

Wells Neighbourhood
Plan Pre submission version July 2022 Regulation 14 Comments
North Norfolk District Council response September 2022

These comments and advice relate to the formal consultation version of the emerging Draft Wells Neighbourhood Plan published for consultation between 15th July 2022 and 9th September 2022.

Overview

Thank you for the opportunity to comment formally on the emerging Wells Neighbourhood Plan at Regulation 14 stage. Overall the WNP is well presented and it can be seen that much of our previous advice has been incorporated into this consultation version, however there are notable exceptions mainly when it comes to the specific policies and the policy wording, and the presentation of the evidence. A number of key comments are made below and the accompanying schedule of comments provide more detail in relation to each plan section for the steering group and town council to consider in finalising the Plan. We would be pleased to go through these comments with the steering group in more detail and continue to work with the group in order to finalise the neighbourhood plan.

Policies in the WNP will be considered alongside those of the whole Development Plan. The WNP is not a standalone document and as such, there is no requirement or need to have policies on each community suggested area of land use planning and many, if not all, of the policies should be reviewed in light of the existing and emerging Local Plans, when there are policies in existence that are already evidenced, justified and cover many of the issues in greater detail. There is significant concern that the existing (and emerging) local plan policies have been ignored in an attempt to provide NP policies covering the relevant planning matters. Although the NP does reference the emerging local plan in much of the introduction, it is this emerging local plan that will be adopted after the WNP. Consequently, in order to ensure the NP policies are not replaced when the emerging plan is adopted and thereby stay relevant, it does remain necessary to ensure the NP policies also contain a high degree of conformity with the emerging local plan, which is at an advanced stage. A failure to do so will invite risk and reduce the life span of the WNP. A further concern on this area is that some of the policies seem not to be supported by evidence while others are too broad and in places have less detail and considerations than the local plan equivalent which if they were to remain could reduce the influence and application of the development plan in such matters.

WNP policies should detail only further material considerations identified as locally specific and evidenced/justified in each subject matter. There are concerns that the steering group consider that the WNP should include duplication and repetition to demonstrate to the local community that they have responded to local concerns raised during consultation and engagement events. The purpose of the WNP is to focus on what additional local detail it can bring to the decision making process, based and justified on more specific local evidence and to not duplicate strategic policies or water down considerations. Where such policies have been included and specific criteria in others that in many cases have been worded and evidenced in such a way that they will reduce the ability of the Town Council to guide development in the way that they are intended and could reduce the ability of the District Council, as the local planning authority (LPA), to implement and influence proposals. Where such approaches are identified in the WNP, the policy or the criteria in question should be deleted to avoid any misinterpretation / conflict with the strategic policies and it should be made clear in the WNP that the WNP policy is in addition to the national and strategic approach already set out. It is likely that repetition and duplication will be removed at examination and it is better to do this yourselves, so that the steering group fully understand the NP, rather than leave it to further scrutiny and third parties.

NP Policies are a material consideration along with those across the development plan and it is wrong to use language in a NP policy that gives the impression that an application will be 'permitted' solely if the listed criteria in that specific policy is met. Such an approach could also restrict the LPA's ability to apply

the wider development plan to any determination and open up decisions to challenge. A number of policies in the WNP incorrectly do this and where this is the case, they should be changed as detailed below.

Change “permitted” to supported ... or add the following to each phrase for clarity; policy will be permitted subject to the following criteria (as listed) and (add) all other material considerations.

Coupled with the above concerns there appears to be a lack of explanation of the need for many of the policies. This would include appropriate analysis of policy areas in the existing and emerging local plan and areas of the PPG \NPPF. Further analysis by the steering group would show that many of the broad policy positions in the WNP simply repeat the established policies and in places, also conflict with the strategic aims of the Local Plan and bring significant ambiguity. As such, in places the WNP brings little, or no, additional local material considerations for the LPA to consider, which can lead to confusion and questions around the ability of the LPA to apply them in the way that is intended. In fact, many policy areas are broad and considered to provide less material considerations than the wider Development Plan. This consequently weakens the policy positions and ironically could lead to a reduced ability of the community to influence proposals and achieve the objectives of the WNP. Coupled with this, there is a lack of detail in the issues that the neighbourhood plan is trying to address and limited review of the potential alternative options. If the policy is already there or the approach covered in national policy and/or the local plan, such NP policies will only bring confusion and interpretation issues between them and the strategic approaches, as set out in the higher order strategic plan, which collectively will be used with the WNP in any determination. It would be better to explain that the issue is already covered in the strategic plan than to repeat or duplicate a policy, especially when the approach taken potentially weakens the level of policy influence. Any such NP policies should build on the strategic policies to add a further local dimension and only detail the further local considerations and criteria required from a review of the evidence and considerations of the alternative approaches / options available. It appears that it is this local level of analysis that is missing and as such, the Plan is misleading in what it can achieve and/or deliver. It is recommended that a full review of the existing and emerging local plan policy base is undertaken in each area of the WNP and only those areas that bring further localised approaches which are evidenced and justified following a review of all the options, be taken forward into appropriate policies in the final draft WNP and policies areas that bring duplication removed. This would produce a simpler, slimmed down WNP but one much more focused on delivering local considerations and the key objectives.

The evidence for such a review and the evidence used to justify the policies should be documented in separate evidence background/ topic papers. Although there are some standalone evidence documents mainly delivered through third party commissions, there is also some further evidence put forward in this version of the plan in the Appendices. It is considered that these, in the main, are **only partial assessments and contain omissions and consequently, cannot be relied upon to** substantiate the positions and policies put forward. As such, these assessments should be updated to fully reflect the requirements of the National Planning Policy Framework,(NPPF), Planning Practice Guidance, (PPG) and best practice guidance, including the Historic England advice note 7, (local heritage listing) which appears to be quoted in name but the **full assessment criteria has not been applied in practice.** The same is true in relation to the partial assessments of Local Green Space (LGS). NNDC has published a number of background papers and NP guidance documents including those that cover evidence requirements. Specifically, there is a NP guidance document on Local Green Space where there is a full proforma that should be used in any

assessment. In relation to this matter, as will be seen in the below schedule, a number of land areas put forward as LGS are already designated with an open space designation and guidance states that rarely will it be appropriate to designate an area with another such designation. The Council undertook a review of many of the land areas at the request of the town council in the early stages of the Local Plan review and the assessments are also published in the Amenity Green Space study. As such, in addition to the unnecessary duplication of work, many of the potential designations put forward in the WNP are contrary to the published assessments and evidence. Similarly, in the non-designated heritage asset assessment, a number of local assets have not been identified for review and as such, there is concern that it is incomplete. It is strongly recommended to remove such conflict and update the WNP evidence base in relation to these matters.

Overall, the WNP would benefit from a number of further background papers reviewing specific policy areas and fully documenting and updating the supporting evidence, including the existing national and strategic approaches and the available published evidence to inform and justify further local policy criteria. Where necessary these are suggested in the relevant part of the schedule below.

In relation to principal homes and the identification of one community led housing site in the WNP, there are concerns that the approach taken is based on opinion rather than objective analysis of all the options and it is considered that the WNP approach is unlikely to be effective against the WNP aims and objectives. It is likely that demand will be deflected towards existing homes, which are, ironically, often the smaller dwellings and premises that are more suited to local incomes.

The housing market is complicated and it is not established that second homes are the cause or driver of house price inflation in Wells or across the District. House prices have increased significantly in the coastal areas of North Norfolk and indeed across the District and country and continue to do so. It remains difficult to directly attribute any particular concerns such as rising house prices or supply shortages to second homes and holiday lets, given that there are so many other potential factors that could be attributed to these issues.

North Norfolk is highly dependent on tourism, with the sector contributing over £500m to the local economy prior to Covid-19, thus supporting numerous local businesses, employees and residents. Whilst second homes and holiday lets undoubtedly contribute to this figure, it remains difficult to determine whether they provide an overall net gain or loss to the economy and it has not been established in the WNP. It is similarly considered that the impact on communities is difficult to determine, with secondary data suggesting that there are both positive and negative impacts. It is suggested that ultimately residents' concerns must be considered alongside the importance of tourism for the local economy.

Restricting houses to principal homes is likely to have some small impact on market value, but it is unlikely to make them any more affordable to those already in the local community and may affect the ability of some to plan ahead and move to the town as they had intended. The approach could also affect the ability of development to deliver on policy compliant levels of affordable housing and undermine the aim of the District Council to provide more housing for those on lower incomes with a connection to the town. The Council's planning policies support the delivery of affordable housing. Planning policy requires that new housing development of more than 10 homes provide 45% affordable homes. The emerging local plan reduces this threshold to 5 or more dwellings

and updates the percentage requirement based on an up to date assessment of Viability to 35%. In addition, the Council's policy on affordable housing in the countryside allows for the development of affordable housing on rural exceptions housing sites. These sites can be developed exclusively to satisfy local need.

No evidence has been supplied to address these concerns and it is questionable if the approach in the WNP, coupled with that there being only one identified community led site (which is separately known to have unresolved delivery issues) and the failure to set and justify a housing target in the NP, that the Plan will be able to deliver on its aims and objectives, including aspirations of the local community in establishing a more balanced housing market and meet the existing and future needs of those who live in the town and those that wish to move there.

It is accepted that in principle, a NP can include such a policy on principal residency, but just because other NPs have done this does not make it the right tool for the town, nor does it justify the approach. It is not deemed to be an effective solution as it would place increased pressure on existing dwellings. It is recommended that the steering group and the Town Council further explore the options available, including the identification of further affordable housing sites adjacent to the town boundary, many of which are being currently promoted for residential development and where there is the opportunity and scope to develop appropriate allocations in the NP to steer and influence any future proposal to directly address the local community's needs. Secondly it needs to be made clear that the principle residency policy will not apply to the local plan allocations. The Local Plan allocations are put forward to address a wider district and strategic needs whose drivers are more complex. This can be resolved by making it clear that such a policy will only apply to growth outside the strategic allocations and within that facilitated by the WNP.

One of the main omissions of the WNP is its failure to set a housing requirement (target) based on the local level of identified need and in addition to that, set in the emerging Local plan in relation to the wider strategic requirements. As such, it is a missed opportunity to directly establish policies to meet that need and in particular apply the principle residency approach. We would encourage the town council to review this position and amend the final iteration of the plan to include an appropriately agreed housing requirement (target) and identify further potential sites for affordable housing/ housing to which its housing policies would apply.

A significant part in delivering the WNP housing strategy also depends on the release of a restrictive covenant by the Holkham Estate in relation to the community housing site. It is strongly recommended that this matter is agreed through a statement of common ground and/or a legal agreement prior to the submission of the WNP for examination. Without such an agreement it is feared that the site will not be released or even contested and a core element would not come forward in the plan period.

There is draft provision in the Levelling Up and Regeneration Bill that would require second home owners to obtain planning permission if they do not let their property for holiday purposes for at least 90 days. This would give the Council and the WNP the option to consider planning policy to manage the numbers and distribution of some types of second homes use in specific locations when the bill is enacted. The bill also included provision for the district council to increase council tax for such properties. Collectively such approaches could be used to restrict and disincentive future second home provision and raise additional funds for investment into local communities.

The neighbourhood plan will require screening for HRA/ SEA and it is recommended that once the policies have been reviewed and the plan updated, that a request for the emerging draft WNP be “screened” by officers in relation to HRA and SEA requirements. This will help establish the extent of the required Habitat Regulation evidence and compliance with European legislation in line with the requirements of the Basic Conditions tests, inform the final policies and establish if, and the extent, of any further Appropriate Assessment in relation to the Regulations. Further work in this area should not be undertaken until such a screening determination has been requested and a determination issued.

The RTPI advise that in order to support and explain each policy neighbourhood plans should include a supporting statement for each policy i.e. reason for the policy and the evidence that supports the policy. • You should summarise the evidence succinctly and if appropriate provide links to further information or direct the reader to an evidence summary. • Present the evidence clearly so that the reader understands what the evidence is showing. A range of techniques and methods can be adopted including the use of tables, maps, graphs and diagrams. • Ensure you clearly reference the source of your evidence. Wherever evidence is referred to it should be clearly referenced (with hyperlinks where possible) and dated.

It is noticed that many of the policy areas seems to be justified by the inclusion of statements that the approach are/ have been supported at consultation events. Opinion and views of the local community and others that have a stake in the future of a neighbourhood plan area e.g. expressed through consultation, demonstrate that the policies in your plan have been informed by the participation of the local community and others with an interest in the area and as such help meet the requirements of the Basic conditions at examination but opinion itself does not provide the justification for policies choices. Where this is the case it is recommended that further evidence and review is undertaken. Further information on this and policy formation can be found on the Locality web site and contained in the NDC neighbourhood planning guides.

NNDC have produced a suite of additional guidance aimed at supporting local communities in North Norfolk who are undertaking neighbourhood planning. These are based around specific check sheets and frequent topics that Parish & Town Councils have sought to include in neighbourhood plans. They are designed to provide background information and guidance on how neighbourhood planning groups can reflect local circumstances and develop policies that are justified and evidence in a positive and realistic way which, if followed, will provide more certainty at the examination stage. These guides can be found on the Council’s web site: www.north-norfolk.gov.uk/neighbourhoodplans.

Detailed comments on each plan area are contained in the schedule below.

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Introduction	1.12	Advice	Evidence	<p>The list of evidence submitted in future versions needs to include all that is used to support the Plan. Its best practice to include an evidence pack which includes background papers showing the review of options and the justification for the approaches used in the Plan – all informed by factual evidence and review . Some of this is currently within the emerging plan itself but would benefit from separation and further analysis while other policy areas are unsupported / justified</p> <p>Eg free standing background paper covering:</p> <ul style="list-style-type: none"> • Updated Local green space assessments and methodology • Identification of housing requirement based on local needs • Impacts of second homes and the justification of the approach taken and why this is considered to be the best approach to deliver sustainable development and address the issue of home for local people. It needs to answer the question is this the best approach, and cover the potential impacts. What will it achieve and why • Wells next the sea design guidance and codes • Character appraisal survey work : Local listing methodology, assessment and justification • Historic assets methodology and updated assessment <p>The Council have produced detailed guidance notes on the required evidence for neighbourhood plans and a specific guidance</p>	<p>I would expect stand alone, background papers showing the, review of options and the justification for the approaches used in the Plan – all informed by factual evidence and review.</p> <p>The evidence pack/ background papers should be listed and published in this para</p>

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				<p>note around housing policies including specifically how to review and establish appropriate responses to principle residency policies , how to use evidence and how to assesses LGS- please see Home Neighbourhood Planning (north-norfolk.gov.uk) and click on advice and guides. The housing advice guide includes detailed advice on how to go about establishing the required evidence base in relation to proving that the second and holiday home market is having a detrimental impact on the sustainability of towns and villages¹. Although some detail should be included in the Plan / consultation doc at reg 14 there needs also to be appropriate and proportional standalone background papers to inform the consultation and submission.</p> <p>It is also expected that a short background paper on establishing the housing need and demonstrating its agreement with the Council and alignment with the Local Plan strategic housing approach is produced. Various sections of the PPG neighbourhood planning guidance sets out this requirement some of which I have reproduced below but you will be able to find many more in the neighbourhood planning section of the PPG – all of which form part of the basic conditions tests and examination <u>and if addressed now will save considerable time and efforts and remove risk from the plan</u></p> <p><i>“Where neighbourhood planning bodies have decided to make provision for housing in their</i></p>	

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				<p><i>plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make” Para 103 Reference ID: 41-103-20190509 Revision 09.05.2019</i></p> <p>In terms of Local green space- I note the inclusion of some assessment in the Plan itself towards the end – I would however also expect a full assessment in a stand along background paper. Initial viewing shows to me that there are some of the prescribed assessment criteria missing. The council have produced a specific guide and assessment template for this which can be found in the our neighbourhood Planning guidance 6 npg6-local-green-space.pdf (north-norfolk.gov.uk)</p> <p>Further specific commentary will be contained in the individual sections below where necessary</p>	<p>Further specific commentary will be contained in the individual sections below where necessary</p>

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Introduction	1.13	Clarification	Examination and submission	Once submitted NNDC must satisfy itself that the draft NP complies with the relevant statutory requirements for submission and will then arrange for an independent examination. As part of this the Council will arrange a further round of consultation and only after it has received the independent inspectors report will the Council decide if the Plan meets the basic conditions and advise if it can proceed to referendum.	
Introduction	1.17	Clarification	National and local planning policy context	Although para 1.21 mentions the emerging Local plan it is worth at this point(para 1.17) adding text that the Council is advancing a new replacement local plan and that once adopted will replace the current Core Strategy and site allocations document up to 2036. As such it is this document that will set the strategic approach during the NP period and due regard is required to these in the production of the NP.	Add clarifying text
Introduction	1.21	clarification	National and local planning policy context	Worth also clarifying that the emerging local plan will set the strategic context for the district in the immediate future and for the majority of the Neighbourhood \Plan period. Conformity with the strategic content is seen as important to ensure the np remain up to date and can be used in the determination of planning applications once this document is also adopted . it could be explained that any conflict is resolved in favour of the newer plan therefore failure to taken into account the emerging local plan this close to its finalisation could shorten the life and usefulness of the WNP!!! – There is more in the PPG on this.	Add text around the importance of the NP being aligned and in conformity with this emerging local plan and why.

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
The pariah	2.9	Clarification	Origins and evolution of the town	“Pre-war Wells was a popular base for wildfowlers and a number of hotels in the town catered for this need.”	Wildflowers ?
The pariah	2.13	Clarification	Health	Welcome the additional text in the last sentence from emerging versions, however this could go further. It is ultimately up to the Health authorities to plan for health care and investment The council is a member of the Joint Health protocol – though which planning integrates with health service provision and the Norfolk & Waveney Integrated Care System. (Formally The Norfolk and Waveney Sustainable Transformation Partnership, STP). It is the body that seek S106 contribution from development to help fund GP and service provision from development where they consider it necessary. But long term service provision and investment is in through the Health service longer term plan and estates strategy. There is more on this partnership in the reg 18 and reg 19 local plans and it would help explain to the community how health service is provided if some of this can also be put into the NP	Add text around ICS

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The Parish	2.19/ 2.20	Clarifications	Education	<p>NCC education advises that the school had 583 pupils January 2022 and there was limited spare capacity. The school is thriving.</p> <p>Norfolk County Council consider that the capacity within the available education infrastructure is adequate to meet North Norfolk's proposed housing growth through the emerging Local Plan. Section 106 monies will be sought on new residential developments to mitigate the impact of additional housing growth where necessary</p>	<p>Clarification text should be added around the school. Alderman Peel High School, provides education not just for Wells but also the surrounding rural areas.</p> <p><i>Alderman Peel High school is a higher order school that serves the local community and surrounding hinterland. NNDC as advised by Norfolk County Council consider that the capacity within the available education infrastructure is adequate to meet North Norfolk's proposed housing growth through the emerging Local Plan. Section 106 monies will be sought on new residential developments to mitigate (invest) the impact of additional housing growth where necessary</i></p>
The Parish	2.23	Clarifications	Community services and facilities	Formatting	Amend line formatting last sentence
The Parish	2.35	Clarification	Tourism	Air BnB are not in addition (it is a marketing web site – be careful not to double count with second homes	Remove wording In addition , the AirBnB
				<i>"Bus services to Norwich do not connect well with each other which can prevent local people from working there "- although amended slightly from previous versions this remains a sweeping statement and should be amended as it's an opinion in the base line information section which ideally should not be there. More true is the time it would take given Wells' geographical position and the road network.</i>	Clarify text

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
The Parish	2.51	clarification	Flood Risk	<p>Shoreline management Plan – consider updating text here to include the following summery.</p> <p>The area of coast relevant to Wells-next-the-sea is included within SMP5 and super frontage 2- Thornham to Stiffkey. The wider landscape is dominated by intertidal saltmarsh and mudflats. There are long stretches of sand dunes at Holkham and Brancaster. With the exception of Deepdale and Holkham marshes, the entire super frontage is part of the North Norfolk Ramsar site, SPA, SAC and SSSI.</p> <p>Apart from the low lying defended area east of Wells –next –the –Sea the inland boundary of the designated areas roughly coincides with the tidal flood zone boundary.</p> <p>The 2010 SMP states that for the overall Plan “is to investigate the possibility of gradually increasing natural processes while continuing to provide flood defence where this is technically possible and economically viable. Where there is no active management now, the plan is to allow natural development to continue. In the medium to long term, the plan is to investigate ways to sustain or increase the role of natural process in providing flood defence. Ref 4.3 SMP main report p95</p> <p>The SMP intends to hold current defences where they are now at the River Burn outfall, Burnham Overy Staithe, Wells flood West embankment, Wells quay and Wells East bank.</p> <p>Summary of SLM policies</p>	Add shoreline management text as detailed in the column to the left

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change															
				<p>Wells Flood Embankment</p> <table border="1" data-bbox="846 300 1361 1217"> <thead> <tr> <th data-bbox="846 300 929 419">Policy PDZ 2J</th> <th data-bbox="929 300 1032 419">To 2025</th> <th data-bbox="1032 300 1158 419">2025- 2055</th> <th data-bbox="1158 300 1261 419">2055- 2105</th> <th data-bbox="1261 300 1361 419">What this means</th> </tr> </thead> <tbody> <tr> <td data-bbox="846 419 929 568">National SMP policy</td> <td data-bbox="929 419 1032 568">Hold the line</td> <td data-bbox="1032 419 1158 568">Hold the line</td> <td data-bbox="1158 419 1261 568">Hold the line</td> <td data-bbox="1261 419 1361 568">Maintain in all the defences</td> </tr> <tr> <td data-bbox="846 568 929 1217">Local management policy</td> <td colspan="3" data-bbox="929 568 1261 1217">Maintain the defences where they are now.</td> <td data-bbox="1261 568 1361 1217">where they are now to sustain current land use (tourism, beach access, agricultural, freshwater habitats and lifeboat station).</td> </tr> </tbody> </table> <p data-bbox="846 1217 1189 1246">Source SMP main document p 141</p>	Policy PDZ 2J	To 2025	2025- 2055	2055- 2105	What this means	National SMP policy	Hold the line	Hold the line	Hold the line	Maintain in all the defences	Local management policy	Maintain the defences where they are now.			where they are now to sustain current land use (tourism, beach access, agricultural, freshwater habitats and lifeboat station).	
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Vision & Objectives	Objective 1		Objectives	Objective 1: Agree with the amendments that this objective now clarifies that the objective is to "seek " to meet the existing and future needs , as the approach is unlikely to meet the needs in full even when combined with the Local Plan allocations.	Although this text has been clarified and amended the aim of the WNP should be to establish the needs and set out to meet those needs in Full as detailed through the NNPF. As written it is rather a diluted and misguided objective
Vision & Objectives	4.7	clarification	Objectives	It would be useful here to also link to the local plan for reasons of consistency in message.	4.7 add extra bullet <ul style="list-style-type: none"> Align with and add local distinction to the local plan strategic policies
Housing & Design	5.1	n/a		This updated text now explains the relationship well	
Housing & Design	5.2	clarification		The section should also detail that duplication and repetition of policies in the NPPF and Local Plan is not necessary , further explain that collectively the NP once adopted will become part of the overall Development Plan where decisions will be informed by balanced consideration of all policies.	Consider adding this useful clarification
Housing & Design	5.3	clarification	Local Housing requirement	It should be clarified that the Town council have not sought to set a housing requirement. This could be put into the context of the HNA which looked at the wider area, but never the less demonstrates that there is a large unmet need (as explained in 5.13 last bullet.) It should be clarified that should a local indicative housing requirement be set in the NP then it will need to be tested at examination	Add clarification

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Housing &Design	5.10 -5.13 last bullet	Clarification / Advice	Housing Needs Assessment	<p>Welcome the updated text</p> <p>Please clarify which local government statistics are used? Which year? And what is the base source.</p> <p>It would be interesting to know if the population numbers of Wells have continued to fall between the 2011 and 2021 census which has now been published.</p> <p>How does this correlate to the local government projections used to identify an average 16% growth across the district – will past trends not be followed?</p> <p>Please note the local plan is based on the 2016 ONS projections because the Council does not believe the 2014 ONS statistics are accurate because they project forward higher rates of annual growth that were subsequently shown to be have actually occurred. The local plan identifies approx. 7% growth in the population over the plan period. Reliance on the reported and unidentified set of statistics quoting a district average of 16% growth to justify growth in Wells in the last bullet para 5.13 may not be appropriate or Robust.</p>	As above and detailed in previous discussions its recommended that the NP should set out its evidence, establish and agree a housing requirement for the Neighbourhood Plan Area, based on a fuller assessment of the evidence.

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Housing and Design	5.17 – 5.18	Clarification	Site options assessment	Welcome the updated text which provides greater detail around the alternatives considered. However there is clearly some further potential identified through these assessments which has not been taken forward by the WNP group and could/ should be explored further	Add further text directing the reader to the full site assessments and the stand alone evidence and where to find it. i.e link to the suggested evidence pack . Follow through on those sites were it is identified adjustments in size or as referenced may be suitable and seek clarification form promoters/ statutory bodies. Reflect on whether such sites should also be allocated in the WNP
Housing and Design	5.27	Clarification / advice		<i>The proposed housing is only 'exceptional' in relation to the settlement boundary and all other usual planning criteria relating to design layout, impact etc will still apply.</i> <i>The policy is exceptional in that it allows residential development in a n areas that would not otherwise be policy compliant</i>	Rephrase accordingly

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Housing and Design	WSN1	Clarifications/ advice / Objection		<ul style="list-style-type: none"> A neighbourhood Plan policy does not permit development , - proposals are assessed against the whole development plan and it is the LPA which permits development- change line one to support – more detail on this matter is contained in our general advice note that accompanies this schedule It is not clear if this policy is meant to be a rural exception policy or just is intended to focus on community led housing. Due to the interchangeable terms and it is not clear what the focus of the policy is or how it relates to other strategic policies such as rural exception policy. there is a need here for clarity and remove the ambiguity and confusion – so the approach can be applied as necessary Due the use of interchangeable phrases in this policy and supporting text such as community led house and affordable housing / exception housing it is not clear if this policy is adding to the local plan policy re community led development or seeking to replace the existing rural exception policy. It is assumed the policy intention is to only relate to community led housing schemes as such it is very specific and please note it will not apply to most rural affordable housing schemes where HOU3 as the strategic policy will take precedence. If this is the case it would be helpful to acknowledge this in the 	<p><i>Clarify is this a community led housing policy or is it an rural exception affordable housing policy – be consistent in the use of terminology</i></p> <p>Clarity required</p> <p>Amend wording :</p> <ul style="list-style-type: none"> <i>Proposals for the development of small-scale affordable housing schemes community led housing schemes on sites outside of but immediately adjacent to the settlement boundary will be permitted supported on an exceptional basis where there is a proven local need and where such housing:.....</i> If the policy is indeed meant to refer to rural affordable housing and update HOU3 then consider introducing more flexibility in the NP

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				<p>supporting text. The supporting text needs to clarify the intention of the policy is to guide community led housing schemes and not intended to replace the councils strategic rural exception policy by referring to community led housing schemes as the title says and amending the those references to affordable housing</p> <ul style="list-style-type: none"> If the intention is that it is actually a rural exception policy it needs to be renamed and amended. Note though if this is the case the approach is more restrictive than that set out in the local plan and emerging local plan and will restrict options for growth and options to meet the affordable need. NNDC are also likely to object. <p>The policy itself is similar to the existing and emerging local plan policies HO3 and HOU3. However appears more restrictive. The first para appears to limit the support for such a proposal to that immediately adjacent to the settlement boundary. – This especially in the case of Wells will be very restrictive. The Core Strategy policy on exception site development is within the designated countryside while the emerging local plan restricts this to physically well related to the</p>	<p>to address needs and allow the policy to deliver on housing needs across the parish and not just restricted to a small area of land to the south of the town. Amend/replace to remove conflict with the strategic local plan approach plan by incorporating the following: onsites outside of but immediately adjacent to the settlement with <i>in close proximity and well related and integrated to the built up areas of the town...</i></p> <p>Review and amend as necessary</p>

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				<p>built up area. Both these options provide more flexibility than the NP approach which given the land designations and the coast has the potential to restrict the delivery of future sites. Is it your intention to be this restrictive</p> <ul style="list-style-type: none"> • Clause A: national policy on exception site allows a small element of market homes on such schemes to aid with delivery – as such this approach is very limiting and likely to be removed. the clause also conflicts with SS3 part 2 a where this is covered • Clause C – local connection test is not a land use policy. There will potentially legal difficulties including those around equality if this remains. It is the NNDC housing allocation strategy that established this in any case. ALL other NP where this has been included as a general policy requirement have had the whole policy removed at examination. <p>Irrespective of the above It is considered not appropriate to write a policy solely for the use of one affordable housing provider eg Homes for Wells. Clause c would only apply if such a community site is being developed by a CLH group and as such the locally agreed lettings policy could be used. (Noting that it could be but may not be Homes for Wells.) If the community led development was to be</p>	<p>Clause A align with national policy -- amend text housing in the main will be “affordable” and market housing will only be supported as the minimum necessary in order to deliver the affordable dwellings which would otherwise not come forward</p> <p>Clause c – consider refining / removal of this clause / amend to refer directly to the Council’s housing Allocations Strategy</p> <p>Amend clause c - clarifications / conformity</p> <p><i>Is offered in the first instance to people with a demonstrated local connection as identified through the agreed local letting policy (with NNDC) of the CLH Trust by Homes for Wells or in the relevant North Norfolk District Housing Policies (or successor document). Local Allocation Scheme.</i></p>

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				<p>developed by any other registered provider then NNDC's local Allocation agreement would take precedence.</p> <ul style="list-style-type: none"> • Clause d – what constitutes community support – will need to tell us in order to apply this • ALL in all the policy is mainly a repetition of elements of the policies in the Local plan eg HOU3 , SS3 and elements of others - much of the policy is not required and should be rewritten to accord with the strategic policies and only include the elements that are locally distinctive. <p>Irrespective of the above comments the policy is considered not necessary as apart from the immediately adjacent line it does the same as the Local plan policy HOU3 and SS3 and as such there is little need to repeat. Perhaps this part of the NP should better explain the process of exception housing and the councils housing allocation stagey as well as the LP approach to supporting community led initiatives around meeting locally derived needs and explain that the Np complements the districts council approach which it is seeking to support. This would help present a joined up approach to the community around this</p>	<p>Add clarification to policy and or supporting text on what constitutes community support – is support, the Town council, or public? Or both or just one offer of support? see local plan policy SS3 footnote 1 for starters</p> <p>The approach / policy would benefit from further clarity Consider comments and revise approach retain only the necessary local considerations in addition to SS3</p>

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				<p>issue. The approach / policy would benefit from further clarity</p> <ul style="list-style-type: none"> The policy only ref housing - Unless the policy is amended to include other forms of community development all other community led schemes outside that of housing will be guided by the local plan policy SS3 – is that your intention? 	<p>This in itself is ok but it is not clear if this is your intention amend as necessary</p>

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Housing and Design	WNS2	Clarification / Advice /objection	The scale and location of new housing (Allocation WELLS1)	<p>First three para are not part of the policy and should be removed to above the policy box – they are contextual info and help set the interpretation, but have no operable clauses and sit outside any policy.</p> <p>If the policy is meant to inform and control the scale and location of development then the policy needs to set a housing requirement – see separate comments on this. As it is it remains very open to interpretation</p> <p>The policy should start at Site Wells 1 and be specific to the site allocation</p> <p>Irrespective of the above comment - More clarity is needed for para 2 –<i>“The focus of new housing development over the plan period will be on specifically identified sites or infill development within the existing defined Settlement boundary”</i>.</p> <p>Question what are the implications of para 2?</p> <ul style="list-style-type: none"> Identified by whom? Anyone including those sites identified by developers... need to be more specific but not restrictive or negative... Is it the intention that this policy restricts rural exception sites – clarity is required to avoid ambiguity and confusion? Note it is unlikely restrict all development to what is specified as the rural exception site policy is just that – an exception – and is applied as an exception to policy. This includes this NP and this policy. 	<p>Remove first three paragraphs and start policy at the site allocation section</p> <p>Failing the above the policy should set the scale of growth required through establishing a housing requirement. A failure to do so will undermine your intentions</p> <p>Remove the word <i>existing</i> : ...<i>“within the existing defined Settlement boundary”</i></p> <p>The policy and or supporting text needs to bring the clarity to the intention of the policy so the decision maker can apply it. As written there remain significant ambiguity.</p> <p>Consider amending 2nd para to say</p> <p>With the exception of community led housing and or affordable housing exception sites, the focus of new housing development over the plan period will be on the Identified sites in this Np and those brought forward through the Districts</p>

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				<ul style="list-style-type: none"> As written the policy is restrictive and has the potential to conflict with strategic policies Do you really mean the <u>existing</u> settlement boundary? The settlement boundary will change to include the NP and LP allocation sites once adopted. Should the policy be amended to say outside allocations (NP and LP) and with the exception of rural affordable housing? Para 1 and 3 superfluous as the number is in the policy under bullet a. <p>Site WELLS1</p> <ul style="list-style-type: none"> Include in the first para the number of dwelling in the allocation (note this is a minimum to align with national policy) <ul style="list-style-type: none"> The ref to para 5.33 does not provide the definition as stated There appears to be NO / limited justification in the evidence for bullets b,e,f. <u>All policies must be founded on evidence and justified with proportional evidence-</u> Bullet b – add evidence what mix are you looking for between house and bungalows? Bullet c - access is potentially a constraint and any allocation will need to establish if 	<p>Local Plan, or appropriate infill development within the existing defined settlement boundary.</p> <p>Change existing settlement boundary to the identified settlement boundary</p> <p>A site of approximately 1.89ha at Two Furlong Hill (as defined on figure 24) is allocated as a Community Led Housing development for a minimum 45 dwellings with associated infrastructure</p> <p>Remove bullet a – superfluous to requirements. Remove ref to para 5.33</p> <p>add policy justification or remove – be more specific on the policy requirement regarding housing mix so the policy is specific to your requirements ?</p> <p>obtain highways opinion on requirements for access and include in the policy so as to be specific</p>

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				<p>suitable access can be achieved in order to ensure deliverability of the site in the plan period. Recommend that a specific opinion is obtained from the highways authority</p> <ul style="list-style-type: none"> • Bullet e –amalgamates different aspects of policy under one heading. The approach also this assumes there is evidence that there is a surface water issue and through the site allocation process you have identified likely significant effects from hydrological impacts - I am not aware that there have been and to date the plan has not been subject the Habitat Regulation Assessment HRA, screening or assessment • Bullet g - Useful to explain where the open space figure came from- I accept it is from NNDC and that it is a policy compliant minimum in line with the evidence and current NNDC open space calculator <p>In order to comply with strategic policies and HRA the site allocation policy will need reference to the required strategic mitigation in relation to the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy, GIRAMS.</p> <p>The plan will need to undergo HRA screening and likely HRA Assessment. The policy requirement for in combination effects should be added to the policy. ANY HRA / AA will</p>	<p>Separate out policy issues in accordance with evidence.</p> <p>It is likely that the site will need to be assessed under the Habitat Regulations and a screening report and determination should be requested from NNDC <u>before the plan advances any further.</u> (compliance with basic conditions)</p> <p>Add explanation to text around the required quantum of open space and why this minimum i.e in line with strategic policies of the council the minimum is required</p> <p>For alignment / conformity / HRA requirements Add the specific wording to the site allocation policy as detailed below :</p> <ul style="list-style-type: none"> • Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance& Mitigation Strategy, GIRAMS <p>Add detail to the policy around mix and link better to WNS 3 with regard dwelling mix and accessibility standards/ proportions</p>

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				<p>identify if the allocation policy needs further changes and to include appropriate mitigation</p> <p>How does this allocation sit / link with policy WNS3 in particular criterion B – should the allocation not detail the required mix, split of type, size and percentage required to be accessible so as to remove all the ambiguity and provide clarity to the allocation. this would be more specific and make the policy locally distinctive</p>	
Housing and Design	5.37	Clarification	Affordable housing	<p>Clarification required –the para states that <i>there was strong agreement (90 responses) that new housing should cater for older people, first time buyers, those with a specialist housing need and family housing.</i></p> <p>For clarity this should be reported that at the exhibition views expressed showed a preference that housing should be for older people, first time buyers including family housing.</p> <ul style="list-style-type: none"> • This substantiates opinion but is not considered evidence to justify such an approach. • What is the purpose of such commentary – should not the NP go on to establish if there is a level of unmet need for these groups and if so seek to plan to meet such need. A failure to do so would not accord with objective 1 of the NP 	<p>For clarity this should be amended to show that</p> <p><i>at the exhibition views expressed showed a preference that housing should be for older people, first time buyers including family housing.</i></p> <p>What is the evidence for this need and how does the plan seek to address the identified need. Consider further evidence review to substantiate any further policy approach in this area</p>

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Housing and Design	5.38	Clarification / advice / conformity	Affordable housing	<p>Welcome the addition text and updates with regard the local plan approach however reference to first homes should be <u>up to 25%</u> and not stipulated as actually 25%. Our local plan approach is specific in that it allows developers to provide up to 25% first homes (and thus is in line with national policy) but the wording allows for flexibility and providers to provide more rented and shared ownership properties if that is their preference as it is the council view that the first homes are not a desired product and do not meet the district's needs. Given that there are other preferable housing products to meet the known need (due to wage levels and existing house prices) the policy should be amended appropriately to follow suit. , bring greater clarity, joined uop approach and remove the conflict. Text and policy WSN3 should be amended accordingly</p> <p>NNDC's would advise that social rent is currently not a deliverable option as it is not grant funded by the government as such this requirement should be revised</p> <p>The para incorrectly quotes from your own evidence and as such the para and WSN3 should be revised as the misquote has the potential for a significant change in interpretation.</p> <p>The HNS also goes on to say that this is not a policy recommendation but a modelled illustration of how a given need would align with the calculated need. It should also be noted that the HNS is not wells specific and covers a much wider area.</p>	<p>Conformity: Amend para to say up to 25% first homes</p> <p>Amend para to correct mistake <i>The study concludes on page 66 that the mix should include 60 per cent social and affordable rent and at least 13 per cent shared ownership.</i></p> <p>More analysis and reasoned justification through a background paper including the impacts on viability / deferability and the ability of the adopting the modelled position as policy should be undertaken in order to revise the policy approach and provide proportionate justification and</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
					ensure that the approach will deliver on the Plans objectives.

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Housing and Design	WNS3	Objection	Housing Mix	<ul style="list-style-type: none"> The policy first three bullets lacks any specific detail or operable clauses and dilutes the local plan approach as such it does not add any local distinction. The updated reference to 50 % two and three bed homes is welcomed however this applies to sites delivering more than 6 units in the local plan in comparison to your 10 unites so there is conflict that needs to be resolved. The local plan policy HOU2 also goes on to specify of this 50% - 80% should be three bed and 20% 2 bed and in the case of affordable properties the majority should be 2 bed. It is considered that this approach more closely reflects the need. As it reads the NP is seeking to apply this mix to all development proposals and it may not be viable. Perhaps like in the local plan a threshold should be applied The policy as written conflicts with the strategic approach in HOU2 – although very similar it lacks the detail. if it is to remain the policy should clarify it applies to <u>growth outside the strategic allocations of the local plan</u> The reference to some housing should be suitable for those with accessibility needs is also rather vague and less descriptive than the policy in the emerging local plan. What 	<ul style="list-style-type: none"> Review evidence including local plan policy and amend policy. Consider firstly here the need for such a policy in the plan as the mix that best reflects need is already included in the development plan and as such there is no need to duplicate or repeat policies. There is little local distinction that this policy brings as written or evidenced. <p>Consider carefully if the policy will be deliverable and consider if the policy should include an appropriate thresholds for which the mix should apply – see Local plan policy HOU2. and amend policy <u>through evidence and justification.</u></p> <p>Add calcification Outside the strategic allocations of the Local Plan <i>Proposals for new housing should provide for and contribute to</i></p> <p>Remove this requirement and leave it for the local plan strategic policy or provide the evidence and detail the level of need</p>

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				<p>is meant by accessibility? What percentage units is supported by your evidence? Policy HOU8 requires all new dwellings to meet Accessible and adaptable standards as set out in building regulations M4(2) and 5% on sites of 20 or more dwellings to meet wheelchair accessibility as set out in building regs M4(3). Such an approach is detailed in chapter 7.8 of the Local Plan and further evidenced through the published background paper on housing standards.</p> <p>Note M4(3) adds significant costs and two much could affect viability and deliverability and potentially compromise the objective .</p> <ul style="list-style-type: none"> • Why should self builds be catered for has the plan evidenced / set a local requirement based on need? If not remove and leave to the local plan see policy hou2 The council have a register of need as required by legislation – please ask for more details around the local elements if any on the register. • <i>60% social affordable rent</i> - As detailed above the policy is based on a miss quote from your own evidence and needs to be amended. • Please note the grant regime in North Norfolk does not support social rent so Housing providers will not provide this product 	<p>providing the detail and justification for it , the required standards and quantitative requirement in the policy . any requirement should also understand / detail its effect on viability through a proportionate e review of development costs that are based on the LP viability study .</p> <p>The NP needs to evidence why accessible dwellings are required, what proportion and stipulate what standards.</p> <p>Remove this requirement and leave it for the local plan strategic policy or provide the evidence and detail the level of need and quantitative retirement in the policy by interrogating the local register held by NNDC</p> <p>Amend policy 60% social and affordable rent</p> <p>It would be better to amend the policy to say Where affordable housing is proposed it should principally comprise of <u>social / affordable</u>-rent based on the latest evidence of need</p>

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				<ul style="list-style-type: none"> • As detailed above ensure greater flexibility for developers to deliver affordable products are required in relation to need • It would be clearer if the first homes requirement is separated from the home ownership bullet. National conformity is that 25% of all affordable housing units are delivered as first homes. To avoid misinterpretation it should be made clear that the 25% requirement is of the total affordable housing and not a share of the 40% required for home ownership. As written the approach can be read two ways and clarity is required eg is it 25% of the 40% home ownership requirement as stated or is it 25% of the 100% as is required to be in conformity with national policy. 	<p>Amend policy to up to 25% first homes or not more than 25% first homes</p> <p>Separate out the indented bullet into a clear requirement for not more than / up to 25% affordable homes should be first homes.</p> <p>Clearly once this is done there is scope to rewrite the whole policy in a much succinct and clearer way consider amending whole approach to</p> <p>Where affordable housing is proposed it should principally comprise of <u>social / affordable-rent based on the latest evidence of need. Not more than 25% of the affordable homes should be first homes with the remainder up to 15% shared ownership</u></p>

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Housing and Design	5.39 – 5.69		Second Homes & principle Residence Dwellings	<ul style="list-style-type: none"> Update the figures with the most up to date available / replace table on page 63 Update date ref in para 5.42 	<p>Update table as below to reflect most up to date figures</p> <p>Number of holiday homes and second homes in Wells-next-the-Sea.24 (31.03.2022)</p> <p>All council tax homes 1560 All second homes 383 Percentage of second homes 24.6 per cent District average of second homes 8 per cent Holiday homes 244 Council tax and registered holiday homes 1804 Number of second homes and holiday homes 627 Percentage of second homes and holiday homes 34.8 per cent District average of second homes and holiday homes 12.2 per cent</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Housing and Design	WNS 4	Objection	Principal Residence	<p>Please also see detailed comments in the over view section of this schedule.</p> <p>An occupancy condition would require the owner to use the home as their principal home and prevent its use as a second or holiday home. The Council are not supportive of this approach on a number of grounds but principally because:</p> <ol style="list-style-type: none"> I. It could only apply to new-build homes and prospective second/holiday home owners could choose to buy existing properties without an occupancy restriction thereby deflecting demand into the existing housing stock; II. There are doubts about the effectiveness and impacts of such policies; III. It could be difficult and costly to police such restrictions; IV. Limited evidence has been provided/ analysis if the effects and impacts along with consideration of alternatives; V. It is considered to impact on the ability of sites to contribute to the current levels of affordable housing provision (no evidence to counter this has been provided). There is a real concern that, through the approaches presented, there would be less affordable housing delivered within the Neighbourhood Plan Area and as such, this would undermine the aims of both the Local Plan and Neighbourhood Plan. 	<p>Consider carefully and revise where advised the supporting evidence and if this along with the wider housing approach will in fact deliver on the intended purpose of objective 1 of the WNP.</p> <p>Undertake a proportional review of viability evidence based on the Local Plan methodology as advised in national policy</p> <p>Produce a standalone evidence paper to consider more widely the option available including those contained in the emerging Levelling Up & Regeneration Bill</p> <p>Amend the policy and / or supporting text to remove conflict with the strategic policies of the local plan making it clear that the approach if kept would only apply to the additional growth brought forward outside the local plan and as such not apply to the strategic allocations.</p> <p>Consider allocating further sites for both market and or affordable housing in the WNP with specific allocations policies. A number of sites have been assessed in the Np production with further sites assessed during the local plan production. Some of these sites and or derivatives are currently being actively promoted and there is an opportunity to influence these and bring them forward through amalgamation into the WNP</p>

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				<p><u>It is acknowledged that neighbourhood plans can include such policies but this should only be where the local evidence justifies them and where it can be concluded that they will achieve their intended purpose.</u> However there is concern that this is seen as a panacea to solve the issue of second homes/ high house prices which is not justified through the statements included in the WNP and would bring additional and avoidable adverse impacts. There is little evidence that the policy will achieve its desired effect and advise its reassessment. Indeed there is no evidence that the policy combined with the wider approach to community led housing and infill development will cause any reduction in the overall proportion of second homes.</p> <p>A more effective approach for the WNP would be to identify and agree a suitable housing requirement (target) and increase the supply of housing through the identification of suitable housing sites (market and or affordable only) and through specific housing allocation policies. This way those sites that are currently being promoted could be utilised to address the objectives of the np in balancing the housing market, rather than left to the market. As it stands the principle housing policy will make little to know difference in this aim as the NP is only promoting a very small level of growth and in the main only one community</p>	

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				<p>housing site which is intended to be for local need in the first place.</p> <p>It must be recognised that the local plan is allocating two further sites in the town in order to provide for the strategic need. These sites seek to address a wider need as identified in the Strategic Market Housing Assessment, SHMA, and also provide for affordable housing in line with the Councils housing allocation policies and statutory obligations under the Housing Act 1996. The Council have a good record of delivering policy compliant levels of affordable housing on these sites which it would not want to undermine. As such it should be made clear that the approach would only apply to the additional growth brought forward outside the local plan and not apply to the strategic allocations.</p> <p>The approach also has the potential to reduce the incentive for infill development – the main form of growth promoted by the WNP and it is recommended that a proportional review of development viability is undertaken so that the economic impacts are understood on small scale development and also and the impacts around affordable housing delivery are understood.</p>	

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Housing and Design	5.70 – 5.71	Clarification / advice	Paragraphs 5.70-5.71	<p><u>Infill and windfall development</u> Para. 5.70 regarding infill and windfall development is disconnected from the policy wording and in particular, the criteria for infill development within the policy. The paragraph refers to the AECOM Design Code and specifically to ‘a trend in the town for small outbuildings to be erected in gardens, often for holiday accommodation,’ and within the same paragraph discussing plot area ratios in relation to residential development. However, neither of these matters appear in the policy.</p> <p>In addition, the pre-amble sets out that where such proposals would be supported, they should not have an adverse impact in terms of highways, nature conservation, heritage, flooding or the amenity of adjoining occupiers.’ But, the infill criteria in the policy does not refer to nature conservation or flooding and overall, requires enhancement of the street scene.</p> <p><u>Extensions</u> Paragraph 5.71 regarding extensions does not link very well to the criteria set out in the second part of the policy, which specifically refers to holiday accommodation and does not explain any local dimension to justify the need for the policy, or even connecting it to the AECOM Design Code.</p>	<p>Amend para. 5.70 to align with the policy wording regarding infill development. Add a section aligning this paragraph to the appropriate section in the design code.</p> <p>Amend policy criteria to include this criteria on this consideration.</p> <p>Amend para. 5.71 to better align with the policy wording regarding extensions. Add a section aligning this paragraph to the appropriate section in the design code.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Housing and Design	WNS5	Clarification/ Advice	Infill development and extensions	<p>The policy wording needs to make specific reference to the design guidance and codes document.</p> <p><u>Infill</u> In general, the criterion set out in the policy are largely covered in national and existing and emerging Local Plan policies (adopted plan policies EN4, EN8, CT5, CT6) and emerging policies (ENV6, ENV7, ENV8, CC9, HC7) and also covered in the North Norfolk Design Guide. Specific comments concerning the policy criterion for infill development, are as follows:</p> <ul style="list-style-type: none"> a) Requires the <i>enhancement</i> of the form and character of the streetscene. This requirement would be stronger than that enshrined in legislation and the NPPF (para. 206). As such, the wording will need to be amended to accord with planning legislation and the NPPF. b) How would this criteria be applied if the surrounding properties are of differing materials, scale, massing and/or layout? Particularly as the criteria requires that a proposed infill dwelling should reflect all of these elements for all of the surrounding properties. In any event, these matters; materials, scale, massing and layout, are already covered by national guidance and existing and emerging local plan policies and the NNDC Design Guide. c) This repeats parts of a. and b. but adds height as a new matter for consideration. All matters are already covered by national guidance and 	<p>Remove repetitive wording and make specific reference to the supporting design code document in relation to the matters it concerns in the policy.</p> <p>Recommend wording along the lines of 'where the proposal would: a. conserve, and where possible, enhance the form and character of the street scene.'</p> <p>Amend wording of criteria that do not accord with national and local plan policies.</p> <p>Remove duplicated criteria that are covered in existing and emerging local plan policies or if retained, refer to how they are worded in the local plan, to avoid conflict and diluting the intention.</p> <p>Add reference to NNDC Design Guide SPD.</p>

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				<p>existing and emerging local plan policies and the NNDC Design Guide.</p> <p>d) This matter is already covered by national and local plan policies (see above).</p> <p>e) This matter is already covered by national and local plan policies (see above).</p> <p>f) This is already covered by national and local plan policies (see above).</p> <p>g) Requiring on-site parking would not provide the flexibility needed to assess the individual circumstances of a proposal as set out in existing and emerging policies. The requirement also conflicts with the Design Guidance and Design Codes document at DC.2.2 – Residential parking (i), which states 'Vehicle parking should mainly be provided on-site. In general, the approach to the provision of parking should be flexible.....' As such, the criteria should be amended to accord with this supporting document, as well as, local plan policies.</p> <p><u>Extensions</u> The criterion set out in the policy are largely covered in national and existing and emerging Local Plan policies (adopted plan policies EN4, EN8, CT5, CT6) and emerging policies (ENV6, ENV7, ENV8, CC9, HC7) and also covered in the North Norfolk Design Guide. Specific reference to holiday accommodation is confusing in</p>	<p>Remove duplicated criteria that are covered in existing and emerging local plan policies or if retained, refer to how they are worded in the local plan, to avoid conflict and diluting the intention. Better</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>relation to extensions in the policy wording and should be removed.</p> <p>Specific comments concerning the policy criterion for extensions are as follows:</p> <ul style="list-style-type: none"> h) This matter is already covered by national and local plan policies (see above). i) This is a repeat as it is covered in Policy WNS11 – Protecting the Historic Environment. In addition, the matter is already covered by national and local plan policies (see above). j) The matters are already covered by national and local plan policies (see above). The specific requirements of the criteria are unjustified and should be removed. k) This matter is already covered by national and local plan policies (see above). l) This matter is already covered by national and local plan policies (see above). m) Requiring sufficient on-site parking would not provide the flexibility needed to assess the individual circumstances of a proposed extension as set out in existing and emerging policies. The requirement also conflicts with the Design Guidance and Design Codes document at DC.2.2 – Residential parking (i), which states 'Vehicle parking should mainly be 	<p>still, these criteria should be focussed on local considerations evidenced in the character appraisal.</p> <p>If retained, this needs justifying and improved phrasing.</p>

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				<p>provided on-site. In general, the approach to the provision of parking should be flexible.....'. As such, the criteria should be amended to accord with this supporting document, as well as, local plan policies.</p> <p>n) This matter is already covered by national and local plan policies (see above).</p>	
Housing and Design	Paragraphs 5.72-5.77	Clarification / advice	Design	Paragraphs 5.76 and 5.77 refer to national policy in relation to design but omit to refer to any of the existing and emerging local plan policies and the North Norfolk Design Guide that clearly reflect the NPPF and PPG in relation to design matters. As such, it appears to the reader that no regard has been given to this tier of planning policy and guidance.	Add reference to existing and emerging local plan policies and the North Norfolk Design Guide, which is an adopted SPD.
Housing and Design	Paragraphs 5.78-5.79	Clarification / advice	Character Appraisal	Paragraph 5.78 should make proper reference to the supporting document, giving it's full title and date produced – Wells-next-the-Sea Design Guidance and Codes Final Report (February 2022).	Add full reference to the Wells-next-the-Sea Design Guidance and Codes Final Report (February 2022).

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Housing and Design	Paragraphs 5.80-5.83	Clarification / advice	Design Codes and Guidance	<p>The paragraphs refer to national design codes and guides but do not mention the existence of the North Norfolk Design Guide even though Para. 129 of the NPPF states that <i>'These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.'</i> As such, it is considered important for these paragraphs to set out the full complement of the existing design guidance available. In addition, it would be helpful for these paragraphs to summarise the matters that the design guidance and codes cover.</p>	<p>Add reference to existing and emerging local plan policies and the North Norfolk Design Guide SPD.</p> <p>Add summary of the matters that the design guidance and codes cover.</p> <p>Overall, it would be better for this section and policy to only reference the matters contained within the Wells design guidance and codes evidence document.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Housing and Design	Paragraphs 5.84-5.86	Clarification / advice	Consultation results – policy ideas exhibition	<p>Any details of consultation events are better placed within an Appendix in full, in order to be transparent. Paragraph 5.85 sets out some comments logged at the policy ideas exhibition held in October 2021, but some of the responses chosen for inclusion, for example, ‘High quality only if it’s affordable’ and ‘This does not happen now’ may be difficult to comprehend for the reader.</p> <p>Paragraph 5.86 omits any mention of local planning policies and design guidance, which will give the reader a false sense of the full suite of formal design related planning policies and guidance present at this local government level.</p> <p>The last sentence refers to ‘scale’ giving examples as being ‘residential extensions, conversions, changes of use and non-residential developments.’ It is considered that these are examples of ‘types’ of development and not scale.</p>	<p>Recommend moving details of the public event to an Appendix and providing a full log of the responses captured.</p> <p>Note: evidence of consultation is only evidence that consultation has taken place, not evidence that justifies or substantiates an approach.</p> <p>Include reference to existing and emerging local planning policies and NNDC design guide SPD.</p> <p>Amend sentence by replacing ‘scale’ with something like ‘size and type’.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Housing and Design	WNS6	Clarification / advice / objection	High Quality Design	<p>In general, the criterion set out in the policy are largely covered in national and existing and emerging Local Plan policies (adopted plan policies EN4, EN6, EN8, EN9, EN10, CT5, CT6) and emerging policies (CC3, CC10, CC11, CC12, HC2, HC7, ENV6, ENV7, ENV8, CC9,) and also covered in the North Norfolk Design Guide.</p> <p>It is suggested that the policy wording specifically refers to the character area appraisal in the first part of the policy as this evidence is overarching to all of the criteria, not just point 'a.'</p> <p>The criteria appears to summarise some of the design codes and parameters set out in the supporting Design Guidance and Codes Final Report. It is considered that in order to avoid the significant length, omission and duplication of the design code details and findings, the policy wording should require demonstration of how a proposal has addressed the design matters identified within the relevant character area where the site is located (see matrix on pages 41 and 42 of the document).</p> <p>As written, whilst the opening sentence states that the design of all new development 'will reflect the local distinctiveness', it then goes on to say that 'consideration should be given' to the Guidance and Design Codes document, which will not require an applicant to demonstrate any adherence to it. In addition, some of the criteria cover matters that would ideally form a separate policy, for example, regarding SuDS, biodiversity and open space.</p>	<p>Remove repeated criteria that are covered in existing and emerging local plan policies – see list of policies opposite.</p> <p>Add specific reference to the character appraisal contained within the design code document.</p> <p>Recommend the policy wording requires that proposals must demonstrate how it has addressed the design matters identified within the relevant character area where the site is located (see matrix on pages 41 and 42 of the document). Consequently, therefore, the details of the design matters copied from the design code will not need to be duplicated in the policy itself.</p> <p>This will add clarity, make the policy locally distinctive, remove conflict and confusion with the local plan and help make the policy effective and allow the local planning authority to apply it.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>As set out below the criteria are contained within this supporting document:</p> <ul style="list-style-type: none"> a. Contained in design code DC.1.1. b. Contained in design code. DC.1.2 c. Contained in design code. DC.1.2 d. Contained in design code. DC.2.1 e. Contained in design code. DC.2.1 f. Contained in design code. DC.2.2. This partly repeats points g. and m. in policy WNS5 and as it would apply to all development here, it is suggested that the parking criteria is removed in policy WNS5. g. Contained in design code. DC.6.1. The absolute requirement for no development above two stories is considered unduly restrictive, as whilst such a height restriction would generally be the case, there are locations within the town where more than two storeys would serve a useful purpose (e.g. as a focal point) or where it would be in keeping with its surroundings (e.g. if the undeveloped site on the Quayside ever comes forward). Requires the insertion of 'normally'. h. Contained within design code. DC.6.2 How can density enhance the character of the existing settlement? Suggest amending wording to say 'in keeping.' i. Contained within design code. DC.6.4 The criteria requires some amendment in order to clarify that a proposal 'positively contributes' and that 	<p>See comments above. Remove those criteria that duplicate existing and emerging local plan policies and amend the policy to only list the remaining matters which are evidenced in the wells character appraisal and design code. As above, the policy could simply refer to the relevant sections of the evidence and will also pick up any sections that you have not managed to reference.</p> <p>Suggest amending wording to say 'in keeping.'</p> <p>Amend wording as appropriate.</p> <p>Amend policy to specifically state what local distinctiveness you need, using your own evidence.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>materials 'should' reinforce and 'be respectful of' local distinctiveness.</p> <p>j. Contained within design code. DC.7.1. Note, as written, this will lead to a proliferation of existing neighbourhoods, good or bad.</p> <p>k. Contained within design code. DC.8.1. Consider open space as a separate policy or link with LGS policy given the number of elements to it.</p> <p>l. Contained within design code. DC.8.2</p> <p>m. Contained within design code. DC.9.1.</p> <p>n. Contained within design code. DC.9.5</p>	<p>Make a separate policy or link in with LGS/ open space policy.</p> <p>This is an unnecessary repetition of existing policy and dilutes the policy approach.</p> <p>Already covered by national and district policies. There is no need to add the justification for it in the policy itself. Given this NP is promoting small scale infill development, it is highly unlikely that SuDS will be appropriate.</p>
Employment and Retail	6.6	Clarifications / advice	Employment in Wells-next-the-Sea	Sites 1a, and 1b Ref that the sites are part of strategic employment land EMP 23	Amend text to state and acknowledge that the employment sites are designated as part of the Local plan under EMP 23 and fall under local plan policy E2.

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Employment and Retail	WNP 7	Clarifications / advice / objection	Redevelopme nt Opportunities	<p>Marylands site 1 a - is part of the designated employment site EMP23 as such it comes under strategic policy E2 of the Local Plan. This fact needs highlighting in the NP so as there is no conflict</p> <p>Apart from the ref to residential above the employment uses the approach is a duplication of the existing Local Plan policy, though the strategic policy has more detail and specific criteria and as written your policy could undermine and weaken the approach. (Which would be against your objectives). Suggest the policy is amended to remove the unnecessary duplication , ref the local plan and only be used to add the local distinguishing feature / requirement and operable clauses to make the policy mean something and direct the decision maker</p> <p>Question are the sites deliverable and the uses compatible with the known flood risk – do the policies need a clause in theme RE flood risk assessment flood risk?</p> <p>Site 1B is also part of the strategic employment designation and falls under policy E2 of the local plan where Uses classes E(g) , B2 and B8 are supported subject to 6 specified criteria. It is not a redevelopment opportunity it is a designated employment site which is currently</p>	<p>Amend policy to include only the local specific requirements of the WNP.in relation to Maylands. Delate the elements of the policy that duplicate the existing strategic policy (though with less detail) and the elements that are not deliverable.</p> <p>Three sites are identified within the town as having the potential to provide for redevelopment and environmental enhancement which would improve the vitality and viability of the sites and their immediate surroundings and the visual appearance and character of the area (figure 27 and 28).</p> <p>Site 1a: Land south of Maryland (including Great Eastern Way) which is identified for redevelopment for a mix of uses predominantly as set out in the Local Plan E2 with the addition of residential use on upper floors in relation to B8 storage use and subject to appropriate flood risk assessment and surface water management plan—including Industrial (B2), Commercial, Business and Service Uses including offices (Class E), and Storage (B8) at ground floor with residential above (open market and affordable)</p> <p>• site 1b should be deleted from the plan</p> <p>Site 1b— Land south of Great Eastern Way and north of Bluebell</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>in use and has a live permission on it. Although it looks like part of the site could be vacant, was approved for Change of use to Builders Yard/caravan & Boat repairs & storage/ Haulage. Current use is for storage and therefore, it is fully developed. PF/82/0551 - 0.23HA</p> <p>site 1b should be deleted from the plan</p> <p>Suggest car parking is not an employment generating use compatible with delivering jobs and as such this should be removed. Furthermore no evidence has been provided to justify this use.</p> <p>Site 2 is not a redevelopment opportunity and should be removed from the plan.</p> <p>The site is currently being developed under application PF/17/1939 – and a recent reserved matters RV/21/1344. Demolition of the existing grain store building and the erection of 9 dwellings comprising of a detached two storey dwelling, 3no. Two storey terrace dwellings and 5no. Three storey terrace dwellings with integral garaging, associated car parking, access and erection of external steps to facilitate means of escape. As such this area is possibly no longer a redevelopment opportunity and the Plan should NOT MISLEAD the community on the ability of this site to contribute to commercial uses, including retail this – remove ref consider removing the policy aspect. <u>Site 2 should be is deleted from the plan</u></p>	<p>Gardens which is currently underused and is identified as being suitable for a mixed-use development including light industrial and some car parking, subject to compatibility with adjoining uses.</p> <p>Remove site 2</p> <ul style="list-style-type: none"> Site 2: Land on south side of Freeman Street (former Ark Royal Public House) which is identified for a mix of uses including Commercial and Business Uses (Class E) and Retail (F2a and E(a)), with some residential and parking.30

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Retail and Town Centre	WNP 8	Clarification / Advice / objection	Retail and Town Centre	<p>The policy adds little to no local distinction to the approach to town centres and main town centre uses as set out in the local plan. In fact the approach seems broad and potentially undermines the more considered strategic retail and town centre policy in the local plan. As a result there is the strong potential that including a policy of this nature would reduce the ability of the local planning authority to direct retail growth of an appropriate scale and type to enhance the viability of the town and maintain its function for local residents.</p> <p>In line with national policy Retail proposals would first be directed to the designated primary shopping area and the sequential test applied. As such the approach is in conflict with the Local plan and national policy with regard to the named streets and sequential test. The local plan sets an approach that includes the use of a locally derived impact threshold and the requirement to demonstrate the level of impact on the existing retail and main town centre uses. The local plan also reviews and updates the primary shopping area and town centre boundaries and have been consulted on. Ref to the policy being used in conjunction with the local plan policy would assist in strengthening the WNP approach but in the main it is not needed.</p> <p>Remembering that s106 and other contributions can only be sought where they are necessary and directly related to the development and fairly and reasonably related to scale and the kind of development. See NPPF para 55 – 58.</p>	<p>The pre able to the policy should include reference to the local plan and the strategic approach its sets out in policy E4</p> <p>if such a policy is to be kept it should be rewritten making sure it includes specific and justified additional local considerations(i.e a background evidence paper setting out the issues and the considerations of planning options) over and above those set out in the local plan strategic policy that developers and officers should consider when submitting and determining proposals. As such the first 3 paras of the policy are superfluous and should be deleted and the second half amended as detail below. This will ensure that the policy adds to the material considerations</p> <p>Proposals will be supported that contribute to achieving a vibrant and bustling town centre comprising a healthy mix of retail, service sector, business, entertainment, cultural and residential uses.</p> <p>Proposals for new or expanded retail in Staithe Street, The Quay and Freeman Street which would reinforce the retail role of the town and promote a diverse town centre will be supported. Proposals that would add</p>

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				<p>For example the proposals for retailers to also provide parking for visitors is not considered reasonable especially within the main retail streets/ frontage</p> <p>The requirement of the policy supporting first floor residential accommodation on the residential street of Freeman St could not be implemented as the street is already a mix of residential and retail units with accommodation upstairs. That is located outside the PSA but within the town centre where residential development is already supported.</p> <p>The ref to supporting residential development only where it enhances the nigh time economy and vitality and viability of the town centre <u>outside main</u> shopping hrs is also befalling. Is the intention that residents should be conditioned not to spend during the day? Should the policy not be supportive of retail and main town centre uses that extend the main shopping hrs ?</p> <p>amend policy as suggested opposite</p> <p>Note there are also permitted development rights which allow residential development above retail and some commercial units. Ref to this and hence the limitations of the policy in this aspect should be incorporated into the NP</p> <p>The policy requirement to favour specific users such as independent retailers is not a land use policy and is in conflict with national policy.</p>	<p>to the number of independent retailers will also be supported. Proposals for residential development in these areas will be directed to first floor level. Residential development will be supported where it would add to the vitality and viability of the town centre outside of main shopping hours and support the night-time economy.</p> <p>Replace second half of policy with: Eg</p> <p>Proposals for retail and other Main town centre uses- in and around the town centre will be supported in line with sequential test and where (if otherwise appropriate) they contribute to the following aims, as appropriate:</p> <ul style="list-style-type: none"> • Reinforcing the area's distinctiveness priorities and reinforce the PSA and town centre and attractive character as a location where pedestrian activity is prioritised and users have a high sense of safety and belonging. • Ensuring the impact of vehicular traffic is relatively low and frontageservicing is minimised. • Supporting good connectivity between the different areas of the town centre by creating a pedestrian friendly environment and

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				<p style="text-align: center;">delete the requirement</p>	<p>extending existing footpaths/pavements to improve pedestrians safety e.g. north side of Station Road.</p> <ul style="list-style-type: none"> • Enhance pedestrian and cycle accessibility and connection between urban spaces • Ensuring the impact of vehicular traffic is relatively low and frontage servicing is minimised. Adequate rear servicing facilities are provided. • Improving accessibility and safety for pedestrians, cyclists, and other town centre users including provision of cycle parking. Enhance public realm within the PSA. • Providing for parking within easy walking distance from the town centre to encourage walking. <p>Proposals for residential development with in the primary shopping area will be supported provided that they are above ground floor level and include a separate secure access, preferably at the rear of the property which does not result in a net loss of ground floor retail space and adequate parking provision is demonstrated.</p> <p>Note there are also permitted development rights which allow residential development above retail and some commercial units. Ref to this and hence the limitations of the policy in this aspect should be incorporated into the NP</p>

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Infrastructure and Services	7.2	Clarification/ advice	Community Facilities	<p>Clarification required</p> <ul style="list-style-type: none"> • NNDC do not have a CIL • Planning obligations must only be sought where they meet all of the following tests: <ul style="list-style-type: none"> a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development <p>as such is it misleading and raises expectations to states that:</p> <p><i>Housing and other development will be expected to contribute towards improving local services and infrastructure through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via a Section 106 agreement/Section 278 agreement); or use of a planning condition.</i></p>	<p>Amend text</p> <p><i>Housing and other development will be expected to contribute towards improving local services and infrastructure as directed by national planning policy where a proposal is fairly and reasonable related in scale and kind to the development , is directly related to the development and is required to make it acceptable in planning terms</i></p> <p><i>through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via a Section 106 agreement/Section 278 agreement); or use of a planning condition.</i> Such planning obligations will be secured through s106 contributions / s278(highways) and or upfront collection through S111 process .</p>

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Infrastructure and Services	7.3 / 7.8	Clarification/ advice	Community Facilities	<p>The level of facilities and services is commensurate to the position of the town in the settlement hierarchy.</p> <p>It is questioned that the statement that 70 more dwellings in the town will be to the detriment of the services . This is a small level of growth which will help maintain services. Investment in community services is often through growth and the more planned growth there is the more likely that there will be investment strategies through third party to meet the growth eg medical services.</p> <p>Para 7.4 states that: <i>It is essential that thought is given to community infrastructure at an early stage and that the needs of the current community, the capacity of existing services and the anticipated needs of new residents are taken into account.</i></p> <p>What are the, where are the gaps and what is it that the community want. Through the NP there is the opportunity to include a policy or an aspiration which sets out the priorities for community infrastructure improvement.</p> <p>Para 7.8 states that <i>The Town Council believes that developers should work proactively to ensure that the timing of new infrastructure coincides with the timing of growth and is planned well in advance rather than seen as an afterthought and this is an important element of good development.</i></p> <p>If the NP was to include further housing sites it would ensure that other service providers are</p>	<p>Rephrase or remove this section</p> <p>If it can be ascertained and justified Include community priorities around infrastructure improvements as long as they evidence not just opinions. Eg what are the specific junction improvements required, what should any s106 monies for the support of improvements to medical provision be direct to ? any specific open space , play area equipment provision required ?that could be considered appropriate by a developer. ?</p>

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				aware on the potential for growth and as such appropriate forecasting and potential investment could be better planned.	

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Infrastructure and Services	7.09 – 7.11 – WSN9	Clarification / Advice	Visitor parking	<p>Its recognised that there are strongly held views including those around parking however the approach put forward raises a number of concerns.</p> <p>a) It is based on opinions. What evidence is there around quantum of car parking spaces in the town and the available capacity against need in low and high season?</p> <p>b) The policy is akin to an allocation and as such will need an assessment along with any alternatives and it should not be assumed that this site is the most suitable or indeed suitable and its use supported in a specific policy</p> <p>c) The site has been used in the past without permission for such use and it is subject to ongoing live enquiries and discussion with NNDC as to the suitability of the site for both temporary use and or permanent use.</p> <p>Moving forward an evidence base should be established around the capacity and need for the town and from that a review of the alternative approaches undertaken including if necessary an assessment of potential car parking site options to establish the most suitable site</p> <p>Failing that then the approach should be altered to not specifically state a preferred location</p>	<p>Commission a specify car parking study to inform approaches and / identify any suitable sites</p> <p>Alter policy to state:</p> <p>Proposals that allow for suitably located temporary/seasonal car parking, for example at the Pitch and Putt site off Beach Road to be made available for</p>

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					<p>visitors at peak times will be supported subject to :</p> <p>a)demonstration of need ; b)suitable located with easy access to the main routes into the town; c)have safe access and egress; and d)allow for easy accessible pedestrian routes to the town centre and or beach</p> <p>Such temporary arrangements should be in locations with easy access to the main routes into the town, have safe access and egress and allow for easy pedestrian routes to the town centre, beach, and other facilities.</p>

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Infrastructure and Services	7.13 - 7.15 – WSN 10	Clarification/ advice	Former Track Beds / Opportunities for sustainable transport	<p>The relevance of the references to park and ride in St Ives etc are questioned. Presumably they are connected to public railways – no such railway exists in Wells – no such park and ride exists in Wells and the location would conflict with your own policy WSN9 if it were to be used for car parking. NPs should be based on local evidence not elsewhere</p> <p>Para 7.15 the Lp does not omit this land. It is not sought to be protected as there is no current plans to use it for wider railway connection of rail freight. It is currently a narrow gauge tourist attraction</p> <p>In order for this policy to be applied the area of track bed intended needs to be identified and mapped and added to the policy mapping/ section in the draft Plan. Can the track bed be protected in its entirety outside the parish in order for it to be re connect to the main line? eg physically and financially ?</p> <p>The second half of the policy which seeks to restrict all land that has the potential for a rail freight development is potentially a broad brush protectionist approach that could prevent appropriate development and is not appropriate.</p> <p>What evidence is there that the track bed could be used for rail freight, or would be used for rail freight if the track was there in the future – is it not the case that there is a desire to return to passenger services, though this would need further connections outside the NPA? Is this</p>	<p>Re write the section with a specific local dimension for its retention as land for future sustainable transport links – how is the tourist attraction important to the town? What is its passenger numbers? , why should the track bed be protected and for what reasons.</p> <p>Delete the paragraph – clarity and not needed</p> <p>Identify on the WNP policies map the area of land you wish to protect</p> <p>The requirements for and the identification of such land needs to be evidenced and justified and the specific area/ site location identified in the policy / policies mapping for it to be applied . Eg amend second half of the policy subject to appropriate evidence and justification) In addition, any areas of land that are either currently in use as or has the potential for the provision of rail freight terminal facilities within the Neighbourhood Area will be protected from development and identified as</p>

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				<p>still possible or being pursued by third parties such as the Norfolk orbital train group?</p> <p>What areas of land are currently used and which areas of land are seen as having the potential for the provision for rail freight terminal and need to be protected and why?</p> <p>How much land is needed for such development? Where is the assessment of its suitability and any alternatives?</p>	<p>Land Safeguarded for Sustainable Transport. The area of land identified on the policies mapping is safeguarded for the provision of future rail terminal facilities</p>
Environment	Paragraphs 8.1 – 8.11	Clarification / advice	Environment	<p>There is no mention within the pre-amble paragraphs about the national design guide or the North Norfolk Design Guide SPD, which has specific advice on historic buildings, conservation areas, shopfronts, advertisements and materials.</p> <p>Paragraphs 8.6 and 8.7 need to qualify that some development referred to can't be controlled through the planning system, for example, extensions and alterations allowed under permitted development rights and signage that is deemed consent under the advertisement regulations.</p> <p>Paragraph 8.8 is quite restrictive and somewhat misleading, as it does not explain that, sometimes, materials are beyond the control of the planning system, for example, as part of works that are permitted development.</p> <p>At paragraph 8.8 the reference to the avoidance of using non-traditional materials within the Conservation Area pre-determines that all modern/contemporary design/materials would be inappropriate, as it would be classed as non-traditional.</p>	<p>Consider adding references to national and local design guidance, permitted development rights and the advertisement regulations.</p> <p>Consider rephrasing paragraph 8.8 and add 'where appropriate' in order to ensure flexibility.</p>

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Environment	Paragraphs 8.12-8.13	Clarification / advice	Shopfronts in the Conservation Area	Paragraphs 8.12 and 8.13 appear to give a general overview of conservation areas and the difficulties that many towns have faced over recent years. As a Neighbourhood Plan, it is suggested that the paragraphs are more focussed on what challenges Wells has faced in relation to these matters. Has the town lost its post office, bank or any pubs, for example?	Consider making the paragraphs more focussed about Wells.
Environment	Paragraph 8.14	Clarification / advice	Signage	There is no reference to the national Town and Country Planning (Control of Advertisements) (England) Regulations 2007, which sets out what signs deemed consent, ie. do not require advertisement consent. Also, there is guidance contained within the North Norfolk Design Guide regarding shopfronts and signage. The paragraph is specific about what is considered unacceptable, but this is not translated into the policy wording.	Consider adding references about the advertisement regulations and North Norfolk Design Guide. Consider rephrasing paragraph to remove the very specific content that appears to be policy wording, for example, 'hanging signs should be held by slender, well-designed brackets...' Refer to what guidance there is regarding signage in the design code and explain importance of sensitive signage within the town.
Environment	Paragraphs 8.15-8.17	Clarification / advice	Lighting and safety	These paragraphs appear to be quite disconnected in relation to contents of the policy as they refer to lighting, illumination, of signage as well as roller shutters, public realm matters such as street furniture and also refers to third party advice on Historic Town Centres. Matters such as highway signage fall under the authority of Norfolk County Council.	Recommend removing paragraphs as these matters are not related to the policy wording. Matters such as highway signage fall under the authority of Norfolk County Council.

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Environment	WNS11	Clarification / advice / objection	Protecting the Historic Environment	<p>Much of the policy is already covered within existing and emerging local plan policies and guidance. It is considered that the policy should refer to the character appraisal contained within the design guidance and codes supporting document in relation to development proposals.</p> <p><u>Conservation Area</u> With regard to specific comments on the criterion:</p> <ul style="list-style-type: none"> a. This is aspirational and as such, can be encouraged, but there is no statutory duty to maintain or repair traditional buildings. Therefore, consider moving to form an aspiration? b. – e. these matters are largely covered by existing and emerging local plan policies and guidance, where they can be controlled. f. This is a restrictive condition, as it appears to pre-determine that all modern/contemporary detailing/materials would be inappropriate, as it would be classed as non-traditional. The construction industry is moving away from wet trades towards more modern methods of construction and so it is not clear how sustainable this position will be going forward. Suggest adding words of <i>'where possible,</i> enhance local distinctiveness. <p><u>Signage and shopfronts</u> How could an applicant demonstrate that a new sign or advertisement would enhance the character and appearance of the conservation area? The policy makes reference to highway</p>	<p>Alter policy removing reference to existing criteria and add the local distinctive criteria, as set out in your evidenced character appraisal that you wish proposals to take into consideration, in addition to those already in the local plan.</p> <p>Remove/ make this an aspiration.</p> <p>Suggest adding words of 'where possible, enhance local distinctiveness.</p> <p>Change policy wording:</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				and directional signs, which fall under the jurisdiction of the Highways Authority and will be governed by highway safety regulations particularly in terms of standardised size, design and location.	<p><i>Where new or reconfigured advertising and signage (including shopfronts, highway signage and directional signage) is proposed consideration should be given to its size, design, and siting to ensure that it enhances the character and appearance of the Conservation Area.</i></p> <p><i>Proposals that seek to rationalise or reduce the amount of signage in the Conservation Area will be supported encouraged</i></p>
Environment	Paragraphs 8.18-8.21	Clarification / advice	Non-designated Heritage Assets	For information, it is advised that the draft Wells Conservation Area Appraisal, identified over 20 buildings that would be eligible for local listing status and consequently, there is concern that some buildings have not been identified, when others that have been in this document are not considered worthy of being designated as a non-designated heritage asset.	Re scope potential for inclusion

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Environment	WNS12	Clarification/ Advice/Objecti on	Non- designated Heritage Assets	<p>The overall methodology that has been used to identify non-designated heritage assets is considered acceptable, on the basis that the NNDC criteria and Historic England guidance has been taken into account, as stated.</p> <p>However, there is concern about how the methodology has been applied in concluding that some of the suggested non-designated heritage assets are on the list, while other obvious choices have not been included. The evidence appears selective and incomplete and does not justify the end result.</p> <p>It is suggested that the list of non-designated heritage assets is moved to an Appendix rather than being in the policy itself, as this will be easier to update and amend if necessary.</p> <p>See comments regarding Appendix B. There are significant concerns about the robustness of the assessment for the proposed non-designated heritage assets. As such, a review of the application of the criteria is considered necessary.</p> <p>For example, 3. Town Sign near Arch House – object to its inclusion as although attractive, a 2002 sign would most likely be ruled out on age grounds. Was an age range set as part of the Age criteria? It should be if you have followed the Historic England Advice Note, as you said you have.</p> <p>There are considered to be some surprising omissions from the above list, for example, the iconic former F&G Smith maltings building on the Quay.</p>	<p>Recommend that the policy wording requires amending so that it accords with national legislation, s72 of the Planning (Listed Buildings & Conservation Areas) Act, 1990, to conserve and where possible enhance....</p> <p>Thorough review required of the application of the assessment criteria – see comments to Appendix B.</p> <p>Evidence should be moved from Appendix B in to a Background Paper. The Paper should clearly set out the methodology, include a scope of potential assets and update the assessment to fully accord with the assessment methodology, which you state you’ve followed.</p> <p>The policy wording requires amending so that it accords with national legislation, s72 of the Planning (Listed Buildings & Conservation Areas) Act, 1990, to conserve and where possible enhance</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				The policy wording requires amending so that it accords with national legislation, s72 of the Planning (Listed Buildings & Conservation Areas) Act, 1990, to conserve and <i>where possible</i> enhance....	
Environment	Paragraphs 8.22-8.26	Clarification / advice	Paragraphs 8.22-8.26	<p>The paragraphs do not refer to any existing (policy CT1) and emerging (Policy HC2) local plan policies relating to open space or the Amenity Green Space Study (AGS), which is published evidence (June 2018 updated 2019). Please note this is about to be updated and republished with additional sites submitted through the local plan process. The AGS has reviewed the sites suggested by Town and Parish councils for LGS designation against the NPPF and PPG. The NPPF is clear that LGS designation will not apply to most green areas or open space and that it is for spaces that are unique in the benefits they provide to local communities and meet a tailored set of criteria. Where the nominated review sites have not met the LGS assessment criteria they have been reviewed for Open Space Designations such as AGS and or Education/Formal Recreation Area. Consequently, for those areas of land listed in the policy that conflict with the AGS assessments, there will need to be an acknowledgement of this and an explanation / justification.</p> <p>See comments on Appendix C for additional details. As written, the assessments are considered to be inadequate and incomplete.</p>	<p>The assessments don't reflect the most up to date evidence and the assessments are inadequate and incomplete.</p> <p>Redo using the full proforma.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Environment	WNS13	Clarification/ Advice/Objecti on	Local Green Spaces	<p>See NNDC's Amenity Green Space Study (AGS) for full assessment details:</p> <ul style="list-style-type: none"> a. The Buttlands – does not meet the tests for LGS (see AGS). This land will benefit from an open land area designation in the existing and emerging local plan. Full LGS justification is required. b. St Nicholas Church, Cemetery - this land benefits from an open land area designation within the emerging local plan. Full LGS justification is required. c. Market Lane Cemetery – this land benefits from an open land area designation in the emerging local plan. Full LGS justification is required. d. Home Piece (known as Land at Market Lane South) – a larger area of land including this land benefits from an open land area designation in the emerging local plan. Full LGS justification is required. e. Turning circle at Bluebell Gardens –this does not appear to meet the tests to be LGS –full justification is required. f. Mill Road Allotments –this land does not appear to meet the tests for LGS. A larger area of land benefits from an open land area designation in the emerging local plan. Full LGS justification is required. g. Mill Road meadow, north of Mill Road. Emerging site allocation Policy W07/1- Land adjacent Holkham Road, includes 	<p>As evidenced and written, it is considered that none of the identified LGS has been adequately assessed and consequently, it has not been demonstrated that the spaces meet the relevant criteria.</p> <p>It is strongly advised to use the proforma set out in NPG6/ NNDC Neighbourhood Plan guidance on LGS, as the basis for the LGS review.</p> <p>Remove LGS designation g.Mill Road meadow, north of Mill Road, due to conflict with access to site allocation</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>at point 3. that convenient and safe vehicular access to the site will be provided from Mill Road. The specific area of land is currently unknown, but its location will be within the identified LGS area. As such, this designation would be in conflict with the strategic site allocation W07/1 in the emerging local plan. National policy states that LGS designations should not be used to prevent development. As such, this proposed LGS designation is strongly objected to.</p>	<p>Policy W07/1 – Land at adjacent Holkham Road in the emerging local plan.</p> <p>The updated assessments should be a standalone evidence document and include reference to the AGS assessments.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Environment	Paragraphs 8.27-8.28	Clarification / advice	Important views	<p>Paragraph 8.27 should add a caveat that the North Norfolk Sensitivity Assessment SPD was specifically produced to aid identification of potential sites, assessment of and development of policy, in relation to renewable and low carbon energy.</p> <p>The explanation in terms of methodology, choice of views, summary of view description, photographs set out in paragraph 8.28 are not considered adequate to provide the necessary supporting evidence. In addition, Figure 34 is not of a scale that provides the necessary detail about the position of each viewpoint. A map would need to be produced for each viewpoint.</p> <p>A full explanation of the methodology and assessment/evidence should be set out in a standalone background paper, rather than summarised in paragraph 8.28. It should explain the rationale and methodology for the choice of views and criteria used, assessing the views against the cited susceptibility and value criteria. Setting out a proforma for these criteria for each view listed (and including others that were originally considered).</p>	<p>Update paragraph 8.27.</p> <p>A standalone background paper should be produced to explain the methodology and assessment /evidence should be set out in a rather than summarised in paragraph 8.28. It should explain the rationale and methodology for the choice of views and criteria used, assessing the views against the cited susceptibility and value criteria. Setting out a proforma for these criteria for each view listed (and including others that were originally considered).</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Environment	WNS14	Clarification/ Advice/Objecti on	Important views	<p>See comments above. The Policy is considered to lack adequate explanation and evidence to support it. Without this necessary evidence, the policy, as written is considered to be unjustified and will be challenged given the long distance/ wide and open nature of the landscapes within the parish.</p> <p>There is concern that certain views have been identified to potentially prevent development, as a number of views seem to be in locations where of known proposals.</p> <p>Irrespective of the above, the policy wording is vague and ambiguous. What is meant by 'unacceptable adverse impact'? It would be better if the policy was more positively worded, such as, development proposals should demonstrate that their location, scale, design and materials will protect, conserve and enhance, in relation to the defining qualities of the landscape character type, including its key characteristics, valued features and qualities.</p>	<p>See comments above. The Policy is considered to lack the required explanation and evidence to support it. Without this necessary evidence, the policy, as written is considered to be unjustified and will be challenged given the long distance/ wide and open nature of the landscapes within the parish.</p> <p>Remove policy or provide necessary evidence to support it, as described.</p> <p>Consider amending policy to link into appropriately evidenced important views and how they should be treated in proposals.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Sustainability and Climate Change	9.1- 9.5- WNP 15	Clarification/ advice/ objection	Sea level rise and flood risk	<p>The section describes in the main an existing flooding issue in a specific area of the town.</p> <p>It's not appropriate that land use policy around new development can fix existing issues especially when they are not necessarily within the scope of the Np or required to make the proposal acceptable in planning terms e.g. in this case away from the areas at risk of flooding. Remember NPPF stipulates infrastructure that is only necessary to make the development acceptable; in planning terms and <u>related to the development proposal</u></p> <p>Any development in a flood risk zone would first have to pass the sequential and exception tests set out in national policy, safe access and regress would need to be established. this policy is not needed, is not evidenced and would not deliver the access corridors stated</p> <p>Part two of the policy is covered through national policy and not necessary, especially as the Np is not directing growth to these areas. THE LOCAL PLAN COVERS THIS IN MUCH MORE DETAIL AND IS Evidenced. Inclusion of these requirements are not justified in NP and are a further duplication of existing policy both nationally and district wide at strategic level but also as written bring less value. The requirements for proposals and which type of development to provide flood risk assessments and when are first set out set out in national policy and the local plan. The reference in the policy to all development and the requirement</p>	<p>Delete the policy –national and strategic policies already cover this area in specific detail over and above what is mentioned here. It is not evidenced or required.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>to produce a flood risk assessment is in conflict with higher order approaches.</p> <p>This policy seems unjustified, does not take account of existing national and district policy approaches and not properly and proportionally evidenced. It is seen as unhelpful, in parts not deliverable and in the main is an example where the policy seems to have been included irrespective of acknowledging the scope and presence of national and district policy (which is also stronger). The policy should be removed or rewritten to target specific development proposals</p> <p>Note the SFRA identifies the areas affected where there is a requirement for evacuation plans in areas of risk and which informs the required evacuation plans and response to flooding.</p> <p>Since when does development create its own flooding? Do you mean all development? Eg that includes change of use , applications for chimneys etc</p>	

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Sustainability and Climate Change	Paragra phs 9.6-9.7	Clarification / advice	Pollution	The paragraphs do not mention existing and emerging local plan policies regarding pollution matters, in relation to health, living conditions and the natural environment, which cover all of the areas of pollution mentioned in the policy itself. Lighting is discussed in paragraph 9.7, but it should qualify the permitted development rights associated with external/internal lighting. The paragraph needs to explain the different types of pollution the policy is covering and the local concerns relating to these types of pollution.	Remove paragraphs as no local justification/ evidence has been provided to support the inclusion of the policy. See below.
Sustainability and Climate Change	WNS16	Clarification/ Advice/Objecti on	Pollution	The policy content is covered by existing and emerging local plan policies. It's inclusion does not appear to have been locally evidenced and as such, it does not set out any additional considerations. There does not seem to be any local specific area identified as a locally specific issue that is not already covered within the development plan.	The policy content is covered by existing and emerging local plan policies. It's inclusion does not appear to have been locally evidenced and as such, it does not set out any additional considerations.

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Site Specific Policies	WNS17	Clarification/ advice	Wells Beach	<ul style="list-style-type: none"> • The first half has no operable clauses and introduces significant ambiguity – it is unlikely to survive examination. This seems coastal management rather than any planning aspects , • Suggest the approach would be more locally distinctive and of value if the policy identifies the access improvements you wish to be delivered / promoted and could act as material considerations in any off site GI consideration or town council aspiration. as written it brings no value to the development process . • Second part of the policy is not positive and conflicts with Local Plan in relation to caravan sites and extensions as well as coastal roll back policies that facilitate mitigation and adaptation to climate change. There is ambiguity and conflict here and the issue of climate change is not being addressed. Why is the approach not supported? What issue does it cause and what evidence is there to support such an approach? There is no justification in the Np on this issues • The provision of retail would need to follow the sequential test that directs provision to the primary shopping area and then town centre. As such elements of the approach is in conflict with national and district strategic policy while other aspects remain a duplication. 	<p>To be effective and meaningful the approach should be identify the access improvements you wish to be delivered / promoted and could act as material considerations in any off site GI consideration</p> <p>Rephrase to better align with the councils strategic roll back approach and also tourism policies. The issues around growth / non growth approach will also need to be evidenced and justified.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<ul style="list-style-type: none"> • The identification of any suitable out of town retail area would need to be assessed and justified as well as its location / new area boundary identified and shown on the policies map. • What is meant by small scale – this will need to be quantified and justified in order to set a threshold on size and be implemented. As written such an approach would allow the development of all types of retail including convenience, comparison, café – is this the intention? • What is the evidence that retail is required in this location? • What would the impacts be on the existing car parking which would need to be displaced if such provision went ahead? • Should any policy not stipulate no reduction in parking places or provide for an addition of X number of spaces? especially as this seems to be the local issue ... <p>Beech huts Given that the existing huts in this area are fixed they could be considered permanent structures and as such would lend further to the argument that they any further extension would have to seek permission.</p>	<p>Retail here is considered out of town and against national policy. Based on an assessment and evidenced position you would have to identify a suitable area for retail and the appropriate scale/ threshold and identify it on the policies mapping. In doing so there should be an assessment of alternatives and a sustainability appraisal. The policy or reasoned justification section should also clarify what type of retail is sought. As written it is too broad and vague.</p> <p>Consider restricting growth to that which does not reduce car parking or which better provides for additional car parking.</p> <p>What evidence is there and what are the reasons for the policy approach- what is it seeking to do and why?</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>The change wording from the previous version to that of a more positive approach of support subject to criteria is welcome. However the justification for the inclusion of the policy is questioned. Why is there is a need for the policy and on what basis. As written the policy seems to be based on an opinion or would like to do bias without good reason.</p> <p>The policy will need to identify the existing area on the policy map in order to be effective and be implemented.</p> <p>It is likely that a project level HRA would need to be undertaken given the sensitivity of the location.. this would be tested once the emerging plan has undergone HRA scoping</p> <p>Any provision would also have to contribute to the strategic GIRAMS strategy which is set up to ensure no adverse impacts on European sites in relation to in combination effects , however it is likely at a further project level HRA would have to look at “alone effects” . The requirement for GIRAMS contribution could however be added to the policy now.</p> <ul style="list-style-type: none"> • How does this policy link with the fig 35 “the beach policy area. fig 35 seems to define a specific area but it is not designated in ant policy , nor is policy 17 appropriate for the entire area 	<p>Identify and justify the area where policy applies eg identify the boundaries of existing development on the Np’s policies mapping / in the policy, add the following to the policy</p> <p><i>Proposals to extend the area of beach huts beyond the existing area currently used for beach huts as identified on the policies mapping will only be supported where:.....</i></p> <ul style="list-style-type: none"> • Add criteria as below and any other updated consideration: • Appropriate contributions and mitigation measures secured in line with the Norfolk Green infrastructure and recreational impact avoidance and mitigation strategy GIRAMS. (in relation to recreational use) • Clarify the purpose and designation of fig 35

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Site Specific Policies	Fig 35	Clarification / relevance / advice	Beach Policy Area?	<ul style="list-style-type: none"> What is the purpose of this fig? What is the purpose of the Beach policy Area? There is no previous mention / There is no link to any text or policy, how has it been defined and what alternatives considered? Is it this area that policy WNS17 is meant to refer to? If so is that your intention. How does this relate to other policies such as WNS9 which also falls into this area? Is the idea to designate this area as a policy area : if so then there needs to be a designation policy and a policy that then controls the land use within it 	<ul style="list-style-type: none"> Clarification and linkages to policy areas needed. Area needs to be described, evidenced and justified The plan needs to explain what the area is identified and for what purpose The designation needs a specific policy.
Site Specific Policies	10.4 – 10.7 - WNS18	Clarification / advice	The Harbour	<p>The policy itself is rather general and lacking in operable clauses and is rather non-specific.</p> <p>What is the defined Harbour area?</p> <p>It is presumed the policy is meant to support employment provision that supports the areas use as a harbour – but the policy does not say this</p>	<p>Reword to be specific along the lines of the below</p> <p>A – designated the required area and provide the map for the policies map B – rephrase around development proposals should support and enhance the harbour area as a working and functioning port, enhance historical understanding of the harbours role in the towns heritage</p>
Implementation/ monitoring		Clarification	Implementation	Clarification – the NP will be used by WTC to guide and inform its responses to planning matters and by NNDC as the local planning authority in the determination of planning proposals in association with the wider development plan including the local plan and national policy	Amend the text

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Monitoring & Implementat ion	11.1	Clarification / advice	Implementation	<p>Incorrect statement - Suggest that the town councils role is more than that stated in this para :</p> <p><i>The Town Council's role is to bring its influence to bear on matters which lie outside the control of the planning system, but which are of vital importance to the life of the town and the achievement of the vision.</i></p> <p>By the very nature of this neighbourhood Plan the Town Council as the qualifying body promoting this NP and seeking to influence planning. So the above statement is incorrect</p>	Correct this statement
Appendix					

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Appendix B	Heritage assets	Objection	Heritage assets	<p>Page 9 of the 'Local Heritage Listing: Historic England Advice Note 7' in the opening paragraph of the Appendix, does not give information about criteria, as stated, it shows a flowchart detailing the key stages in the development of a local heritage list. Amend to refer to 'Criteria - defining the scope of the local heritage list, pages 11-13.'</p> <p>The criteria list is considered appropriate for the assessment of non-designated heritage assets. However, the application of the criteria is questioned. For example, as stated in the Historic England advice Note 7, 'Age' is likely to be 'an important criterion, and the age range can be adjusted to take into account distinctive local characteristics or building traditions.' It is not known whether an age range was established for the assessment process here. However, the inclusion of a town sign dated 2002 suggests one hasn't been set. As such, this criteria does not appear to have been used as an appropriate assessment tool.</p> <p>Overall, it is considered that the known criteria descriptions referred to (Historic England Advice Note 7) do not appear to reflect the contents for each of the proposed non-designated heritage assets. Consequently, it is considered that a thorough review of the assessment process</p>	<p>Include as a full standalone background paper and ensure the criteria used reflect the descriptions cited – Historic England and NNDC.</p> <p>Review/ amend choice of proposed non-designated heritage assets based on a full assessment against the criteria.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>is carried out in order to ensure it is robust and sound.</p> <p>As compiled, there is a number of queries and objections to the inclusion of some of the buildings/ structures proposed.</p>	
Appendix C	Appendix c LGS	objection	Appendix c LGS	<p>Appendix C sets out the justification for the LGS.</p> <p>It states that the criteria is based on para. 101 of the NPPF. This reference needs to be updated to para. 102, where the criteria is listed. The LGS assessment in the NP uses the three criteria within para. 102 as its base, but does not go in to much detail, particularly in relation to the second and third criteria.</p> <p>Whilst there is some consideration of historic significance, there appears to be little or no consideration of beauty, recreational value, tranquillity or richness of wildlife, as criteria to demonstrate the local significance of the green space. Also, although local character forms part of criteria three, none of the assessments identify or expand on the nature of the local character.</p> <p>The PPG should be referred to where you will find further guidance along with the NNDC NPG6 guidance document.</p> <p>Consequently, it is considered that the LGS assessments are not properly evidenced and detailed to demonstrate their compliance with the criteria, particularly with regard to how the land is 'demonstrably special to a local community' and why each area 'holds a particular local significance.'</p>	<p>Review methodology and it's application. Include a full standalone background paper providing the full assessment details, which also takes account of existing published material and guidance - PPG and NNDC NPG6 document and assessment proforma and also note the land with current open land designations in the local plan.</p> <p>Update paragraph reference to 102 of the NPPF.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Appendix D - Glossary		Advice	Glossary	<p>Clarify that the definitions are taken from the NPPF where appropriate.</p> <p>The glossary should be reviewed to only include those items that are mentioned in the NP. There appears to be many that are not</p> <p>Amend LPA to only ref NNDC as the statutory planning authority</p>	Review as appropriate
Other documents					

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
Design Guidance and Codes	Design Guidan ce and Codes	Advice	Design Guidance and Codes	<p>Section 1.5 omits the North Norfolk Design Guide from the list of key reference policy documents for District design guidance, which has, not only, shaped design in the parish probably more than any other document, but is a formally adopted supplementary planning document.</p> <p>Overall, Section 2, the context analysis/ character appraisal evidence is considered to be sound, but is not utilised to its full potential through the policies.</p> <p>It is advised that Section 3, the design guidance and codes, has more local details added, where possible, rather than being too generic 'good practice' based.</p> <p>For example, DC.3.2 involves generic guidance on new residential layouts; e.g. the hierarchy of streets, which could apply almost anywhere else. As such, it is likely to have limited application in Wells where the opportunities for significant development are likely to be restricted. It would be more beneficial to include tailored design guidance to the kind of small-scale development pressures faced by the town.</p> <p>DC.7.4 – in contrast to policy WNS11, criterion iii. , this suggests that PVC can be acceptable in certain circumstances.</p> <p>DC. 7.6 – includes that chimneys must serve a function, but it is not clear whether this means an actual function or whether it can just serve an important function visually. Also under</p>	<p>Include the North Norfolk Design Guide in Section 1.5 – within the district design guidance.</p> <p>Suggest removal of generic guidance in Section 3.2, on new residential layouts and the provision of more tailored design guidance for potential small scale development that Wells faces.</p> <p>Ensure policy WNS11, criterion ii., accords with contents of DC.7.4.</p> <p>Clarify meaning of DC.7.6 with regard to chimneys and explain what is meant by an 'out-of-scale wall' in criterion ii.</p>

Main Section	Para/ policy No.	Response Type	Section	Comments	Proposed change
				<p>criteria ii. What does the term “out-scale wall” mean?</p> <p>DC.8 Open Space – connect this to the LGS review and wider open space designations.</p>	

End.