

Holt Neighbourhood Plan

Regulation 16 Stage Public Consultation

Report of Representations

Monday 10 October - Monday 21 November 2022

**North Norfolk District Council
Planning Policy Team**

01263 516318

planningpolicy@north-norfolk.gov.uk

North Norfolk District Council,

Holt Road, Cromer, NR27 9EN

www.north-norfolk.gov.uk/holtnp

**Documents can be made available in Braille, audio, large print or
in other languages. Please contact us to discuss your requirements.**



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NORFOLK
CONSTABULARY
Our Priority is You

North Norfolk Council

via email

Date: 10th October 2022

Dear, Mr. Chris Brown,

Norfolk Constabulary

Community Safety
 King's Lynn
 Norfolk

Tel: 01553 665263

Email: steven.gower@norfolk.police.uk

www.norfolk.police.uk
 Non-Emergency Tel: 101

Pre-Submission Consultation
Holt Neighbourhood Plan; Holt Town Council, Nelson House, 2 White Lion Street, Holt.
Norfolk. NR25 6BA.

Thank you for your e-mail inviting comments on the above matter. I have spoken to Mrs. Gemma Harrison the Town Clerk and forwarded your request to the Constabularies Head of Estates (Mr. Duncan Potter) for his thoughts.

As a Designing Out Crime Officer my role within the planning process is to give advice on behalf of Norfolk Constabulary in relation to the layout, environmental design and the physical security of buildings, based upon the established principles of 'Crime Prevention through Environmental Design'.

The Government has reiterated that designing out crime and designing in community safety should be central to the planning and delivery of new development. Specifically, the Planning Practice Guidance on Design reminds practitioners that local authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 and exercise their functions with due regard to their likely effect on crime and disorder, and do all that they reasonably can to prevent crime and disorder.

The National Planning Policy Framework July 2021 also requires that:

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which... are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion....

Furthermore, The Charter for Social Housing Residents (Social Housing White Paper) explains that: ***“A home should provide safety, security and dignity. An opportunity to put down roots and contribute to our community so we can enjoy social and civic lives.”***

Also, that: ***“We also know we need to do more to prevent acquisitive crime in social housing, such as burglary and theft. The £25m Safer Streets Fund³⁴ aims to prevent such crimes from happening in the first place. The fund is investing in crime prevention plans in 52 communities across England and Wales many of which include social housing, and also include activity to tackle anti-social behaviour. “***

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We will answer letters within 10 working days, where information is available.
 Where this is not possible, an explanation will be given for any delay.



Awarded for excellence



INVESTOR IN PEOPLE

And: ***In addition, our National Design Guide, published in 2019, refers to the importance of designing out crime when developing new homes, and Government’s forthcoming guidance on producing local design codes will set out how homes and neighbourhoods must be designed with safety and security in mind by applying the principles of Secured by Design. This includes using passive design measures, such as ‘eyes on the street’ and appropriate layouts for homes.”***

I would therefore encourage the Council to consider requesting that all future planning applications work towards achieving the full Association of Chief Police Officers Crime Prevention Initiative **Secured by Design Awards**.

Secured by Design aims to achieve a good standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable Natural Surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, defensible space and a landscaping and lighting scheme which when combined, enhances Natural Surveillance and safety. Experience shows that incorporating security measures during a new build or refurbishment reduces crime, fear of crime and disorder. The aim of the Police Service is to assist in the Design process to achieve a safe and secure environment for residents and visitors without creating a “fortress environment”.

All new developments should provide a venue that makes the most from the proven crime reduction methodologies of Secured by Design gained from over thirty years policing experience and supported by independent academic research.

There are Residential, Commercial, Hospital and Educational Developments Design Guides available from www.securedbydesign.com which explain all of the crime reduction elements of these schemes. They are separated into sections; Section 1: Deals with the development layout and design and all external features and Section 2: Provides the detailed technical standards for various elements of the buildings.

The interactive design guide <https://www.securedbydesign.com/guidance/interactive-design-guide> is also a very good and self-explanatory tool that can walk you through the various elements of designing out crime in a visual manner. I have presented this guide to the Town Clerk.

The Constabulary is consulted by all of the Counties Planning Authorities with regards to this subject and offers appropriate advice. **Key issues are:**

Creating a sense of place

The main entrances to any development should ideally have a brick pillar style entrance; this is proven to create a “symbolic barrier” to give the impression that the area beyond is Private to the general community and deter casual intrusion by non-residents. To support this a change in road surface such as a simple strip of granite sets reinforces the message and creates a sense of place. Defensible space has the simple aim of designing the physical environment in a way which enables the staff and residents to control the areas around their home. This is achieved by organising all space in such a way that staff and residents may exercise a degree of control over the activities that take place there. A key principle of Crime Prevention Through Environmental Design is to restrict access to unobserved areas putting all visitors to the on view street scene.



Permeability

It can be a challenge to balance connectivity and access in a manner that does not compromise the safety and security of the residents. Excessive permeability is a design feature that is consistently linked to higher crime rates. It is important to limit access to residents and their legitimate visitors. Care needs to be taken to provide appropriate access for new developments.

Of course any new development does have an impact on the surrounding environment. Often new homes carefully consider and incorporate vehicular and pedestrian routes that are visually open, direct and well used with high levels of natural surveillance and modern lighting.



Connecting a new development to an adjacent traditional or period design requires careful thought. Older designs can often be intimidating to walk along and also run in between and at the rear/sides of homes. The lower level of use they experience for their current development and their existing design may be something that is tolerated but the increased demand from a further development of new homes will require consideration regarding their vulnerability.

Currently existing footpaths that are intimidating to use and do not have the benefit of today's design features, are being recorded by the public as such, on the streetsafe platform.

Lighting

To work in harmony with high levels of Natural Surveillance, a carefully designed Lighting plan to cover all vulnerable areas should be in place. This will help to deter and reveal potential offenders and a uniform spread of white light to meet the updated British Standard **BS5489-1:2020** is required.

Secured by Design supports the Institution of Lighting Professionals (ILP) in encouraging a variable controlled lighting level. Please note/ Bollard lighting is purely for wayfinding and can be easily obscured. It does not project enough light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided as the sole means of lighting. Lighting is required to each dwelling elevation that contains a doorset and can also assist in identifying the door and operating locking mechanisms.

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Secured by Design has not specified PIR activated security lighting for several years following advice from the ILP and police concern regarding the increase in the fear of crime (particularly amongst older people) due to repeated PIR lamp activations. Research has proven that a constant level of illumination is more effective at controlling the night environment.

Lighting design should be coordinated with a CCTV installation (when specified) and the landscape designed to avoid any conflicts and to ensure that the lighting is sufficient to support a CCTV system. A good lighting system is one designed to distribute an appropriate amount of light evenly with Uniformity Values of between 0.25 and 0.40 using lamps with a rating of at least 60 on the Colour Rendering Index. A Uo value of 0.4 or 40% is recommended to ensure that lighting installations do not create dark patches next to lighter patches where our eyes would have difficulty in adjusting quickly enough for us to see that it was safe to proceed along any route.

It is recognised that some local authorities have '**dark sky**' policies and deliberately light some of their rural, low crime areas to very low levels of illumination. Some are currently experimenting with switching off streetlamps in low crime areas between certain hours of the night to save energy costs and reduce CO2 emissions. If such policies exist, then these must be brought to the attention of the DOCO at the time of application. Secured by Design supports the Institution of Lighting Professionals (ILP) in discouraging 'switch off' unless a full risk assessment has been carried out, and the ILP also recommends that 'switch off' never be implemented purely for cost saving. A variable controlled lighting level is always the preferred option in addition to one which does not disadvantage disabled and older people who may have a sensory impairment and require well-lit routes to enable easy wayfinding and to make other users more easily visible. Attention to position and location of lighting to improve illuminance at ground level can avoid user casting shadows onto the surface whilst minimising light pollution

Natural Surveillance

The new designs should avoid blank windowless elevations to promote developments that increase Natural Surveillance and deter inappropriate loitering. This is essential to maximise overlooking from active windows over access routes and amenity space.



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The landscaping plans need to provide all specified shrubs and hedges that have a maximum growth height of one metre, whilst all trees should be “up pruned” to a minimum height of two metres to maintain a clear field of vision around the site. An environment that provides a “see and be seen” style will reduce crime and anti social behaviour. The proposal should then provide a design that continues with clear lines of sight and the avoidance of alcoves, recessed areas or opportunities for offenders to loiter in anonymity.

Parking

The provision for car parking should ideally be adjacent to the buildings with active windows overlooking and have appropriate levels of Natural Surveillance. It is always important to ensure that the vehicle owners are provided with a view of their vehicle to offer the best protection. This feature may become more relevant with the increase of electric charging of vehicles.

Having blank elevations adjacent to hard surfaced driveways does not provide appropriate surveillance and these can be ideal future “kick walls” for ball games or encourage inappropriate loitering and the potential for anti social behaviour or graffiti. Of course first floor level or frosted bathroom windows do not provide appropriate active windows for important surveillance.

I would have reservations regarding the use of secluded parking courts. These can present a challenge and the photograph’s (below) are of a similar feature in a Norfolk village. Once constructed they are often abandoned as a parking court but used as a playground. Often ball games in such confined hard surfaced areas amplify the noise and become a nuisance for residents. Also, homeowners prefer to park their vehicles where they can see them and generally park opposite their front windows. On occasion blocking the footpaths and causing danger to pedestrians. They can also provide blank walls at the entrance which can be subject to abuse. I would not promote their use on a new development.



For larger sections of parking it would be a wise move to consider the design criteria for car parking laid down in the police owned 'ParkMark' initiative. Further information can be found at www.parkmark.co.uk

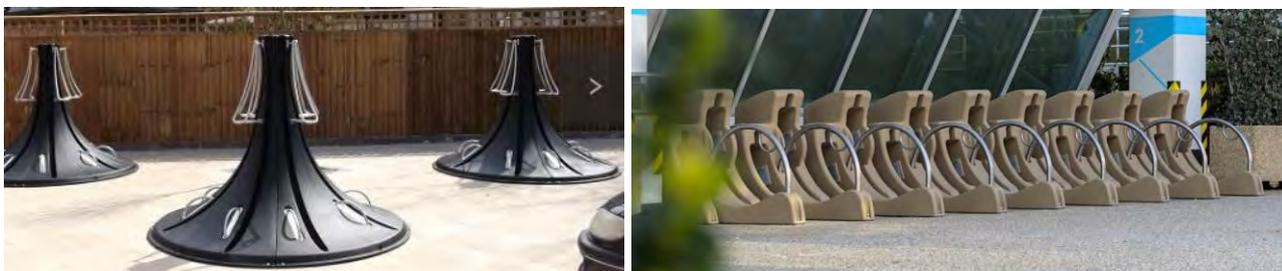
Cycling

The securing of cycles left unattended must be considered within the design of any new development. The position of any cycle storage area requires the same level of attention as for car parking and again should be positioned with active windows overlooking and have appropriate levels of Natural Surveillance.

Often cycle storage areas are very low on the list of priorities in a new scheme and get tucked away in a corner making them vulnerable to crime. Careful thought is required regarding the positioning of a cycle store to truly promote cycling. The cycle stand must facilitate the locking of both wheels and the crossbar. Hooped rings set into the ground do not provide for this. There are several secure cycle options detailed in the "member companies" section of Secured by Design. These professional structures have been security tested to achieve accreditation.



These structures should always be the default standard used today.



I would prefer to avoid canopies for cycle storage areas unless they are completely secure buildings with appropriate access control measures installed. Canopies have been used in the past as gathering points or shelter areas where a potential offender's presence is legitimised. This provides opportunity for crime.

I would also advocate promoting both cycle security and cycle marking/registration. The Constabulary and indeed every Police Force in the United Kingdom uses the **BikeRegister** database to search for stolen and recovered cycles. You can register your cycle on to this National Police Approved Data Base for free. You can also pay a fee and upgrade this registration with marking systems and labels to reduce the risk of becoming a victim. **You are 83% more likely to have your cycle stolen if it is not marked!**



How does **BikeRegister** work?



1

Register your bike

Add your bike details to our National Police-approved database for free



2

Mark & Protect

Mark & Protect your bike with one of our security marking kits



3

Apply warning label

Reduce your risk of theft by warning thieves that you use BikeRegister

Boundary treatments

It has become popular to set back some boundary treatments from the street scene but this does offer a recessed area where a potential opportunist offender could be concealed. It is essential to reduce these opportunities and place boundaries closer to the front elevation/building line.



Care also needs to be taken to avoid providing a stepping platform opportunity from low demarcation fencing that is adjacent to any rear perimeter treatments.

Terraced homes are a particular challenge to provide access to their rear gardens and yet the safety and security provided by a robust perimeter boundary. Some robust shared alleygates across the development will need incorporating to provide for this essential measure to reduce the risk of burglary.

Some 85% of house burglaries occur at such vulnerable positions.

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Formal Surveillance

Although Closed Circuit Television is not a universal solution to security problems. It can help deter crime and assist in the management of a venue if it is monitored continuously and appropriately recorded.



The provision of CCTV is most effective when it forms part of an overall security plan. It is essential that developers are very clear about the objectives they wish to meet and establish a policy for its use and operation before it is installed.

It is important to seek independent advice before approaching an installer and to develop a comprehensive **Operational Requirement** for the system, which can be supplied to installers during the tendering process. An operational requirement will be used for the design, performance specification and functionality of the CCTV system.

In effect, it is a statement of problems, not solutions and will highlight the areas that must be observed by the system and the times and description of activities giving cause for concern.

A useful reference to help achieve this goal is the CCTV Operational Requirements Manual 2009 ISBN 978-1-84726-902-7 Published April 2009 by the Home Office Scientific Development Branch.

Secured by Design



If you should wish to discuss any of my comments, or require some assistance with Secured by Design principles, then please do not hesitate to contact me.

I am very keen to help in any way I can to provide future developments that reduce the opportunity for crime and the fear of crime, creating a safer more secure and sustainable environment for future residents.

Yours sincerely

Steve Gower

Steve Gower
Designing Out Crime Officer
Norfolk Constabulary

cc Mr. Duncan Potter via e-mail.
& Holt Mrs. Gemma Harrison Town Clerk via e-mail.



Chris Brown

From: Tessa Saunders <tSaunders3@anglianwater.co.uk>
Sent: 18 October 2022 08:59
To: Chris Brown
Subject: FW: Holt Neighbourhood Plan (Submission Version) Consultation

You don't often get email from tsaunders3@anglianwater.co.uk. [Learn why this is important](#)

Dear Chris,

Thank you for consulting Anglian Water on the Holt Neighbourhood Plan Submission (Reg. 16). I can confirm that we have no specific comments to raise regarding the neighbourhood plan.

Please could you ensure my contact details are added to the planning policy database so that I am informed of future neighbourhood plan consultations, and could you remove planningliaison@anglianwater.co.uk from the database as this email is for our developer services team.

Many thanks,



Tess Saunders MRTPI
Spatial Planning Advisor

Mobile: 07816 202878

Web: www.anglianwater.co.uk
Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire, PE29 6XU



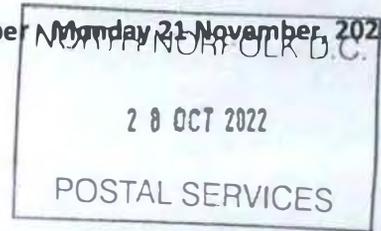
Holt Draft Neighbourhood Plan Submission Version Consultation (Regulation 16) Consultation Response Form



Holt Town Council have submitted a Draft Neighbourhood Development Plan to North Norfolk District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). In accordance with Regulation 16, North Norfolk District Council is now inviting representations on the Draft Plan, supporting documents and the evidence base.

Responses to the consultation are invited between ~~Monday 10 October~~ **Monday 21 November, 2022.**

PART A and Part B MUST be completed in full.



Part A: Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed. Please fill in your contact details below:

Personal Details	
Title: <u>Mr.</u>	Name: <u>Derek Godfrey</u>
Please tell us the capacity in which you are commenting on the Plan:	
I am a resident in the Neighbourhood Area (the parish) <input checked="" type="checkbox"/>	I am a Statutory Consultee <input type="checkbox"/>
I work in the Neighbourhood Area (the parish) <input type="checkbox"/>	Other (please specify) <input type="checkbox"/>
I represent a Resident's Association <input type="checkbox"/>
Organisation Name (if responding on behalf of your organisation)	
Address: [REDACTED]	
Postcode: [REDACTED]	
Telephone: [REDACTED]	Email: [REDACTED]

Please note: All responses to this consultation will be forwarded with the Plan and supporting documentation to an independent examiner who will consider whether the Plan meets certain legal and procedural requirements. For these reasons the information you provide (including your name, and organisation if you represent one) will be made publically available and may be published on the council's web site. Other personal information including email and property address details will not be published or made available for public inspection and will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018. For more information on how we process your data please see our [Data Protection](#) and [Privacy Policies](#)

Oral Examination

The majority of Neighbourhood Plan examinations are dealt with by written representations (in writing only). However, should it be decided that there is a need for an oral examination (a public hearing), please state below whether you would like to participate by ticking the relevant box.

No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation at the hearing would be necessary.

*I fully support the
Holt Neighbourhood Plan
2016 - 2036.
A very thorough and considered
piece of work.*

Future Notification & Next Stages

Following the consultation period and examination, the Draft Neighbourhood Plan (including any proposed modifications) will be put to a public referendum to determine if the Plan should be accepted. If satisfied that the Plan meets all the necessary legal requirements North Norfolk District Council will approve the Plan for use. If you would like to be notified of the Council's decision to "make" (adopt) the plan, please tick this box.

Please notify me

Thank you for completing this form - your participation is appreciated.

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. **Representations must be received no later than Monday 21 November, 2022. Late representations may not be accepted.**

Signature:

[Redacted Signature]

Print Name:

DEREK GODFREY

Date:

24/10/2022

For official use only

Date received:

Ref No:

Part B: Representation Details

You are invited to make comments on the proposed Neighbourhood Plan, supporting documents and evidence base. In doing so, you may wish to address whether or not the draft Neighbourhood Plan meets the basic conditions, set out below, and other matters that the independent examiner is required to consider under paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

Basic Conditions

Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be 'made'.

The relevant basic conditions for Neighbourhood Plans are:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). Read more details.
- b) The making of the neighbourhood plan contributes to the achievement of sustainable development. Read more details.
- c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). Read more details.
- d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. Read more details.
- e) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. Read more details.

In the table below please complete each column to show:

- which part of the Neighbourhood Plan or supporting document your representation relates to
- whether your response is an objection to the plan, supporting the plan, or providing neutral comments
- details of what you are supporting, objecting or commenting on, and why
- details of any changes you think necessary. If seeking textual amendments please include your proposed revised wording for policies or supporting text, including the justification for it along with any available supporting evidence.

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. **Further submissions will only be at the request of the examiner, based on the matters he or she identifies for examination.**

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change

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Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change

Please use additional rows / additional sheets of paper to add further comments.

Holt Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

Holt Town Council have submitted a Draft Neighbourhood Development Plan to North Norfolk District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). In accordance with Regulation 16, North Norfolk District Council is now inviting representations on the Draft Plan, supporting documents and the evidence base.

Responses to the consultation are invited between **Monday 10 October - Monday 21 November, 2022**.

PART A and Part B MUST be completed in full.

Part A: Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed. Please fill in your contact details below:

Personal Details			
Title: Mr	Name: David Fletcher		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input type="checkbox"/>	I am a Statutory Consultee	<input type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input checked="" type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	Specify: Planning Agent	
Organisation Name (if responding on behalf of your organisation)			
Strutt & Parker on behalf of North Norfolk Tomatoes & Heath Farm Holt Partnership			
Address: 66-68 Hills Road, Cambridge			
Postcode: CB2 1LA			
Telephone: [REDACTED]	Email: David.Fletcher@StruttAndParker.com		

Please note: All responses to this consultation will be forwarded with the Plan and supporting documentation to an independent examiner who will consider whether the Plan meets certain legal and procedural requirements. For these reasons the information you provide (including your name, and organisation if you represent one) will be made publically available and may be published on the council's web site. Other personal information including email and property address details will not be published or made available for public inspection and will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018. For more information on how we process your data please see our [Data Protection](#) and [Privacy Policies](#)

Oral Examination

The majority of Neighbourhood Plan examinations are dealt with by written representations (in writing only). However, should it be decided that there is a need for an oral examination (a public hearing), please state below whether you would like to participate by ticking the relevant box.

No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation at the hearing would be necessary.

The policies of the plan directly impact on my client's land holding. I would need to be present at any oral examination to represent my client's interests.

Future Notification & Next Stages

Following the consultation period and examination, the Draft Neighbourhood Plan (including any proposed modifications) will be put to a public referendum to determine if the Plan should be accepted. If satisfied that the Plan meets all the necessary legal requirements North Norfolk District Council will approve the Plan for use. If you would like to be notified of the Council's decision to "make" (adopt) the plan, please tick this box.

Please notify me

Thank you for completing this form - your participation is appreciated.

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. **Representations must be received no later than Monday 21 November, 2022. Late representations may not be accepted.**

Signature: D Fletcher

Print Name: David
Fletcher

Date: 3rd November 2022

For official use only

Date received:

Ref No:

Part B: Representation Details

You are invited to make comments on the proposed Neighbourhood Plan, supporting documents and evidence base. In doing so, you may wish to address whether or not the draft Neighbourhood Plan meets the basic conditions, set out below, and other matters that the independent examiner is required to consider under [paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990](#) (as amended).

Basic Conditions

Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be 'made'.

The relevant basic conditions for Neighbourhood Plans are:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). [Read more details.](#)
- b) The making of the neighbourhood plan contributes to the achievement of sustainable development. [Read more details.](#)
- c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). [Read more details.](#)
- d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. [Read more details.](#)
- e) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. [Read more details.](#)

In the table below please complete each column to show:

- which part of the Neighbourhood Plan or supporting document your representation relates to
- whether your response is an objection to the plan, supporting the plan, or providing neutral comments
- details of what you are supporting, objecting or commenting on, and why
- details of any changes you think necessary. If seeking textual amendments please include your proposed revised wording for policies or supporting text, including the justification for it along with any available supporting evidence.

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. **Further submissions will only be at the request of the examiner, based on the matters he or she identifies for examination.**

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
3. Planning Policy Context, The Emerging North Norfolk Local Plan 2016-2036	3.9-3.11	Support in part/Object in part	<p>Paragraphs 3.9-3.11 relate to the Emerging North Norfolk Local Plan 2016-2036. My client has made representations in relation to the Regulation 19 Consultation: Proposed Submission Version Local Plan (in particular in relation to allocations H20 and H27/1). Please find these appended to this response.</p> <p>Support is given to the allocation of site H20, however objection has been raised to the allocation of site H27/1 for reasons explained within the representation that has been appended to this report.</p>	Changes to the Emerging North Norfolk Local Plan 2016-2036 (outside of the scope of the neighbourhood plan). The Neighbourhood Plan should be updated to ensure consistency with the emerging Local Plan once the updated plan is published, with removal of policy H27/1.
5. Aspirations, Objectives & Land Use Policies	HOLT1 Design Guidance	Neutral subject to minor amendments	<p>My client's land at allocation H20 is located 'elsewhere within the defined Holt Settlement Boundary'. The importance of a combination of long and revealed views into the Conservation Area from public vantage points on its outskirts are noted, although none are anticipated from allocation H20.</p> <p>Policy HOLT1 also draws attention to the special interest in character of: 'The predominance of two storey, residential detached or semi-detached buildings, with occasional bungalows, all set within regular plot shapes and sizes in regular street patterns.'</p> <p>In relation to allocation H20, it should be acknowledged that this development sits in the context of more modern development previously permitted at Heath Farm. The context of this development therefore differs from that outlined in HOLT1.</p>	A third bullet point should be added to 2. Stating: 'the context of recent development at Heath Farm.'

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
5. Aspirations, Objectives & Land Use Policies	HOLT2 Housing Mix & Tenure	Neutral subject to minor amendments	<ol style="list-style-type: none"> 1. The importance of the design principles of dementia friendly communities are acknowledged. Our clients support this policy, provided that consideration is given to the viability of development. Please suggested minor amendment to this policy. 2. The importance of providing specialist residential accommodation for older people is acknowledged. It should be noted that allocation H20 includes provision of elderly persons accommodation. The location of H20 in relation to being suitably located in terms of amenity and proximity to local services will be evaluated as part of the local plan adoption and should not be duplicated by this policy. 3. Noted. 	<ol style="list-style-type: none"> 1. Paragraph 1 of the policy should be amended as follows: ‘In addition to meeting other development plan requirements for accessible and adaptable homes, all proposals for residential development should incorporate the design principles of dementia friendly communities unless demonstrably impractical or unviable’. 2. Paragraph 2 should be amended as follows: ‘Proposals for specialist residential accommodation for older people will be supported provided they are within the defined Holt Settlement Boundary and are suitably located in terms of their amenity and proximity to local services (or have received an allocation in the Adopted Local Plan).’
5. Aspirations, Objectives & Land Use Policies	HOLT3 Green Infrastructure	Support	My client acknowledges the importance of the Green Infrastructure Network. Allocation H20 does not lie within or adjoining the network. It is noted that draft Policy 20 of the emerging local plan includes paragraph 11 which requires an appropriate contribution towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impacts Avoidance and Mitigation Strategy.	N/a

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
5. Aspirations, Objectives & Land Use Policies	HOLT4 Employment Growth in Holt	Object	See above in relation to paragraphs 3.9-3.11. A request has been made to NNDC for the allocation of site H27/1 to be removed from the NNDC emerging Local Plan.	The Neighbourhood Plan should be updated to ensure consistency with the emerging Local Plan once the updated plan is published, with removal of policy H27/1.
5. Aspirations, Objectives & Land Use Policies	HOLT6 Connectivity in and around Holt	Object	<p>1. Paragraph 1 identifies a proposed Green Wheel. This Green Wheel includes footpath FP9a on my client's land between Hempstead Road and the A148. Inclusion of this route within any Green Wheel would likely intensify the use of this route. This route already serves a private farm, business and domestic use and is used by large farm vehicles including combine and sugar beet lorries between farms. The proposed intensification of use of this footpath is opposed on safety grounds. It is considered to be more appropriate for the green wheel to follow a route along Nightjar Road, which has a dedicated segregated cycleway and pedestrian footpath. This would allow the green wheel to then continue along its proposed route along Hempstead Road and then south into the country park.</p> <p>Paragraph 5.43 sets out: 'The entire Green Wheel will be freely available to walkers and eventually cyclists.' Cyclists can be more of a health and safety issue than walkers being faster moving, often silent</p>	<p>1. The section of the proposed Green Wheel which crosses my client's land should be excluded from the Green Wheel due to safety concerns. Under no circumstances should the route be upgraded to accommodate cyclists. The plan should be amended to follow a route along Nightjar Road</p> <p>2. The label on Plan H should be amended to refer to 'potential footpath linked to new development and road crossing'.</p>

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
			<p>and are less easy for a vehicle to see and anticipate. The upgrade of footpath FP9a would require a separate application to upgrade the footpath to a bridleway or cyclists. Any such application would be strongly opposed by the landowner on health and safety grounds and the negative impact it would have on running the farming business.</p> <p>It is also noted that Plan H includes reference to a 'proposed footpath linked to new development and road crossing'. As set out in the attached representation, although my client has no objection in principle to this link, its delivery is subject to third-party land and approval by the highway authority. Any pedestrian island should not block the farm access for large machinery.</p>	

Please use additional rows / additional sheets of paper to add further comments.

Appendix A



Regulation 19 Consultation: Proposed Submission Version Local Plan

Land at Heath Farm, Holt

Prepared by Strutt & Parker on behalf of North Norfolk Tomatoes

4th March 2022

Site Name:	Land at Heath Farm
Client Name:	North Norfolk Tomatoes
Type of Report:	North Norfolk District Council: Regulation 19 Proposed Submission Version Local Plan
Prepared by:	Jack Millar
Checked by:	David Fletcher
Date:	4 th March 2022

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 Tel No: 01223 459433

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1. INTRODUCTION	4
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1. INTRODUCTION

- 1.1 This representation has been prepared by Strutt & Parker on behalf of North Norfolk Tomatoes, in relation to a parcel of land at Heath Farm. This representation has been prepared in response to North Norfolk's Proposed Submission Version (Regulation 19 Publication) Local Plan Consultation. The Proposed Submission Version Local Plan includes an allocation for residential land on land owned by our clients (Holt, Land at Heath Farm, H20). Allocation H20 is shown in Figure 1 below:



Figure 1: Allocation H20

- 1.2 The purpose of this representation relates specifically to Policy H20 (Residential: Land at Heath Farm). For reasons explained further within Section 2 of this report, the North Norfolk Tomatoes LLP as landowners of the site, in principle fully support the proposed allocation as set out in Policy H20. It is however requested, that some adjustments are made to the wording of the policy in order for it to be considered to be sound in planning terms. Accounting for the position of the landowners of the site, it is requested that Policy H20 is amended as set out in Section 2 of this report.

2 PLANNING CONSIDERATION

2.1 The purpose of this Regulation 19 consultation is to test if the Proposed Submission Version Local Plan is legally compliant and sound. The tests of soundness are set out in Paragraph 35 of the National Planning Policy Framework (2021). According to Paragraph 35, plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.2 Policy DS 1 Development Site Allocations of the Proposed Submission Version Local Plan sets out the sites proposed for allocation in the proposed local plan. This includes an allocation on our clients' land (Holt, Land at Heath Farm, H20, approximate 180 dwellings, 60 units of elderly care accommodation, open space and supporting infrastructure). Further details relating to the requirements for development of this site are provided by site-specific Policy H20.

Policy H20

Land at Heath Farm

Land amounting to 7.1 hectares, as defined on the Policies Map, is allocated for residential development of approximately 180 dwellings, elderly persons accommodation, public open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site specific requirements:

- 1. Access being delivered off Nightjar Road and new A148 roundabout and delivery of footpath connections to footpath FP9a;*
- 2. Submission of a heritage impact assessment incorporating suitable open space and landscaping to preserve and enhance the setting of the Listed Buildings at Heath Farm to the south east of the site;*
- 3. Submission of a Transport Assessment identifying sustainable traffic mitigation measures to include; delivery of enhanced pedestrian access improvements across and along the A148 to facilitate pedestrian access to the medical centre, and bus stops on Cromer Road and the east of the town;*

4. *That the existing Anglian Water Main is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains should be located in highways or public open space;*
5. *A layout of development which protects the alignment of the medium pressure gas main which crosses the site;*
6. *Submission and approval of effective Surface Water Management Plan ensuring that there is no increase in greenfield run off rates;*
7. *Submission of a Foul Drainage Strategy setting how additional foul flows will be accommodated within the foul sewerage network and implemented prior to first occupation of any dwellings;*
8. *On-site provision of minimum of 1.55 ha open space;*
9. *Delivery of comprehensive development in accordance with agreed phasing which ensures delivery of all aspects of the allocated uses including not less than 60 units of specialist elderly persons accommodation;*
10. *Submission of adequate information in order to undertake a project Level Habitat Regulation Assessment, HRA, addressing issues relating to hydrological issues, site design, layout, drainage, supporting habitats and habitat survey, localised recreational impacts and provision of suitable long term drainage maintenance strategy designed to mitigate impacts on European sites, and*
11. *Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).*

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

- 2.3 The allocation of the site under Policy H20 is in general fully supported by North Norfolk Tomatoes LLP. For reasons explained within our earlier representations on the emerging Local Plan, the site is fully deliverable in planning terms and provides for a logical expansion to Holt. It is however, requested for some adjustments to be made to the policy wording in order for it to be considered sound in planning terms.
- 2.4 We would therefore make the following comments in relation to the requirements of Policy H20:

Setting of Health Farm

- 2.5 The landowners fully support the second requirement within the policy, which requires the submission of a Heritage Impact Assessment to ensure that the setting of the Listed Buildings at Health Farm are safeguarded as a result of the development. The landowners are strongly committed to ensuring the safeguarding of the listed buildings.
- 2.6 In order to safeguard the setting of Health Farm both in heritage and residential amenity terms, it is the landowner's intention for a wide landscape buffer of approximately 1.3 hectares to be provided along the east and south-east boundary of the site, to be retained by the landowners. Whilst it is possible that this may result in a reduction in total number

of dwellings being delivered to approximately 150-160 the applicants are committed to ensuring that this buffer is provided between the residential development and Heath Farm.

Footpath Connection

2.7 Footpath FP9a currently runs along the farm track connecting Hempstead Road to the A148. The farm track is used extensively by farm vehicles, and increased non-vehicular movements along the footpath could lead to safety issues. Introducing multiple connections to the existing footpath is therefore considered inappropriate. Instead, a single footpath connection is considered to be appropriate. One footpath will provide ease of access for all new residents within the development.

2.8 We would suggest the rewording of this requirement to state:

1. Access being delivered off Nightjar Road and new A148 roundabout and delivery ~~a of~~ ~~footpath connections~~ to footpath FP9a;

Enhanced Pedestrian Access Improvements over the A148

2.9 Point 3 of policy H20 requires the delivery of enhanced pedestrian access improvements across and along the A148 to facilitate pedestrian access to the medical centre and bus stops on Cromer Road and the east of the town.

2.10 Whilst the landowners have no objection in principle to this requirement and the sustainability benefits are understood, the provision for these improvements may necessitate the need for third party land outside of the applicants control. Whilst every effort will be made to ensure the delivery of a safe crossing point, it is considered that some flexibility is needed within the wording of the policy, to allow for the event that this is not achievable or not deemed practical by the Highway Authority.

2.11 We suggest that the wording of this requirement is amended to state:

2. Submission of a Transport Statement identifying sustainable traffic mitigation measures. **Reasonable endeavours will be used to scope out the feasibility of the delivery** of enhanced pedestrian improvements across and along the A148 to facilitate pedestrian access to the medical centre, and bus stops on Cromer road and the east side of the town.

Open Space

2.12 Policy HC2 of the emerging Local Plan sets out the requirements of North Norfolk District Council having regard to on site open space requirements. It is considered premature and unnecessary to prescribe a minimum area of open space to be delivered on site within H/20 at this stage, given that provision of open space is controlled under policy HC2.

2.13 This is particularly the case given the need on this site for a buffer to be maintained with Heath Farm to the east of the site (refer to paragraph 2.5 and 2.6 of this statement). It is the intention of North Norfolk Tomatoes to maintain a substantial buffer to Heath

Farmhouse, which could in itself impact upon the quantum of developable area and number of residential dwellings. In order to ensure that the policy wording is effective in planning terms, the area of open space to be provided should be determined at outline planning application stage in accordance with the policies of the Local Plan.

8. We would suggest the rewording of this requirement to state:

8. ~~On-site provision of minimum of 1.55 ha open space;~~ Open space will be delivered in accordance with the standards set out in the Local Plan.

3 SUMMARY

- 3.1 As set out in this representation, the proposed allocation of Heath Farm for residential development, under policy H20 of the Local Plan is in generally fully supported. It is requested that consideration is given to the following amendments to the policy wording to ensure that it is justified and effective and therefore sound in planning terms:
1. It is the landowner's intention to retain a substantial buffer of landscaping adjacent to Heath Farm. It is possible that this may result in a slightly reduced quantum of development being delivered of approximately 150-160 dwellings.
 2. Re- wording of point 1 of the policy to require the provision of one footpath connection to footpath FP9a
 3. Re- wording of point 3 of the policy in order to give flexibility to the delivery of the crossing over the A148 to allow for the event that it may not be deliverable in planning terms.
 4. Amendment to point 7 of the policy, to remove the requirement for 1.55 hectares of open space to be provided on the site.
- 3.2 It is considered that the above amendments of Policy H20 are required in order for this policy to be considered sound in planning terms.

Appendix B



Regulation 19 Consultation: Proposed Submission Version **Local Plan**

Land at Heath Farm, Holt

Prepared by Strutt & Parker on behalf of North Norfolk Tomatoes

4th March 2022

Site Name:	Land at Heath Farm
Client Name:	North Norfolk Tomatoes
Type of Report:	North Norfolk District Council: Regulation 19 Proposed Submission Version Local Plan
Prepared by:	Jack Millar
Checked by:	David Fletcher
Date:	4 th March 2022

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1. INTRODUCTION

- 1.1 This representation has been prepared by Strutt & Parker on behalf of North Norfolk Tomatoes, in relation to a 6 hectare parcel of land at Heath Farm. This representation has been prepared in response to North Norfolk's Proposed Submission Version (Regulation 19 Publication) Local Plan Consultation. The Proposed Submission Version Local Plan includes an allocation for employment land on land owned by our clients (Holt, Land at Heath Farm, H27/1). Allocation H27/1 is shown in Figure 1 below:



Figure 1: Allocation H27/1

- 1.2 The purpose of this representation relates specifically to Policy H27/1 (Employment: Land at Heath Farm). For reasons explained further within Section 2 of this report, the North Norfolk Tomatoes LLP as landowners of the site, do not support the allocation of the site for employment development and therefore the site allocation is not deliverable in planning terms. Accounting for the position of the landowners of the site, it is requested that Policy H27/1 is removed as an allocation within the emerging Local Plan.

2 PLANNING CONSIDERATION

2.1 The purpose of this Regulation 19 consultation is to test if the Proposed Submission Version Local Plan is legally compliant and sound. The tests of soundness are set out in Paragraph 35 of the National Planning Policy Framework (2021). According to Paragraph 35, plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.2 Policy DS 1 Development Site Allocations of the Proposed Submission Version Local Plan sets out the sites proposed for allocation in the proposed local plan. This includes an allocation on our clients' land (Holt, Land at Heath Farm, H27/1 Employment Land). Further details relating to the requirements for development of this site are provided by site-specific Policy H27/1.

2.3 Since earlier rounds of preparation of the plan, North Norfolk Tomatoes LLP have given further consideration to the allocation of Heath Farm, as defined under policy H27/1. In the early iterations of the plan, the landowners did have some concerns regarding the H27/1 allocation. Having further considered their position, the landowners cannot support the allocation of the site for employment uses and the land is not available for development. Therefore, the allocation of policy H27/1 can no longer be considered to be Effective in planning terms, in that the site is not deliverable for development. The site is situated within a sensitive location within the existing farm holding and it is the landowner's intention to continue to farm this land.

2.4 In order to be considered sound, it is requested that policy H27/1 is removed from the plan in its entirety and that policy DS 1 is re-worded to omit reference to Heath Farm employment allocation.

2.5 In addition to the in principal objection to the allocation of the site for employment purposes, there are a number of detailed matters of objection to the proposed allocation.

Infrastructure and Access

2.6 The landowners have had long standing viability concerns regarding the provision of the access onto Nightjar Road. The proposed new access onto Nightjar Road will be very expensive to deliver and it would render employment allocation on this site unviable.

- 2.7 The proposed new access would cross the existing farm track and footpath. Provision of an access track in this location would have a significantly detrimental impact on farm operations and upon users of the footpath.
- 2.8 The access in this location, being immediately opposite the access to the existing employment allocation to the west side of Nightjar Road, has the ability to frustrate the delivery of employment within the existing allocated area.

Secondary Location

- 2.9 The proposed employment allocation is situated within a secondary location that is not considered to be suitable for employment purposes. Holt Town Council have also commented that they feel the site is secondary and not prominent. There have been long standing employment allocations in Holt as part of the adopted Local Plan, which have been slow in coming forward for development. Recently one site has been reallocated for non-employment use due to lack of demand. It is our view that this location is not appropriate for employment provision and that there is no demand for 6 hectares of employment space within this location.

3 SUMMARY

- 3.1 In summary, unfortunately, this means that the 6 hectares of employment land associated within Allocation H27/1 is not available, suitable or deliverable. Allocation H27/1 is not available for development, nor does it have a realistic prospect of delivering the required growth within the timeframe covered by the plan.
- 3.2 It is considered that the removal of this site is required in order for the plan to be considered sound in planning terms. It is not however considered that the removal of this site undermines the strategic objectives of the Local Plan as a whole and suitable employment allocations exists elsewhere within the plan to meet the demand for employment provision within North Norfolk.

Date: 02 November 2022
Our ref: 409397
Your ref: Holt Neighbourhood Plan



North Norfolk District Council
planningpolicy@north-norfolk.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir or Madam,

Holt Neighbourhood Plan Regulation 16 Consultation

Thank you for your consultation on the above dated 07 October 2022

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully

Julian Clarke
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Chris Brown

From: Spray, David <David.Spray@marinemanagement.org.uk>
Sent: 09 November 2022 09:59
To: Planning Policy
Subject: Holt Neighbourhood Plan (Submission Version) Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from david.spray@marinemanagement.org.uk. [Learn why this is important](#)

Consultation response - PLEASE READ

Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Marine Management Organisation Functions

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the [Coastal Concordat](#). This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local

planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#). We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.
- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325.

David Spray (he/him) | Marine Planner (East) | Marine Management Organisation

MMO | Pakefield Road | Lowestoft | Suffolk | NR33 0HT

David.Spray@marinemanagement.org.uk | 02080 265359 | 07584 533027

Our MMO Values: Together we are **Accountable**, **Innovative**, **Engaging** and **Inclusive**

[Explore Marine Plans](#) [Website](#) [Blog](#) [Twitter](#) [Facebook](#) [LinkedIn](#) [YouTube](#)



During the current health emergency, the Marine Management Organisation is continuing to provide vital services and support to our customers and stakeholders. We are in the main working remotely, in line with the latest advice from Government, and continue to be contactable by email, phone and on-line. Please keep in touch with us and let us know how we can help you <https://www.gov.uk/mmo>.

This message has been sent using TLS 1.2

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Chris Brown

From: Scales, Andy <Andy.Scales@nps.co.uk>
Sent: 14 November 2022 10:06
To: Planning Policy
Cc: Potter, Duncan; Norfolk & Suffolk Police
Subject: Holt Neighbourhood Plan – Response to Regulation 16 Consultation
Attachments: Holt NP Consultation Form.pdf

You don't often get email from andy.scales@nps.co.uk. [Learn why this is important](#)

FAO Planning Policy Team

I refer to the consultation on the above consultation.

NPS is commissioned by Norfolk Constabulary to prepare representations on infrastructure planning policy matters. Therefore, on behalf of each Constabulary, I would make the following comments, based on the role Norfolk Constabulary have for policing, making each county a safe place where people want to live, work, travel and invest in.

Central Government place great emphasis on the role of the Police and the National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 92 which states

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which.....

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;

Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their Secured By Design initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live. This has been highlighted by the response sent by Steve Gower Designing Out Crime Officer earlier this month.

In terms of creating and maintaining safer communities, it is disappointing there are a number of measures that have been omitted from this version. Therefore, revision should be made to the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions and the needs of the Neighbourhood Plan area (as detailed in the attached consultation response form) as also as outlined below.

- The Neighbourhood Plan should include the specific aim to '*create and maintain a safer community and reduce crime and disorder*'. This would be consistent with NPPF advice and it is disappointing that this important consideration is currently excluded from its aims.
- The Neighbourhood Plan highlights in Policy 1 the importance of design but regrettably omits clear support for the principles of crime prevention through good design as the design and layout of the built environment plays an important role in designing out crime and reducing the opportunities for and risk of anti-social behaviour. There should be specific reference to this within policy 1 that '*All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety*'. This would be supported by an aim to '*create and maintain a safer community and reduce crime and disorder*'.

I trust that these matters can still be incorporated into the Plan objectives and policies to reduce the opportunities for crime and disorder (and also help reduce the fear of crime in the Neighbourhood Plan area) to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities.

Copy to Duncan Potter (Norfolk Constabulary - Head of Estates)

Andy Scales Head of Planning Consultancy

NPS Property Consultants

M +44 (0) 7512 193279 T 01603 706706

E andy.scales@nps.co.uk W nps.co.uk



5 Anson Road | Norwich | NR6 6ED

Consider the environment before printing this email

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Holt Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

Holt Town Council have submitted a Draft Neighbourhood Development Plan to North Norfolk District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). In accordance with Regulation 16, North Norfolk District Council is now inviting representations on the Draft Plan, supporting documents and the evidence base.

Responses to the consultation are invited between **Monday 10 October - Monday 21 November, 2022.**

PART A and Part B MUST be completed in full.

Part A: Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed. Please fill in your contact details below:

Personal Details			
Title:	Name: ANDY SCALES		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input type="checkbox"/>	I am a Statutory Consultee	<input checked="" type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input checked="" type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	ACTING AS AGENT ON BEHALF OF NORFOLK CONSTABULARY.	
Organisation Name (if responding on behalf of your organisation)			
NORFOLK CONSTABULARY			
Address: Estates & Facilities Department, Jubilee House, Falconers Chase, Wymondham, Norfolk			
Postcode: NR18 0WW			
Telephone: 07512 193279	Email: andy.scales@nps.co.uk		

Please note: All responses to this consultation will be forwarded with the Plan and supporting documentation to an independent examiner who will consider whether the Plan meets certain legal and procedural requirements. For these reasons the information you provide (including your name, and organisation if you represent one) will be made publically available and may be published on the council's web site. Other personal information including email and property address details will not be published or made available for public inspection and will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018. For more information on how we process your data please see our [Data Protection](#) and [Privacy Policies](#)

Oral Examination

The majority of Neighbourhood Plan examinations are dealt with by written representations (in writing only). However, should it be decided that there is a need for an oral examination (a public hearing), please state below whether you would like to participate by ticking the relevant box.

No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation at the hearing would be necessary.

Future Notification & Next Stages

Following the consultation period and examination, the Draft Neighbourhood Plan (including any proposed modifications) will be put to a public referendum to determine if the Plan should be accepted. If satisfied that the Plan meets all the necessary legal requirements North Norfolk District Council will approve the Plan for use. If you would like to be notified of the Council's decision to "make" (adopt) the plan, please tick this box.

Please notify me

Thank you for completing this form - your participation is appreciated.

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. **Representations must be received no later than Monday 21 November, 2022. Late representations may not be accepted.**

Signature: *Andy Scales*

Print Name: ANDY SCALES

Date: 14/11/2022

For official use only

Date received:

Ref No:

Part B: Representation Details

You are invited to make comments on the proposed Neighbourhood Plan, supporting documents and evidence base. In doing so, you may wish to address whether or not the draft Neighbourhood Plan meets the basic conditions, set out below, and other matters that the independent examiner is required to consider under [paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990](#) (as amended).

Basic Conditions

Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be 'made'.

The relevant basic conditions for Neighbourhood Plans are:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). [Read more details.](#)
- b) The making of the neighbourhood plan contributes to the achievement of sustainable development. [Read more details.](#)
- c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). [Read more details.](#)
- d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. [Read more details.](#)
- e) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. [Read more details.](#)

In the table below please complete each column to show:

- which part of the Neighbourhood Plan or supporting document your representation relates to
- whether your response is an objection to the plan, supporting the plan, or providing neutral comments
- details of what you are supporting, objecting or commenting on, and why
- details of any changes you think necessary. If seeking textual amendments please include your proposed revised wording for policies or supporting text, including the justification for it along with any available supporting evidence.

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. **Further submissions will only be at the request of the examiner, based on the matters he or she identifies for examination.**

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
Page 15	Objectives (Para 5.2)	Object	The Neighbourhood Plan should include the specific key objective to <i>'create and maintain a safer community and reduce crime and disorder'</i> . This would be consistent with NPPF advice, and it is disappointing that this important consideration is currently excluded from its key objectives.	Add key objective <i>To create and maintain a safe community and reduce crime and disorder</i>
Page 16	Policy 1	Object	<p>The Neighbourhood Plan highlights in Policy HOLT 1 the importance of design but regrettably omits clear support for the principles of crime prevention through good design as the design and layout of the built environment plays an important role in designing out crime and reducing the opportunities for and risk of anti-social behaviour.</p> <p>There should be specific reference to this within policy 1 that <i>'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'</i>. This would be supported by an aim to <i>'create and maintain a safer community and reduce crime and disorder'</i>.</p>	Add additional criteria (4) to policy HOLT 1 that states <i>4. All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety.</i>

Please use additional rows / additional sheets of paper to add further comments.

Planning Policy Team
North Norfolk District Council
By email

Direct Dial: 01223 582746

Our ref: PL00284682

15 November 2022

Dear Planning Policy Team,

Ref: Holt Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time, although we welcome the strong commitment to protecting and enhancing the historic environment of Holt parish that is evident in the plan.

We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk [<mailto:eastplanningpolicy@historicengland.org.uk>](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

CC:

Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk



Our Ref: MV/ 15B901605

15 November 2022

North Norfolk District Council
planningpolicy@north-norfolk.gov.uk
via email only

Dear Sir / Madam

**Holt Neighbourhood Plan - Regulation 16 Consultation
October – November 2022
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Holt Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



HNP10

Consultation Response Form

Holt Town Council have submitted a Draft Neighbourhood Development Plan to North Norfolk District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). In accordance with Regulation 16, North Norfolk District Council is now inviting representations on the Draft Plan, supporting documents and the evidence base.

Responses to the consultation are invited between Monday 10 October - Monday 21 November, 2022.

PART A and Part B MUST be completed in full.

Part A: Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed. Please fill in your contact details below:

Personal Details			
Title: Mr	Name: Simon Harrap		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input type="checkbox"/>	I am a Statutory Consultee	<input type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input checked="" type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	Honorary Secretary, Trustees of Holt Lowes, on behalf of the Trustees	
		
		
Organisation Name (if responding on behalf of your organisation)			
TRUSTEES OF HOLT LOWES			
Address: [REDACTED]			
Postcode: [REDACTED]			
Telephone: [REDACTED]		Email: secretary@holtlowes.org	

Please note: All responses to this consultation will be forwarded with the Plan and supporting documentation to an independent examiner who will consider whether the Plan meets certain legal and procedural requirements. For these reasons the information you provide (including your name, and organisation if you represent one) will be made publically available and may be published on the council's web site. Other personal information including email and property address details will not be published or made available for public inspection and will be processed in accordance with the General Data Protection Regulations and the Data Protection Act 2018.

For more information on how we process your data please see our [Data Protection](#) and [Privacy Policies](#)

Oral Examination

The majority of Neighbourhood Plan examinations are dealt with by written representations (in writing only). However, should it be decided that there is a need for an oral examination (a public hearing), please state below whether you would like to participate by ticking the relevant box.

No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation at the hearing would be necessary.

Future Notification & Next Stages

Following the consultation period and examination, the Draft Neighbourhood Plan (including any proposed modifications) will be put to a public referendum to determine if the Plan should be accepted.

If satisfied that the Plan meets all the necessary legal requirements North Norfolk District Council will approve the Plan for use. If you would like to be notified of the Council's decision to "make" (adopt) the plan, please tick this box.

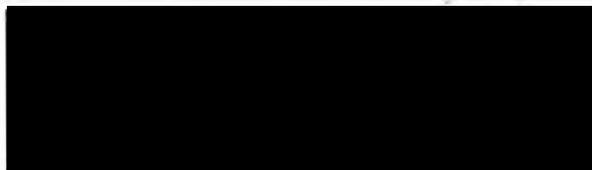
Please notify me

Thank you for completing this form - your participation is appreciated.

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. **Representations must be received no later than Monday 21 November, 2022. Late representations may not be accepted.**

Signature:

Signature:



Print Name:
Simon Harrap,
Honorary
Secretary,
Trustees of Holt
Loves

Date: 15/11/2022

For official use only

Date received:

Ref No:

Part B: Representation Details

You are invited to make comments on the proposed Neighbourhood Plan, supporting documents and evidence base. In doing so, you may wish to address whether or not the draft Neighbourhood Plan meets the basic conditions, set out below, and other matters that the independent examiner is required to consider under [paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990](#) (as amended).

Basic Conditions

Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be 'made'.

The relevant basic conditions for Neighbourhood Plans are:

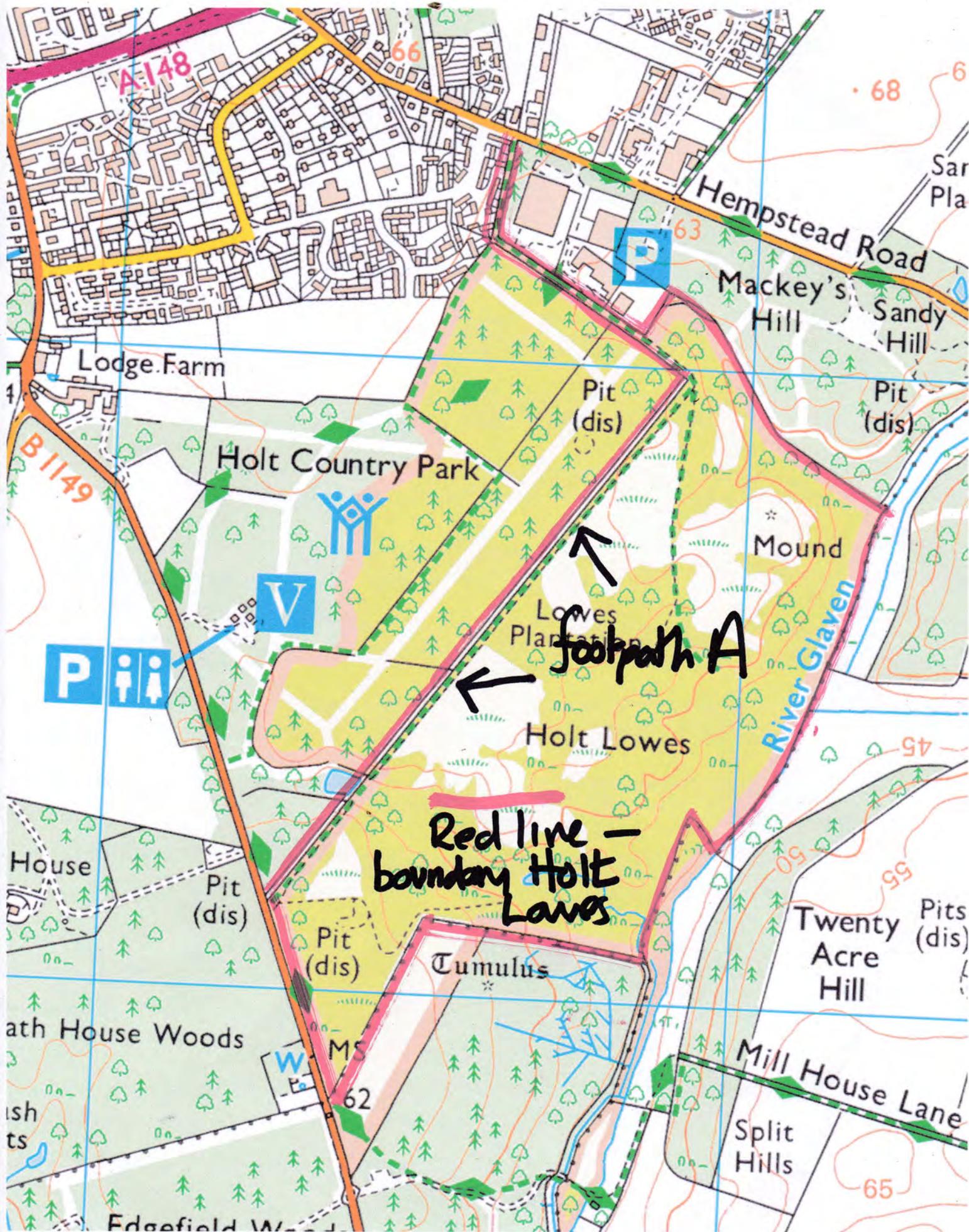
- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). [Read more details.](#)
- b) The making of the neighbourhood plan contributes to the achievement of sustainable development. [Read more details.](#)
- c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). [Read more details.](#)
- d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. [Read more details.](#)
- e) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. [Read more details.](#)

In the table below please complete each column to show:

- which part of the Neighbourhood Plan or supporting document your representation relates to
- whether your response is an objection to the plan, supporting the plan, or providing neutral comments
- details of what you are supporting, objecting or commenting on, and why
- details of any changes you think necessary. If seeking textual amendments please include your proposed revised wording for policies or supporting text, including the justification for it along with any available supporting evidence.

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. Further submissions will only be at the request of the examiner, based on the matters he or she identifies for examination.

Section & Page No.	Policy / Objective / Paragraph Number	Object / Support / Neutral	Comments	Proposed Change
5.38 to 5.43 pages 27 & 28		OBJECT	<p>The Trustees of Holt Lowes note that the proposed 'Holt Green Wheel' (Plan H) takes in land (Holt Lowes - see attached map below) that is owned and controlled by the Trustees. Holt Lowes is an SSSI (Site of Special Scientific Interest) and an SAC (Special Area of Conservation). Holt Lowes is also a registered common.</p> <p>The Trustees, together with our tenant, Norfolk Wildlife Trust, manage Holt Lowes for wildlife conservation and quiet recreation. All management has to be in accordance with a management plan approved by Natural England in order to preserve and enhance the features of interest of the SSSI and SAC, and take into account the specially protected breeding birds, which include Nightjar (Schedule 1 of the Wildlife and Countryside Act and a Species of European Conservation Concern and protected under Annex 1 of the EU 'Birds' Directive).</p> <p>The Trustees welcome public access on foot for 'quiet recreation' but have become concerned by the increasing use of Holt Lowes by dog walkers, many of whom do not control their dogs, which pose a real risk to ground-nesting birds such as the Nightjar, and by the overall challenge of managing increasing public access due to the growth of Holt. We do not wish to do anything that would limit access for members of the public wanting to enjoy a visit to the Lowes per se, but we would not want Holt Lowes to become part of a wider circuit or 'through route'.</p> <p>Thus the Trustees of Holt Lowes would not want the Lowes to 'provide and promote connections into and out of the town including to businesses and tourist attractions' (para 5.39), or to be 'corridors to other attractions along the wheel' (para 5.41). We would particularly object to 'the entire Green Wheel will be freely available to walkers and eventually cyclists' ... the long-term aim is to create a complete circuit available to cyclists' (para 5.43, our emphasis) as access is currently only permitted on foot. As a registered common under the Countryside and Rights of Way Act Holt Lowes is 'Access Land' and the public have a right of access on foot. For management and conservation purposes the Trustees may also wish in the future to exercise their right to close the Lowes (away from the public rights of way) for limited periods of time for management purposes or to protect particular species or habitats.</p> <p>The Trustees strive to keep Holt Lowes as 'wild' as possible, both for the benefit of wildlife and for the benefit of visitors; we have no made-up paths and have tried to keep signage to a minimum. We would consider any 'physical construction works' (para 5.42) associated with more formal routes totally unacceptable.</p>	<p>The whole of Holt Lowes be removed from the proposed 'Holt Green Wheel', which should be re-routed through Holt Country Park proper (i.e. <u>not</u> re-routed onto the footpath along the north-western border of Holt Lowes (just south-east of the Country Park - see attached map below) which the Trustees allow to be used as part of the Park's way-marked trail system).</p>



Footpath A

Red line -
boundary Holt
Lowes

NORTH NORFOLK D.C.

17 NOV 2022

POSTAL SERVICES

Holt Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

Holt Town Council have submitted a Draft Neighbourhood Development Plan to North Norfolk District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). In accordance with Regulation 16, North Norfolk District Council is now inviting representations on the Draft Plan, supporting documents and the evidence base.

Responses to the consultation are invited between **Monday 10 October - Monday 21 November, 2022.**

PART A and Part B MUST be completed in full.

Part A: Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed. Please fill in your contact details below:

Personal Details			
Title: MR + MRS	Name: DAVID + SUZANNE KINGLEY		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input checked="" type="checkbox"/>	I am a Statutory Consultee	<input type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	
I represent a Resident's Association	<input type="checkbox"/>		
Organisation Name (if responding on behalf of your organisation)			
Address: [REDACTED]			
Postcode: [REDACTED]			
Telephone: [REDACTED]		Email: [REDACTED]	

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Oral Examination

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No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation at the hearing would be necessary.

Future Notification & Next Stages

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Please notify me

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Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. **Representations must be received no later than Monday 21 November, 2022. Late representations may not be accepted.**

Print Name: MR DAVID KINGLEY
MRS SUZANNE KINGLEY

Date: 16/11/22.

For official use only

Date received:

Ref No:

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
30	6.4	OBJECT	<p>We strongly object to this aspirational new rail route. The damage to the environment all the mature trees/hedgerows that line the bypass would have to be cut down. These trees etc give the most wonderful backdrop to all the properties which back onto the bypass. Very important these mature trees give the bypass residents protection against the noise from vehicles that need</p>	
			<p>to use the bypass. Another important point is how is the railway line going to cross the Crocker Road as if they are linking from the Poppy Line there is a hazardous bend I fear a level crossing would not be appropriate. The cost + destruction + disruption would be immense ie large lifting machinery, tipping lorries etc etc.</p>	

In our opinion it would be a costly mistake + it would destroy the natural habitats!

Holt Draft Neighbourhood Plan

Submission Version Consultation (Regulation 16)



Consultation Response Form

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PART A and Part B MUST be completed in full.



Part A: Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed. Please fill in your contact details below:

Personal Details	
Title: MRS	Name: ANNE BARRETT
Please tell us the capacity in which you are commenting on the Plan:	
I am a resident in the Neighbourhood Area (the parish)	<input checked="" type="checkbox"/> I am a Statutory Consultee <input type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/> Other (please specify) <input type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>
Organisation Name (if responding on behalf of your organisation)	
Address: [REDACTED]	
Postcode: [REDACTED]	
Telephone: [REDACTED] [REDACTED]	Email: -

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No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether an oral examination is necessary. If this is the case, please outline why you consider that your participation at the hearing would be necessary.

IN ORDER TO PUT POINTS AND QUESTIONS WHERE NECESSARY.
--

Future Notification & Next Stages

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Please notify me

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Signature:

Print Name:

ANNE BRIDGET BARRETT

Date:

17th November 2022

For official use only

Date received:

Ref No:

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
HOLT NEIGHBOUR HOOD PLAN WEST SIDE POUND LANE AND PARALLEL TO VALLEY LANE	NOT KNOWN.	OBJECT	<p>1 AMOUNT OF TRAFFIC THAT WILL EXIT POUND LANE ON TO AN ALREADY OVER-BUSY A148.</p> <p>2 POTENTIAL INTRUSION INTO SPOUT HILLS AND CLAVEN VALLEY CONSERVATION AREA.</p> <p>3 ONLY SIDE OF HISTORICAL HOLT RELATIVELY UNSPOILT WITH LITTLE HOUSING SO WHY??</p>	

Please use additional rows / additional sheets of paper to add further comments.

Holt Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

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Responses to the consultation are invited between **Monday 10 October - Monday 21 November, 2022**.

PART A and Part B MUST be completed in full.

Part A: Personal Details

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed. Please fill in your contact details below:

Personal Details			
Title: Mr	Name: B Squires		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input checked="" type="checkbox"/>	I am a Statutory Consultee	<input type="checkbox"/>
I work in the Neighbourhood Area (the parish)	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>
I represent a Resident's Association	<input type="checkbox"/>	
Organisation Name (if responding on behalf of your organisation)			
Address: [REDACTED]			
Postcode: [REDACTED]			
Telephone: [REDACTED]	Email: [REDACTED]		

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Yes, I wish to participate at an oral examination

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Please notify me

Thank you for completing this form - your participation is appreciated.

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. **Representations must be received no later than Monday 21 November, 2022. Late representations may not be accepted.**

Signature:



Date: 19th November 2022

Print Name: B Squires

For official use only	
Date received:	Ref No:

Part B: Representation Details

You are invited to make comments on the proposed Neighbourhood Plan, supporting documents and evidence base. In doing so, you may wish to address whether or not the draft Neighbourhood Plan meets the basic conditions, set out below, and other matters that the independent examiner is required to consider under [paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990](#) (as amended).

Basic Conditions

Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be ‘made’.

The relevant basic conditions for Neighbourhood Plans are:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). [Read more details.](#)
- b) The making of the neighbourhood plan contributes to the achievement of sustainable development. [Read more details.](#)
- c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). [Read more details.](#)
- d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. [Read more details.](#)
- e) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. [Read more details.](#)

In the table below please complete each column to show:

- which part of the Neighbourhood Plan or supporting document your representation relates to
- whether your response is an objection to the plan, supporting the plan, or providing neutral comments
- details of what you are supporting, objecting or commenting on, and why
- details of any changes you think necessary. If seeking textual amendments please include your proposed revised wording for policies or supporting text, including the justification for it along with any available supporting evidence.

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Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
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Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
Section 6 Page 30	6.3	Neutral	<p>It is noted that in order to obtain better access to Holt Country park a footpath along the Norwich Road is proposed.</p> <p>Spout Hills is an equally important green space in the Town but is accessed across the busy A148 with its (proven) speeding traffic. This proves a barrier to many people, especially the elderly, disabled and families with children.</p> <p>It is surprising that a safe crossing of this road is not included in the list of priorities for investment of future contributions.</p> <p>In view of the number of new housing projects and the opportunities presented to new inhabitants by Spout Hills amenities, perhaps this could be considered as a project part financed by CIL.</p>	Provision of a crossing of the A148 in order to safely access Spout Hills.

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change

Please use additional rows / additional sheets of paper to add further comments.

Holt Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



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Personal Details			
Title: Mr	Name: Joe Penfold		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish) <input type="checkbox"/> I work in the Neighbourhood Area (the parish) <input type="checkbox"/> I represent a Resident's Association <input type="checkbox"/>		I am a Statutory Consultee <input type="checkbox"/> Other (please specify) <input checked="" type="checkbox"/> Representing Melton Constable Trust	
Organisation Name (if responding on behalf of your organisation)			
Melton Constable Trust			
Address: [REDACTED]			
Postcode: [REDACTED]			
Telephone: [REDACTED]	Email: [REDACTED]		

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Please notify me

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Signature: Joe Penfold

Print Name: Joe Penfold

Date: 18/11/22

For official use only

Date received:

Ref No:

Part B: Representation Details

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- c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). [Read more details.](#)
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- details of what you are supporting, objecting or commenting on, and why
- details of any changes you think necessary. If seeking textual amendments please include your proposed revised wording for policies or supporting text, including the justification for it along with any available supporting evidence.

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Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
Section 6 Implementation The Future of Rail Travel for Holt Page 30-32	6.4-6.8	Object	<p>A number of minor modifications are necessary in order to make important factual corrections to improve the effectiveness and consistency of the Plan aspiration to return rail travel to Holt via the project being pursued by registered charity, the Melton Constable Trust (MCT). These modifications are necessary:</p> <ol style="list-style-type: none"> 1) To address incorrect references to Norfolk Orbital Railway, which should be 'Melton Constable Trust'. 2) To address inconsistencies between the text and map figures (Plan J). The text omits reference to the proposed temporary station east of Station Road which is a necessary element of Phase 1 and can be seen in Plan J, Sheet 4. 3) To add further context and corrections. 	Melton Constable Trust requests that the text supplied within the attachment to our representation should entirely replace paragraphs 6.4 - 6.8.

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change

Please use additional rows / additional sheets of paper to add further comments.

Holt Neighbourhood Plan Submission Version Consultation

Proposed Modifications to Holt Neighbourhood Plan on behalf of Melton Constable Trust

18/11/2022

The following additions are proposed in red, and deletions shown as ~~strike-through~~.

The Future of Rail Travel for Holt

6.4 The aspirational plan to return train travel to Holt, ~~via the Norfolk Orbital Railway (NOR), via the reinstatement of the North Norfolk Railing Line~~ **from Sheringham, Norwich and intermediate stations via the project being pursued by a registered charity, the Melton Constable Trust (MCT),** has always been borne in mind in the Neighbourhood Plan and is supported by Holt Town Council. It will bring positive support to car-free travel, tourism and sustainable travel.

6.5 The ~~NOR~~ **MCT's project** aspires to reinstate a public transport service using modern trains to parts of Norfolk which suffered badly from railway closures in the 1960's. Its principal goal is to provide the very thing for which railways were created: to transport people safely and efficiently for work and leisure purposes. This new railway could also be used by heritage services. The environmental benefits of rail travel are of major importance, in line with modern thinking about global warming.

6.6 The aim of the ~~NOR will~~ **MCT is to** link the North Norfolk Railway (NNR) at High Kelling to ~~Fakenham, where it will join the Mid Norfolk Railway (MNR), which is extending its railway between Wymondham and Dereham through to Fakenham~~ **a station serving Holt itself.** This, combined with the existing Bittern Line between Norwich and Sheringham, will create a modern rail transport system which will link many of the towns and villages in North Norfolk. These objectives are in line with government policy (reversing 'Beeching') and the **All-Party** Parliamentary Group **On Heritage Rail's** report ~~entitled 'Public transport on heritage railways'~~ **'Public Transport On Heritage Railways'**. The reconstruction of the railway will be subject to the legal process of a Transport and Works Order. The aim is for the new railway to host services operated by the Train Operating Company which has the franchise for the operation of The Bittern Line between Norwich and Sheringham. **The MCT is also working with the Mid Norfolk Railway, (MNR), to extend its line to Fakenham, where the MCT has purchased a section of the route. The ultimate goal is to join both routes via former railway track beds creating, together with existing Network Rail lines, a Norfolk Orbital Railway.** The construction of the full orbital route is a **very** long-term ~~project~~ **ambition** which will ~~proceed~~ **be pursued** by achievable stages, thus phasing expenditure. The ~~next~~ **first**, and critically important, stage is to extend the railway into Holt. **The whole of the proposed route has been surveyed by WS Atkins, which is an engineering consultancy specialising in transport infrastructure projects. This survey has demonstrated that it is possible to reinstate the railway. The MCT has already purchased two key pieces of land between the NNR Terminus at High Kelling and the Holt Bypass.**

Plan J: Indicative Plans for new Holt Railway Station on the Norfolk Orbital Railway

6.7 An indicative scale plan of the potential route to Holt for the railway has been produced. Following investigations by ~~NOR~~ the MCT, site visits and surveys, two possible locations for Holt railway station (the Station) have been identified (see Plan J). These have been discussed with representatives of the Town Council, who have guided the choice of the optimum site options, which takes into account local needs. The aspirational site will be on the southern edge of the land currently occupied by Holt Community Primary School (the school), which is scheduled for redevelopment following the relocation of the school to a new site in Holt. ~~Only~~ A narrow strip of land, approximately ~~7 meters wide~~ 14 metres wide, consisting of 10 metres on the southern boundary of the existing school grounds and 4 metres of the grass verge alongside Thornage Road, will be required to accommodate both walkways, the track and platform, ~~as illustrated on the preliminary sketch of the potential site for the station and the immediate surrounding area~~ as illustrated on plan J. Consequently, a substantial majority of the current site of the school will be available for other developments. The initial station site is, however, expected to be a simple structure to the east of Station Road. This will minimise the engineering task and any disruption involved, whilst still being close to the centre of Holt. For the length of the railway on the grass verge of the Holt Bypass and Thornage Road there will be a Vehicle Restraint Barrier and an Anti-glare Screen to avoid distraction between the road and railway. All safety, environmental and noise mitigation required by the relevant statutory and local government bodies will be put in place.

6.8 The next priorities are to acquire the remaining land needed for the route into Holt, to obtain the necessary official permissions and then to gather resources and begin the ~~construction~~ building of the railway ~~over this first part of the NOR route to Holt~~. This sort of railway reconstruction has been done before and ~~is being~~ can be done again. The NNR extended its line from Weybourne to High Kelling in the 1980's, and the MNR is currently making good progress in extending its line from Dereham to County School on the way to Fakenham. There is a substantial margin of land on the North side of the Holt by-pass belonging to Norfolk County Council (NCC) which can accommodate the railway. Some years ago NCC offered this land ~~for the construction of this part of the NOR~~ to the MCT's project at little or no cost, although this decision would need to be ratified. The land has been extensively measured and an expert railway engineer has demonstrated that there are adequate clearances to accommodate the railway. The Holt by-pass is an existing transport corridor, therefore occasional trains will be hardly noticeable among the existing constant traffic.

Holt Neighbourhood Plan Submission Version (September 2022)



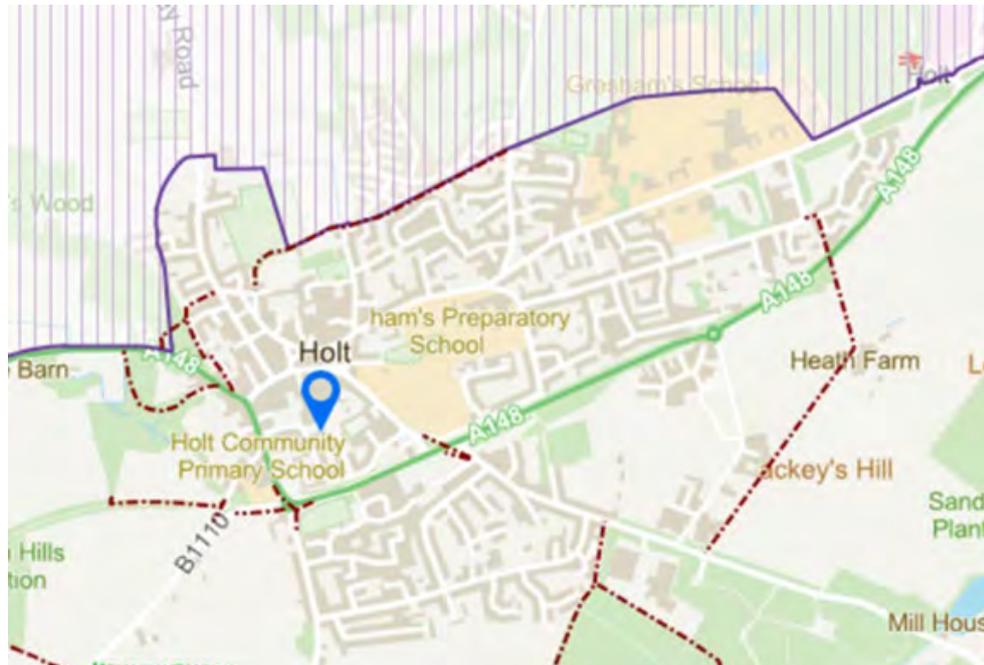
North Norfolk District Council Response

- 1.1. The submitted Holt Neighbourhood Plan demonstrates the huge amount of work that Holt Town Council has undertaken since the earlier pre-submission version in order to create a neighbourhood plan that supports their vision for the neighbourhood and adds local distinction to the adopted and emerging strategic land use policies of the District Council. Officers have welcomed the positive engagement and are satisfied that the revised Plan as submitted address the issues raised previously by the Council during formal consultation at Regulation 14 stages. The Council supports the submission of this document.

- 1.2. The Neighbourhood Plan has been produced during a period of significant policy change both nationally and locally. This is acknowledged in the neighbourhood plan where it is recognised that there have been updates to the NPPF, and PPG and the local planning authority are now at an advanced stage in preparing the emerging Local Plan (submission stage). It is this updated Local Plan which, once adopted, will provide the strategic policies for the district during the majority of the Neighbourhood Plan period. It is therefore important for the Neighbourhood Plan that due consideration and reference is given to the emerging Local Plan as well as the adopted Plans to ensure that the Neighbourhood Plan retains its relevance once the Local Plan is adopted next year. In doing so it is recognised that the intention is that the Neighbourhood Plan is to be in general conformity with both the adopted plan and the proposed submission version of the emerging Local Plan, recognising that decisions are made with regard to the Development Plan as a whole and as such there is no need to repeat the content of the strategic policies but to build upon them through justified local distinctiveness.

- 1.3. On reviewing the final document we make the following comments and proposed changes:
 - 1) The policies would benefit from being incorporated into a policy box format throughout to ensure clarity for application and implementation purposes.

 - 2) There is very little mention of the Norfolk Coast AONB boundary which extends into the northern half of the town. This is a national designation that merits plotting on the maps and strongly acknowledging within the Plan, given that development within the area is more restricted. Plan F and Appendix A, Holt Green Infrastructure Map (May 2022) omits to show the boundary of the Norfolk Coast AONB (shown in purple hatching on the map below). This should be included in a modification and text added to highlight the duty 'to conserve and enhance the landscape and scenic beauty of the AONB' (para 176 of the NPPF).



- 3) There is no mention of the North Norfolk Landscape Character Assessment (2021 SPD). Holt lies within the Wooded Glacial Ridge Landscape Type and the town is noted both as a Key Characteristic and as a Valued Feature of this Type. Para. 5.22 could be modified to incorporate this for reasons of clarity and consistency and conformity with the strategic policies which evoke this guidance into policy.
- 4) The Green wheel, Plan H, page 27 would benefit from a key and clearer explanations in relation to the text boxes for reasons of clarity and certainty around implementation purposes.
- 5) For reasons of clarity in relation to implementation, Policy 6 and/or supporting text would benefit from a modification providing a clear link to the need for development proposals to deliver on the identified green wheel opportunities in order to improve wider connectivity and permeability by bringing investment to the identified opportunities (pink lines) on the green wheel map. The policy would benefit from stronger wording in point two/three requiring investment from appropriate residential proposals and requiring proposals to include how they will seek to connect to and improve the green wheel and connectivity/permeability with the town. The reduction on the reliance on cars and encouraging more sustainable healthy and safe pedestrianisation is also an aim of national policy.
- 6) The hopper bus is in existence and is currently supported by recent s106 contributions. It's not clear if the map, Plan H, page 27 is showing a future route, and hence aspirational, or if the map is indicative, showing the actual route now. The map should be enlarged to include the medical centre which is missing from the top right. Alternatively, a further inset map could be inserted. Presumably the future route is to include the medical centre? The supporting text could usefully also outline the neighbourhood plan intentions here.
- 7) The section Future of Rail Travel for Holt, paragraphs 6.4 – 6.9 has not previously been part of the Neighbourhood Plan. The subject is not and has not previously been linked to any policy in the Neighbourhood Plan nor consulted on at any stage. The section clearly depicts the aspirations of the Norfolk Orbital Railway Group/Melton

Constable Trust and it is not known if these are shared by the community as a whole or are achievable. The inclusion of this section and in particular Plan J is potentially misleading as any scheme detail is not advanced enough to provide any level of certainty around delivery or scheme detail. As such the inclusion of the whole section is questioned.

- 8) As a minimum the section needs to be clearly separated from chapter 6 - Implementation and separated from the neighbourhood plan in its entirety through a clearly labelled new 'Aspiration' section. It is recognised that it is the aspiration of the Melton Constable Trust to reinstate the railway and the Towns Councils support for the reintroduction of rail travel to the wider network but it needs to be made clear in this document that no firm proposals or policies are in place or have been proposed for the track bed or any station and the drawings in Plan J are preliminary sketches by Norfolk Orbital Railway Group/Melton Constable Trust and not proposals or plans. For reasons of clarity and to avoid any confusion and misrepresentation the new aspiration section should also clearly set out that the drawings in Plan J remain indicative and aspirational of the Melton Constable Trust and that it is far from certain if this can be delivered. New wording should introduce such a section advising that there is shared aspiration with the Town Council and Melton Constable Trust around the principle of reintroduction of the railway but that much more work including land permissions would be required before any scheme or proposal could be known.

Iain Withington

Planning Policy Team Leader
North Norfolk District Council

18/11/2022



Norfolk County Council

Norfolk County Council Comments on the: Holt Neighbourhood Plan (Reg 16) 21 November 2022

1. Preface

- 1.1. The officer-level comments below are made without prejudice.
- 1.2. The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Neighbourhood Plan to date.

2. General Comments

- 2.1 The County Council supports the Vision, Aims and Objectives set out in the Plan (page 15).

3. Infrastructure Delivery

- 3.1. The County Council reiterates its comments relating to the following;
 - Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives.
 - It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new development.
- 3.2. The neighbourhood plan should therefore contain policies referencing the delivery of the above infrastructure and services.
- 3.3. Should you have any queries with the above comments please call Joe Wyatt (Strategic Planner Apprentice) on 01603 495866 or email joe.wyatt@norfolk.gov.uk

4. Lead Local Flood Authority

- 4.1. The LLFA note that there is still very limited reference made to flooding from groundwater or flooding within the Neighbourhood Plan and its 7 proposed policies. It is noted that Paragraph 5.3 states that the policies included within the Neighbourhood Plan focus only up on a small number of specific planning matters of the greatest interest to the local community with other policy matters to be dealt with via Local and Strategic Planning Policy documents including the NPPF and emerging NNDC Local Plan.

- 4.2. The LLFA welcome the reference to water bodies and sustainable drainage land in Policy HOLT3 Green Infrastructure in respect of developments being required to demonstrate no harm would occur from scheme layouts and landscaping. Notwithstanding this, the LLFA still recommends that a full review of flooding within the Parish of Holt should assess all forms flood risk in the area, including flood risk from surface water, groundwater and ordinary watercourses.
- 4.3. The LLFA note that there is also no reference to Sustainable Drainage Systems (SuDS) within the document.
- 4.4. The LLFA would re-iterate the LLFA view provided as part of the Corporate Regulation 14 response that given that the Holt Neighbourhood Plan does not include flood risks from surface water flood, or set a policy for surface water drainage for new developments, it is advised that ideally the plan would seek to contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Holt area and would promote a range of assessment and mitigation measures that will ensure that any future development (or redevelopment) will have a neutral or positive impact on flooding.
- 4.5. The LLFA recommend reference to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document Version 6.1' within the Neighbourhood Plan regarding surface water risk and drainage for any allocated sites or areas of proposed development, available from the "Information for developers" section of the Norfolk County Council website.
- 4.6. According to LLFA datasets (extending from 2011 to present day) we have 1 record of internal flooding and 3 records of external/anecdotal flooding in the Parish of Holt. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. We note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.
- 4.7. The LLFA advise that Norfolk County Council (NNC), as the LLFA for Norfolk, publish completed flood investigation reports here.
- 4.8. The LLFA are aware of AW DG5 records within the Parish of Holt however, this will need to be confirmed with/by Anglian Water.
- 4.9. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Holt.
- 4.10. The LLFA note this does not include flood risk from surface water or any mapping. The LLFA therefore recommend inclusion of surface water flooding

maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area. Information on this and associated tools/reference documents can be found at:

[GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map](#)
[Norfolk County Council \(NCC\) – Flood and Water Management Policies](#)
[Norfolk County Council \(NCC\) – Lead Local Flood Authority \(LLFA\) Statutory Consultee for Planning: Guidance Document](#)

4.11. **Allocation of Sites**

4.12. The LLFA would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. It is not evident to the LLFA that this has been undertaken in respect of any site allocations (however it is noted that no housing allocations form part of the plan). If a risk of flooding is identified then a sequential test, and exception test where required, should be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.

4.13. **LLFA Review of Local Green Spaces (LGS)**

4.14. The document proposes 2 no open spaces (we note these are referred to as open spaces as opposed to Local Green Spaces in the document). It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment on LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.

4.15. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

5. **Natural Environment**

5.1. **Ecology**

5.2. Policy HOLT3 Green Infrastructure is supported, and we are pleased to note that all relevant statutory and non-statutory wildlife site designations are recognised, as shown in Appendix A

5.3. Policy HOLT6 Connecting in and around Holt is also supported. The Holt Green Wheel concept is welcomed as a means of encouraging sustainable travel to key wildlife site destinations around Holt. However, it is important that any new access routes are carefully designed so as to avoid negatively impacting on the wildlife sites, for example, during their construction.

- 5.4. Policy HOLT6 Connecting in and around Holt is also supported. The Holt Green Wheel concept is welcomed as a means of encouraging sustainable travel to key wildlife site destinations around Holt. However, it is important that any new access routes are carefully designed so as to avoid negatively impacting on the wildlife sites, for example, during their construction.
- 5.5. It should also be noted that the recently adopted Norfolk Green Infrastructure Recreational Avoidance Management Strategy (GIRAMS) provides a mechanism for off-setting future increased recreational pressures as a result of planned development. This funding stream is expected to not only mitigate impacts to Natura 2000 features, but also indirectly bring about a wider suite of beneficial outcomes, particularly in relation to coastal parishes.
- 5.6. **Landscape**
- 5.7. Policy HOLT1 Design Guidance is supported and we are pleased to note the consideration of both landscape and townscape in it's content. It is encouraging to see the consideration of both long distance and adjacent views into the conservation area being considered as well as the setting of Holt within the Glaven Valley and the wider context of the Norfolk Coast AONB to the north.
- 5.8. Policy HOLT3 Green Infrastructure is also supported, and we are pleased to see the consideration of existing and enhancements being viewed in a holistic approach.
- 5.9. Policy HOLT6 Connecting in and around Holt has an interesting approach with The Holt Green Wheel and from a landscape perspective this is welcomed as a mechanism for connecting people and landscapes in a positive and functional way. We are encouraged to see the mention of connecting through from more urban formal spaces, through semi-natural spaces, and finally onto the wider countryside – there is great opportunities for place-making along these routes to utilise both existing and new GI to tell the story of the landscape and really create a sense of space that changes along the route.
- 5.10. Should you have any queries with the above comments please contact the Natural Environment Team neti@norfolk.gov.uk

6. **Minerals and Waste**

- 6.1. Norfolk County Council as the Minerals and Waste Planning Authority has no objections to the Holt Neighbourhood Plan. However, it should be noted that community facility "Holt Playing Fields" is approx. 5 hectares and is underlain by sand and gravel resource (map below). Since the allocation is for an existing community facility and comprises of a playing field, it does not sterilise the mineral resource underlain. However, if a planning application was to be

submitted for built development policy CS16 (or any successor policy) of the Minerals and Waste Local Plan would apply.

- 6.2. Should you have any queries with the above comments please contact Caroline Jeffrey (Principal Planner, Minerals and Waste Policy) at caroline.jeffery@norfolk.gov.uk or call 01603 222193.




 Safeguarded Mineral
 Resource: Sand and
 Gravel



Norfolk County Council

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Chris Brown

From: Mike Jones <mikej@norfolkwildlifetrust.org.uk>
Sent: 21 November 2022 19:55
To: Planning Policy
Subject: Consultation response to Holt Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from mikej@norfolkwildlifetrust.org.uk. [Learn why this is important](#)

Dear North Norfolk Planning Policy Team,

Thank you for consulting Norfolk Wildlife Trust on the Regulation 16 draft of the Holt Neighbourhood Plan (HNP). We disagree with the conclusions of the Habitats Regulations Assessment Screening Determination, dated July 2022, that the plan would not have an adverse effect upon the integrity of the Norfolk Valley Fens Special Area of Conservation (SAC).

The Norfolk Valley Fens SAC is vulnerable to impacts from visitor pressure, and whilst the screening determination discusses potential impacts from an increasing population due to housing allocations in the county's local plans, and the mitigation response proposed by the co-operative GIRAMS work (of which we support), we do not believe that this fully captures the potential for the HNP in relation to visitor pressure on the SAC. Therefore we disagree that Likely Significant Effects have been ruled out. As the risk of an adverse effect still remains, we therefore conclude that the plan in its current form, is not compliant with the Habitats Regulations and is unsound.

Policy Holt 6: Connectivity in and around Holt

We object to policy Holt 6, as we believe it can potentially lead to an adverse effect on the Holt Lowes component of the Norfolk Valley Fens SAC. The policy wording and the supporting text show a clear desire to promote access to the green wheel, to the extent that section 2 of the policy requires any future major development in Holt to demonstrate *'how their future occupants will be able to access the Green Wheel in safe and convenient ways'*, with the supporting text making clear the plan's aspirations to promote access to land along the green wheel. The green wheel clearly runs through Holt Lowes, which forms part of the Norfolk Valley Fens SAC.

The earlier HRA screening report, dated May 2022, for the HNP makes clear reference in section 2.12 to the vulnerability of the SAC to visitor pressure, but the link between the policy promotion of increased visitor access to the SAC and the potential for adverse effects from the increased visitor pressure does not appear to have been made in the HRA assessment. This does not relate to the proposed GIRAMS being delivered in a collaborative manner by local authorities across the county in response to visitor pressure impacts from new housing allocations, and so without further assessment (i.e. an Appropriate Assessment of the policy) the risk of an adverse effect on the SAC remains.

Therefore we believe that it is incorrect for the HRA screening exercise to have ruled out any Likely Significant Effect on the Norfolk Valley Fens SAC. We believe that the HRA documents supporting the draft plan should be revised, with a LSE for policy 6 recorded, and an Appropriate Assessment of the visitor pressure impacts of the policy carried out, in order to ensure that the plan can safely rule out adverse effects on the SAC.

We would be happy to discuss our comments further with the Council with a view to resolving our concerns, if that would be considered helpful. We kindly request to be consulted directly on any further revisions to the HRA documents that are made, if possible.

Regards,

Mike Jones
Conservation Officer (Planning)

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Web: www.norfolkwildlifetrust.org.uk



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