <p>The modifications under consultation fail to demonstrate this required "special regard." Instead, they appear to facilitate development that prioritises private financial gain over the preservation of our heritage.</p> <p>The council's own policies reinforce this duty. In particular:</p> <ul style="list-style-type: none"> • Policy ENV1 requires development to conserve and enhance valued landscapes and their settings. A proposal that threatens the foundations of a listed building is wholly incompatible with this obligation. • Policy ENV7 requires sufficient information to demonstrate and fully assess harm to non-designated heritage assets. By definition, designated heritage assets such as Listed Buildings demand even greater scrutiny and protection. • Policy ENV8 requires proposals to achieve high quality design informed by local character and heritage context. Destructive development of this nature is fundamentally inconsistent with that requirement. <p>Approval of such proposals would not only breach statutory obligations but also directly contradict the principles underpinning the Local Plan itself.</p> <p>The council is accountable to its residents and has a legal and moral responsibility to act as guardian of our historic environment. I therefore urge the council to:</p> <ol style="list-style-type: none"> 1 Uphold its statutory duty under Section 66(1) of the 1990 Act. 2 Recognise the irreparable harm these plans would cause to the listed building and its setting. 3 Ensure that the Local Plan modifications continue to align with Policies ENV1, ENV7 and ENV8, by rejecting proposals that would destroy heritage assets. <p>North Norfolk's heritage is not just a legal matter, but the cornerstone of our community's identity and character. To sacrifice it for inappropriate development would be both unlawful and short-sighted.</p>
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	<p>Positively prepared</p> <p>Justified</p> <p>Effective</p> <p>Consistent with national policy</p>
Question 7 - Explanation of Soundness Reasons	<p>I write to object to elements of the <i>Schedule of Proposed Main Modifications to the North Norfolk Local Plan (August 2025)</i> on the grounds that they would cause irreversible harm to a Listed Building.</p> <p>The proposed development would undermine and potentially destroy the structural foundations of an eighteenth-century property dating from the 1700s [Lokeside House, Mundesley Road, North Walsham - a Grade II listed property]. This contravenes the protections enshrined in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66(1) is explicit:</p> <p><i>"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority... shall have special regard to the desirability of preserving the building or its setting."</i></p>

	<p>The modifications under consultation fail to demonstrate this required “special regard.” Instead, they appear to facilitate development that prioritises private financial gain over the preservation of our heritage.</p> <p>The council's own policies reinforce this duty. In particular:</p> <ul style="list-style-type: none"> • Policy ENV1 requires development to conserve and enhance valued landscapes and their settings. A proposal that threatens the foundations of a listed building is wholly incompatible with this obligation. • Policy ENV7 requires sufficient information to demonstrate and fully assess harm to non-designated heritage assets. By definition, designated heritage assets such as Listed Buildings demand even greater scrutiny and protection. • Policy ENV8 requires proposals to achieve high quality design informed by local character and heritage context. Destructive development of this nature is fundamentally inconsistent with that requirement. <p>Approval of such proposals would not only breach statutory obligations but also directly contradict the principles underpinning the Local Plan itself.</p> <p>The council is accountable to its residents and has a legal and moral responsibility to act as guardian of our historic environment. I therefore urge the council to:</p> <ol style="list-style-type: none"> 1 Uphold its statutory duty under Section 66(1) of the 1990 Act. 2 Recognise the irreparable harm these plans would cause to the listed building and its setting. 3 Ensure that the Local Plan modifications continue to align with Policies ENV1, ENV7 and ENV8, by rejecting proposals that would destroy heritage assets. <p>North Norfolk's heritage is not just a legal matter, but the cornerstone of our community's identity and character. To sacrifice it for inappropriate development would be both unlawful and short-sighted.</p>
Attached File (where submitted)	
Officer Summary	<p>I write to object to elements of the <i>Schedule of Proposed Main Modifications to the North Norfolk Local Plan (August 2025)</i> on the grounds that they would cause irreversible harm to a Listed Building.</p> <p>The proposed development would undermine and potentially destroy the structural foundations of an eighteenth-century property dating from the 1700s [Lokeside House, Mundesley Road, North Walsham - a Grade II listed property]. This contravenes the protections enshrined in the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>The council is accountable to its residents and has a legal and moral responsibility to act as guardian of our historic environment. I therefore urge the council to:</p> <ol style="list-style-type: none"> 1 Uphold its statutory duty under Section 66(1) of the 1990 Act. 2 Recognise the irreparable harm these plans would cause to the listed building and its setting. 3 Ensure that the Local Plan modifications continue to align with Policies ENV1, ENV7 and ENV8, by rejecting proposals that would destroy heritage assets. <p>North Norfolk's heritage is not just a legal matter, but the cornerstone of our community's identity and character. To sacrifice it for inappropriate development would be both unlawful and short-sighted.</p> <p>The modifications under consultation fail to demonstrate this required “special regard.” Instead, they appear to facilitate development that prioritises private financial gain over the preservation of our heritage.</p>
Officer Response	<p>Objections noted. The site assessment process used to identify all allocations in the Local Plan is supported by a Heritage Impact Assessment and consultation with Historic England, as a result, any necessary modifications have been included within the site-specific policy, this includes landscaping mitigation to help offset any impacts on the asset's setting.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC158
Response Date	16/09/2025 15:07:01
Full Name	Mr Richard Moore
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	

Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Effective
Question 7 - Explanation of Soundness Reasons	<p>1. Rejected twice previously</p> <p>2. Edge of Town/countryside development, very poor connectivity timTown & all local services & infrastructure</p> <p>3. Three other NorthnWalsham sites planned/commenced to provide 2197 homes already.</p> <p>4. poor pedestrian access to Town, distance & narrow/ single pathways.</p> <p>5. Lack of Public transport to site.</p> <p>6. Great difficulty in obtaining Doctors & Dentists appointments.</p> <p>7. Limited employment opportunities in Town or Industrial Estate.</p> <p>8. Dubious capacity for water & sewage connections.</p> <p>9 Access problems: Mundesley Road access should not be used as high dangerous congestion likely at junction at Premier Shop location & Lyngate Rd, together with line of constant parked cars on latter Rd. Also Acorn Rd access should not be used as leads onto an already highly built up estate with large volume of traffic.</p> <p>10. Prime access to & from site must be via new Roundabout on the B1145 & access Bridge over Paston Way. This MUST be completed & open to estate traffic prior to FIRST house occupation. The infrastructure cost of this new access is possibly going to be prohibitive to the development of the site!</p> <p>11. Build period of 8 years is totally unacceptable to local residents, with continual construction traffic & it's many challenges. The 8 year period does NOT indicate a need for more local housing? Also will these be affordable to local people?</p> <p>12. Stated that at least a new Primary School is required to cope with the additional population.</p> <p>13. The ecology & condition of Paston way, Pigneys Wood & Dilham Canal is likely to become very adversely affected by this development.</p> <p>14. The site is Grade 2 prime farm land, the loss of such only increases our reliance on expensive non green imports.</p> <p>15. Grave concern to loss of wildlife habitats.</p> <p>16. Noise pollution & loss of privacy & open landscape views, to particularly those existing homes built to the North side of Swafield Rise. Also a tree belt/open space should be provided between the southern site boundary & the rest boundary of these existing homes.</p> <p>17. Increase in the extreme traffic problems in travelling through Coltishall, as many new residents will do to access shopping, leisure & employment, will become gridlocked. This must be resolved prior to development.</p> <p>18. Parking in Town already compromised.</p> <p>19. Policy CT2 states that Developer MUST CONTRIBUTE to areas of insufficient INFRASTRUCTURE! (Section 16?)</p> <p>20. Labour have stated that any new developments must be supported by adequate infrastructure, ie. Doctors, Dentists, Schools, etc.</p> <p>21. As the above issues prove, this site is NOT SUITABLE FOR DEVELOPMENT!</p>
Attached File (where submitted)	
Officer Summary	<p>1. Rejected twice previously</p> <p>2. Edge of Town/countryside development, very poor connectivity timTown & all local services & infrastructure</p> <p>3. Three other NorthnWalsham sites planned/commenced to provide 2197 homes already.</p> <p>4. poor pedestrian access to Town, distance & narrow/ single pathways.</p> <p>5. Lack of Public transport to site.</p> <p>6. Great difficulty in obtaining Doctors & Dentists appointments.</p> <p>7. Limited employment opportunities in Town or Industrial Estate.</p> <p>8. Dubious capacity for water & sewage connections.</p> <p>9 Access problems: Mundesley Road access should not be used as high dangerous congestion likely at junction at Premier Shop location & Lyngate Rd, together with line of constant parked cars on latter Rd. Also Acorn Rd access should not be used as leads onto an already highly built up estate with large volume of traffic.</p>

	<p>10. Prime access to & from site must be via new Roundabout on the B1145 & access Bridge over Paston Way. This MUST be completed & open to estate traffic prior to FIRST house occupation. The infrastructure cost of this new access is possibly going to be prohibitive to the development of the site!</p> <p>11. Build period of 8 years is totally unacceptable to local residents, with continual construction traffic & it's many challenges. The 8 year period does NOT indicate a need for more local housing? Also will these be affordable to local people?</p> <p>12. Stated that at least a new Primary School is required to cope with the additional population.</p> <p>13. The ecology & condition of Paston way, Pigneys Wood & Dilham Canal is likely to become very adversely affected by this development.</p> <p>14. The site is Grade 2 prime farm land, the loss of such only increases our reliance on expensive non green imports.</p> <p>15. Grave concern to loss of wildlife habitats.</p> <p>16. Noise pollution & loss of privacy & open landscape views, to particularly those existing homes built to the North side of Swafeld Rise. Also a tree belt/open space should be provided between the southern site boundary & the rest boundary of these existing homes.</p> <p>17. Increase in the extreme traffic problems in travelling through Coltishall, as many new residents will do to access shopping, leisure & employment, will become gridlocked. This must be resolved prior to development.</p> <p>18. Parking in Town already compromised.</p> <p>19. Policy CT2 states that Developer MUST CONTRIBUTE to areas of insufficient INFRASTRUCTURE! (Section 16?)</p> <p>20. Labour have stated that any new developments must be supported by adequate infrastructure, ie. Doctors, Dentists, Schools, etc.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Policy requirements for both sites in North Walsham require the provision of a Transport Assessment to be conducted as part of any application, this assessment will consider the site's impact on North Walsham, mitigation has already been identified in the site-specific policies for both sites and a SoCG (signed May 2025) now exists between all relevant parties which ensures these requirements are delivered through proportionate funding.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC186
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome reference to heritage assets in the supporting text. We welcome bullet point 4 relating to landscaping and bullet point 5 which focuses development to the south of the site away from the heritage assets.
Attached File (where submitted)	

Officer Summary	We welcome reference to heritage assets in the supporting text. We welcome bullet point 4 relating to landscaping and bullet point 5 which focuses development to the south of the site away from the heritage assets.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC202
Response Date	16/09/2025 21:44:00
Full Name	Mrs Maria Forsdick
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>Firstly the land you are talking about is grade 2 best and most valued versatile Farm land which is needed to have home grown food, we live in uncertain times and this is important as stated by the housing minister Mr Mathew Pennycook. I know there is pressure from the government to build many houses, but they need to be in the right places.</p> <p>When looking at the plans from Richborough Estates it said that the trees on the south and west side of the land were protected but there is no mention of this in your modifications. There is a beautiful horse chestnut tree that the tawny owls sit in at night, there are mixed trees that have been here for many years and should not be removed.</p> <p>I would also like to inquire why you think that there is reasonable connectivity to the town Centre, medical facilities, education etc. The roads are old medieval roads that can not be changed, many of them have pavements on one side and not the other, Crow Road that would be the route to Sainsburys and town centre has no pavement and is too narrow to change this so what mitigations can solve this?</p> <p>Here is a list of travel times from the end of Mundesley road:</p> <p>Town Centre 0.8 miles 18 minute walk 3 minutes by car Doctors 1.1 Miles 22 minutes walk 4 minutes by car Dentists 0.9 miles walk 19 minutes walk 3 minutes by car North Walsham Infant and junior school 1.1 miles 22 minutes walk 4 minutes by car North Walsham high school 1.3 miles 27 minutes walk 5 minutes by car Railway station 1.5 miles 27 minutes walk 4 minutes by car nearest bus stop Harvey Drive 0.3 miles 6 minute walk bus stop Swayfield Rise 0.3 miles 6 minute walk (only 3 buses per day) Sainsburys 0.8 miles 17 minute walk 3 minutes by car Lidl 0.9 miles 21 minute walk 4 minutes by car</p> <p>if you were ill would you walk 1.1 miles to the doctors or would you go by car, if you had a toothache would you walk 0.9 miles or would you go by car. If you are a busy mum or dad would you walk 1.3 miles to school and 0.8 to the shops. You can verify these by looking them up on Google. My point being this development will bring far too much extra traffic to North Walsham it will make small roads gridlocked and very dangerous for pedestrians when they aren't gridlocked. And the distances and irregularity of pavements will make it far too difficult for elderly people to navigate safely. I would also like to bring to your attention that at the junction where Lyngate Road meets the Mundesley Road when you turn right to go to the end of Mundesley Road there is a sign that says unsuitable for HGVs. This is not the right place for a housing development.</p> <p>There will be some employment at the industrial estate but not enough for 330 families.</p>

	<p>Water supply, for the NW16 development alone an extra 44 million litres a year would be required this does not include the other 1800 houses being built.</p> <p>The surface water drainage system that Richborough Estates proposes is worrying to say the least. They intend to use drainage pools that are inappropriate for chalk/limestone regions. which is the case in this area. they often fail and are usually used in much smaller areas about 5 acres no more than ten this land is 35 acres. There is a lot of surface water that lays on top of the field and at the entrance of the field, when it is not planted. And when there is very heavy rain which is likely to happen more in the future the road in front of the three houses at the bottom of Mundesley road floods and fills the front gardens with water. the risk of this getting worse because houses have been built is a huge worry, water getting inside the houses would be terrible.</p> <p>The field is enriched with manure and fertilisers every year with the extra water drainage that will make it way into the canal that is just one field away could do serious damage to the local wildlife. Not only the canal but also the river Ant that it is part of and then Barton Broad, where the river Ant then joins the river Bure.</p> <p>sewage/foul water, in 2023 there were 3701 spills. in 2024 there were 4337 spills that's a 17% increase and that's without the NW16 development not good for Mundesley beaches blue flag award. as that is where the sewage spills end up.</p> <p>The Paston Way does not need improving it is a natural nature corridor, It is perfect as it is, any work done to it will affect the local wildlife that includes rare barbastelle bats.,</p> <p>This is not the right place for a housing estate.</p> <p>If the building goes ahead the bridge and roundabouts need to be done before any building starts.</p> <p>On a personal note although I know this probably doesn't count for anything if the end of Mundesley road is opened to build the bridge lots of beautiful oak trees will be lost and the houses at the bottom of Mundesley road will be surrounded by busy roads traffic noise and fumes as the roads will be in front of the houses and the B1145 is behind the houses. which would be very bad for me as I am asthmatic and need the clean country air. there are many people who oppose this development including the town council, various nature societies. Please reconsider and remove it from the plan. thank you for reading this.</p>
Attached File (where submitted)	MMC202 - Images showing surface water flooding.pdf
Officer Summary	<p>Firstly the land you are talking about is grade 2 best and most valued versatile Farm land which is needed to have home grown food, we live in uncertain times and this is important as stated by the housing minister Mr Mathew Pennycook. I know there is pressure from the government to build many houses, but they need to be in the right places.</p> <p>There will be some employment at the industrial estate but not enough for 330 families.</p> <p>Water supply, for the NW16 development alone an extra 44 million litres a year would be required this does not include the other 1800 houses being built.</p> <p>The surface water drainage system that Richborough Estates proposes is worrying to say the least. They intend to use drainage pools that are inappropriate for chalk/limestone regions. which is the case in this area. they often fail and are usually used in much smaller areas about 5 acres no more than ten this land is 35 acres.</p> <p>sewage/foul water, in 2023 there were 3701 spills. in 2024 there were 4337 spills that's a 17% increase and that's without the NW16 development not good for Mundesley beaches blue flag award. as that is where the sewage spills end up.</p> <p>The Paston Way does not need improving it is a natural nature corridor, It is perfect as it is, any work done to it will affect the local wildlife that includes rare barbastelle bats.,</p> <p>This is not the right place for a housing estate.</p> <p>If the building goes ahead the bridge and roundabouts need to be done before any building starts.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Anglian Water were consulted on throughout the Local Plan process and mitigation has been identified through the site-specific policy. No changes are considered necessary
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC204
Response Date	17/09/2025 08:11:00
Full Name	Amy Harrison
Organisation	Richborough Estates
Agent Full Name	Amy Harrison
Agent Organisation	Boyer Planning
Question 3 - Legal Compliance * Yes (Support)	Yes (Support)

<ul style="list-style-type: none"> * No (Object) * No Comment / Unsure * General Comment 	
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness <ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	No (Object)
Question 6 - Reasons Not Sound <ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>1. INTRODUCTION</p> <p>1.1 These representations have been prepared by Boyer on behalf of Richborough to the North Norfolk Local Plan Main Modifications Consultation being undertaken by North Norfolk District Council ('NNDC'). Richborough are promoting NW16 – Land at Mundesley Road, North Walsham for residential development.</p> <p>1.2 The North Norfolk Local Plan was submitted to the Secretary of State in May 2023 for Examination. The Local Plan was examined between January and March 2024 by Planning Inspector David Reed. Following this examination, further evidence and housing allocations were required as set out within the Inspectors Post Hearings Letter in May 2024 to address matters of soundness and to ensure that the plan would meet the housing needs of North Norfolk in full.</p> <p>1.3 The Council proposed a number of additional housing allocations and increasing the number of units proposed to Small Growth Villages to address these soundness concerns. As part of this Land at End of Mundesley Road, North Walsham was proposed as a housing allocation for up to 330 dwellings. A further public consultation took place in December 2024. Following the further consultation, the Plan further hearing sessions were held by Inspector David Reed in April 2025. The Inspector recommended changes to the Plan as presented in this Main Modifications consultation, which are required to be resolved for the Local Plan to be considered sound.</p> <p>1.4 Richborough are promoting Land at End of Mundesley Road, North Walsham (reference: NW16) for the development of up to 330 dwellings, with 60 units of elderly care accommodation. Richborough have submitted an outline application to NNDC (reference: PO/24/2717) in December 2024 seeking approval for 330 dwellings, with 60 units/40 dwelling equivalent of elderly care accommodation with access, open space, drainage, landscaping, and associated infrastructure (all matters are reserved except for access).</p> <p>1.5 Richborough have actively promoted and participated throughout the emerging Local Plan process through their submission of representations at Regulation 18 stage as well as Regulation 19 stage. In addition to this, Richborough have participated throughout the Examination hearing sessions.</p> <p>1.6 Whilst overall Richborough consider the plan to be sound, these representations have been prepared to assist the Council and the Inspector over minor wording changes to a number of policies and in relation to NW16, alignment to the agreed Statement of Common Ground between Richborough, the promoters of North Walsham West SUE, North Norfolk District Council and Norfolk County Council.</p> <p>3. RESPONSE TO NW16 MODIFICATIONS</p> <p>3.1 The following section of these representations provides Richborough's response to the proposed modifications to Policy NW16, in addition to the proposed amendments to the policy map within Section 14.4 of the Local Plan.</p> <p>Policy NW16 Land at End of Mundesley Road</p> <p>3.2 Within the Main Modifications consultation, the new policy for site NW16 Land at End of Mundesley Road, North Walsham is proposed to be included following the need for the Council to provide for further housing allocations in North Norfolk to meet the identified housing requirement.</p> <p>3.3 The site was proposed as a housing allocation for up to 330 dwellings within the further consultation of the North Norfolk Local Plan (November/December 2024) and was considered to be a suitable allocation through the resumed hearing sessions as part of the examination of the Local Plan in April 2025.</p> <p>3.4 Following the hearing sessions the Inspector requested a Statement of Common Ground (SoCG) to be agreed between Richborough, North Norfolk District Council, Norfolk County Council (Education and Highways), and the consortium of the proposed allocation of Land West of North Walsham (reference: NW62/A), which consists of Lovell Partnerships Ltd, Flagship Housing Developments Ltd, and ESCO Developments Ltd. The SoCG was signed and finalised on 30th April 2025.</p> <p>3.5 The wording presented within Policy NW16 Land at End of Mundesley Road largely reflects the wording which was agreed through the SoCG, however, there have been amendments made within the Policy which do not accord with the agreed wording as set out within the agreed SoCG.</p>

3.6 Richborough consider the wording which has been agreed by all signatories should be used within the policy wording within the North Norfolk Local Plan for Policy NW16 in addition to Policy NW62/A.

Transport

3.7 Firstly, Policy NW16 introduces a new requirement at paragraph 2 of Policy NW16 '*An internal layout that minimises traffic utilising Mundesley Road*'. As demonstrated through the current outline application, the access from Mundesley Road will be a secondary point of access to the site, and the primary access will be taken from the B1145 through the form of a roundabout. The access from Mundesley Road is required to be provided for emergency access into the site and this access will need to be designed to adoptable standards and suitable for use by vehicular traffic. As such whilst, it is feasible to design a layout that provides a primary point of access to the B115, the secondary point of access will be required to be available to all vehicular traffic and therefore it is considered that this policy wording should be reflected to state that: '*An internal layout that provides a secondary point of access to Mundesley Road will be created*'. This secondary access will be a key desire line for pedestrians and cyclists into the centre of North Walsham.

3.8 Additionally, within subparagraph 11(IV) the requirement has been extended to request: '*A detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision.*'

3.9 We agree this amendment to be appropriate, to ensure there is suitable walking and cycling routes and encourage active transport in North Walsham. This requirement has been provided within the Transport Assessment produced by Hub Transport accompanying the outline application. Section 4.0 'Local Facilities and Sustainable Transport' identifies this distance from the site to local facilities and continues to assess the accessibility of the site to these facilities by walking, cycling, and public transport.

Proportionate Contributions

3.10 In regard to Highway contributions and mitigation, within paragraph 13 of Policy NW16 in the Main Modifications, the wording states:

'The delivery of necessary Highway infrastructure and mitigation as part of the development through proportionate works and/or contributions from NW62/A and NW16, taking account of their relative impacts. The requirements for each development and its funding will be agreed and detailed as part of the phasing and delivery plan(s) prior to determination and secured by legal agreements.'

3.11 This has been amended from the wording of the SoCG:

'Where necessary the delivery of the above Highway infrastructure mitigation by the site applicants through proportionate contributions from NW62/A and NW16 reflective of the impacts of each development, and its funding will be agreed and detailed as part of the phasing and delivery plan(s) prior to determination.'

3.12 The amended wording differs to the agreed SoCG and it is unclear why the wording which has been agreed is proposed to be amended. The SoCG has been agreed with the Highway authority and demonstrates Richborough's commitment to providing a proportionate contribution which is reflective of the impact caused by the development of NW16 on the wider network.

3.13 In regard to the education contribution requirements, paragraph 14 of Policy NW16 in the Main Modifications is proposed to state the following:

'Unless otherwise agreed by the Local Education Authority, proportionate educational contributions will be required from NW62/A and NW16 to ensure the necessary school provision is delivered at the right time in line with the phasing of the strategic allocations in North Walsham.'

3.14 Within the SoCG, the following wording was agreed at paragraph 13 of the wording of Policy NW16:

'Unless otherwise agreed with the Local Education Authority, a proportionate educational contribution will be required from NW62/A and NW16 to ensure appropriate school provision/places can be delivered in line with the phasing of the strategic allocations in North Walsham and educational requirements.'

3.15 The wording of Policy NW16 refers to the delivery of the new school required within Policy NW62/A to be delivered within the site at the Land West of North Walsham. We consider the wording should remain as agreed within the SoCG, which has also been agreed by the Local Education Authority (Norfolk County Council), which allows for 'provision/places' to be provided as opposed to 'provision' alone.

3.16 Within the consultation response the outline application for Land at End of Mundesley Road, North Walsham, it is confirmed there is existing capacity in the schools in North Walsham. The wording within the SoCG also allows for the existing capacity in schools to be utilised by the number of places required generated by Land at End of Mundesley Road. If this existing capacity is not taken up prior to the delivery of the new school, this will impact the viability and operations of the existing schools and may result in closure if there is a lack of students.

4. CONCLUSION

4.1 Boyer have prepared these representations on behalf of Richborough in response to the North Norfolk Local Plan Main Modifications Consultation which is being undertaken by North Norfolk District Council ('NNDC') following recommendations requested by the Planning Inspector.

4.2 As demonstrated within these representations, we consider the modifications proposed by NNDC to be largely appropriate and capable of being found sound with minor amendment. This will ensure that the proposed policies are consistent in their requirements throughout the Local Plan.

	<p>4.3 Richborough support the inclusion of Land at Mundesley Road, North Walsham within Policy NW16 of the Local Plan for the development of 330 dwellings, with 60 units/40 dwelling equivalent of elderly care accommodation and open space, drainage, landscaping and access from the B1145. It is positive NNDC are committed to meeting the housing needs of the District, as demonstrated by the allocation of this site, in addition to the proposed increased growth within Small Growth Villages.</p> <p>4.4 However, we consider Policy NW16, and subsequently Policy NW62/A, should fully reflect the agreed wording set out within the Statement of Common Ground. The Statement of Common Ground has been agreed and signed by all parties, including Richborough, the Consortium of developers of NW62/A, NNDC, and Norfolk County Council (Education and Highways).</p> <p>4.5 Overall, these representations have set out our recommendations to assist NNDC in achieving a Local Plan which can be capable to be found sound in accordance with the NPPF, as the North Norfolk Local Plan progresses towards adoption.</p>
Attached File (where submitted)	250908 - Representations to NNDC Main Modifications.pdf (1)
Officer Summary	<p>Within the Main Modifications consultation, the new policy for site NW16 Land at End of Mundesley Road, North Walsham is proposed to be included following the need for the Council to provide for further housing allocations in North Norfolk to meet the identified housing requirement.</p> <p>3.3 The site was proposed as a housing allocation for up to 330 dwellings within the further consultation of the North Norfolk Local Plan (November/December 2024) and was considered to be a suitable allocation through the resumed hearing sessions as part of the examination of the Local Plan in April 2025.</p> <p>3.4 Following the hearing sessions the Inspector requested a Statement of Common Ground (SoCG) to be agreed between Richborough, North Norfolk District Council, Norfolk County Council (Education and Highways), and the consortium of the proposed allocation of Land West of North Walsham (reference: NW62/A), which consists of Lovell Partnerships Ltd, Flagship Housing Developments Ltd, and ESCO Developments Ltd. The SoCG was signed and finalised on 30th April 2025.</p> <p>3.5 The wording presented within Policy NW16 Land at End of Mundesley Road largely reflects the wording which was agreed through the SoCG, however, there have been amendments made within the Policy which do not accord with the agreed wording as set out within the agreed SoCG.</p> <p>3.6 Richborough consider the wording which has been agreed by all signatories should be used within the policy wording within the North Norfolk Local Plan for Policy NW16 in addition to Policy NW62/A.</p> <p>Transport</p> <p>3.7 Firstly, Policy NW16 introduces a new requirement at paragraph 2 of Policy NW16 <i>‘An internal layout that minimises traffic utilising Mundesley Road’</i>. As demonstrated through the current outline application, the access from Mundesley Road will be a secondary point of access to the site, and the primary access will be taken from the B1145 through the form of a roundabout. The access from Mundesley Road is required to be provided for emergency access into the site and this access will need to designed to adoptable standards and suitable for use by vehicular traffic. As such whilst, it is feasible to design a layout that provides a primary point of access to the B115, the secondary point of access will be required to be available to all vehicular traffic and therefore it is considered that this policy wording should be reflected to state that: <i>‘An internal layout that provides a secondary point of access to Mundesley Road will be created’</i>. This secondary access will be a key desire line for pedestrians and cyclists into the centre of North Walsham.</p> <p>3.8 Additionally, within subparagraph 11(IV) the requirement has been extended to request: <i>‘A detailed assessment of walking and cycling routes to and from the town to identify desire lines and to remedy any gaps in provision.’</i></p> <p>3.9 We agree this amendment to be appropriate, to ensure there is suitable walking and cycling routes and encourage active transport in North Walsham. This requirement has been provided within the Transport Assessment produced by Hub Transport accompanying the outline application. Section 4.0 ‘Local Facilities and Sustainable Transport’ identifies this distance from the site to local facilities and continues to assess the accessibility of the site to these facilities by walking, cycling, and public transport.</p> <p>Proportionate Contributions</p> <p>3.10 In regard to Highway contributions and mitigation, within paragraph 13 of Policy NW16 in the Main Modifications, the wording states:</p> <p><i>‘The delivery of necessary Highway infrastructure and mitigation as part of the development through proportionate works and/or contributions from NW62/A and NW16, taking account of their relative impacts. The requirements for each development and its funding will be agreed and detailed as part of the phasing and delivery plan(s) prior to determination and secured by legal agreements.’</i></p> <p>3.11 This has been amended from the wording of the SoCG:</p> <p><i>‘Where necessary the delivery of the above Highway infrastructure mitigation by the site applicants through proportionate contributions from NW62/A and NW16 reflective of the impacts of each development, and its funding will be agreed and detailed as part of the phasing and delivery plan(s) prior to determination.’</i></p> <p>3.12 The amended wording differs to the agreed SoCG and it is unclear why the wording which has been agreed is proposed to be amended. The SoCG has been agreed with the Highway authority and demonstrates Richborough’s commitment to providing a proportionate contribution which is reflective of the impact caused by the development of NW16 on the wider network.</p>

	<p>3.13 In regard to the education contribution requirements, paragraph 14 of Policy NW16 in the Main Modifications is proposed to state the following:</p> <p><i>‘Unless otherwise agreed by the Local Education Authority, proportionate educational contributions will be required from NW62/A and NW16 to ensure the necessary school provision is delivered at the right time in line with the phasing of the strategic allocations in North Walsham.’</i></p> <p>3.14 Within the SoCG, the following wording was agreed at paragraph 13 of the wording of Policy NW16:</p> <p><i>‘Unless otherwise agreed with the Local Education Authority, a proportionate educational contribution will be required from NW62/A and NW16 to ensure appropriate school provision/places can be delivered in line with the phasing of the strategic allocations in North Walsham and educational requirements.’</i></p> <p>3.15 The wording of Policy NW16 refers to the delivery of the new school required within Policy NW62/A to be delivered within the site at the Land West of North Walsham. We consider the wording should remain as agreed within the SoCG, which has also been agreed by the Local Education Authority (Norfolk County Council), which allows for ‘provision/places’ to be provided as opposed to ‘provision’ alone.</p> <p>3.16 Within the consultation response the outline application for Land at End of Mundesley Road, North Walsham, it is confirmed there is existing capacity in the schools in North Walsham. The wording within the SoCG also allows for the existing capacity in schools to be utilised by the number of places required generated by Land at End of Mundesley Road. If this existing capacity is not taken up prior to the delivery of the new school, this will impact the viability and operations of the existing schools and may result in closure if there is a lack of students.</p> <p>4. CONCLUSION</p> <p>4.1 Boyer have prepared these representations on behalf of Richborough in response to the North Norfolk Local Plan Main Modifications Consultation which is being undertaken by North Norfolk District Council (‘NNDC’) following recommendations requested by the Planning Inspector.</p> <p>4.2 As demonstrated within these representations, we consider the modifications proposed by NNDC to be largely appropriate and capable of being found sound with minor amendment. This will ensure that the proposed policies are consistent in their requirements throughout the Local Plan.</p> <p>4.3 Richborough support the inclusion of Land at Mundesley Road, North Walsham within Policy NW16 of the Local Plan for the development of 330 dwellings, with 60 units/40 dwelling equivalent of elderly care accommodation and open space, drainage, landscaping and access from the B1145. It is positive NNDC are committed to meeting the housing needs of the District, as demonstrated by the allocation of this site, in addition to the proposed increased growth within Small Growth Villages.</p> <p>4.4 However, we consider Policy NW16, and subsequently Policy NW62/A, should fully reflect the agreed wording set out within the Statement of Common Ground. The Statement of Common Ground has been agreed and signed by all parties, including Richborough, the Consortium of developers of NW62/A, NNDC, and Norfolk County Council (Education and Highways).</p> <p>4.5 Overall, these representations have set out our recommendations to assist NNDC in achieving a Local Plan which can be capable to be found sound in accordance with the NPPF, as the North Norfolk Local Plan progresses towards adoption.</p>
Officer Response	<p>Comments, support and proposed change noted.</p> <p><u>Proposed change</u> - ‘An internal layout that provides a secondary point of access to Mundesley Road will be created’. The council does not consider this proposed change necessary to improve the soundness of the Local Plan, this change would identify a second access without requirements to minimise its use, thus diluting the reliance on the provision of the bridge to the B1145 which is the primary access into the site, the delivery of which is required by the site-specific policy. Justification would need to be provided to evidence this change and how it may impact Mundesley Road.</p> <p><u>Policy wording & SoCG</u>: It is noted that amendments to wording identified in the SoCG were agreed between all parties and that this has been used to inform the proposed policy as modified. However, the Council recognises the Inspector’s discretion to amend policy wording to ensure soundness and clarity. The amendments to the highways requirements are supported as they remain consistent with the Statement of Common Ground (SoCG) and do not alter intent. However, in relation to education, the modified wording is less explicit about the timing and delivery of new school provision. The Council considers that the SoCG wording is more effective in ensuring education provision keeps pace with development and would support reinstatement of this wording if the Inspector is minded to do so.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC205
Response Date	17/09/2025 09:02:23
Full Name	Mrs Rowan Harris-Bates
Organisation	
Agent Full Name	

Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Effective
Question 7 - Explanation of Soundness Reasons	<p>The provision of a roundabout onto the B1145 is a positive but I really feel that the work on this and the accompanying bridge of the Paston Way, needs to be completed before the development of the site, to minimise years of disruption for the existing residents. Mundesley Road is already becoming a racetrack at certain times of the day with cars going to and from the Mundesley Road store, and any provision to allow cars to enter the new estate from the end of Mundesley Road will only exacerbate this.</p> <p>What has also seemingly been overlooked is that North Walsham has one petrol station located at Sainsbury's. There is no realistic other choice for users of either the supermarket or the petrol station, who live at this end of the town, than to use a combination of Mundesley Road, Crow Road or Lyngate. A roundabout on the B1145 is not going to solve this problem as residents of the new estate who wish to use the petrol station or Sainsbury's have no means of getting to the roundabout without first travelling along these roads which are already a bottleneck and becoming increasingly dangerous.</p> <p>The junction Lyngate and the bypass is already an accident blackspot and increasing the volume of traffic along the bypass following the creation of a roundabout is going to make it even more dangerous for cars pulling out onto the bypass from this junction.</p> <p>I would also like to add that with the imminent discussion of the Government's changes to the Planning Bill, will the proposed design and environmental safeguards provide sufficient restoration measures to this site. At the moment the field is home to nesting skylarks and many other creatures - my understanding of the changes is that the 'precautionary principle' must be given regard and that a lack of scientific certainty that damage could be caused is not a reason to fail to implement measures to prevent that damage. I also understand that any conservation measures should be put in place before that harm occurs. Have the developers giving sufficient thought to how what these restoration measures will be put in place (in advance) to protect this wide variety of wildlife that currently resides on this piece of land? However much green space may be proposed it will not replicate the habitat in which they currently live and thrive in.</p>
Attached File (where submitted)	
Officer Summary	<p>The provision of a roundabout onto the B1145 is a positive but I really feel that the work on this and the accompanying bridge of the Paston Way, needs to be completed before the development of the site, to minimise years of disruption for the existing residents. Mundesley Road is already becoming a racetrack at certain times of the day with cars going to and from the Mundesley Road store, and any provision to allow cars to enter the new estate from the end of Mundesley Road will only exacerbate this.</p> <p>What has also seemingly been overlooked is that North Walsham has one petrol station located at Sainsbury's. There is no realistic other choice for users of either the supermarket or the petrol station, who live at this end of the town, than to use a combination of Mundesley Road, Crow Road or Lyngate. A roundabout on the B1145 is not going to solve this problem as residents of the new estate who wish to use the petrol station or Sainsbury's have no means of getting to the roundabout without first travelling along these roads which are already a bottleneck and becoming increasingly dangerous.</p> <p>The junction Lyngate and the bypass is already an accident blackspot and increasing the volume of traffic along the bypass following the creation of a roundabout is going to make it even more dangerous for cars pulling out onto the bypass from this junction.</p> <p>I would also like to add that with the imminent discussion of the Government's changes to the Planning Bill, will the proposed design and environmental safeguards provide sufficient restoration measures to this site. At the moment the field is home to nesting skylarks and many other creatures - my understanding of the changes is that the 'precautionary principle' must be given regard and that a lack of scientific certainty that damage could be caused is not a reason to fail to implement measures to prevent that damage. I also understand that any conservation measures should be put in place before that harm occurs. Have the developers giving sufficient thought to how what these restoration measures will be put in place (in advance) to protect this wide variety of wildlife that currently resides on this piece of land? However much green space may be proposed it will not replicate the habitat in which they currently live and thrive in.</p>

Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Policy requirements for both sites in North Walsham require the provision of a Transport Assessment to be conducted as part of any application, this assessment will consider the site's impact on North Walsham, mitigation has already been identified in the site-specific policies for both sites and a SoCG (signed May 2025) now exists between all relevant parties which ensures these requirements are delivered through proportionate funding.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC207
Response Date	17/09/2025 09:47:44
Full Name	Mr Bruce Lindon
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective
Question 7 - Explanation of Soundness Reasons	<p>The junction at Lyngate road /Mundesley road is unsuitable for the traffic currently using it. HGV's, buses and cars regularly have to mount the pavement to negotiate the junction and the footpaths in lyngate road are too narrow to be safe for pedestrians.</p> <p>For traffic exiting Lyngate road on to Mundesley road the visibility is poor, particularly as vehicles visiting the shop frequently park on the pavement opposite the shop.</p> <p>Contrary to Mr David Reed the Government Inspector's statement, the Lyngate Road/Mundesley Road is a very busy and potentially dangerous junction.</p> <p>This Main Modification should include that a bridge and roundabout from the proposed development onto the B1145 should be provided before commencement of the first phase of the development to minimise the traffic along Mundesley Road and Lyngate Road.</p>
Attached File (where submitted)	
Officer Summary	<p>The junction at Lyngate road /Mundesley road is unsuitable for the traffic currently using it. HGV's, buses and cars regularly have to mount the pavement to negotiate the junction and the footpaths in lyngate road are too narrow to be safe for pedestrians.</p> <p>For traffic exiting Lyngate road on to Mundesley road the visibility is poor, particularly as vehicles visiting the shop frequently park on the pavement opposite the shop.</p> <p>Contrary to Mr David Reed the Government Inspector's statement, the Lyngate Road/Mundesley Road is a very busy and potentially dangerous junction.</p> <p>This Main Modification should include that a bridge and roundabout from the proposed development onto the B1145 should be provided before commencement of the first phase of the development to minimise the traffic along Mundesley Road and Lyngate Road.</p>
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Proposed change is not required for the soundness of the Local Plan. The exact phasing and delivery of the allocation will be determined through the application.
Question 1 - Document Selection * Main Modifications	Main Modifications

* Policy Map Changes	
Question 2 - Modification Reference	MM51
ID	MMC211
Response Date	17/09/2025 09:34:00
Full Name	Jocelyn Rowbotham
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>I wish to raise an objection to the Main Modifications on this proposed site.</p> <p>The building of a roundabout will not ease the situation of overuse on Mundesley road as there is only one petrol station in town and both of the main supermarkets will be accessed by this road too, therefore no benefit will be seen.</p> <p>A roundabout will destroy much of the vital native environment destroying habitat for tawny owls, sky larks and many many other species.</p> <p>We need farm land and this housing development in not suitable for any of the housing needs of the area.</p> <p>We have not enough school places and they are all a long way from this development</p> <p>We have a shortage of doctors and dentists</p> <p>There are very few work opportunities in this town, so traffic will be increased massively on the Norwich - North Walsham road.</p>
Attached File (where submitted)	
Officer Summary	<p>I wish to raise an objection to the Main Modifications on this proposed site.</p> <p>The building of a roundabout will not ease the situation of overuse on Mundesley road as there is only one petrol station in town and both of the main supermarkets will be accessed by this road too, therefore no benefit will be seen.</p> <p>A roundabout will destroy much of the vital native environment destroying habitat for tawny owls, sky larks and many many other species.</p> <p>We need farm land and this housing development in not suitable for any of the housing needs of the area.</p> <p>We have not enough school places and they are all a long way from this development</p> <p>We have a shortage of doctors and dentists</p> <p>There are very few work opportunities in this town, so traffic will be increased massively on the Norwich - North Walsham road.</p>
Officer Response	Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC213

Response Date	17/09/2025 09:42:00
Full Name	Mr Adrian Will
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>Whilst I am bitterly disappointed that the planning committee appear to have not taken any consideration into account for the wildlife and the damage to the environment, I do have requests I would like taken into consideration.</p> <p>- Vehicle access via a roundabout onto the B1145 - We all know how developers work and I have serious concerns this will never happen, please can we have a legally binding requirement that does not allow any backtracking when the developers return to the table demanding amendments.</p> <p>- Provision of a bridge over the Paston Way trail must be included in the above with no wriggle room to return to the table asking for amendments on this issue. The limitations of the current exhausted and out of date road system demands this for the safety of the residents.</p> <p>- Lyngate Road and Crow Road cannot handle anymore uplift in traffic, measures must be in place to avoid this.</p> <p>- having previously lived in a house on Rye Close flooded due to poorly maintained rain water drainage I have very real concerns that the addition of this site will further enhance the risks to these home owners and the nature reserve on the other side. The decision makers will of course have to held to account if and when this happens</p>
Attached File (where submitted)	
Officer Summary	<p>Whilst I am bitterly disappointed that the planning committee appear to have not taken any consideration into account for the wildlife and the damage to the environment, I do have requests I would like taken into consideration.</p> <p>- Vehicle access via a roundabout onto the B1145 - We all know how developers work and I have serious concerns this will never happen, please can we have a legally binding requirement that does not allow any backtracking when the developers return to the table demanding amendments.</p> <p>- Provision of a bridge over the Paston Way trail must be included in the above with no wriggle room to return to the table asking for amendments on this issue. The limitations of the current exhausted and out of date road system demands this for the safety of the residents.</p> <p>- Lyngate Road and Crow Road cannot handle anymore uplift in traffic, measures must be in place to avoid this.</p> <p>- having previously lived in a house on Rye Close flooded due to poorly maintained rain water drainage I have very real concerns that the addition of this site will further enhance the risks to these home owners and the nature reserve on the other side. The decision makers will of course have to held to account if and when this happens</p>
Officer Response	<p>Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Access onto the B1145 is required as written in the site-specific policy, the exact details of its provision and legal agreements will be determined through the application.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC214
Response Date	17/09/2025 09:54:00

Full Name	Mrs Sally East
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>As a resident of Mundesley Road I strongly object to any development/ building of 330 new homes on the prime farming land at the top of Mundesley Road for the following reasons :-</p> <ol style="list-style-type: none"> 1. This is prime agricultural land 2. There are many protected species that live on and around this land including Sky larks the field is full of them spring through to end of autumn Roe Deer, Bats, Numerous finches sparrows robins wrens wagtails, Herons, Buzzards, Peregrine falcons, Marsh Harriers, Sparrow hawks, Otters, Water voles, White Egrets, Cranes, Barn Owls Just to name a few, all this would be impacted and threatened by building in this field. 3. Mundesley road and surrounding roads cannot cope with a potential 600 plus more cars not to forget delivery Lorrie's etc which would service and be owned by people In proposed development, Mundesley road is already a cut through from Trunch Swafeld the industrial estate and surrounding area people don't use the dual Carriageway as the developers suggested! We already find it hard getting out of our drives on Mundesley road by car let alone on foot it sometimes takes me 10-15 minutes to cross over to get into my own drive on foot , by car exiting my house is a nightmare! Even now without further houses being built . We do not have the infrastructure to support houses on our side of north Walsham! 4. There are no schools or doctors or dentists for residents for more houses let alone for those of us who already live in north Walsham 5. This is an area of outstanding natural beauty! 6. They are already proposing another 2,000 plus houses in north Walsham we do not have infrastructure to support this ! Why do we need more ? 7. There are plenty of Brown sites that could be built on elsewhere in north Norfolk ! 8. Having studied the revised plans following the meeting with the independent inspector David Reed there is no mention of the exit bridge and roundabout being built prior to any development at the top of Mundesley Road over Paston way ,why is this ? it clearly states at the junction with Lyngate road and the Premier Shop and Mundesley road that NO HGV vehicles are allowed onto that part of Mundesley road . It therefore needs to be added into the proposed plan for NW16 prior to development as this part of Mundesley road is certified as unsuitable for HGV vehicles and therefore also construction vehicles to the proposed site.
Attached File (where submitted)	
Officer Summary	<p>As a resident of Mundesley Road I strongly object to any development/ building of 330 new homes on the prime farming land at the top of Mundesley Road for the following reasons :-</p> <ol style="list-style-type: none"> 1. This is prime agricultural land 2. There are many protected species that live on and around this land including Sky larks the field is full of them spring through to end of autumn Roe Deer, Bats, Numerous finches sparrows robins wrens wagtails, Herons, Buzzards, Peregrine falcons, Marsh Harriers, Sparrow hawks, Otters, Water voles, White Egrets, Cranes, Barn Owls Just to name a few, all this would be impacted and threatened by building in this field. 3. Mundesley road and surrounding roads cannot cope with a potential 600 plus more cars not to forget delivery Lorrie's etc which would service and be owned by people In proposed development, Mundesley road is already a cut through from Trunch Swafeld the industrial estate and surrounding area people don't use the dual Carriageway as the developers suggested! We already find it hard getting out of our drives on Mundesley road by car let alone on foot it sometimes takes me 10-15

	<p>minutes to cross over to get into my own drive on foot , by car exiting my house is a nightmare! Even now without further houses being built . We do not have the infrastructure to support houses on our side of north Walsham!</p> <p>4. There are no schools or doctors or dentists for residents for more houses let alone for those of us who already live in north Walsham</p> <p>5. This is an area of outstanding natural beauty!</p> <p>6. They are already proposing another 2,000 plus houses in north Walsham we do not have infrastructure to support this ! Why do we need more ?</p> <p>7. There are plenty of Brown sites that could be built on elsewhere in north Norfolk !</p> <p>8. Having studied the revised plans following the meeting with the independent inspector David Reed there is no mention of the exit bridge and roundabout being built prior to any development at the top of Mundesley Road over Paston way ,why is this ? it clearly states at the junction with Lyngate road and the Premier Shop and Mundesley road that NO HGV vehicles are allowed onto that part of Mundesley road .</p> <p>It therefore needs to be added into the proposed plan for NW16 prior to development as this part of Mundesley road is certified as unsuitable for HGV vehicles and therefore also construction vehicles to the proposed site.</p>
Officer Response	<p>Objections noted. The representation appears to largely repeat representations at the Further Consultation stage and examination in Public. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested or considered necessary.</p> <p>Policy requirements for both sites in North Walsham require the provision of a Transport Assessment to be conducted as part of any application, this assessment will consider the site's impact on North Walsham, mitigation has already been identified in the site-specific policies for both sites.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC216
Response Date	17/09/2025 10:08:00
Full Name	Mr Trevor Cutting
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>I am sending this email as I have found the portal to comment on the planed amendment's for the development of the land at the end of Mundesley Road North Walsham so difficult to use and get into. It is obvious that the council do not want people to use it. We have voiced our views on this matter when the plans were first submitted. It is obvious that resident's views of the proposed plans will make no difference, and the building of 330 homes will go ahead.</p> <p>Please take into account that the Mundesley Road has double parking in places, and no pavement on one side making the road dangerous for extra vehicles and large vehicles to use, and making it more difficult for vehicles and pedestrians exiting their drives on the side where there is no pavement. It is imperative that works traffic can only access the site via the bypass, and not via the Mundesley Road, Lyngate Road or Swafeld Rise. Please remember that all large vehicles use the Mundesley Road, because all the bridges, bar one, are not tall enough. It is obvious to us that this plan is going ahead, but please remember the the residents of the Mundesley Road and Lyngate Road, we think we take our fair share of lorries now, so is not it time OUR council took its residents into consideration.</p>

Attached File (where submitted)	
Officer Summary	Please take into account that the Mundesley Road has double parking in places, and no pavement on one side making the road dangerous for extra vehicles and large vehicles to use, and making it more difficult for vehicles and pedestrians exiting their drives on the side where there is no pavement. It is imperative that works traffic can only access the site via the bypass, and not via the Mundesley Road, Lyngate Road or Swafield Rise. Please remember that all large vehicles use the Mundesley Road, because all the bridges, bar one, are not tall enough. It is obvious to us that this plan is going ahead, but please remember the the residents of the Mundesley Road and Lyngate Road, we think we take our fair share of lorries now, so is not it time OUR council took its residents into consideration.
Officer Response	Objections noted. The council has a statutory duty to plan to meet the needs of the district. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Policy requirements for both sites in North Walsham require the provision of a Transport Assessment to be conducted as part of any application, this assessment will consider the site's impact on North Walsham, mitigation has already been identified in the site-specific policies for both sites.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM51
ID	MMC227
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water welcomes the statement in the supporting text to advise developers to undertake early engagement with us to assess infrastructure capacity and any specific requirements needed to deliver the proposed development. This will also ensure that our rising main and any associated easements are taken account of in the site layout and design.</p> <p>Anglian Water supports the policy clauses 8 and 9 which require the submission, approval and implementation of a Surface Water Management Plan and Foul Drainage Strategy. We welcome our suggested amendment to clause 9.</p>
Attached File (where submitted)	
Officer Summary	<p>Anglian Water welcomes the statement in the supporting text to advise developers to undertake early engagement with us to assess infrastructure capacity and any specific requirements needed to deliver the proposed development. This will also ensure that our rising main and any associated easements are taken account of in the site layout and design.</p> <p>Anglian Water supports the policy clauses 8 and 9 which require the submission, approval and implementation of a Surface Water Management Plan and Foul Drainage Strategy. We welcome our suggested amendment to clause 9.</p>
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications

Question 2 - Modification Reference	MM51
ID	MMC263
Response Date	17/09/2025 15:09:00
Full Name	Angela Powles
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>Although I am still wholeheartedly against NW16 being included in the local plan, I understand that the inspector has said it can be included with mitigations to be added, therefore my comments must be related to MM51.</p> <p>1) Provision of convenient and safe vehicular access via a roundabout onto the B1145 and additional access provided on Mundesley Road/Lyngate Road. A roundabout on the B1145 and a bridge over the Paston Way MUST be provided before any work begins on the site so that construction traffic DOES NOT use Lyngate Road and Mundesley Road. I have previously put forward my objections based on how unsuitable Lyngate Road is. One of those objections is the fact that wider, heavier vehicles mount the pavement whilst passing parked cars. This road/junction is busy, narrow and hazardous. I am sure you will agree construction traffic cannot be added to the existing problems, safety MUST come first.</p> <p>2) An internal layout that minimises traffic utilising Mundesley Road/Lyngate Road. In my opinion the access directly onto Mundesley Road should be emergency access only, but if it is open to all traffic then there must be a road layout that limits its use. Mundesley Road/Lyngate Road and Mundesley Road/Crow Road junctions are already under considerable pressure and do not need more traffic to add to it.</p> <p>I would also like to add that any developer should be requested to financially support any work which is needed in Coltishall in order for them to handle increased traffic from the development. This is something that also needs to be undertaken before construction. NW16 is a smaller development compared to others in the town but any developer still needs to share the responsibility.</p> <p>I still believe that North Walsham is being overdeveloped and that NW16 should not be included in the plan for multiple reasons but if it must be, the above mitigations must be undertaken.</p>
Attached File (where submitted)	
Officer Summary	<p>Although I am still wholeheartedly against NW16 being included in the local plan, I understand that the inspector has said it can be included with mitigations to be added, therefore my comments must be related to MM51.</p> <p>1) Provision of convenient and safe vehicular access via a roundabout onto the B1145 and additional access provided on Mundesley Road/Lyngate Road. A roundabout on the B1145 and a bridge over the Paston Way MUST be provided before any work begins on the site so that construction traffic DOES NOT use Lyngate Road and Mundesley Road. I have previously put forward my objections based on how unsuitable Lyngate Road is. One of those objections is the fact that wider, heavier vehicles mount the pavement whilst passing parked cars. This road/junction is busy, narrow and hazardous. I am sure you will agree construction traffic cannot be added to the existing problems, safety MUST come first.</p> <p>2) An internal layout that minimises traffic utilising Mundesley Road/Lyngate Road. In my opinion the access directly onto Mundesley Road should be emergency access only, but if it is open to all traffic then there must be a road layout that limits its use. Mundesley Road/Lyngate Road and Mundesley Road/Crow Road junctions are already under considerable pressure and do not need more traffic to add to it.</p> <p>I would also like to add that any developer should be requested to financially support any work which is needed in Coltishall in order for them to handle increased traffic from the development. This is</p>

	<p>something that also needs to be undertaken before construction. NW16 is a smaller development compared to others in the town but any developer still needs to share the responsibility.</p> <p>I still believe that North Walsham is being overdeveloped and that NW16 should not be included in the plan for multiple reasons but if it must be, the above mitigations must be undertaken.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. The exact phasing and delivery of the allocation will be determined through the application. A SoCG (signed May 2025) now exists between all relevant parties which ensures these requirements are delivered through proportionate funding.</p>

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM53
ID	MMC208
Response Date	17/09/2025 10:38:31
Full Name	Mr Philip Hendry
Organisation	Hendry and Sons Builders
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE As a local land owner and owner of BLA/04 allocated land neither myself, nor my agent were made aware that there had been a further call for sites in Blakeney. As a consequence my further land holdings were not proposed or promoted as options for inclusion in the Local Plan. I have uploaded a plan that shows my further landholding to the south of the BLA/04 allocation which I believe to be a better option than the proposed inclusion of BLA/01 for the same reasons that BLA/04 was originally chosen over BLA/01. BLA/01 is 7.76 acres to provide 30 dwellings -a density of 3.05 per acre. Twice the size of the current BLA/04 allocation and half the density. This is because so much land is needed to provide an acceptable access to the developable area of BLA/01. This is unsustainable and should not be considered acceptable in the Norfolk Coast Landscape Area and Galven Valley Conservation Area. Had we been made aware of the further call for sites we would have promoted the land to the south of BLA/04 as it is easily accessed from the Langham Road and will connect well with the current proposed allocation. It is, in every respect a better option than BLA/01 We have also previously highlighted significant viability issues with BLA/01 - the abnormal costs associated with providing the extended access road is just one aspect of this. This amendment has been included without proper consultation and without appropriate due diligence taking place into what better alternatives are available. It is an unsound amendment.
Attached File (where submitted)	Site Plan Blakeney.pdf
Officer Summary	As a local land owner and owner of BLA/04 allocated land neither myself, nor my agent were made aware that there had been a further call for sites in Blakeney. As a consequence my further land holdings were not proposed or promoted as options for inclusion in the Local Plan. I have uploaded a plan that shows my further landholding to the south of the BLA/04 allocation which I believe to be a better option than the proposed inclusion of BLA/01 for the same reasons that BLA/04 was originally chosen over BLA/01. BLA/01 is 7.76 acres to provide 30 dwellings -a density of 3.05 per acre. Twice the size of the current BLA/04 allocation and half the density. This is because so much land is needed to provide an acceptable access to the developable area of BLA/01. This is unsustainable and should not be considered acceptable in the Norfolk Coast Landscape Area and Galven Valley Conservation Area. Had we been made aware of the further call for sites we would have promoted the land to the south of BLA/04 as it is easily accessed from the Langham Road and will connect well with the current proposed allocation. It is, in every respect a better option than BLA/01 We have also previously highlighted significant viability issues with BLA/01 - the abnormal costs associated with providing the extended access road is just one aspect of this.

	This amendment has been included without proper consultation and without appropriate due diligence taking place into what better alternatives are available. It is an unsound amendment.
Officer Response	Comments and objections noted. The Council did not conduct a public Call for Sites seeking new submissions for consideration. The Council undertook a review of the Local Plan's supported site assessment process to identify additional sites for consideration if they were considered suitable through an updated assessment, this process is set out in the supporting evidence in association with the Further Consultation undertaken in November/December 2024, and is available to view in the examination library.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM53
ID	MMC228
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	Anglian Water supports the modification, which provides clarity on the expectations for the foul drainage strategy.
Attached File (where submitted)	
Officer Summary	Anglian Water supports the modification, which provides clarity on the expectations for the foul drainage strategy.
Officer Response	Support noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM54
ID	MMC187
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome the amendments to bullet point 7 in relation to heritage.
Attached File (where submitted)	
Officer Summary	We welcome the amendments to bullet point 7 in relation to heritage.
Officer Response	Support noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM54
ID	MMC229
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified	

* Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	Anglian Water supports the modification, which provides clarity on the expectations for the foul drainage strategy.
Attached File (where submitted)	
Officer Summary	Anglian Water supports the modification, which provides clarity on the expectations for the foul drainage strategy.
Officer Response	Support noted.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM55
ID	MMC230
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks.</p> <p>The suggested amendments from our response to the Further Consultation in December 2024, included in clause 9, are supported.</p> <p>It is suggested that to be consistent with other policy modifications, clause 9 of the policy is amended to read:</p> <p>Provision<u>The submission, approval and implementation</u> of a Foul Drainage Strategy...</p>
Attached File (where submitted)	
Officer Summary	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks.</p> <p>The suggested amendments from our response to the Further Consultation in December 2024, included in clause 9, are supported.</p> <p>It is suggested that to be consistent with other policy modifications, clause 9 of the policy is amended to read:</p> <p>Provision<u>The submission, approval and implementation</u> of a Foul Drainage Strategy...</p>
Officer Response	Comments noted. Proposed Change is considered to be beneficial for consistency purposes and will not impact the Local Plan's soundness.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM55
ID	MMC249
Response Date	17/09/2025 09:40:00
Full Name	
Organisation	Barratt David Wilson Homes (Anglia) Ltd
Agent Full Name	Katie Leeder
Agent Organisation	Bidwells
Question 3 - Legal Compliance	Yes (Support)

<ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness <ul style="list-style-type: none"> * Yes (Support) * No (Object) * No Comment / Unsure * General Comment 	Yes (Support)
Question 6 - Reasons Not Sound <ul style="list-style-type: none"> * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified 	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>LAND ADJACENT TO INGHAM ROAD, STALHAM (POLICY ST19/B)</p> <p>On behalf of Barratt David Wilson Homes (Anglia) (BDW), Bidwells continue to strongly support the allocation of Land Adjacent to Ingham Road, Stalham, under Policy ST19/B for residential development of approximately 150 dwellings.</p> <p>As demonstrated within previous Representations, including our Representation on the North Norfolk Local Plan Examination – Further Consultation in December 2024 (appended to this Letter), the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Since the Hearing Sessions held in April 2025, BDW have submitted a full planning application for 150 dwellings, which is currently pending determination.</p> <p>We fully support the Council's proposed Main Modification (ref. MM55) which removes Policy ST19/A and inserts replacement Policy ST19/B, which covers the entirety of the site proposed to be allocated for the delivery of 150 dwellings.</p> <p>Furthermore, we support the Council's amendment to Criterion 3 of Policy ST19/B, as set out below, with a suggested minor amendment underlined below. This amendment ensures that that for reasons detailed in the Representation attached as Appendix 1, that Policy ST19/B is justified and effective, and therefore, sound.</p> <p>Amended Criterion 3 (ref. MM55):</p> <p>"Widening of Ingham Road carriageway to 6.0m where necessary and as agreed by the Highway Authority."</p> <p>Superseded Criterion 3:</p> <p>"Widening of Ingham Road carriageway to 6.0m for the full width of the site frontage."</p> <p>On this basis, we consider Policy ST19/B to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, should be allocated in the Local Plan. The allocation enables BDW to continue to bring forward the site for residential development.</p>
Attached File (where submitted)	MMC249 - NNDC Main Modifications Consultation - Policy ST19-B.pdf
Officer Summary	<p>As demonstrated within previous Representations, including our Representation on the North Norfolk Local Plan Examination – Further Consultation in December 2024 (appended to this Letter), the site is entirely deliverable, and will make a valuable contribution towards achieving North Norfolk District Council's housing needs during the plan period. Since the Hearing Sessions held in April 2025, BDW have submitted a full planning application for 150 dwellings, which is currently pending determination.</p> <p>We fully support the Council's proposed Main Modification (ref. MM55) which removes Policy ST19/A and inserts replacement Policy ST19/B, which covers the entirety of the site proposed to be allocated for the delivery of 150 dwellings.</p> <p>Furthermore, we support the Council's amendment to Criterion 3 of Policy ST19/B, as set out below, with a suggested minor amendment underlined below. This amendment ensures that that for reasons detailed in the Representation attached as Appendix 1, that Policy ST19/B is justified and effective, and therefore, sound.</p> <p>Amended Criterion 3 (ref. MM55):</p> <p>"Widening of Ingham Road carriageway to 6.0m where necessary and as agreed by the Highway Authority."</p> <p>Superseded Criterion 3:</p> <p>"Widening of Ingham Road carriageway to 6.0m for the full width of the site frontage."</p> <p>On this basis, we consider Policy ST19/B to be sound, in accordance with the tests set out within paragraph 36 of the National Planning Policy Framework; and therefore, should be allocated in the Local Plan. The allocation enables BDW to continue to bring forward the site for residential development.</p>
Officer Response	Support noted.

MM56

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM56
ID	MMC107
Response Date	08/09/2025 08:11:18
Full Name	Ms Jessica Simmons
Organisation	
Agent Full Name	Rory Baker
Agent Organisation	Ceres Property
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	MMC107 - NNDC Main Mods - ST04.pdf
Officer Summary	<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>
Officer Response	Comments and support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM56
ID	MMC231

Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks.</p> <p>The suggested amendments from our response to the Further Consultation in December 2024, included in clause 9, are supported.</p> <p>It is suggested that in order to be consistent with other policy modifications, clause 9 of the policy is amended to read:</p> <p>The provision The submission, approval and implementation of a Foul Drainage Strategy...</p>
Attached File (where submitted)	
Officer Summary	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks.</p> <p>The suggested amendments from our response to the Further Consultation in December 2024, included in clause 9, are supported.</p> <p>It is suggested that in order to be consistent with other policy modifications, clause 9 of the policy is amended to read:</p> <p>The provision The submission, approval and implementation of a Foul Drainage Strategy...</p>
Officer Response	Comments noted. Proposed Change is considered to be beneficial for consistency purposes and will not impact the Local Plan's soundness.

MM57

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM57
ID	MMC155
Response Date	15/09/2025 11:16:00
Full Name	
Organisation	Holkham Estate
Agent Full Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 4 - Reasons Not Legally Compliant	<p>Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so "with the objective of contributing to the achievement of sustainable development".</p> <p>The Sustainability Appraisal of the Main Modifications (Addendum) screens the Main Modifications at Chapter 3. Both MM36 (which removes Policy W07/1 from the list of allocations at Policy DS 1) and MM57 (which deletes Policy W07/1) are screened out of requiring SA re-appraisal. No assessment or justification is provided for why the Council considers these Main Modifications unlikely to have significant effects upon the SA Objectives. This is particularly concerning with respect to SA Objective "SA12 – <i>To ensure that everyone has the opportunity of a good quality, suitable and affordable home to meet their needs.</i>" Our client's previous representations clearly set out the evidence from the independent Housing Needs Assessment (HNA) for Wells-next-the-Sea undertaken in 2021 which demonstrates that there are significant affordability issues facing people in the town. In this context, the deletion of a housing allocation from Wells-next-the-Sea without assessing the impact of this on delivering SA Objective SA12 clearly fails the statutory requirement to carry out a Sustainability Appraisal of each of the proposals in the Local Plan.</p>
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>To be considered sound, policies must be positively prepared, justified, effective and consistent with National Policy:</p> <p>a) Positively prepared – The deletion of Policy W07/1 not only fails to plan positively for the housing needs of Wells-next-the-Sea, but in deleting the policy support for a site with planning permission for residential development (ref. PF/24/1572) it actively seeks to frustrate the delivery of much needed new homes.</p> <p>b) Justified – It is not appropriate or justified to delete a housing allocation for a site with planning permission for residential development without considering reasonable alternatives. For example, the site could be included within the settlement boundary to indicate that it is a committed housing site. This is the approach taken for other committed housing sites to ensure ongoing policy support for development (e.g. Land of Beresford Road, Holt which is included in the settlement for Holt despite not having commenced development at the point the plan was submitted for examination).</p> <p>c) Effective – The deletion of Policy W07/1 would render the Local Plan ineffective in meeting the housing needs of Wells-next-the-Sea. It is recognised that the Neighbourhood Plan allocation at Land at Two Furlong Hill will provide additional housing delivery in the town, but it should be recognised that this site was allocated in recognition that the need for new homes is greater than would have been met through the submission version of the Local Plan. The deletion of Policy W07/1 could result in a significant reduction in housing delivery in Wells-next-the-Sea as it removes the security of a policy allocation supporting the current planning permission.</p> <p>d) Consistent with National Policy – The deletion of W07/1 would render the Local Plan inconsistent with the social objective for sustainable development at NPPF paragraph 8 which seeks to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations.</p>

	<p>In summary, the decision to delete Policy W07/1 is not considered to be positively prepared, justified, deliverable or consistent with national policy. It is therefore unsound against the test set by NPPF paragraph 36.</p>
Attached File (where submitted)	
Officer Summary	<p>Object. Reference to the legal requirements for a LPA to carry out a sustainability appraisal for each of the proposals within a local plan and to the SA of the Main Modifications (Addendum) which at Chapter 3 screens modifications for SA assessment. Both MM36 (removal of Policy W07/1 from the list of allocations at Policy DS 1) and MM57 (deletes Policy W07/1) are screened out of requiring SA re-appraisal. No assessment or justification is provided as to why these Main Modifications are unlikely to have significant effects upon the SA Objectives. This is particularly concerning with respect to SA Objective "SA12 – To ensure that everyone has the opportunity of a good quality, suitable and affordable home to meet their needs."</p> <p>Reference to previous representations regarding the Housing Needs Assessment (HNA) for Wells-next-the-Sea which demonstrates significant affordability issues. In this context, the deletion of a housing allocation from Wells-next-the-Sea without assessing the impact of this on delivering SA Objective SA12 clearly fails the statutory requirement to carry out a Sustainability Appraisal of each of the proposals in the Local Plan.</p> <p>To be considered sound, policies must be positively prepared, justified, effective and consistent with National Policy:</p> <p>a) Positively prepared – deletion of Policy W07/1 fails to plan positively for the housing needs of Wells-next-the-Sea and seeks to frustrate the policy support and delivery of a site with planning permission for residential development (ref. PF/24/1572).</p> <p>b) Justified – not appropriate or justified to delete a site allocation with planning permission without considering reasonable alternatives. For example, the site could be included within the settlement boundary to indicate that it is a committed housing site. Reference to residential site off Beresford Road, Holt, which has been included in settlement boundary.</p> <p>c) Effective – The deletion of Policy W07/1 would render the Local Plan ineffective in meeting the housing needs of Wells-next-the-Sea. It is recognised that the Neighbourhood Plan allocation at Land at Two Furlong Hill will provide additional housing delivery in the town, but this site was allocated in recognition of the greater need for new homes than would have been allocated through the Local Plan. The deletion of Policy W07/1 could result in a significant reduction in housing delivery in Wells-next-the-Sea as it removes the security of a policy allocation supporting the current planning permission.</p> <p>d) Consistent with National Policy – The deletion of W07/1 would render the Local Plan inconsistent with the social objective for sustainable development at NPPF paragraph 8 which seeks to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations.</p> <p>In summary, the decision to delete Policy W07/1 is not considered to be positively prepared, justified, deliverable or consistent with national policy. It is therefore unsound against the test set by NPPF paragraph 36.</p>
Officer Response	<p>Objection noted. The Sustainability Appraisal (SA) has followed an iterative process that runs parallel to the production of the local plan where proposed policies have been consistently appraised against a comprehensive set of sustainability objectives, including the preferred and alternative sites. It is not the role of the SA to determine the options to be chosen throughout the local plan process but to inform choices.</p> <p>The SA Addendum to the Main Modifications report should be read alongside the main SA report and SA Addendum (Further Consultation). Site W07/1, was appraised in the original SA report, and where the summary conclusion formed part of the overall site assessment (in the Site Assessment Booklet for Wells-next-the Sea [D8]).</p> <p>It is also the role of the SA and the sustainability objectives to be used to test the overall effect of the plan and help identify any particular significant effects, to provide a complete picture of the plan's sustainability implications following modifications. As such, the most recent SA Addendum assesses both individually and cumulatively, the proposed main modifications to the relevant policies and site allocations against the sustainability objectives to provide a full picture alongside the main SA report and SA Addendum (Further Consultation). The modification resulted in the site being screened out of any further appraisal as it is no longer part of the Plan.</p> <p>The Council would have preferred for the site W07/1 to have remained in the Plan. However, the site has subsequently been granted planning permission and as such, will count as windfall development and will assist in addressing the local housing needs of Wells-next-the-Sea.</p> <p>With the addition of new and extended sites proposed and agreed through the Further Consultation process the local plan provides an appropriate amount of residential sites to meet the updated identified needs and consequently, overall housing numbers as required.</p>

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC17
Response Date	08/08/2025 16:10:31
Full Name	Tom James
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Effective
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILES <p>The original plan was to develop the field to the East of Langham Road on the field south of Kingsway. This plan BLA04 was debated extensively by the local parish and council representatives. It was deemed the most economical and practical site to develop. Whilst no local resident wishes for farmland to be developed, it was the most sympathetic solution for the desired 30 dwelling target to be achieved. Conversely the site BLA01 opposite to the west of Langham Road and to the South of Morston Road is not practical nor cost effective to engineer. The cost of the infrastructure / roadway to reach the dwellings makes this option completely unviable. Furthermore it represents significantly more detriment to the landscape and surrounding nature as well as considerably more noise and light pollution. The appropriate site to develop as previously debated and unanimously agreed is BLA04 to the East of Langham Road.</p>
Attached File (where submitted)	BLA04 Indicative proposed block plan.pdf BLA04 Indicative Site Plan 1.pdf
Officer Summary	<p>he original plan was to develop the field to the East of Langham Road on the field south of Kingsway. This plan BLA04 was debated extensively by the local parish and council representatives. It was deemed the most economical and practical site to develop. Whilst no local resident wishes for farmland to be developed, it was the most sympathetic solution for the desired 30 dwelling target to be achieved. Conversely the site BLA01 opposite to the west of Langham Road and to the South of Morston Road is not practical nor cost effective to engineer. The cost of the infrastructure / roadway to reach the dwellings makes this option completely unviable. Furthermore it represents significantly more detriment to the landscape and surrounding nature as well as considerably more noise and light pollution. The appropriate site to develop as previously debated and unanimously agreed is BLA04 to the East of Langham Road.</p>
Officer Response	Objection noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library. No changes are considered necessary
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC48
Response Date	28/08/2025 15:47:28
Full Name	Roy Nicholson
Organisation	

Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified Effective
Question 7 - Explanation of Soundness Reasons	<p>1 - no development has taken place on the site to the east of Langham Road allotted in the Blakeney Neighbourhood Plan due I understand to the infrastructure cost required.</p> <p>2 - the positioning of the site adjacent to the existing housing may have the same issues and also those of access to Langham Road. If the site was positioned to the south of Harbour Way in the quadrant of land available (the freeholders may be open to this) , any developer could piggy back the infrastructure with the site to the east of Langham Road killing both birds with one stone.</p> <p>3 - the suggested footpath would not be necessary as access to the village would be by Langham Road (and is closer). In any event , on the current proposal, the footpath should run through Queen's Close which would be materially cheaper and closer to the village centre.</p> <p>4 -note ENV1 and HC2 -the proposed development does not contribute to conservation or enhancement of valued landscapes</p>
Attached File (where submitted)	
Officer Summary	<p>1 - no development has taken place on the site to the east of Langham Road allotted in the Blakeney Neighbourhood Plan due I understand to the infrastructure cost required.</p> <p>2 - the positioning of the site adjacent to the existing housing may have the same issues and also those of access to Langham Road. If the site was positioned to the south of Harbour Way in the quadrant of land available (the freeholders may be open to this) , any developer could piggy back the infrastructure with the site to the east of Langham Road killing both birds with one stone.</p> <p>3 - the suggested footpath would not be necessary as access to the village would be by Langham Road (and is closer). In any event , on the current proposal, the footpath should run through Queen's Close which would be materially cheaper and closer to the village centre.</p> <p>4 -note ENV1 and HC2 -the proposed development does not contribute to conservation or enhancement of valued landscapes</p>
Officer Response	Objections noted. No residential sites are allocated in the Blakeney Neighbourhood Plan. No changes to the policy are being suggested or considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC55
Response Date	17/09/2025 12:02:26
Full Name	Mr William Page
Organisation	Pigeon Investment Management Ltd
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 4 - Reasons Not Legally Compliant	SEE ATTACHED FILE

Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	SEE ATTACHED FILE
Attached File (where submitted)	MMC55 - Pigeon Main Modifications Representations - Blakeney.pdf
Officer Summary	<p>This representation confirms that the Site is in single ownership, is not subject to any technical constraints and is suitable, achievable, and available for development within the first 5 years following adoption of the Local Plan. This submission supports the detailed representations provided throughout the Local Plan process.</p> <p>The Site's designation for approximately 30 dwellings, together with public open space and associated infrastructure, provides a proportionate and sustainable contribution to meeting local housing needs while respecting the character of the surrounding area. The site-specific requirements within the policy ensure that development will be sensitively integrated, with careful attention to design, layout, building heights, materials, and landscaping to safeguard the National Landscape, the SSSI, and the amenity of existing residents. These policy requirements are fully supported. Pigeon is fully committed to delivering a landscape and design-led sustainable scheme in accordance with the requirements of Policy BLA01/B and the wider Local Plan. The proposals will respect the local character and landscape, carefully integrating new homes with the existing built form and enhancing natural features. A safe and convenient access will be provided, along with highways improvements which support sustainable travel. The deliverability of the Site is further demonstrated by the recent submission of a comprehensive pre-application advice request (ref. PRE4/25/1723). This submission included a suite of supporting documents such as an Initial Sketch Layout, Illustrative Views, a Landscape Technical Note, Shadow Habitat Regulations Assessment, Ecology Assessment, and a Biodiversity Net Gain Statement. Requests for pre-application advice have also been submitted to the Lead Local Flood Authority and Highways Authority. An outline planning application will be submitted shortly following the pre-application process, ensuring that homes, including much-needed affordable housing, can be delivered in the early years of the Plan period.</p> <p>For these reasons the inclusion of Policy BLA01/B within the Main Modifications is supported. The allocation is justified, effective and deliverable, and its retention will ensure the Local Plan provides a sound framework for growth in North Norfolk.</p>
Officer Response	Comments and support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC98
Response Date	04/09/2025 10:26:00
Full Name	Tracey Bayfield
Organisation	Blakeney Parish Council
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective	

* Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>a) Blakeney Doctors Surgery – this facility no longer exists, further reducing local healthcare provision.</p> <p>b) Sewage system – there is significant concern as to whether the current sewage system can cope with additional demand.</p> <p>c) Sustainability of development – we struggle to understand how the village can sustain further development without major investment in infrastructure and services.</p> <p>d) Scale of proposed development – we feel that the village cannot reasonably cope with a further 60 properties unless there is investment in infrastructure and essential services.</p> <p>e) Housing mix – the Plan must ensure a housing mix that genuinely meets the needs of the locality and its residents.</p> <p>f) Affordability – if additional housing is to be delivered, it must be genuinely affordable and prioritised for local people.</p> <p>g) Neighbourhood Plan – the adopted Blakeney Neighbourhood Plan must be adhered to in full.</p>
Attached File (where submitted)	
Officer Summary	<p>a) Blakeney Doctors Surgery – this facility no longer exists, further reducing local healthcare provision.</p> <p>b) Sewage system – there is significant concern as to whether the current sewage system can cope with additional demand.</p> <p>c) Sustainability of development – we struggle to understand how the village can sustain further development without major investment in infrastructure and services.</p> <p>d) Scale of proposed development – we feel that the village cannot reasonably cope with a further 60 properties unless there is investment in infrastructure and essential services.</p> <p>e) Housing mix – the Plan must ensure a housing mix that genuinely meets the needs of the locality and its residents.</p> <p>f) Affordability – if additional housing is to be delivered, it must be genuinely affordable and prioritised for local people.</p> <p>g) Neighbourhood Plan – the adopted Blakeney Neighbourhood Plan must be adhered to in full.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent examination in public and set out in various evidence documents in the Local Plan examination library. The site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested or considered necessary. The Council acknowledge that the site should come forward in accordance with the policies set out in the Local Plan and the Neighbourhood Plan.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC141
Response Date	13/09/2025 17:12:00
Full Name	Cllr Victoria Holliday
Organisation	Member for Coastal Ward (NNDC)
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified

Question 7 - Explanation of Soundness Reasons	<p>Object</p> <p>This site is 300m from the North Norfolk SAC/ SPA/ RAMSAR. Development on the northern part of the site will be closer to these protected landscapes and therefore have more impact, especially with the pedestrian access. Identified risks to the protected landscapes from development on this site listed in the Habitats Regulations assessment are cat predation, invasive species spread, fire risk and light pollution. There is no mention of the more likely recreational pressure by increased footfall or dog activity.</p> <p>Development on the northern part of the site will be more visible in long views across the Norfolk Coastal National Landscape. There will be more impact on the special qualities of the National Landscape - tranquillity, wildness, dark skies.</p> <p>There is no footpath on the MORSTON Rd to receive the pedestrian traffic from the development. Anglian Water advises that upgrades to the local foul water drainage network may be required - has the waste water treatment works sufficient headroom? What mitigation is proposed for the scheduled monument, two bowl barrows, and for the increased recreational impact on WIVETON Downs SSI?</p> <p>Conserving, protecting and enhancing the Norfolk National Landscape is enshrined in the NPPF. In the Norfolk Coast AONB Management Plan (updated 2022) of the seven Key Qualities of Natural Beauty, 5 are rated as amber (ie some grounds for concern) and only 2 as green (ie the key quality is being conserved and enhanced). This development will jeopardise any improvement in ratings.</p>
Attached File (where submitted)	
Officer Summary	<p>Object</p> <p>This site is 300m from the North Norfolk SAC/ SPA/ RAMSAR. Development on the northern part of the site will be closer to these protected landscapes and therefore have more impact, especially with the pedestrian access. Identified risks to the protected landscapes from development on this site listed in the Habitats Regulations assessment are cat predation, invasive species spread, fire risk and light pollution. There is no mention of the more likely recreational pressure by increased footfall or dog activity.</p> <p>Development on the northern part of the site will be more visible in long views across the Norfolk Coastal National Landscape. There will be more impact on the special qualities of the National Landscape - tranquillity, wildness, dark skies.</p> <p>There is no footpath on the MORSTON Rd to receive the pedestrian traffic from the development. Anglian Water advises that upgrades to the local foul water drainage network may be required - has the waste water treatment works sufficient headroom? What mitigation is proposed for the scheduled monument, two bowl barrows, and for the increased recreational impact on WIVETON Downs SSI?</p> <p>Conserving, protecting and enhancing the Norfolk National Landscape is enshrined in the NPPF. In the Norfolk Coast AONB Management Plan (updated 2022) of the seven Key Qualities of Natural Beauty, 5 are rated as amber (ie some grounds for concern) and only 2 as green (ie the key quality is being conserved and enhanced). This development will jeopardise any improvement in ratings.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested. Both Anglian Water and Historic England, in addition to internal Council specialists were all consulted on throughout the Local Plan process and relevant mitigation has been identified. The development is purposefully located to the north-east, with extensive landscaping to the south to minimise the site's impacts on the setting of nearby heritage assets, this is in conjunction with other requirements set out in the policy.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC175
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure	Yes (Support)

* General Comment	
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	MM58 Residential: Land West of Langham Road Policy BLA01/B <p>Natural England is concerned about the potential development due to the proximity to Wiveton Downs SSSI and impacts from increased recreational disturbance. We support provision in the policy for the submission and approval of an impact assessment in relation to local recreational pressures on Wiveton Downs SSSI, and the enhancement of existing natural boundaries to mitigate the impact on its setting. We also support the provision of multifunctional open space on site to alleviate recreational disturbance to nearby designated sites.</p>
Attached File (where submitted)	
Officer Summary	<p>Natural England is concerned about the potential development due to the proximity to Wiveton Downs SSSI and impacts from increased recreational disturbance. We support provision in the policy for the submission and approval of an impact assessment in relation to local recreational pressures on Wiveton Downs SSSI, and the enhancement of existing natural boundaries to mitigate the impact on its setting. We also support the provision of multifunctional open space on site to alleviate recreational disturbance to nearby designated sites.</p>
Officer Response	<p>Comments and support noted. An impact assessment is required in relation to local recreational pressures on Wiveton Downs SSSI. Development will need to provide effective mitigation which includes the enhancement of existing natural boundaries to mitigate the impact on its setting. This main modification addresses previous comments from NE at the further Consultation and EIP stages.</p>
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC188
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>We welcome the reference to the scheduled monument (bowl barrows) in the new supporting text. We welcome criterion 8 of the new policy which refers to the bowl barrows.</p>
Attached File (where submitted)	
Officer Summary	<p>We welcome the reference to the scheduled monument (bowl barrows) in the new supporting text. We welcome criterion 8 of the new policy which refers to the bowl barrows.</p>
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications	Main Modifications

* Policy Map Changes	
Question 2 - Modification Reference	MM58
ID	MMC232
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks.</p> <p>Anglian Water supports the policy clauses 9 and 10 which require the submission, approval and implementation of a Surface Water Management Plan and Foul Drainage Strategy. We welcome our suggested amendment to clause 10.</p>
Attached File (where submitted)	
Officer Summary	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks.</p> <p>Anglian Water supports the policy clauses 9 and 10 which require the submission, approval and implementation of a Surface Water Management Plan and Foul Drainage Strategy. We welcome our suggested amendment to clause 10.</p>
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC262
Response Date	17/09/2025 21:19:00
Full Name	Peter Arbuthnot
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)

Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>However, I am VERY uneasy about the possibility of development occurring on what is sometimes known as the Oddfellows Field (that is the current farmland immediately to the SOUTH of the A.149 (Morston Road) and to the WEST of the Langham Road (that leads southwards from the centre of Blakeney).</p> <p>Blakeney is too pretty a village to be converted unnecessarily into a 'small town'....it is well-known around Britain for its coastal attraction & charm...this should NOT BE LOST, please ? We do NOT NEED THIS....</p> <p>This field (if developed into housing-stock) would be very visible from the well-walked coastal path by 000's of visitors and would undoubtedly be detrimental overall to Blakeney's relatively-unspoilt profile.</p> <p>This field is immediately adjacent (slightly to the east of) the geologically very important Blakeney Downs</p> <p>This field would have (if the development were to proceed) far too much water & sewage infrastructure required for our current village system to cope ? Storm-flooding (= to the immediate north of any building development) would be unavoidable, I fear ?</p> <p>The inevitable street-lighting required in such a development would be a distinct light-pollutant AND interfere with nocturnal wildlife in the immediate area. Noise might well also become an issue ?</p> <p>Assuming that more young people would be occupying any such new housing = it is located too far from the local school and shops, requiring an increase in wholly unnecessary vehicle traffic ? Access by vehicles or pedestrians onto the A.149 could be VERY dangerous ? Accidents WILL HAPPEN....</p> <p>The current very poor state of the housing market would mean that such a housing-development (although allegedly desired & being steam-rollered through by Central Government) might NOT be at all easy to sell = many of such new houses may well then become virtually UNSALEABLE (but once-built the current agricultural land usage has gone for ever)</p> <p>Please can you kindly register this e-mail as an 'OBJECTION' to whatever you are considering doing with that field immediately to the SOUTH of A.149 (& slightly to the southeast of Bliss Blakeney). I can understand that you may not regard this as the 'correct' procedure for 'registering an official objection' but I would be grateful if you can be a little flexible in accepting that (as an immediate neighbour) I am VERY CLEARLY OBJECTING to any development of any housing on that lovely field.</p> <p>I would be grateful of your concern in protecting the traditional charm of Blakeney by dropping this idea, please ?</p>
Attached File (where submitted)	
Officer Summary	<p>Blakeney is too pretty a village to be converted unnecessarily into a 'small town'....it is well-known around Britain for its coastal attraction & charm...this should NOT BE LOST, please ? We do NOT NEED THIS....</p> <p>This field (if developed into housing-stock) would be very visible from the well-walked coastal path by 000's of visitors and would undoubtedly be detrimental overall to Blakeney's relatively-unspoilt profile.</p> <p>This field is immediately adjacent (slightly to the east of) the geologically very important Blakeney Downs</p> <p>This field would have (if the development were to proceed) far too much water & sewage infrastructure required for our current village system to cope ? Storm-flooding (= to the immediate north of any building development) would be unavoidable, I fear ?</p> <p>The inevitable street-lighting required in such a development would be a distinct light-pollutant AND interfere with nocturnal wildlife in the immediate area. Noise might well also become an issue ?</p> <p>Assuming that more young people would be occupying any such new housing = it is located too far from the local school and shops, requiring an increase in wholly unnecessary vehicle traffic ? Access by vehicles or pedestrians onto the A.149 could be VERY dangerous ? Accidents WILL HAPPEN....</p> <p>The current very poor state of the housing market would mean that such a housing-development (although allegedly desired & being steam-rollered through by Central Government) might NOT be at all easy to sell = many of such new houses may well then become virtually UNSALEABLE (but once-built the current agricultural land usage has gone for ever)</p> <p>Please can you kindly register this e-mail as an 'OBJECTION' to whatever you are considering doing with that field immediately to the SOUTH of A.149 (& slightly to the southeast of Bliss Blakeney). I can understand that you may not regard this as the 'correct' procedure for 'registering an official objection' but I would be grateful if you can be a little flexible in accepting that (as an immediate neighbour) I am VERY CLEARLY OBJECTING to any development of any housing on that lovely field.</p>
Officer Response	<p>Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested.</p>

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM58
ID	MMC266
Response Date	17/09/2025 21:23:00
Full Name	Mrs Yvonne Tyndall
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	I want to object to the proposals BLA04/A and BLA01/B. Blakeney should NOT be classed as a development village as it no longer has a surgery. An application has already been submitted for affordable housing further down Langham Road and, in my opinion, further development is not required and will spoil the character of the village. The most recent development of Harbour Way consists mainly of second homes rather than permanent residences and there is a considerable amount of property on the market at present and that looks unlikely to change. Added to that, is the lack of infrastructure to support new housing. A good example of this is at Heacham where fishing for shellfish has been banned because of polluted coastal waters. This is completely unacceptable and demonstrates a serious over development of the locality.
Attached File (where submitted)	
Officer Summary	I want to object to the proposals BLA04/A and BLA01/B. Blakeney should NOT be classed as a development village as it no longer has a surgery. An application has already been submitted for affordable housing further down Langham Road and, in my opinion, further development is not required and will spoil the character of the village. The most recent development of Harbour Way consists mainly of second homes rather than permanent residences and there is a considerable amount of property on the market at present and that looks unlikely to change. Added to that, is the lack of infrastructure to support new housing. A good example of this is at Heacham where fishing for shellfish has been banned because of polluted coastal waters. This is completely unacceptable and demonstrates a serious over development of the locality.
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested.

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM59
ID	MMC99
Response Date	04/09/2025 10:26:00
Full Name	Tracey Bayfield
Organisation	Blakeney Parish Council
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>a) Blakeney Doctors Surgery – this facility no longer exists, further reducing local healthcare provision.</p> <p>b) Sewage system – there is significant concern as to whether the current sewage system can cope with additional demand.</p> <p>c) Sustainability of development – we struggle to understand how the village can sustain further development without major investment in infrastructure and services.</p> <p>d) Scale of proposed development – we feel that the village cannot reasonably cope with a further 60 properties unless there is investment in infrastructure and essential services.</p> <p>e) Housing mix – the Plan must ensure a housing mix that genuinely meets the needs of the locality and its residents.</p> <p>f) Affordability – if additional housing is to be delivered, it must be genuinely affordable and prioritised for local people.</p> <p>g) Neighbourhood Plan – the adopted Blakeney Neighbourhood Plan must be adhered to in full.</p>
Attached File (where submitted)	
Officer Summary	<p>a) Blakeney Doctors Surgery – this facility no longer exists, further reducing local healthcare provision.</p> <p>b) Sewage system – there is significant concern as to whether the current sewage system can cope with additional demand.</p> <p>c) Sustainability of development – we struggle to understand how the village can sustain further development without major investment in infrastructure and services.</p> <p>d) Scale of proposed development – we feel that the village cannot reasonably cope with a further 60 properties unless there is investment in infrastructure and essential services.</p> <p>e) Housing mix – the Plan must ensure a housing mix that genuinely meets the needs of the locality and its residents.</p> <p>f) Affordability – if additional housing is to be delivered, it must be genuinely affordable and prioritised for local people.</p> <p>g) Neighbourhood Plan – the adopted Blakeney Neighbourhood Plan must be adhered to in full.</p>
Officer Response	Objections noted. These matters were fully considered during the recent examination in public, and set out in various evidence documents in the Local Plan examination library. The site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested or considered necessary. The Council acknowledges that the site should come forward in accordance with the policies set out in the Local Plan and the Neighbourhood Plan.
Question 1 - Document Selection	Main Modifications

* Main Modifications * Policy Map Changes	
Question 2 - Modification Reference	MM59
ID	MMC267
Response Date	17/09/2025 21:23:00
Full Name	Mrs Yvonne Tyndall
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	I want to object to the proposals BLA04/A and BLA01/B. Blakeney should NOT be classed as a development village as it no longer has a surgery. An application has already been submitted for affordable housing further down Langham Road and, in my opinion, further development is not required and will spoil the character of the village. The most recent development of Harbour Way consists mainly of second homes rather than permanent residences and there is a considerable amount of property on the market at present and that looks unlikely to change. Added to that, is the lack of infrastructure to support new housing. A good example of this is at Heacham where fishing for shellfish has been banned because of polluted coastal waters. This is completely unacceptable and demonstrates a serious over development of the locality.
Attached File (where submitted)	
Officer Summary	I want to object to the proposals BLA04/A and BLA01/B. Blakeney should NOT be classed as a development village as it no longer has a surgery. An application has already been submitted for affordable housing further down Langham Road and, in my opinion, further development is not required and will spoil the character of the village. The most recent development of Harbour Way consists mainly of second homes rather than permanent residences and there is a considerable amount of property on the market at present and that looks unlikely to change. Added to that, is the lack of infrastructure to support new housing. A good example of this is at Heacham where fishing for shellfish has been banned because of polluted coastal waters. This is completely unacceptable and demonstrates a serious over development of the locality.
Officer Response	Objections noted. These matters were fully considered during the recent EiP, and set out in various evidence documents in the Local Plan examination library, the site-specific policy includes requirements approved by relevant consultees to mitigate the issues mentioned. No changes to the policy are being suggested.

MM61

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM61
ID	MMC100
Response Date	05/09/2025 10:33:36
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>We recommend the addition of a point around the requirement for a a Surface Water Management Plan to include the use of Sustainable Urban Drainage Systems (SUDS). Gutter-fed ponds and other larger drainage systems installed in gardens and on streets can help buffer the effects of flooding and provide habitat for wildlife. The NPPF, supported by national standards for SuDS, promotes their mandatory use in new developments in England to help reduce flood risk and pollution.</p> <p>This allocation has the potential to create a barrier to wildlife movement north and south of the settlement, which would have long term impacts on the viability of populations, in particular amphibians given the large number of ponds identifiable from aerial photography of the area. We support the inclusion of clause 5 which states a requirement to provide landscaping and wildlife links through the site to minimise any impacts. We support the text in point 8 stating a requirement for the retention of existing hedgerows along the southern boundary but recommend that this be extended to apply to all existing hedgerows and trees within the site.</p>
Attached File (where submitted)	
Officer Summary	<p>We recommend the addition of a point around the requirement for a a Surface Water Management Plan to include the use of Sustainable Urban Drainage Systems (SUDS). Gutter-fed ponds and other larger drainage systems installed in gardens and on streets can help buffer the effects of flooding and provide habitat for wildlife. The NPPF, supported by national standards for SuDS, promotes their mandatory use in new developments in England to help reduce flood risk and pollution.</p> <p>This allocation has the potential to create a barrier to wildlife movement north and south of the settlement, which would have long term impacts on the viability of populations, in particular amphibians given the large number of ponds identifiable from aerial photography of the area. We support the inclusion of clause 5 which states a requirement to provide landscaping and wildlife links through the site to minimise any impacts. We support the text in point 8 stating a requirement for the retention of existing hedgerows along the southern boundary but recommend that this be extended to apply to all existing hedgerows and trees within the site.</p>
Officer Response	Comments noted. Proposed change is not required for the soundness of the Local Plan, the policy criterion allows flexibility in how the surface water management plan can be undertaken and through this plan, and in consultation with relevant consultees, mitigation can be identified.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM61
ID	MMC189
Response Date	16/09/2025 13:44:00

Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>We note that the new text for this site (para 19.2.4 refers to Potential impacts on heritage assets to the east. As set out in our hearing statement, reference to the heritage assets would be more appropriate for site (BRI01) Land East of Astley Primary School in paragraph 19.1.3 which is closer to the heritage assets.</p> <p>Suggested change</p> <p>Move reference to 'Potential impacts on heritage assets to the east' from paragraph 19.2.4 to paragraph 19.1.3.</p>
Attached File (where submitted)	
Officer Summary	<p>We note that the new text for this site (para 19.2.4 refers to Potential impacts on heritage assets to the east. As set out in our hearing statement, reference to the heritage assets would be more appropriate for site (BRI01) Land East of Astley Primary School in paragraph 19.1.3 which is closer to the heritage assets.</p> <p>Suggested change</p> <p>Move reference to 'Potential impacts on heritage assets to the east' from paragraph 19.2.4 to paragraph 19.1.3.</p>
Officer Response	Comments noted. It is considered the suggest change could help ensure effectiveness of both site allocations in Briston.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM61
ID	MMC233
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object)	Yes (Support)

* *	No Comment / Unsure General Comment	
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified		
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks, and protection of existing assets within the site.</p> <p>Anglian Water supports the policy clause 6 which requires the submission, approval and implementation of a Foul Drainage Strategy. We welcome our suggested amendment to clause 6.</p>	
Attached File (where submitted)		
Officer Summary	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks, and protection of existing assets within the site.</p> <p>Anglian Water supports the policy clause 6 which requires the submission, approval and implementation of a Foul Drainage Strategy. We welcome our suggested amendment to clause 6.</p>	
Officer Response	Support noted.	

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM62
ID	MMC12
Response Date	07/08/2025 10:27:46
Full Name	Paul Booty
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Justified Effective Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>Since the consultation meeting an application for planning on Catfield Road has been received. That would mean a total of over 80 new homes if the School Lane field development were to expand as proposed. The village resources simply could not cope. All the points raised at the consultation stage (School/Doctor/Traffic etc.) have been exacerbated as a result of the new planning application on Catfield road and are therefore repeated here for sake of completeness.</p> <p>It is known that the proposed development creates a potential flood risk to neighbouring land. The existing development has, as part of its permissions, obligations to mitigate the issue. The question has to be, will it be enough? Already the developer and, vicariously, the local authority risk litigation and substantial damages awards against them (see below). Should this proposed development go ahead the same issues arise in respect of the neighbouring land of Willow Way and Pykes Nursey. The developers are liable at common law for any nuisance that is created on neighbouring land, and that includes flooding. If the current or even the proposed expansion alters the drainage to cause flooding then the developers could be liable for substantial damages. The applicable test is from the High Court case of Partakis-Stevens v Silhan where developers were ordered to pay damages for nuisance (flooding).</p> <p>In addition the Flood and Water Management Act 2010 creates obligations and responsibilities on Landowners/Developers and Local Authorities.</p> <p>So it is quite clear that the developers have legal liability in both common law and by statute. It would follow therefore that if any local authority, knowing of such a risk – which you do – granted planning to a developer where such liability arose, then that local authority could be held vicariously liable for failing in its statutory duty and/or being complicit in allowing the nuisance and or breach of statute. I ask simply if the local authority have taken legal advice and/or insurance to cover the cost of defending an action for nuisance and breach of statute that would arise should the flooding situation change in Ludham be it Willow Way, Pykes Nursery or further a field, say Horsefen Road, as a result of this development.</p>
Attached File (where submitted)	
Officer Summary	<p>It is known that the proposed development creates a potential flood risk to neighbouring land. The existing development has, as part of its permissions, obligations to mitigate the issue. The question has to be, will it be enough? Already the developer and, vicariously, the local authority risk litigation and substantial damages awards against them (see below). Should this proposed development go ahead the same issues arise in respect of the neighbouring land of Willow Way and Pykes Nursery.</p> <p>I ask simply if the local authority have taken legal advice and/or insurance to cover the cost of defending an action for nuisance and breach of statute that would arise should the flooding situation change in Ludham be it Willow Way, Pykes Nursery or further a field, say Horsefen Road, as a result of this development.</p>

Officer Response	Objection noted. This response does not relate to a specific main modification or policy map change. No change is considered necessary. Local Plan process included consultation with relevant statutory consultees such as Anglian Water and the environment agency.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM62
ID	MMC20
Response Date	13/08/2025 11:10:24
Full Name	Joanne Read
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared Justified Effective Consistent with national policy
Question 7 - Explanation of Soundness Reasons	<p>This applies to legal as well.</p> <p>The junction with Norwich Road crosses flood zone 2. As the plan indicates no development on flood zone 2, how is the access road to be built? It is after all a development of a Road. Also this aces is only 1 bungalow away from the junction with pikes nursery therefore it is dangerous. By linking this road will willow way you are creating a rat run through willow way. This will cause real issues for the school, the residents of willow way and the amount of traffic using the Norwich Road junction.</p> <p>Anglia Water in the constraints section state no development until the water system upgrades are complete. This relates to their drains and systems beyond the development. Notwithstanding your comments in section 6, which is contrary to Anglian Water, please confirm no development will start until A/W have completed the off site work.</p> <p>lastly the right of way is not disused, merely blocked at the south eastern end by the developers allowing the exit to become overgrown in a wholly illegal act which you cannot condone in this way.</p>
Attached File (where submitted)	
Officer Summary	<p>The junction with Norwich Road crosses flood zone 2. As the plan indicates no development on flood zone 2, how is the access road to be built? It is after all a development of a Road. Also this aces is only 1 bungalow away from the junction with pikes nursery therefore it is dangerous. By linking this road will willow way you are creating a rat run through willow way. This will cause real issues for the school, the residents of willow way and the amount of traffic using the Norwich Road junction.</p> <p>Anglia Water in the constraints section state no development until the water system upgrades are complete. This relates to their drains and systems beyond the development. Notwithstanding your comments in section 6, which is contrary to Anglian Water, please confirm no development will start until A/W have completed the off site work.</p> <p>lastly the right of way is not disused, merely blocked at the south eastern end by the developers allowing the exit to become overgrown in a wholly illegal act which you cannot condone in this way.</p>
Officer Response	Objections noted. These matters were fully considered during the recent examination in Public, and set out in various evidence documents in the Local Plan examination library. The policy does not include a requirement to connect Norwich Road to Willow Way. Anglian Water have been consulted throughout the process and mitigation identified. The ROW is currently inaccessible and will be brought into use through the policy requirements.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications

Question 2 - Modification Reference	MM62
ID	MMC101
Response Date	05/09/2025 10:35:09
Full Name	Dr Sarah Eglington
Organisation	Norfolk Wildlife Trust
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Consistent with national policy
Question 7 - Explanation of Soundness Reasons	We recommend the inclusion of additional bullet points to ensure that existing hedgerows and trees are retained and enhanced. We also recommend the addition of a point around the requirement for a Surface Water Management Plan to include the use of Sustainable Urban Drainage Systems (SUDS). Gutter-fed ponds and other larger drainage systems installed in gardens and on streets can help buffer the effects of flooding and provide habitat for wildlife. The NPPF, supported by national standards for SuDS, promotes their mandatory use in new developments in England to help reduce flood risk and pollution
Attached File (where submitted)	
Officer Summary	We recommend the inclusion of additional bullet points to ensure that existing hedgerows and trees are retained and enhanced. We also recommend the addition of a point around the requirement for a Surface Water Management Plan to include the use of Sustainable Urban Drainage Systems (SUDS). Gutter-fed ponds and other larger drainage systems installed in gardens and on streets can help buffer the effects of flooding and provide habitat for wildlife. The NPPF, supported by national standards for SuDS, promotes their mandatory use in new developments in England to help reduce flood risk and pollution
Officer Response	Comments noted. Proposed changes are not required for the soundness of the Local Plan, the policy criterion allows flexibility in how the surface water management plan can be undertaken and through this plan, and in consultation with relevant consultees, further mitigation can be identified. Requirements already exist in both policies for the retention of existing hedgerow, the mature trees along the southern boundary of BRI02/C will be incorporated into the required landscaping along that edge. Trees located to the north are within the school's boundary and will be retained.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM62
ID	MMC157
Response Date	16/09/2025 08:25:00
Full Name	
Organisation	D L Ritchie Will Trust
Agent Full Name	David Jones
Agent Organisation	Armstrong Rigg Planning
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)

Question 4 - Reasons Not Legally Compliant	The proposed replacement of Policy LUD01/A with Policy LUD01/C has been subject to a sustainability appraisal and appropriate consultation with the community and neighbouring authorities through the Local Plan Further Consultation from November to December 2024.
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>To be considered sound, policies must be positively prepared, justified, effective and consistent with National Policy:</p> <p>a) Positively prepared – The allocation of additional land at Policy LUD01/C is required to meet the areas objectively assessed needs (OAN). Ludham is a Large Growth Village that can sustainably accommodate the level of growth proposed. As set out in previous representations, Ludham was allocated too few dwellings in the submission version of the Local Plan which failed to take account of its sustainability or the need for development to support local facilities and services. This was compounded by the proposed undeliverable allocation of land at Grange Road, Ludham for 15 dwellings that is proposed to be deleted. The allocation of LUD01/C provides a positive strategy for the growth of the village and will help to meet the OAN such that it is positively prepared.</p> <p>b) Justified – The identification of the site as a proposed allocation followed a detailed site assessment process and review of alternative options which demonstrates that the proposed allocation is justified based on proportionate evidence.</p> <p>c) Deliverable – As set out in our previous representations to the Local Plan Further Consultation in December 2024, the site is available for development now, there are no legal constraints that would prevent its development and it is considered suitable for residential development. As such the site should be considered to be deliverable for the proposed use.</p> <p>d) Consistent with National Policy – Our previous representations demonstrate that the proposed allocation would deliver sustainable development in accordance with national policy. Safe vehicular and pedestrian access can be provided. A high-quality landscape scheme is proposed that would pay careful attention to retaining views towards the Grade I Listed St Catherine's Church and would provide high-quality public open space. The proposal can be sustainably drained and is acceptable in Flood Risk terms and it would be subject to a project level Habitats Regulations Assessment to ensure no adverse on the integrity of protected sites.</p> <p>In summary, the proposed allocation is considered to be positively prepared, justified, deliverable and consistent with national policy. It is therefore sound against the test set by NPPF paragraph 36.</p>
Attached File (where submitted)	
Officer Summary	<p>To be considered sound, policies must be positively prepared, justified, effective and consistent with National Policy:</p> <p>a) Positively prepared – The allocation of additional land at Policy LUD01/C is required to meet the areas objectively assessed needs (OAN). Ludham is a Large Growth Village that can sustainably accommodate the level of growth proposed. As set out in previous representations, Ludham was allocated too few dwellings in the submission version of the Local Plan which failed to take account of its sustainability or the need for development to support local facilities and services. This was compounded by the proposed undeliverable allocation of land at Grange Road, Ludham for 15 dwellings that is proposed to be deleted. The allocation of LUD01/C provides a positive strategy for the growth of the village and will help to meet the OAN such that it is positively prepared.</p> <p>b) Justified – The identification of the site as a proposed allocation followed a detailed site assessment process and review of alternative options which demonstrates that the proposed allocation is justified based on proportionate evidence.</p> <p>c) Deliverable – As set out in our previous representations to the Local Plan Further Consultation in December 2024, the site is available for development now, there are no legal constraints that would prevent its development and it is considered suitable for residential development. As such the site should be considered to be deliverable for the proposed use.</p> <p>d) Consistent with National Policy – Our previous representations demonstrate that the proposed allocation would deliver sustainable development in accordance with national policy. Safe vehicular and pedestrian access can be provided. A high-quality landscape scheme is proposed that would pay careful attention to retaining views towards the Grade I Listed St Catherine's Church and would provide high-quality public open space. The proposal can be sustainably drained and is acceptable in Flood Risk terms and it would be subject to a project level Habitats Regulations Assessment to ensure no adverse on the integrity of protected sites.</p> <p>In summary, the proposed allocation is considered to be positively prepared, justified, deliverable and consistent with national policy. It is therefore sound against the test set by NPPF paragraph 36.</p>
Officer Response	Comments and support noted.
Question 1 - Document Selection	Main Modifications

* Main Modifications * Policy Map Changes	
Question 2 - Modification Reference	MM62
ID	MMC190
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome reference to views of St Catherine's church in the supporting text. We welcome criterion 4 relating to open space and views of St Catherines Church.
Attached File (where submitted)	
Officer Summary	We welcome reference to views of St Catherine's church in the supporting text. We welcome criterion 4 relating to open space and views of St Catherines Church.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM62
ID	MMC234
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective	

* *	Consistent with national policy Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks, and protection of existing assets within the site.</p> <p>Anglian Water supports the policy clauses 7 and 8 which require off-site mains reinforcement, and the submission, approval and implementation of a Foul Drainage Strategy. We welcome our suggested amendment to clause 8.</p> <p>Whilst we support policy clause 11, to safeguard our existing underground asset within the site boundary, we recommend that the wording is amended to read:</p> <p>11. Submission of details to demonstrate the safeguarding of suitable access for the maintenance of wastewater supply infrastructure;</p>	
Attached File (where submitted)		
Officer Summary	<p>Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks, and protection of existing assets within the site.</p> <p>Anglian Water supports the policy clauses 7 and 8 which require off-site mains reinforcement, and the submission, approval and implementation of a Foul Drainage Strategy. We welcome our suggested amendment to clause 8.</p> <p>Whilst we support policy clause 11, to safeguard our existing underground asset within the site boundary, we recommend that the wording is amended to read:</p> <p>11. Submission of details to demonstrate the safeguarding of suitable access for the maintenance of wastewater supply infrastructure;</p>	
Officer Response	Comments and support noted. Proposed change could be considered an effective additional modification for the purposes of clarity and consistency with Anglian Water.	

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM64
ID	MMC176
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	MM64 Residential: Land off Cromer Road & Church Lane Policy MUN03/A The proposed site is close to the Wash SPA and Southern North Sea SAC, Sidestrand and Trimingham Cliff and Mundesley Cliff SSSIs. A project level HRA may be required at the planning application stage in addition to the GIRAMS payment and an impact assessment may be required for Sidestrand and Trimingham Cliff and Mundesley Cliff SSSI's.
Attached File (where submitted)	
Officer Summary	The proposed site is close to the Wash SPA and Southern North Sea SAC, Sidestrand and Trimingham Cliff and Mundesley Cliff SSSIs. A project level HRA may be required at the planning application stage in addition to the GIRAMS payment and an impact assessment may be required for Sidestrand and Trimingham Cliff and Mundesley Cliff SSSI's.
Officer Response	Comments noted. As stated, this requirement may be expected at the application stage, therefore the Council do not consider it necessary to amend the site-specific policy as it will be for the application to determine if this requirement is needed.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM64
ID	MMC191
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	

Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome reference to The Conservation Area and listed church. We welcome reference to heritage views and the Conservation Area and listed church in criterion 1.
Attached File (where submitted)	
Officer Summary	We welcome reference to The Conservation Area and listed church. We welcome reference to heritage views and the Conservation Area and listed church in criterion 1.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM64
ID	MMC235
Response Date	17/09/2025 08:38:00
Full Name	Tessa Saunders
Organisation	Anglian Water
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks. Anglian Water supports the policy clauses 7 and 8 which require the submission, approval and implementation of a Surface Water Management Plan and Foul Drainage Strategy. We welcome our suggested amendment to clause 8.
Attached File (where submitted)	
Officer Summary	Anglian Water welcomes the reference in the supporting text to ensure developers engage with us at an early stage in respect of connections to our water and wastewater networks. Anglian Water supports the policy clauses 7 and 8 which require the submission, approval and implementation of a Surface Water Management Plan and Foul Drainage Strategy. We welcome our suggested amendment to clause 8.
Officer Response	Support noted.

MM65

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM65
ID	MMC192
Response Date	16/09/2025 13:44:00
Full Name	Mrs Debbie Mack
Organisation	Historic England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	We welcome the addition of criterion 6 which refers to the scheduled monuments.
Attached File (where submitted)	
Officer Summary	We welcome the addition of criterion 6 which refers to the scheduled monuments.
Officer Response	Support noted.

MM66

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	MM66
ID	MMC129
Response Date	12/09/2025 15:23:23
Full Name	Mr T Brannstrom
Organisation	
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Positively prepared
Question 7 - Explanation of Soundness Reasons	Change references to 2024-2040 to 2026-2040 in order to align on adoption date. Text in MM66 refers to Table 9 while at the same deleting Table 9: clarification needed.
Attached File (where submitted)	
Officer Summary	Object. Change references to 2024-2040 to 2026-2040 in order to align on adoption date. Text in MM66 refers to Table 9 while at the same deleting Table 9: clarification needed.
Officer Response	Objection noted. No change is considered necessary. MM66 deletes tables 8 and 9 as shown in section 23 of the Submission Version of the local plan and replaces it with a new table 9: Housing Delivery by source (2023-2040).

General Comments (not specifically related to a Main Modification)

Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	N/A
ID	MMC66
Response Date	07/08/2025 11:03:00
Full Name	Mr Steve Gower
Organisation	Norfolk Constabulary (Designing Out Crime)
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	General Comment
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	General Comment
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	
Attached File (where submitted)	MMC66 - 1) 2025 North Norfolk's Local Plan Consultation.pdf MMC66 - 2) SBD TESTING THIRD PARTY CERTIFICATION EXPLAINED.pdf MMC66 - 3) PCPI_LIGHTING_GUIDE_web (1).pdf
Officer Summary	<p>Thank you for your e-mail inviting comments on the above matter. I have also forwarded your request to the Constabularies Head of Estates (Mr. Duncan Potter) for his thoughts. Norfolk Constabulary provides Designing Out Crime Officers to assist in the planning process and to offer advice in relation to the layout, environmental design and the physical security of buildings, based upon the established principles of 'Crime Prevention through Environmental Design'. The police service places great importance upon the need to build sustainable and inclusive communities and to raise awareness of the significant impact that low crime makes to the ongoing and long-term sustainability of well-designed buildings. Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that the Secured by Design Initiative widely supports; however, it is imperative that they must also be safe, secure, and accessible. Mitigating the opportunities for crime is not only about reducing and preventing injury and crime, but it is also about building strong, cohesive, vibrant, and participatory communities.</p> <p>Nationally the Police Service achieves this by joining together and delivering the Secured by Design initiative to deter criminal and anti-social behaviour through the design, layout and specification of buildings and the spaces around and between them, to reduce easy opportunities for crime...</p> <p>I would therefore encourage North Norfolk District Council to consider requesting that all future planning applications work towards achieving the full Association of Chief Police Officers Crime Prevention Initiative Secured by Design Awards. There are Residential, Commercial, and Educational Development Design Guides available from www.securedbydesign.com which explain all the crime reduction elements of these schemes</p>
Officer Response	Comments noted. The representation appears to largely repeat previous commentary which has already been considered through the examination. The comments are more general in nature and do not relate to a specific main modification. No change is considered necessary.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	N/A
ID	MMC67
Response Date	26/08/2025 09:49:00

Full Name	Mr Harry Skinner
Organisation	Environment Agency - Sustainable Places
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	Thank you for the opportunity to provide comments on the Main Modifications to the North Norfolk Local Plan, alongside the addendums to the Habitat Regulations Assessment and Sustainability Appraisal. We have reviewed the modifications alongside the comments we provided in the earlier consultation letter referenced AC/2024/132501/01. We have no further comments to make, and we are satisfied with the approaches taken within the draft document.
Attached File (where submitted)	
Officer Summary	Having review the proposed Main Modifications, Habitat Regulations and Sustainability Appraisal addendums, the Environment Agency are satisfied with the approaches taken within the draft document.
Officer Response	Support noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	N/A
ID	MMC68
Response Date	27/08/2025 10:32:00
Full Name	Nicole Jarmey
Organisation	Great Yarmouth Borough Council Strategic Planning
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	General Comment
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	General Comment
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	

Question 7 - Explanation of Soundness Reasons	
Attached File (where submitted)	MMC68 - Great Yarmouth Borough Council Response.pdf
Officer Summary	Great Yarmouth Borough Council clarifies that they have no further comments to make on the Main Modifications, nor Policy Map Changes.
Officer Response	Noted.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	N/A
ID	MMC111
Response Date	08/08/2025 11:24:00
Full Name	Ms Eleanor Roberts
Organisation	Water Management Alliance
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	General Comment
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	General Comment
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	
Attached File (where submitted)	MMC111 - 20250808 WMA NNLP Response Updated.pdf
Officer Summary	<p>SEE ATTACHED FILE</p> <p>Thank you for consulting the Water Management Alliance on the Proposed Changes to the North Norfolk Local Plan (17). The Parishes included in the Housing Allocation Plan have some lands located within the boundary of the Internal Drainage District (IDD) of the Broads (2006) Internal Drainage Board (IDB) and Norfolk Rivers Internal Drainage Board (IDB). The Board's Byelaws therefore apply to those lands.</p> <p>The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. In order to reduce potential conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the points set out below.</p> <p>Sites within WMA Board IDD – F10 : This allocation site is partially within the Norfolk Rivers IDD, and I note the presence of a Board Adopted watercourse (DRN093G0101 – MN51 Fakenham) adjacent to the southern site boundary, as well as riparian watercourses to the east and west. For any future proposals at this site, please be aware of the following: Surface water disposal, consent requirements etc.</p> <p>A number of sites lie outside (listed in attached) the Norfolk Rivers IDB's IDD, however have the potential to significantly impact the Board's district should a surface water discharge be proposed. We recommend that as each of these sites prepares to apply for planning permission, they ensure their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4 and with the input of the IDB.</p> <p>A further number of sites lie outside (listed in attached) are less likely to negatively impact the IDD. For these sites, we have no initial concerns, however as stated above we would request that the WMA is consulted on any forthcoming planning applications at these sites</p>

Officer Response	This response is an identical repeat of the Water Management Alliance Reg 19 and Further Consultation response with the exception that sites C22/4, NW16, LUD01/C, HV06/A and ST04/A are included in the table as 'Sites outside WMA Board IDD with potential to negatively impact the IDD', and, sites ST19/B and HV01/C are included in the table as 'Sites outside WMA Board IDD less likely to negatively impact the IDD'. Comments noted. No changes to policy required.
Question 1 - Document Selection * Main Modifications * Policy Map Changes	Main Modifications
Question 2 - Modification Reference	N/A
ID	MMC165
Response Date	16/09/2025 12:09:00
Full Name	Gemma Clark
Organisation	Natural England
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	Yes (Support)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	
Question 7 - Explanation of Soundness Reasons	<p>SEE ATTACHED FILE</p> <p>General comments relating to section 2.1, 2.2, 2.3, 3 and 4 of the attached file.</p> <p>2.1 National Landscapes</p> <p>Some of the proposed sites are located in, or close to the boundary of the North Norfolk National Landscape or Broads National Park. These include:</p> <ul style="list-style-type: none"> • MM39 Cromer, Mixed-Use: Land West of Pine Tree Farm, Policy C22/4 • MM46 Hoveton, Land East of Tunstead Road, Policy HV01/C • MM47 Hoveton, Residential: Land at Stalham Road, Policy HV06/A • MM56 Residential: Land at Brumstead Road Policy ST04/A • MM58 Residential: Land West of Langham Road Policy BLA01/B • MM62 Residential: Land South of School Road Policy LUD01/C <p>If these sites come forward then a Landscape Visual Impact Assessment (LVIA), may be required and we would advise to speak to the Norfolk Coast National Landscape Team and Broads Authority for advice on ensuring that special qualities of the designations are not compromised. The need for an LVIA could be incorporated into the summary or policy for the above sites.</p> <p>2.2 Recreational disturbance</p> <p>Natural England supports the references in the proposed site allocation policies for appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).</p> <p>Natural England consider that larger residential developments within the zone of influence of European sites, or some smaller residential developments that are in very close proximity to designated sites, are not able to fully mitigate the adverse impacts on European designated sites with a contribution to GIRAMS alone. Natural England advise that for these developments a project level HRA will be required to assess the impacts of recreational disturbance, and where required, whether the open space / Green Infrastructure of the development is of sufficient quantity and quality to deflect recreational disturbance pressure off nearby designated sites.</p> <p>Some of the site allocation policies above 50 dwellings have included the delivery of multi-functional open space together with measures for its ongoing maintenance. We advise that as a minimum, provisions should typically include:</p> <ul style="list-style-type: none"> • High-quality, informal, semi-natural areas • Circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PRoW)

	<ul style="list-style-type: none"> • Dedicated 'dogs-off-lead' areas • Signage/information leaflets to householders to promote these areas for recreation • Dog waste bins • The long-term maintenance and management of these provisions <p>We also advise that Natural England's Green Infrastructure Standards https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx (of Natural England's Green Infrastructure Framework https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx) are considered when delivering GI, which define what good GI 'looks like' and how to plan it strategically to deliver multiple benefits for people and nature.</p> <p>2.3 Nutrient Neutrality</p> <p>As previously stated, Natural England supports MM9 Policy CC13 Protecting Environmental Quality clause 6 in reference to Nutrient Neutrality.</p> <p>A number of proposed site allocations are within or close to the Nutrient Neutrality catchment. These include:</p> <ul style="list-style-type: none"> • MM39 Cromer, Mixed-Use: Land West of Pine Tree Farm, Policy C22/4 • MM46 Hoveton, Land East of Tunstead Road, Policy HV01/C • MM47 Hoveton, Residential: Land at Stalham Road, Policy HV06/A • MM51 North Walsham, Mixed-Use: Land at End of Mundesley Road, Policy NW16 • MM55 Residential: Land Adjacent Ingham Road, Policy ST19/B • MM56 Residential: Land at Brumstead Road Policy ST04/A • MM61 Residential: Land West of Astley Primary School Policy BRI02/C • MM62 Residential: Land South of School Road Policy LUD01/C <p>As such any application will need to be accompanied with an HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. This could be made more explicit in the site allocation policies or there could be a reference to Policy CC13 clause 6.</p> <p>3. North Norfolk Local Plan HRA Addendum relating to Main Modifications, Examination Library Document Reference MMC03 July 2025, Footprint Ecology</p> <p>Natural England concur with the conclusions of the HRA, that the proposed Main Modifications to the North Norfolk Local Plan will not lead to likely significant effects on Habitats sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA of the North Norfolk Local Plan.</p> <p>4. Addendum to the Sustainability Appraisal Report, Examination Library Document Reference FC006, November 2024</p> <p>Natural England have no further comments to make on the modifications to the SA.</p>
Attached File (where submitted)	MMC165 - 522153 North Norfolk Local Plan Main Modifications and Policy Map Changes.pdf
Officer Summary	<p>Support and comment. Norfolk Coast National Landscape - Some of the proposed sites are located in, or close to the boundary of the North Norfolk National Landscape or Broads National Park where a Landscape Visual Impact Assessment (LVIA) may be required, which could be incorporated into the summary or policy for the relevant sites.</p> <p>Supports the references in the proposed site allocation policies for appropriate contributions towards mitigation measures identified in the Norfolk GIRAMS. NE considers that larger residential developments within the zone of influence of European sites, or some smaller residential developments that are in very close proximity to designated sites, are not able to fully mitigate the adverse impacts on European designated sites with a contribution to GIRAMS alone and advise that a project level HRA will be required for these developments to assess the impacts of recreational disturbance, and where required, whether the open space / Green Infrastructure of the development is of sufficient quantity and quality to deflect recreational disturbance pressure off nearby designated sites.</p> <p>Provides advice about what site allocation policies above 50 dwellings (which have included the delivery of multi-functional open space together with measures for its ongoing maintenance) should typically include as a minimum.</p> <p>Also provides advice to consider the Natural England's Green Infrastructure Standards and Natural England's Green Infrastructure Framework when delivering GI, which define what good GI 'looks like' and how to plan it strategically to deliver multiple benefits for people and nature.</p> <p>Support for MM9 Policy CC13 Protecting Environmental Quality clause 6 in reference to Nutrient Neutrality.</p> <p>A number of proposed site allocations (eight listed) are within or close to the Nutrient Neutrality catchment. As such any application will need to be accompanied with an HRA informed by a Nutrient Neutrality budget calculation and mitigation strategy. This could be made more explicit in the site allocation policies or there could be a reference to Policy CC13 clause 6.</p> <p>Natural England concurs with the conclusions of the North Norfolk Local Plan HRA Addendum relating to Main Modifications in that the proposed Main Modifications to the North Norfolk Local Plan will not lead to likely significant effects on Habitats sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA of the North Norfolk Local Plan.</p> <p>Natural England have no further comments to make on the modifications to the SA contained in the Addendum to the Sustainability Appraisal Report (Main Modifications).</p>
Officer Response	Support and comments noted. The requirements for a LVIA are covered in policies ENV1 (criterion 5) and ENV2 (criterion 5) and would apply to all development proposals, including site allocations. No change considered necessary.
Question 1 - Document Selection	Main Modifications

* Main Modifications * Policy Map Changes	
Question 2 - Modification Reference	N/A
ID	MMC271
Response Date	12/09/2025 10:28:00
Full Name	Miss Natalie Beal
Organisation	Broads Authority
Agent Full Name	
Agent Organisation	
Question 3 - Legal Compliance * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No Comment / Unsure
Question 4 - Reasons Not Legally Compliant	
Question 5 - Soundness * Yes (Support) * No (Object) * No Comment / Unsure * General Comment	No (Object)
Question 6 - Reasons Not Sound * Positively prepared * Justified * Effective * Consistent with national policy * Unsure / Not Specified	Unsure / Not Specified
Question 7 - Explanation of Soundness Reasons	<p>General Comments</p> <p>Policy HC6</p> <p>There are no proposed changes to HC6. This policy covers telecommunications apparatus and infrastructure. These could have an impact on the Broads and its setting. This policy needs to refer to the impact on the Broads and its setting of some schemes. Given the amended LUR Act 2024 which says that the purposes of the Broads should be furthered, the absence of consideration of the impact of telecommunications infrastructure and apparatus on the Broads is not furthering the purposes. We raised this comment in the MIQs: eh016-e-broads-authority-response-to-miqs-matter-10.pdf (https://www.north-norfolk.gov.uk/media/9786/eh016-e-broads-authority-response-to-miqs-matter-10.pdf).</p> <p>Policy CC12</p> <p>The individual policies of the draft NNDC Plan stated that native trees were the order of the day, but the inspector has added 'or appropriate' in every instance. This is probably most significant in clauses 1 and 2 of policy CC 12. In clause 1 "The planting of appropriate native new trees, hedgerows and woodlandwill be encouraged" has been amended to "The planting of suitable native or appropriate new trees, hedgerows and woodland will be encouraged". Perhaps the inspector has made these changes because the Trees, Hedgerows and Woodlands section states in 3.12.2 that "planting of new and appropriate trees and woodland across the district will be positively encouraged". But I would have thought the wording of the actual policy CC 12 should have been given most weight in determining intention. The changes are more significant than they could have been as they create two categories "appropriate native new trees, hedgerows and woodland" becomes "suitable native trees, hedgerows and woodland" or "appropriate new trees, hedgerows and woodland". Not only do these two categories largely overlap, the term 'new' now differentiates them, but to what effect? No criteria are included that might be used to determine if a non-native tree is 'appropriate' (or for that matter if a native tree is 'suitable'). The North Norfolk Landscape Character Assessment repeatedly makes the point that non-native tree species present a risk to native trees and woodland, and also recommends the phased replacement of conifers with native trees. The new wording does not seem to enable these ends. Instead of a strong presumption in favour of native species, there is now in effect no preference expressed for native species. Given that an 'appropriate' non-native tree could mean any tree species, the change to the NNDC policies – 'native trees' becomes in effect 'any trees' - creates a risk of detriment to the Broads, both in terms of the landscape quality visible from the Broads and the risk of invasive species becoming established near, and eventually in, the Broads. There are a number of approaches that would be an improvement. Here are two options:</p> <p>1) Remove 'appropriate' where it has been added to the policies. Remove 'appropriate' from clause 1 of policy of CC12 and remove 'suitable' from clause 2 of policy of CC12. Edit 3.12.2 to read "planting of native new and appropriate trees and woodland across the district will be positively encouraged". This would establish a straightforward unnuanced requirement for all trees to be native.</p> <p>2) Accept the inspector's additions of 'appropriate' and amendments of CC12 (although perhaps with the replacement of 'new' with 'non-native' (thus creating a proper 'or', instead of two significantly overlapped categories)) but add in further text on what 'appropriate' means. Eg.</p>

	<p>Insert in as new clause 3.12.8 – or perhaps in the actual policy CC12 at the end of section 2?:</p> <p>“When deciding if a tree to be planted is appropriate:</p> <p>a) Native species, ideally of local provenance, are strongly preferred due to the benefits to the wildlife that is adapted to them.</p> <p>b) Non-native species should not be planted in rural settings.</p> <p>c) A diverse range of species and genetic diversity is favoured as this will increase resilience to disease and change.</p> <p>d) Tree species or varieties which are climate adapted, particularly resilient to hotter summers and wetter winters, are to be favoured.</p> <p>e) Salt tolerant species such as Whitebeam, Hawthorn and Pedunculate Oak are appropriate on sites close to the sea.</p> <p>f) The tree species should have a mature canopy spread and height that works in its functional setting. For example avoid species with low level branches next to footways and carriageways”.</p> <p>Also edit 3.12.2 to read “planting of new and appropriate trees and woodland across the district will be positively encouraged”.</p> <p>It might also be useful to explain what is meant by native tree.</p>
Attached File (where submitted)	
Officer Summary	<p>Object. Policy HC6. No modifications have been proposed. Reiteration of comment made MIQ Matter 10 response [Eh016e]. This policy needs to refer to the potential impact on the Broads and its setting of some schemes, particularly given the amended LUR Act 2024.</p> <p>Object to proposed modification to Policy CC12. Two options proposed for consideration.</p> <p>1) Remove ‘appropriate’ from clause 1 of policy of CC12 and remove ‘suitable from clause 2. Edit 3.12.2 to read “planting of native new and appropriate trees and woodland across the district will be positively encouraged”. This would establish a straightforward unnuanced requirement for all trees to be native.</p> <p>2) Accept the inspector’s additions of ‘appropriate’ and amendments of CC12 (although perhaps with the replacement of ‘new’ with ‘non-native’ (thus creating a proper ‘or’, instead of two significantly overlapped categories)) but add in further text on what ‘appropriate’ means. Advice provided to explain assessment of when a tree is ‘appropriate.’</p> <p>Explanation of what a native tree is might be useful.</p>
Officer Response	<p>Objections noted. The requested changes are not considered necessary for the following reasons.</p> <p>Policy HC 6 - the comments do not relate to a specific modification. Policy HC6 was considered at EIP and no changes proposed. The Local Plan applies to the North Norfolk district, where the entire suite of policies should be considered as a whole, including Policy ENV 1, which provides the highest degree of protection to the Norfolk Coast National Landscape and The Broads.</p> <p>Policy CC12, the matter was considered at EIP where the wording was agreed, based on evidence of the need to take account of climate change adaptation.</p>