

Examination Library Document Reference A5.3

(Appendix C: Consultation Statement - Examination Library Document Reference A5)

First Draft Local Plan (Part 1)

Regulation 18 Stage Public Consultation

**Appendix C: Schedule of Representations -
Comments Submitted by Statutory Consultees & Other
Organisations**

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Appendix C: Comments Submitted by Statutory Consultees & Other Organisations

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Notes

The Council undertook a major consultation exercise on the emerging First Draft Local Plan (Part 1) and a range of supporting documents between 7 May and 28 June 2019. The responses received were related to multiple proposed policies and sites in the Plan and the Council has therefore, through this document, attributed part, or all of the response to its relevant Local Plan policy, section, or other consultation document as relevant. The original consultation responses can be viewed in full on the [Consultation Portal](#)¹. All consultation and other supporting documents can be viewed in the [Document Library](#)².

The following tables provide a summary of the comments submitted to the Council as part of the **First Draft Local Plan (Part 1)** document consultation. These comments were submitted by **Statutory Consultees & Other Organisations** against a variety of proposed Local Plan policies. An additional table at the end of each policy/site provides a combined summary of the comments.

Five separate appendices have been published in total: Appendix A (Individuals), Appendix B (Parish & Town Councils), **Appendix C (Statutory Consultees & Other Organisations)**, Appendix D (Alternatives Considered) and Appendix E (SA and HRA). These documents should be read together in order to gain a full understanding of the feedback received.

‘OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:’ This wording is used throughout the document. It applies in two scenarios where either:

1. An officer has typed a summary based on their interpretation of the comments; or,
2. An officer has inserted part of a comment and therefore the text is a summary of this particular part of the original representation.

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

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

First Draft Local Plan (Part 1)

Comments on Proposed Policies

(Submitted by Statutory Consultees & Other Organisations)

Sustainable Development Policies

Policy SD1 - Presumption in Favour of Sustainable Development

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD1	Natural England (1215824)	LP708	General Comments	We advise that the presumption in favour of sustainable development does not negate environmental objectives as specified in section 8a of the NPPF or the assessment of impacts to designated sites and the possible need for mitigation.	Noted
SD1	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP747	General Comments	Development In recognition of the role of Country Estates and the inclusion of a policy supporting Estate Masterplans, the second paragraph should be amended as follows: Planning applications that accord with the policies in this Plan (and, where relevant, with policies in Neighbourhood Plans or Council endorsed Estate Masterplans) will be approved without delay, unless material considerations indicate otherwise	Noted Consider comments in the finalisation of the policy
SD1	Save Our Streets North Walsham, Mr Berni Marfleet (1217329)	LP337	Object	The Plan does not address key issues and risks, which are vital to safeguard against speculative and environmentally damaging development. We believe the DLP needs to be radically re drafted and for it to be subject to further consultation with the public before proceeding to the next Deposit stage. Whilst the Plan does have objectives and policies for sustainable development and climate change mitigation, it does not address the challenges of assessing the impact, for instance, the carbon footprint of the proposals and what needs to be done to deliver an effective Climate Emergency strategy. The Local Plan is one of the key means to deliver on this recent policy and the Plan does not deal with this directly or fully and comprehensively.	Noted, Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach through the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The Local Plan supports the transition to a low carbon future in accordance with the 2015 written ministerial

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					statement and the Government's new net zero target moving toward net carbon by 2050. Meeting the target by 2050 will require further significant increase in the use of renewable technologies and the switch to low carbon heating such as heat pumps. The Government is consulting (Oct -Dec 2019) on a future homes standard through building regulations that includes options to increase energy efficiency standards for new homes in 2020 and a requirement to ensure future homes to be future proofed with low carbon heating by 2025. Changes in national policy will also need to be considered in the finalisation of this policy.
SD1	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Include a footnote to bullet one along the same lines as footnote 6 on page 6 of the NPPF	Noted- consider the addition of a footnote in the preparation of the policy.
SD1	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Recognises the need for an efficient Planning system and acknowledges NNDC's support for the delivery of sustainable development. However, Policy SD1 provides a selective re-write of NPPF paragraph 11 which omits aspects that make it consistent with the national policy test, such as the footnotes. It is therefore suggested that NNDC should simply refer to NPPF paragraph 11 and not seek to rewrite it into the Plan.	Disagree. It is important to highlight the presumption in favour of sustainable development in line with the development plan as a starting point for decision making.
SD1	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP611	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Broadly supports the Plan's Policy confirming the presumption in favour of sustainable development (Policy SD 1). Pigeon suggests that the Council may wish to consider a change to the Policy's justification (paragraphs 7.7-7.11) to indicate the circumstances whereby the Plan's policies may be considered 'out of date'. For instance, where housing needs have changed and/or have not been met; and/or after a period of time without review (5 years). The Council may also wish to consider changing the policy's justification to provide a North Norfolk context to the criteria for considering applications where there are no relevant policies, or they are out of date, for instance what the District's areas or assets of particular importance worthy of special protection are, such as the North Norfolk Coast AONB; coastal path and margins etc. This change would address the requirements under paragraph 16 of the NPPF, which advises that plans should avoid unnecessary duplication of policies in the Framework.	Support noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD1	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP573	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: It is critical to deliver development that addresses the economic, social and environmental wellbeing of the area, and Trinity College support taking an integrated approach with the Council to find solutions to achieve that.	Noted.
SD1	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We recognise that when the presumption in favour of sustainable development was first introduced the advice from PINs was to duplicate this policy in local plans. However, this is no longer the case and given that paragraph 16 of the NPPF states that local plans should avoid unnecessary duplication of policies in the Framework we would recommend that the Council deletes policy SD1.	Disagree. It is important to highlight the presumption in favour of sustainable development in line with the development plan as a starting point for decision making.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD1)
Objection	2	No substantial issues raised. There was support for the approach and priority given to the principle of sustainable development as defined in the NPPF. A number of respondents commented that the policy and supporting text could usefully include further references to wider plans such as master plans and more detail on the presumption does not negate environmental objectives as specified in section 8a of the NPPF or the assessment of impacts to designated sites and the possible need for mitigation, as such "environmentally damaging development" should be excluded and further clarifications could be given as to policy's justification and interpretation around the specific circumstances of North Norfolk context when considering applications where there are no relevant policies, or they are out of date, and or detail for instance what the District's areas or assets of particular importance worthy of special protection are, e.g. North Norfolk Coast AONB; coastal path etc.
Support	3	
General Comments	3	

Policy SD2 - Community-Led Development

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD2	Broads Authority (321326)	LP806	General Comments	Does it matter that 4c uses the terms 'long -term' and 'perpetuity'	Yes the words bring clarity and interpretation to different parts of the policy
SD2	Natural England (1215824)	LP709	Support	support the principal of community-led development. Where green spaces are proposed we suggest that local biodiversity assets are supported by incorporating appropriate habitat into the design. Any new housing should to be subject to the emerging Recreational Impact Avoidance & Mitigation Strategy (RAMS) as stated in the HRA.	Supported Welcomed: Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan
SD2	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP748	General Comments	To be consistent with the support the NPPF expresses for all types of housing across the rural area the opening paragraph of Policy SD2 should include reference to market housing, as follows: The Council is supportive of Community-Led Development. This may include schemes involving market housing, affordable housing... To make the policy more effective and in recognition of the unique ability of Country Estates to facilitate beneficial community led development which may otherwise not be realised, part 4a. of the policy should be amended as follows: 4. The Council is satisfied that: a. the scheme was initiated by, and is being led by, a legitimate local community group such as a Parish Council, Community Land Trust or Country Estate; and.. The final paragraph of policy SD2 should also be amended to be consistent with the inclusion of market housing as follows: "Where development including market housing is proposed it will only be considered acceptable if it can be demonstrated that it is necessary to: • Enable the delivery of affordable housing or other community benefits on the site and the community benefits of the scheme (such as the level of affordable housing or open space) are significantly greater than would be delivered on an equivalent open market site: or • Deliver market housing comprising a mix of dwellings that would meet a demonstrable need identified by the community through mechanisms such as a market housing needs assessment; or • Maintain or enhance the vitality of the community in that it will help safeguard community facilities that are under threat or would help secure additional community facilities where there is a current need." These amendments would directly support the aspiration of both the general housing policies of the NPPF as well as Policy SD6 of the Draft LPP1	Noted Consider comments in the finalisation of the policy
SD2	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning) (1218489, 1218491)	LP803	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: I write on behalf of our client Hopkins Homes who have a current interest in a wide range of sites across North Norfolk District, primarily within the rural villages. Specifically, these sites are to be promoted by Hopkins and Moore, the sister company of Hopkins Homes specialising in the delivery of smaller more bespoke village-scale developments. Our client is currently in the process of securing a range of suitable and deliverable sites within eight of the proposed Small Growth Villages that we consider to be amongst the most appropriate locations for additional allocations. The villages that our client is currently focusing on are as follows: • Binham; • Bodham; • Corpusty; • Langham; • Little Snoring; • Overstrand; • Walsingham; and • West Runton. On this basis our client	Comments noted: - The Council is supportive of Plan led development including where Local communities bringing forward additional growth to support local identified need through neighbourhood planning and not growth that is in conflict with the wider Development Plan. Consider clarification to para 7.14 adding support to community led

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>is also intending to respond to the Council's Call for Sites process which is running parallel with the current Draft LPP1 consultation. In respect of the Draft LPP1 our client wishes to provide comments on the following policies: SD2: SD3: SD4: HOU1: SD10:SD16:</p> <ul style="list-style-type: none"> • Policy SD2 Our client is supportive of the Council's initiatives to ensure that development that receives strong endorsement from local communities can come forward in a fashion or in locations that may otherwise conflict to an extent with the wider spatial policies of the development plan. Paragraph 7.14 describes the Council's intentions in respect of Policy SD2 most clearly in that The Council wishes to support Community-led developments including those which may not comply with some aspects of this Plan provided it is demonstrated that the development proposed is needed and will make a meaningful and lasting contribution to the vitality of the community. This statement very much brings the policy in line with paragraph 78 of the National Planning Policy Framework (NPPF) that promotes the delivery of new homes – both market and affordable – in rural areas where it will “enhance or maintain the vitality of rural communities”. This stands as separate to the NPPF's approach to the delivery of rural exception sites described at paragraph 71 and clearly recognises that the delivery of market housing in the countryside offers community benefits in its own right. In addition, paragraph 68 of the NPPF recommends that local planning authorities should seek to deliver small and medium sized housing sites through mechanisms such as area-wide design assessments and Local Development Orders (LDOs).To this end we recommend that the first paragraph of the policy makes reference to market housing. The final paragraph should then be amended to read as follows: “Where development including market housing is proposed it will only be considered acceptable if it can be demonstrated that it is necessary to: • Enable the delivery of affordable housing or other community benefits on the site and the community benefits of the scheme (such as the level of affordable housing or open space) are significantly greater than would be delivered on an equivalent open market site: or • Deliver market housing comprising a mix of dwellings that would meet a demonstrable need identified by the community through mechanisms such as a market housing needs assessment; or • Maintain or enhance the vitality of the community in that it will help safeguard community facilities that are under threat or would help secure additional community facilities where there is a current need.” These amendments would directly support the aspiration of both the general housing policies of the NPPF as well as Policy SD6 of the Draft LPP1 	<p>development where there is evidenced needs brought forward through neighbourhood Planning . - Consider amendments as proposed</p>
SD2	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP474	Support	We support Policy SD2 – Community –Led Development 2. That there is ‘no harm caused to character of settlement and the surrounding countryside’.	We support Policy SD2 – Community –Led Development 2. That there is ‘no harm caused to character of settlement and the surrounding countryside’.

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SD2	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Include the natural and historic environment to the end of Criterion 2	Noted- consider amendment to criterion 2 in the preparation of the policy.
SD2	RSPB (1217391)	LP390	General Comments	It is good to see community involvement in schemes being encouraged. This can deliver significant benefits for people and wildlife. Whilst many such schemes will be associated with settlements and away from protected areas, there may be some schemes that could generate impacts on protected sites. Such schemes will need to be properly assessed to ensure that they will adversely affect the integrity of Natura 2000, SSSI and other locally important sites for wildlife. Proposed changes: Highlight for clarity within the policy that projects may be required to undertake assessments to ensure they are not simply appropriate to the location, but will not harm important areas for wildlife nearby.	Noted- consider highlighting that projects may be required to undertake assessments to ensure they are not simply appropriate to the location, but will not harm important areas for wildlife nearby.
SD2	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP612	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports, particularly given Pigeon's approach to community engagement and track record of delivering community led schemes. However, the Council may wish to consider a change to the Policy to be more supportive of open market housing where it is supported by the local community and would contribute to sustainable development, rather than seek to restrict it. Also, to consider a change to the Policy's justification to include advice on how Community support is to be quantified and considered, in order to provide clarity on the Policy's application.	Support noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD2)
Objection	1	The principle of community led development (through neighbourhood plans) was supported. Clarification was sought on the extent of community support with some organisations seeking amendments to the approach around the inclusion of estate masterplans, greater recognition and endorsement of market housing in rural areas, recognising the contribution to sustainable development and the use of Housing needs assessments in demonstrating need, and hence support in rural areas.
Support	4	
General Comments	3	

Policy SD3 - Settlement Hierarchy

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD3	Natural England (1215824)	LP710	General Comments	Settlement Hierarchy In accordance with the paragraph171 of NPPF, the Plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA process to justify the site selection and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.	Agreed: Landscape and settlement considerations including environmental constraints and designations, the potential impact of development on landscape and views, along with a site specific SA have all informed site selections. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. A separate SA has also been published.
SD3	Gladman Developments, Mr Craig Barnes (1217131)	LP274	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The hierarchy comprises four tiers of settlements, with locations beyond these tiers classed as open countryside. At each tier the Local Plan seeks to focus a proportionate amount of growth according to the size of the settlement, role, and sustainability. The settlement hierarchy is supported by a recent appraisal of the services, constraints and needs of each settlement located in the District.. North Walsham, Fakenham, and Cromer sit jointly atop of the settlement hierarchy as Large Growth Towns. The identification of these settlements at the highest level of the settlement hierarchy is considered justified by Gladman given the scale and role of these towns in the District as a whole. Each settlement is generally home to the widest range of services, shops and employment opportunities in the Borough, and benefit from good transport links. The second tier of the settlement hierarchy (Small Growth Towns) is comprised of Holt, Hoveton, Sheringham, Stalham, and Wells-next-the-Sea. Gladman welcome the Council's acknowledgement of the suitability of Holt as a location for new development over the plan period. Holt is home to a range of existing facilities, services and shops and is well connected to nearby settlements by public transport. The inclusion of Holt is supported by Gladman. Notwithstanding the above, it is noted that Holt is identified as a Principal Settlement (along with Cromer, Fakenham and North Walsham) in the Core Strategy. The 'downgrading' of Holt in the hierarchy of the emerging Local Plan is not necessarily objected to as a matter of principle, as long as sufficient housing growth is directed to it in recognition of its extensive range of services and facilities; and, the fact in recognition of the fact that Holt is a significant net importer of employees from surrounding areas (as stated at paragraph 14.3 of the emerging Local Plan). With reference to Holt Gladman support the specific mention made within the policy which recognises Holt as fulfilling an important role for the wider rural area of Central North Norfolk. Development provided in Holt will therefore also help to meet housing needs of	Noted Consider comments in the finalisation of the policy. Consider the position of Holt within the settlement hierarchy and ensure that there is consistency among all tiers of the hierarchy. Consider the extent to which Policy SD 3 is flexible enough and consider the approach set out within the recently adopted Ashford Local Plan in the preparation of the policy.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>the wider rural area providing justification for increased housing provision at the settlement. Providing additional housing in Holt will also provide opportunities for employees that currently travel into work in Holt from other areas to live there and help address the importation of employees issue and secure a more sustainable pattern of development. Further justification for additional development in Holt is provided by the environmental constraints to development which affect large parts of the Borough and effects Holt to a lesser degree. Several sustainable settlements identified in Policy SD3 are located either entirely or partially within the AONB, or subject to flood risk. Nationally planning policy restricts housing development in locations which are affected by these constraints, as such, development required in these locations should be redistributed to the Districts other most sustainable locations including Holt. -The latter part of Policy SD3 defines the approach to be taken to residential development in areas outside of settlement boundaries. Only developments of 5 dwellings or less on previously developed land and in locations which would provide for infill development or the rounding off of the settlement will be supported. Whilst this provides some scope for additional development beyond allocated sites, the policy does little to provide the necessary flexibility to support the full delivery of the housing requirement. It is noted that the Council is reliant on around a fifth of its housing land supply to come forward at windfall locations (see Section 5.1 of this representation). The reliance made by the Council on development at such locations is significant especially given the rigorous assessment of urban capacity taken by the Council in its SHLAA. This, together with the fact that windfall development is, by definition, a diminishing source of supply, means that scope for windfall over the plan period will inevitably reduce. Policy SD3 provides the opportunity to the Council to maintain and even increase windfall provision where it is sustainable, helping to support the deliverability of the Local Plan. The approach of Policy SD3 however does not capture this in its present form, owing to the highly limited circumstances in which development proposals which do not form committed or allocated sites will be permitted. In response, Gladman suggest that this section of Policy SD3 requires revision, with a changed emphasis to support sustainable windfall development at suitable locations. Proposed Changes: Gladman's favoured approach is provided by Policy HOU5 of the adopted Ashford Local Plan which was recently found sound . The wording of Policy HOU5 is set out below and should be adapted to be relevant to North Norfolk. "Proposals for residential development joining or close to the existing built up confines of [list settlements] will be acceptable provided that each of the following criteria is met: a) The scale of development proposed is proportionate in size to the settlement and level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in the Local Plan and committed development in liaison with service providers; b) The Site is within easy walking distance of basic day to day services in the nearest settlement and/or has access</p>	

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>to sustainable methods of transport to access a range of services; c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area; d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services; e) Conserves and enhances the natural environment and preserves or enhances any heritage assets in the locality; and f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements: i) It sits sympathetically within the wider landscape; ii) It preserves or enhances the setting of the nearest settlement; iii) It includes an appropriately sized and designed landscape buffer to the open countryside; iv) It is consistent with the local character and built form, including scale, bulk and the materials used; v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents; vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with Policy.” Gladman consider Policy HOU5 of the Ashford Local Plan to represent a positively prepared but balanced policy. The policy provides a framework in which decisions can be made about windfall development proposals located beyond the settlement boundary. The policy allows development required to support the vitality and vibrancy of rural areas and enables the delivery of rural housing needs where these are not met by allocations and commitments. The Policy includes the necessary safeguards to prevent unsustainable patterns of development. Its application as part of Policy SD3 will ensure that the spatial strategy of the Local Plan is not undermined. The need for a policy similar that in Ashford LP in the case of North Norfolk is particularly necessary given the significant extent and reliance on windfall development. Its adoption will help boost housing delivery increasing the prospect that the windfall allowance set out in the Local Plan can be achieved and will also assist in providing the necessary uplift in housing land supply required to meet identified housing need.</p>	
SD3	CPRE (Mr Michael Rayner) (1204056)	LP297	Support	<p>Support with condition : We feel that more clarity should be given to footnote 11 which explains the amount and type of “small-scale development” which could be permitted under this policy, so that it should be amended to read “infill development of between 1-20 dwellings (to be selected in a Part 2 Plan)”. We’re concerned that left as it is that “new allocations” could imply that this type of new development in the named Small Growth Villages could be different from more acceptable “infill development”, and could result in estate-type developments of 20 houses. concerned that draft policy SD3 could lead to estate-type developments in the named Small Growth Villages of up to 20 houses, which would adversely affect these villages' appearance, character and form. Change footnote 11 to: infill development of between 1-20 dwellings (to be selected in a Part 2 Plan).</p>	Comments noted

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD3	Crisp Maltings Group (Mr J Alflatt, Bidwells) (1217455 / 1217379)	LP554	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: On behalf of Crisp Malting Group, we recommend that land off Fakenham Road, Gt Ryburgh is allocated for residential development. The site, which extends to approximately 2.5 hectares is entirely deliverable, and capable of contributing at least 50-75 dwellings towards satisfying the Council's housing needs during the period to 2036. The site has previously been identified within the Council's Housing and Economic Land Availability Assessment as being suitable for development due to its location adjacent to the settlement of Gt Ryburgh whilst having no major constraints to its delivery. The proposed residential allocation, is part of the wider Crisp Malting Group landholdings at Gt Ryburgh, and forms an integral part of the wider mixed-use scheme currently being promoted on behalf of Crisp. The proposed development is intended to facilitate the expansion of the existing maltings, provide local housing, potential community facilities, public open space and new road infrastructure to minimise the impacts of HGV traffic through the village. The realisation of this development will help sustain the head office of Crisp Malting and its UK production within Gt Ryburgh, alongside the significant direct and indirect economic benefits this business in this location brings to the local, regional and national economy. Crisp Malting Group are a major economic driver for North Norfolk. Over 280 local farmers produce barley, wheat and rye for Crisp in Norfolk. In addition, 200 businesses across East Anglia supply goods and services to Crisp, 80 of which are within the NR postcode. The facility at Gt Ryburgh currently has 115 workers working on or from this site and it is the headquarters of an international business with turnover of approximately £200 million. We, therefore, consider the existence of such a significant employer within a rural location is rather unusual when compared to other parts of the district and, therefore, consider this should be adequately reflected within the Council's emerging Local Plan. Policy SD 3 of the First Draft Local Plan identifies the Council's proposed Settlement Hierarchy. We contend that Gt Ryburgh does not neatly fall within the categories identified, and based upon these should fall between a large and small growth village. Whilst it is acknowledged that Gt Ryburgh does not benefit from all the local facilities indicated by the Large Growth Villages, Gt Ryburgh does have services/facilities comparable to the Small Growth Villages, with the additional benefit of having a significant employer within the village, employing local people in roles at all levels up to and including senior management. Therefore, we contend that the scale of any new residential development should be able to exceed that identified for Small Growth Villages (i.e. 0-20 dwellings) on the basis that it will help enable the continued expansion and sustain the business in Gt Ryburgh/North Norfolk, and deliver new road infrastructure which will help reduce HGV movements through the village centre, providing a benefit to the local amenity of the village. The First Draft Local Plan does not recognise Gt Ryburgh as a Small Growth Village; however, no detailed explanation is provided as to why the settlement has not been selected. Whilst our client is supportive of the emerging Plan's intention to, in accordance with the NPPF, allocate sites for small</p>	Noted Consider: comments in the finalisation of approach to Rural settlements and policy SD3 and the alternative site submitted.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>scale development, it is evident that, in our view, the methodology is flawed and should be reconsidered to ensure that growth requirements to 2036 can be delivered. The starting point of the Council's assessment was to consider only those settlements which had a school or a shop. This approach is considered too restrictive as it rules out a number of other settlements which otherwise could be suitable for small scale development. More specifically, it fails to recognise that certain locations, such as Gt Ryburgh, are within close proximity of higher order settlements i.e. Large Growth Towns or Small Growth Towns. In the case of Gt Ryburgh, the village is two miles south east of the large market town of Fakenham and, therefore, capable of benefiting from the wide range of services / amenities on offer within these locations. The village of Gt Ryburgh is approximately 2 miles from Fakenham which caters for both primary and secondary school education. In addition, Gt Ryburgh is serviced by public transport, providing a bus service to Fakenham, allowing the village to be accessed by a sustainable form of transport. In relation to Secondary and Desirable Services, Gt Ryburgh is well provided, with easy access to the A1067 (Fakenham – Norwich Road), which as detailed above, provides connectivity and public transport access to the higher order settlement of Fakenham. Gt Ryburgh is also well served by local village facilities, including a public house / restaurant, memorial hall, butcher, nursery, village shop, chip shop, post office and internet cafe. The methodology adopted within the consultation documents, provides the potential for settlements which already have a range of local services to expand, whilst restricting the ability of those which under the terms of the Council's methodology don't, to experience growth. This is considered to be an unreasonable and unsustainable approach which is contrary to the NPPF. More specifically, if certain locations experience growth, it is likely that the increased demand and expenditure generated will make it more viable for new services to open; a process that will, crucially, help maintain the vitality of rural communities. This is particularly evident for a rural settlement which contains a major employer, such as Crisp Malting Group, whose employees already help sustain the local village facilities. Approach considered to be contrary to paragraph 77 of the NPPF .</p>	
SD3	<p>Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd)</p> <p>(1216793, 1216789)</p>	LP234	Support	<p>Support the identification of Small Growth Villages as this accords with the NPPF and NPPG objectives for supporting sustainable rural communities through recognising that additional rural housing is essential to the support and retention of local services. Fleur Homes particularly supports the inclusion of Langham as a location that can support additional residential development and are promoting development of land west of North Street through its inclusion in the Call-for-Sites consultation process</p>	Support for Langham Noted
SD3	Holkham Estate (Ms Lydia Voyias,	LP561	Support	<p>The National Planning Policy Framework (NPPF) (Feb 2019) sets out at the requirements for plan making at paragraphs 15 to 36. Paragraph 35 identifies the tests for Local Plans to be found sound. It is necessary for Local Plans to be: positively prepared, justified,</p>	Comments noted : Consider comments in the finalisation of the

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	Savills) (1215901)			<p>effective and consistent with national policy. These representations are made in this context. The District Council has identified Wells-next-the-Sea as a 'Small Growth Town', a second tier settlement within the Settlement Hierarchy. Draft Policy SD 3 directs "...a more limited amount of additional development will be accommodated" when compared to the 'Large Growth Towns' of North Walsham, Fakenham and Cromer. The Council explains its justification for this approach is due to Wells being constrained by environmental considerations. Support is given to the identification of two sites suggested for allocation at Wells to accommodate 80 new dwellings at the town. Notwithstanding the above, it is requested that the Council considers the potential for development at Land south of Warham Road, Wells-next-the-Sea (Site Ref: W11) for mixed use development comprising 50 dwellings and some light industrial commercial workspace. This is the subject of a separate representation made by Savills on behalf of the Estate. Notwithstanding the above support, it is requested that the Council considers the potential for development at Land south of Warham Road, Wells-next-the-Sea (Site Ref: W11) for mixed use development comprising 50 dwellings and some light industrial commercial workspace. This is the subject of a separate representation made by Savills on behalf of the Estate.</p>	<p>housing targets and site approach to Wells •</p>
SD3	Wells Neighbourhood Plan, Questionnaire. (Mr Peter Rainsford) (1216818)	LP686	Object	<p>When asked what use any new land for housing should be for, the response to the survey (clarification added - in the wells NP survey) overwhelmingly showed a preference for affordable rented housing for local people. 125 (41%) gave this site their first preference, 89 (30%) second preference and 17 third preference. When asked "do you think there should be some limit on second homes occupancy" 245 (81%) said yes and 49 (16%) said no. When asked "Do you think that tourism should in any way be restricted in and around Wells by controls over development" 235 (78%) said yes and 52 (17%) said no. It has been put to us that these preferences would be met if in SD3 Wells is re-designated as a Large Village instead of a Small Town.</p>	<p>Disagree: The settlement hierarchy is based on an assessment of the facilities, role and function and the functional relationship between places. Wells clearly is and functions as a higher order settlement. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account in setting the housing targets for settlements. Evidence contained within the Housing and Economic Land Availability Study and NNDC Landscape Character Assessment 2019 and background paper 2</p>

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					detailing service provision have also been used to inform distribution of growth site assessment and the potential impact on landscape character.
SD3	Walsingham Estate Management (1226868)	LP830	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: we have noticed various inaccuracies with regard little Walsingham. Secondary services include the Bull Inn and the Black Lion Hotel. Meeting places include Village hall and parish hall. Desirable services. Desirable service include three vehicle repair shops (centre of village and two on the Industrial estate), three Churches, Russian Orthodox, Methodist and Anglican. Egmore employment site lies within the parish boundary. Proposed sites have been submitted separately through the call for sites and include Butchers field, HD284, the Surgery, H1010 and Cookers hill allotment , H1003 along with the inclusion of the coach park	Comments noted. Include comments in any update of background paper no 2
SD3	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP749	Support	The draft policy includes High Kelling as a Small Growth Village which is supported. Kelling is a small village at the centre of the Estate is served by a primary school, one of the key services categories with convenience shop and GP surgery. The village offers obvious infill plots which could be released for housing development which would make a positive contribution to meeting future housing needs, while preserving the special character and appearance of the conservation area. Work undertaken on behalf of the Estates by heritage and landscape specialists confirm this to be the case. The Kelling school has a capacity of 90 pupils with only around 53 pupils on the school roll. Provision of housing suitable for young families could help sustain this important community facility for Kelling and nearby settlements. Paragraph 78 of the NPPF confirms that planning policies should identify opportunities for villages to grow and thrive, especially where this would support local services. To this end we consider that the policy SD3 should be amended to: Remove part 1 of the policy which imposes a cap of 5 dwellings and part 2 of the policy that sites in areas designated as Countryside must be on previously developed land. With the retention of part 3, together with other policies of the Plan adequate safeguard is provided that the policy would not allow for isolated homes in the countryside and only permit small scale developments appropriate to their setting. However the recommended changes would allow the benefits of a scheme greater than 5 units to be realised where site circumstances allowed for it, such as an appropriate infill or larger previous developed land opportunity. In addition to the above policy SD3 by reference to footnote 11 imposes a limit on development size at Small Growth Villages to up to 20 dwellings. We consider this arbitrary cap is unhelpful and unnecessary and could limit opportunities where larger schemes may be appropriate. The identified Small Growth Villages differ quite significantly in their size and range of service provision. Therefore while some villages may yield a very limited number of dwellings over the plan period others by reasons of their size, location or level of service	Noted Consider comments in the finalisation of the policy

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				<p>provision may be capable of supporting a greater level of growth. This change would be consistent with the example set by the adopted Site Allocations DPD where it was considered appropriate to allocate sites for more than 20 dwellings at a number of 'Small Growth Villages', as follows: Horning (a site for 26 dwellings); Overstrand (35 dwellings); Roughton (30 dwellings) and Walsingham (24 dwellings). Accordingly the footnote to the policy should be amended to read: Infill development and new allocations (to be selected in a Part 2 Plan). We consider these changes would introduce a greater degree of flexibility and contribute to the achievement of more sustainable patterns of development in accordance with the NPPF. It is also noted that read together the fifth paragraph of the policy and the footnote (11) are in conflict. The fifth paragraph indicates that development must be within the defined boundaries of the Small Growth Villages, while new allocations are unlikely to be within defined boundaries. This should be corrected to make it clear allocations can be beyond settlement boundaries.</p>	
SD3	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning (1218489, 1218491)	LP803	General Comments	<p>The positive and proactive approach towards rural growth advocated as part of this policy is supported by our client. In particular, the introduction of the "Small Growth Villages" tier, comprising a range of sustainable rural villages, is welcomed. It is this tier and the role that it will play as part of the Council's development strategy that we wish to focus on specifically due to our client's land interests. It is noted that Policy HOU1 sets a target of at least 400 homes at the villages of this tier by way of new allocations to be identified in the LPP2. The continued reliance of the plan on higher tier settlements comprising the 'Large Growth Towns', 'Small Growth Towns' and 'Small Growth Villages' to deliver the bulk of growth across the District is acknowledged. Many of these settlements, North Walsham in particular, are proposed to accommodate a substantial number of new homes on a range of strategic-scale sites, the delivery of which will inevitably happen slowly due to infrastructure requirements and local market place saturation, amongst other constraints. Due to the important role that non-strategic sites across the rural area will play in the Council's supply within the first five years, and the choice they will offer to the market, it is important that the figure of 400 homes to be delivered new allocations at the Small Growth Villages is clearly stated as a minimum. This will ensure that the LPP2 is afforded flexibility to maximise suitable development opportunities across this tier if a surplus of appropriate sites is identified. Resultantly, the final wording of Policy SD3 and accompanying footnote should ensure that the capacity of, and need for new homes at, each Small Growth Village present two of the main drivers for the number of homes they should be expected to accommodate rather than an arbitrary cap on development. Perhaps most crucially in relation to delivery, the other should be the availability of sites with a clear developer commitment. The selected villages The selected villages In respect of the Small Growth Village tier it is noted that this is currently proposed to comprise 23 separate settlements, all of which the Council consider can sustain some level of new development. We understand that</p>	<p>Noted: Consider comments in the development the policy approach. The distribution of growth and identification of the proposed small growth villages is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment</p>

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				<p>the final list of villages was compiled following a high-level review of rural settlements that focused on matters such as population, the presence of essential services and accessibility to higher tier settlements. This process is described in the report to the Council's Planning Policy and Built Heritage Working Party on 18th October 2018. As acknowledged in the same report the villages on the final shortlist vary widely in terms of settlement size, land availability and accessibility to services. Due to these variations we undertook our own analysis of each settlement on behalf of our client. This comprised a desk top study of all 23 settlements and site visits to the villages we considered to be the most sustainable for new allocations. Whilst this review was primarily intended to allow our client to identify a range of suitable and deliverable sites across the District it has also allowed us to draw very clear conclusions on which villages are best placed to accommodate growth. Ultimately, it has enabled us to present a clear view on the way in which the Council must frame their rural growth strategy and approach the allocation of sites in the LPP2 to ensure the minimum target of 400 homes is achieved. From our review we consider that the following settlements have very limited potential to accommodate additional allocations for the following reasons:</p> <p>Badersfield (Scottow): - lack of market attractiveness is inevitably exacerbated by the presence of the prison (predominantly male sex offenders) half of the village lies within Broadland District, further restricting the ability of the Council to secure growth at Badersfield by way of allocation that will contribute directly towards North Norfolk's housing land supply. East Runton: We are aware that there are currently no sites being actively promoted at the village through the Council's HELAA. The village is significantly constrained by a combination of an extensive conservation area, the Norfolk Coast Area of Outstanding Natural Beauty (AONB) to the south of the railway and the presence of the Coastal Erosion Zone to the north of the A149. In addition, the LPP1 proposes a significant residential allocation (Site C10/1) on the western edge of Cromer, only 500m from the village, that is intended to deliver 90 new homes. All of these factors combined suggest that it is highly unlikely that the village should suitably accommodate anything other than small-scale incremental growth over the plan period and certainly should not be subject of any additional allocations. Horning. Horning received a single allocation of 26 homes in the adopted Site Allocations DPD (2011). This site is subject of a current planning application (reference 11/1505) that has remained undetermined for approaching 8 years. This delay is due to significant constraints at Horning in relation to lack of capacity in the local water treatment system and the heightened sensitivity of the nearby water environment due to the immediate proximity of the village to the Norfolk Broads. The most recent joint position statement signed by the Council, the Environment Agency, the Broads Authority and Anglian Water suggests that this position is under constant review. However, it is clear that the matter is no closer to resolution than it was when first identified as a major constraint in 2013. Indeed, according to the Council's most recent Housing Land Supply statement it is expected that the current</p>	<p>constraints. Further detail is published in background paper 2. The council will review the identification settlements and land supply along with the finalisation of the approach following the consultation and the call for sites in the proposed villages.</p>

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				<p>allocation will only likely be delivered post 2023. Potter Heigham a village of two distinct parts, each lying to the north and south of the A149 respectively. The southern portion of the village contains a range of shops and services but lies almost entirely within the Environment Agency's Flood Zone 3, presenting an overriding constraint to development. Whilst the northern portion partially lies outside of either Flood Zones 2 and 3 it is largely severed from the core of the village by the A149. We note that there has been a recent pre-application enquiry at the village (reference IB/18/0340) seeking to deliver a potential affordable housing exception site. This enquiry investigated the delivery of a development of 10 dwellings on one of the few parcels of land lying outside the Flood Zone. In response to this enquiry Officers concluded that other constraints existed in relation to the site, including deficient access, landscape impact and distance from services. Due to the paucity of suitable sites it is extremely unlikely that Potter Heigham will be subject of any allocations in the LPP2 and may struggle to accommodate even small-scale infilling over the plan period. Sculthorpe a very small village of a predominantly linear nature with few clear infill opportunities. It also has a predominantly rural character that would be significantly impacted on by any development of scale. This is clear from the refusal of an application for 71 new dwellings at the heart of the village in 2015 (on land which incidentally comprises the only site currently promoted towards the HELAA), a scheme dismissed for exactly this reason. .Southrepps: It is recognised that Southrepps contains a range of shops, services and amenities sufficient to sustain a level of growth over the plan period. It is, however, entirely washed over by the AONB . Due to the likely availability of alternative sites across the network of villages lying outside of the AONB it is unlikely that exceptional circumstances (as required in NPPF) could be identified, particularly as the village already comprises two allocations capable of accommodating 22 dwellings that are as yet undelivered. Walcott - lack of any available sites in the HELAA, its location almost entirely within the Coastal Erosion Zone and its close proximity to the higher order settlement of Bacton. Weybourne constrained by AONB and location within the setting of Sheringham Park. Based on a lack of available or suitable sites, low developer interest and environmental constraints it should be concluded that each of the eight villages listed above are poorly placed to deliver any meaningful growth towards the minimum 400 home target set for the Small Growth Village tier. Growth must be met through most sustainable of the remaining 15 villages. This results in a need to identify sites to accommodate an average of at least 27 dwellings per settlement (subject to any additional uplift required following our review of Policy HOU1, below). We are therefore pleased to confirm that the villages our client have a land interest in – namely Binham, Bodham, Corpusty, Langham, Little Snoring, Overstrand, Walsingham and West Runton – are all capable of sustaining in excess of 27 additional dwellings. This re-emphasises the key role our client will play in delivering the homes required across the District. Ultimately, the main driver that should lead the search for sites at the Small Growth</p>	

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				Villages is the government's increased focus on deliverability described by the NPPF. It is therefore paramount that Policy SD3 allows the LPP2 to identify sites that are principally available, suitable and achievable before all other objectives. This means that the wording of Policy SD3 must build in enough flexibility to allow the Council to respond to all appropriate development opportunities that come forward through the current Call for Sites process. All this means that if an appropriate site is identified at one of the Small Growth Villages that exceeds the 1ha ceiling it should not be discounted purely based on size. Whilst the LPP1 does not provide a cap on the site area of future allocations Policy SD3 does include a seemingly arbitrary cap on the scale of development of 20 dwellings (Footnote 11 of the Plan). It is not clear where this figure has derived from – it certainly does not appear to stem from any requirement set out at paragraph 68 of the NPPF. we recommend the following amendments to Policy SD3 to ensure that it forms the basis of a sound strategy: • The deletion of Sculthorpe and Walcott. The amendment of the fifth paragraph to read “Appropriately scaled development, including brownfield developments, community facilities and services will be permitted within (or on the edge of in the instance of allocations to be identified by the Part 2 Plan) the defined boundaries of the following Small Growth Villages”; and • The amendment of Footnote 11 to remove the 20-unit cap and read “Infill development and new appropriately-scaled allocations (to be selected in the Part 2 Plan)”.	
SD3	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP479	Support	Settlement hierarchy needs to also assess hierarchy of environmental assets and a robust evidence base of environmental data and accompanying Habitat Regulation Assessments where applicable. We would like to see undesignated areas outside of the AONB considered first, and areas that would not impact on the scenic value of the AONB i.e. large development just beyond the boundary	Consider comments in the finalisation Plan. The Local Plan is supported by an HRA.
SD3	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP679	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet support the identification of North Walsham as a Large growth Town. Larkfleet agree that North Walsham has a variety of services, facilities, jobs and leisure opportunities sufficient to meet the day to day needs of residents and visitors without the need to travel a long distance. These services and facilities are easily accessible via walking, cycling and public transport.	Support noted.
SD3	Kingsland Engineering Company Ltd (Mrs Nicola Wright, La Ronde Wright) (1209984 & 1217492)	LP638	Support	Kingsland Engineering state that the justification for policy SD3 appears to be sound.	Support noted.

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SD3	Persimmon Homes Anglia (Mr John Long, John Long Planning Ltd) (1216065 & 1216066)	LP162	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) broadly supports the Plan's identification of Hoveton as a 'Small Growth Town' in the Settlement Hierarchy Policy SD 3, with conditions (see comments below)</p> <ul style="list-style-type: none"> • Persimmon Homes (Anglia) notes that the range of services, facilities job opportunities and land availability opportunities that the 'conjoined' villages of Hoveton and Wroxham contain are comparable to those found in settlements identified as Large Growth Towns in the top tier of the Plan's Settlement Hierarchy. • Persimmon Homes (Anglia) accepts that some of Hoveton's environmental, traffic and infrastructure constraints may restrict substantial development land opportunities; however, there is scope to identify limited additional development land that could be brought forward to help meet the needs not just of Hoveton and its hinterland but those of Wroxham in the event that they cannot be fully met in Wroxham. • Persimmon Homes (Anglia) suggests that there is more land available in Hoveton, particularly adjoining the allocation HV01/B, than the DLP and the HEELA might suggest, and that the Plan should make the most of such opportunities, particularly to meet cross boundary growth needs; assist with dwelling affordability; help deliver additional affordable homes; and address the potential needs of a growing workforce. For instance, allocation HV01/B in Hoveton could be extended northwards to accommodate further growth without impacting on environmental designations. The proposed allocation's current northern boundary is not defined by any particular landscape feature, and its extension would not compromise the Plan's ambition to accommodate sustainable development in the village. 	Support noted. Consider comments in the finalisation of the policy and overall numbers to Hoveton. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
SD3	Seagull Properties Ltd (Mr Charlie Merry, Iceni Projects) (1218486 & 1218487)	LP800	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Seagull Properties Ltd broadly support the principle of focussing the majority of new development within and close to larger settlements, in order to meet the District's OAN. However, we encourage the Council to ensure the Plan facilitates an appropriate level of growth in smaller settlements and the countryside in order to support rural communities and meet their development needs.</p> <ul style="list-style-type: none"> • We agree it is important that any growth of these smaller villages is of an appropriate scale to maintain its character, but do not consider that this should preclude a certain level of growth to meet housing needs close to where they arise. • Alternative site proposed: Seagull Properties Ltd owns land to the south of Blakeney Road, in the village of Wiveton (approx. 2.2 ha). The site was submitted during the Call for Sites exercise in May 2016 (HELAA ref: H0299) illustrating that the site could be developed for residential purposes, and accommodate up to approx.25-30 new homes. 	General support noted. Consider comments in the finalisation of the policy. <ul style="list-style-type: none"> • The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing,

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				<p>We consider the site is well related to the existing village. This would apply to settlements such as Wiveton and nearby villages of Cley next the Sea and Newgate. The provision of additional homes within smaller villages would positively contribute to meeting local need, by improving affordability, the range of housing choice and provide a more balanced contribution towards the District's OAN, together with enhancing the sustainability and viability of the villages, in line with para. 78 of the NPPF. Given the proximity of Wiveton, Cley next the Sea and Newgate, any new development within these settlements would contribute to supporting their services and decrease the need to travel to larger settlements.</p> <ul style="list-style-type: none"> • We encourage the Council to clarify how a modest shift in the spatial distribution of growth towards the smaller settlements would increase unsustainable travelling. We anticipate that it will be necessary to the delivery of the District's housing supply, to ensure that an appropriate number of smaller sites are allocated for development, which are capable of being delivered without significant infrastructure improvements or long delays in delivering the new homes proposed. • We suggest that new development within villages, excluded from Policy SD 3, can be sympathetically positioned and designed to relate well to the existing settlement and its character. Policies ENV 1 – 11 would provide appropriate controls on a site-by-site basis to ensure development proposals did not have an unacceptable impact. • The Council could support a more dispersed pattern of growth across the District by pooled contributions collected via CIL. This would generate funding from all relevant development to deliver substantive improvements as required. Having regard to para. 35 of the NPPF, we would encourage the Council to identify the relevant infrastructure improvements required across the District to support the housing requirement, and to provide details as to how these would be funded. • We consider limiting new residential development to a number of identified villages is contrary to NPPF Para's 68, 77 and 78. We encourage the Council to reconsider these aspects of it's spatial strategy to ensure it complies with the tests of soundness set out at Para.35 of the NPPF. 	<p>jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth being concentrated in those settlements that have a range of services, are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environmental constraints. Further detail is published in background paper 2.</p> <ul style="list-style-type: none"> • Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. Evidence contained within the Housing and Economic Land Availability Study and NNDC Landscape Character Assessment 2019 and background paper 2 detailing service provision have also been used to inform distribution of growth, site assessment and the potential impact on landscape character. • The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited

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					<p>services, Other policies actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address identified local need.</p> <ul style="list-style-type: none"> • The Council have undertaken a proportionate assessment of Plan viability as laid out in the NPPG in order to appraise the impacts of the emerging policies on the economic viability of the development expected to be delivered through the Local plan. The study recommended not to introduce a CIL charge in the current economic circumstances . The study is published as part of the evidence base and concludes there is little potential to accommodate additional charges such as CIL.
SD3	Raynham Estate (Mr Nick Moys, Brown & Co) (1215832 & 1215834)	LP133	Object	<p>The introduction of some flexibility in draft Policy SD3 to allow development in smaller villages is welcomed. It is considered that, in principle, this approach accords with national planning guidance on rural housing. However, it is considered that the conditions under which development may be permitted under Policy SD3 are unduly and unnecessarily restrictive. In particular, it is considered that by limiting development to previously development land (PDL), the draft policy would unacceptably limit or rule out development in many rural settlements due to the lack or absence of brownfield sites. For instance, in the villages of East Raynham, West Raynham and Helhoughton, the only 'previously developed' sites potentially available comprise residential gardens in built up areas or are occupied by agricultural buildings. However, these sites fall outside the NPPF definition of PDL and so would not qualify for consideration under Policy SD3. In South Raynham, the only potentially available PDL sites are occupied by existing businesses, the redevelopment of which would result in an undesirable loss of employment and/or community facilities.</p>	<p>Noted: Consider clarification in future iteration of the Plan. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as</p>

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					well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environmental constraints. Further detail is published in background paper 2.
SD3	Westmere Homes (Mr Alex Munro, Armstrong Rigg Planning) (1218491 & 1219352)	LP829	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</p> <p>Westmere Homes is supportive of additional housing delivery across the 'Small Growth Villages' tier of the hierarchy, being a proportionate approach to meeting additional growth requirements, in line with national policy and planning guidance.</p> <ul style="list-style-type: none"> It is clear from the Council's commentary in its committee paper (18.10.2018) that Officers see the allocation of sites at its Small Growth Villages as performing two key functions in respect of NPPF policy. Firstly, it responds to para. 68 of the NPPF, where the Council sees the Small Growth Village tier as representing a ready supply of sites that can help meet the quota. Secondly, it relates to boosting housing land supply and the stimulation of housing delivery early in the plan period (the first five years). In response to para. 60 of the NPPF the Council has adopted the District's Local Housing Need figure as the baseline housing requirement for the District. This has resulted in a 2,000 dwelling uplift compared to the previous SHMA based figure. It is clear that the Small Growth Villages will play a key role in accommodating a proportion of these additional homes. To this end, the requirement to maximise delivery at suitable sites, in line with para 122 and 123 of the NPPF, should play an important role. It is paramount that Policy SD3 allows the LPP2 to identify sites that are principally available, suitable and achievable before all other objectives. This means that the wording of Policy SD3 must build in enough flexibility to allow the Council to respond to all appropriate development opportunities so that if an appropriate site is identified at one of the Small Growth Villages that exceeds the 1ha ceiling it should not be discounted purely based on size alone. To do so may result in appropriate larger sites being overlooked in favour of smaller sites that are less sustainable or have constraints to delivery. This outcome would be counter to the NPPF's desire to secure sustainable development and to boost housing supply. <ul style="list-style-type: none"> Westmere Homes support the Council's general approach to rural housing delivery set out in the draft LPP1. In particular, the inclusion of Little Snoring as a 'Small Growth Village' capable of accommodating additional housing is welcomed. We consider Little Snoring to be one of the most sustainable villages at this tier and capable of suitably accommodating allocations able to deliver in excess of 20 dwellings. It is our view that the current wording of Policy SD3 is unduly restrictive in respect of the amount of new homes and size of allocations that can come forward in the LPP2 document. We cannot support any arbitrary cap on the size of development capable of coming forward at each 	Noted: Disagree - Consider clarification in future iteration of the Plan. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers and the scale of appropriate development are influenced by local factors including service provision and environmental constraints. Landscape and settlement considerations including the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site

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				<p>settlement – this should be assessed on a site-by-site, village-by-village basis. We recommend the following amendments to Policy SD3 to form the basis of a sound strategy:</p> <ol style="list-style-type: none"> 1. Amendment of the fifth paragraph to read “Appropriately scaled development, including brownfield developments, community facilities and services will be permitted within (or on the edge of in the instance of allocations to be identified by the Part 2 Plan) the defined boundaries of the following Small Growth Villages”; 2. The amendment of Footnote 11 to remove the 20-unit cap and read “Infill development and new appropriately-scaled allocations (to be selected in the Part 2 Plan)”. 	<p>preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. Further detail is published in background paper 2.</p>
SD3	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Support the delivery of sustainable development and NNDC's approach is recognised as an appropriate strategy to achieve this. Our comments on Policy HOU1 further discuss the scale and distribution of growth; these policies should be consistent. NNDC should ensure that the needs of rural areas have been considered and will be adequately met through the proposed spatial strategy. This will ensure that necessary development is delivered in rural areas, ensuring that rural communities continue to thrive. With regard to land use designations, there should be sufficient flexibility to ensure that employment opportunities and community uses can be located near to homes. This would help to reduce journey length and encourage use of sustainable transport modes, improving health and wellbeing and achieving the Plan's vision. This is conducive to delivering sustainable development and is consistent with the overarching theme of the NPPF, as well as the Duchy of Cornwall's own development principles. It is suggested that the policy should make reference to the ability of neighbourhood plans to bring forward small scale development and should be consistent with NPPF paragraph 69.</p>	<p>Support noted. Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community. The Council considers it important to retain land supply solely for employment uses. Consider amendment to policy SD3 in the preparation of the policy.</p>
SD3	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>One approach to supporting development on the edge of settlements that has been recently been found sound is policy HOU5 in the Ashford Local Plan and is set out below. “Proposals for residential development adjoining or close to the existing built up confines of [list settlements] will be acceptable provided that each of the following criteria is met: a) The scale of development proposed is proportionate in size to the settlement and level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in the Local Plan and committed development in liaison with service providers; b) The Site is within easy walking distance of basic day to day services in the nearest settlement and/or has access to sustainable methods of transport to access a range of services; c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area; d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services; e)</p>	<p>Noted Consider comments in the finalisation of the policy. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. The proposed approach which allows small scale infill development</p>

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				<p>Conserves and enhances the natural environment and preserves or enhances any heritage assets in the locality; and f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements: i) It sits sympathetically within the wider landscape; ii) It preserves or enhances the setting of the nearest settlement; iii) It includes an appropriately sized and designed landscape buffer to the open countryside; iv) It is consistent with the local character and built form, including scale, bulk and the materials used; v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents; vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with Policy.” This approach allows the Council to take a more flexible approach that is proportionate to the size and nature of the settlement without compromising the integrity of the Council’s spatial strategy and settlement hierarchy. Such an approach will better support the Council in meeting its ambitious targets for windfall development and provide flexibility in delivering both market and affordable homes that will improve the vibrancy and vitality of North Norfolk’s rural communities. Recommendation The SD3 is rewritten to provide greater flexibility to support development within and on the edge of settlements in rural communities.</p>	<p>in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback evidence of need and the potential impacts on affordable housing provision.</p>
SD3	Firs Farm Partnership (Ms Becky Rejzek, Lanpro) (1218497 1218496)	LP805	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supporting Policy SD3 The identification of Sutton as a ‘Small Growth Village’ capable of accommodating some housing growth within Policy SD3 of the draft Local Plan is supported. Sutton has a good range of local facilities including an infant school, two Churches, village hall, boating marina and daily bus services between Sutton and Norwich, Great Yarmouth, Wroxham, Gorleston, North Walsham and Stalham. Services run regularly throughout the day. These facilities have been identified within Background Paper 2 – Distribution of Growth, which concludes that Sutton meets the criteria of a ‘Small Growth Village’. In addition, Sutton is located within 1.8 miles of a range of services and facilities within Stalham, which is identified as a ‘Small Growth Town’ within the proposed settlement hierarchy.</p> <p>Whilst it is considered both logical and sustainable to focus growth within the larger settlements that are capable at present of sustaining additional population, the ability to improve upon the sustainability of a settlement by delivering community benefits and new homes, is not given appropriate recognition within Draft Policy SD3. Paragraph 78 of the National Planning Policy Framework is clear in that: “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” In this respect, the prescription of no more than 20 dwellings to all identified smaller villages within the Draft Plan is considered overly restrictive. As</p>	<p>Noted. Consider comments in the development the policy approach. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural</p>

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				<p>worded, the Policy lacks the necessary flexibility to allow development proposals to respond positively to the specific characteristics and needs of different settlements. In this particular case, whilst Sutton is considered by the Council to lack the necessary services to be 'designated' a larger village within the Settlement Hierarchy, it is capable of accommodating more than the 20 dwellings anticipated by draft Policy SD3 and in doing so can deliver community benefits as set out above. Contrary to paragraph 35 of the National Planning Policy Framework, the Draft Plan's restriction on growth within the smaller villages is considered to be neither 'justified', 'positively prepared' nor 'effective' in responding to the needs of individual populations. For the reasons set out above, and in order to make the Draft Plan 'sound', we request that the rather arbitrary restriction of between 0 – 20 dwellings for small villages be deleted from the policy and that this restriction be replaced by a criteria based approach to assessing settlement suitability and requirements to accommodate additional growth.</p>	<p>villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.</p>
SD3	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP613	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Cromer already provides a range of services, facilities, jobs and leisure opportunities sufficient to meet the day to day needs of residents and visitors without the need to travel long distances, particularly by the private motor car. Walking, cycling and public transport are all viable options for travel for people to meet their day to day needs. The town is rightly identified as being in the 'Top Tier' of the Settlement Hierarchy. This is supported by the evidence in the Plan's Interim Sustainability Appraisal, which confirms that Cromer has the necessary range of services, jobs and facilities to serve new development; and conversely that new development in Cromer will help to: support, enhance and make efficient use of these services, jobs and facilities; that there are alternatives for travel to access services, jobs and facilities without relying on the private motor car; deliver additional affordable housing where it is needed; maximise the use of infrastructure capacity and allow providers to plan for upgrades; and that new development can be accommodated without adversely impacting on the rural character of North Norfolk. Pigeon therefore concurs with the Plan and its supporting material, including the Sustainability Appraisal which confirms that the District's Top Tier settlements, including Cromer are capable of accommodating further growth; and that this growth would meet the National Planning Policy Frameworks (NPPF)'s definition of 'sustainable development' (NPPF para. 8), by accommodating: • opportunities to help build and support a strong, responsive and competitive economy through the identification of development land to support business growth; • opportunities for new homes in an accessible location to help meet identified housing needs; and • growth opportunities which acknowledge and respect that natural, built and historic environment; and take into account climate change. Pigeon acknowledge that there are limited opportunities for the redevelopment of previously developed (brownfield) land in and around Cromer and greenfield release is therefore necessary to accommodate future growth. Pigeon agrees that the Settlement Hierarchy represents an appropriate</p>	<p>Support noted. Consider comments in the finalisation of the policy and over all numbers to Cromer. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.</p>

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				<p>strategy after taking into account the alternatives, and options such as building a large new settlement somewhere in the District; Rural Dispersal; and multiple settlement expansion etc., which are less well performing in sustainability terms than the proposed hierarchy. The Council may, however, wish to consider whether more growth should be directed to Cromer given the extensive employment opportunities in the town (including the headquarters of North Norfolk District Council, which is a significant employer) and the number of people on the Council's housing waiting list who have expressed a preference for living in Cromer. At 1,479 the number of people on the housing waiting list expressing a desire to live in Cromer is higher than the other two large growth towns (Fakenham, 1,125 and North Walsham, 1,432). However, with the proposed allocations identified in the First Draft Local Plan it will receive fewer new allocations than Fakenham (680) and considerably fewer than North Walsham (2,150). We note that one of Cromer's known infrastructure constraints is limited school capacity and their locations in relation to catchments; and can confirm that Pigeon's site interests at Cromer (site ref: C10/1: Policy DS 3 is able to accommodate a new 2 Form Entry primary school, and land will be reserved for this provision. In order to meet this requirement a 2.2ha site is identified for a 2 Form Entry primary school (with sufficient land for a pre-school should this be required) with a further 0.4 ha of land for further expansion, in order to future proof education in the town. We note that whilst school capacity has contributed to a 'throttle' on housing numbers in Cromer (Background Paper 2: Distribution of Growth: Cromer conclusion (page 18)), that the new school capacity to be provided on site C10/1 will address this issue.</p>	
SD3	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP574	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: There is a clear and justified need to explore the best approach to meet the housing and economic growth needs of the District, particularly given the current acute housing shortage nationwide and the need to maintain economic stability in conjunction with that. The approach to distributing development in accordance within the proposed settlement hierarchy is supported. With regard to Fakenham specifically, the proposed policy appropriately maintains the town's status as a primary location for growth in the District (being identified in the current Core Strategy as a Principal Settlement) and recognises its role as a retail and service centre for the wider area. This will secure its ongoing potential to deliver additional residential and commercial development.</p>	Support noted.
SD3	Glavenhill Ltd (Hannah Smith, Lanpro) (1218811)	LP736	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: These representations are submitted on behalf of the land promotor, Glavenhill Limited who is submitting the site (land adjacent to the former RAF Coltishall and the village of Badersfield) for its mixed-use, residential-led allocation on behalf of the landowner, Mr Simon Shaw. A Call for Sites (Small Growth Village) has been submitted along with a Sustainable Urban Extension Vision and Delivery Document. Whilst the North Norfolk site is modest in size, it forms part of a wider proposed allocation area which 'straddles' the two Districts of Broadland and North Norfolk and as set out below and within the</p>	Noted. Consider comments in the development the policy approach. The distribution of growth is informed by the guiding principles of the NPFF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic

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				<p>enclosed, has the propensity to address a number of cross boundary development requirements in direct accordance with National Planning Policy Guidance. The site (as it relates to Broadland District) has been submitted and promoted through the Greater Norwich Local Plan consultation process. The provision of new homes on land adjacent to the Enterprise Park, together with much needed supporting social, community and highway infrastructure could ensure the continued success of this employment location and deliver a new self-sustaining and contained community for the two constituent Districts. The proposed allocation site, in seeking to address local needs across administrative boundaries, will facilitate on-going joint working between strategic policy-making authorities to produce a positively prepared and justified strategy in direct accordance with Paragraphs 25 and 26 of the NPPF. The land is under single ownership and is available and deliverable in the short to medium term. The subject site has been assessed by Glavenhill for its environmental sensitivity and the potential social and economic constraints and opportunities to development. The site is demonstrated within the enclosed Vision and Delivery Document to be 'suitable' for the proposed development and associated new public open spaces and strategic landscaping. In summary the vision document sets out that the extension can –provide a meaningful number of homes across the two authorities to assist in meeting individual and cross boundary housing needs (including affordable and or self-build units) – deliver a new care and extra care facilities to meet identified and pressing cross boundary needs for a mix of elderly person accommodation. –additional residents will provide an additional local working population and support the sustainable and longer-term performance of the Enterprise Park that at present relies heavily on inward commuters. – Provide land for a new primary school to overcome current capacity deficiencies within the local area (cross boundary) and assist in the upgrade or relocation of the current, specialist education facility in the area (subject to further discussions with the education provider) together with a new crèche for use by employees of the adjacent Enterprise Park. - Deliver a range of supportive, small-scale commercial and community spaces to include potential small-scale retail provision for use by the existing and future communities. - Provide substantial areas of new green infrastructure, including recreation space and habitat areas to the benefit of the existing and future residential communities and North Norfolk's and Broadland's biodiversity networks. - Improve upon current difficulties with large HGVs travelling through the local villages to enter the Enterprise Park by providing a new dedicated site access to the Park, within the promoter's control. - Enhance the site's accessibility by sustainable transport modes through assisting in the delivery of a new dedicated shuttle bus service between the site and Worstead Train Station. Whilst the North Norfolk proposed allocation area forms part of a far wider proposed allocation site that has far wider reaching combined benefits in terms of addressing cross boundary needs, it can and should, for the purpose of this consultation, be considered to present a self-sustaining, suitable, available and beneficial</p>	<p>character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan</p>

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				<p>development offer in its own right. The site is located adjacent to the village of Badersfield which is identified as suitable and capable of accommodating small scale (in the order of 20 dwellings) new residential development, based upon its current local service provision. The settlement is recognised at page 92 of the Council's Background Paper 2, Distribution of Growth that has been published alongside the draft Local Plan to provide a "valuable functional role within the District". The Council conclude that "for Badersfield it is considered that the constraints would not limit the principle of development within the settlement". The provision of housing would in the Council's view help address housing need, enhance the vitality of the community and support the retention and viability of local services. The proposed North Norfolk allocation site is well related to the existing village and is bound on two sides by built form and to the west by woodland and the north by a major road link that clearly and defensively delineates the proposed allocation site. The North Norfolk site can be seen from the enclosed documentation to be a well contained, defensible and sustainable small-scale extension to the existing settlement that is capable of being supported by the Council's existing Spatial Strategy when considered individually and / or as part of the wider (Broadland) proposed allocation area.</p> <p>Draft Policy SD3</p> <p>Whilst it is considered both logical and sustainable to focus growth within the larger settlements that are capable at present of sustaining additional population, the ability to improve upon the sustainability of a settlement by delivering a mix of uses, including a meaningful element of housing and assisting to address settlement specific needs, including affordable housing, is not, in Glavenhill's view, given appropriate recognition within Draft Policy SD3. Quotes paragraph 78. In this respect, the prescription of no more than 20 dwellings to all identified smaller villages within the Draft Plan is considered overly restrictive. As worded, the Policy lacks the necessary flexibility to allow development proposals to respond positively to the specific characteristics and needs of different settlements. Whilst Badersfield is considered by the Council to lack the necessary services to be 'designated' a larger village within the Settlement Hierarchy, it is capable and in need, due to the presence of a successful Enterprise Park that lacks a large residential / working population nearby, and the need to provide additional new affordable homes, of accommodating additional residential and local service provision beyond that facilitated through draft Policy SD3. Contrary to paragraph 35 of the NPPF, the Draft Plan's restriction on growth within the smaller villages is considered to be neither 'justified', 'positively prepared' nor 'effective' in responding to the needs of individual populations. For the reasons set out above, and in order to make the Draft Plan 'sound', Glavenhill request that the rather arbitrary and unjustified restriction of between 0 – 20 dwellings for small villages be deleted from the policy and that this restriction be replaced by a criteria based approach to assessing settlement suitability and requirements to accommodate additional growth. That said, the enclosed</p>	

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				<p>Vision and Delivery Document demonstrates that the allocation of 40 dwellings at the proposed allocation site would not materially conflict with the Council's proposed Settlement Hierarchy as drafted and in this respect is capable of attracting the support of officers.</p>	
SD3	Norfolk Land Ltd, Mr A Presslee (1216618 1216614)	LP369 LP370 LP371 LP376	Object	<p>The proposed Settlement Hierarchy/spatial strategy superficially follows a broadly logical format/distribution, focusing the bulk of the identified housing growth over the Plan period to the Large Growth Towns (North Walsham, Fakenham and Cromer), and then to the Small Growth Towns, Large Growth Villages and so on. As is noted under Policy SD3 in the 'Alternatives Considered' document, "the scale of growth in each location to be determined by consideration of need, constraint and capacity." However, what the preferred approach (Draft Plan) does not do - fundamentally – is seek to address where people might want to live (in essence, demand) with the District. A District-wide needs assessment must then address demand within it, if housing delivery is to be successful. We acknowledge that constraints in North Norfolk mean that a hierarchical approach should not be simply cast aside in favour of unconstrained development in places where most people would like to live (that would be nonsense) but housing demand – in locational terms - cannot be overlooked. Lessons of the current Core Strategy should not be overlooked either. A significant proportion of its housing allocation has been focused on a single site in Fakenham (800-900 dwellings: Policy F01: Land North of Rudham Stile Lane). Although the subject of an outline application made in May 2017, little progress appears to have been made to determination (the last input to the Council's application website being July 2018) and it is our understanding that no housebuilders are presently involved and thereby no prospect of an imminent Reserved Matters submission or the building of houses (even if/when an outline permission is forthcoming). According to the Interim Housing Land Supply Statement of June 2018, only 101 dwellings on the Site F01 Allocation are under construction, but as yet none are built and occupied (and therefore none actually delivered). Part of the original allocation (but not the subject of the current outline application) has been allocated again in the Draft Local Plan (as site F01), for a further 560 dwellings. The Council's Annual Monitoring Report (December 2018) indicates that the Lancaster Ward (Fakenham) has seen only 146 housing completions between 2012/13 and 2017/18 (i.e. broadly since the adoption of the Site Allocations Plan), at an average of only 24.3 dwelling completions per annum. And none from the F01 allocation. With that record what – therefore – are the Council's expectations for the delivery of current and proposed allocations over the next decade/Plan period? It is evident that Fakenham is not delivering the requisite houses, with so few of the 950 allocation emerging in the last decade (and no completions). Which begs the question, why are a further 680 dwellings being allocated in the Draft Local Plan, 560 of these on the same land that has failed to deliver housing since the last Plan? Experience suggests – including elsewhere in Norfolk</p>	<p>Consider comments in the finalisation of the policy. Existing allocation subject to a live application for mixed use development including 950 dwellings. This plan builds on the previous allocation, with site DS6 included as a reserved site for growth . Fakenham is highly sustainable , and self contained settlement that provides for a large rural area. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment</p>

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				<p>– that an “all eggs in one basket” (large, complex, multi-use sites) approach almost inevitably leads to considerable delay in delivery (if delivery at all), especially in locations where viability, house prices and return to landowner/developer, and/or where demand by house buyers is less robust. To that end, we strongly suggest that a more even distribution is adopted, particularly within the Large Growth Towns and Small Growth Towns categories of the Settlement Hierarchy.</p>	<p>constraints. Further detail is published in background paper 2.</p>
SD3	WSP Indigo, Miss Emily Taylor (1217127)	LP632 LP633	Object	<p>The distribution of growth in the emerging Local Plan is fundamentally flawed. It relies heavily on the Council's settlement hierarchy, set out in Policy SD 3, to justify decisions on the appropriate spread of allocations across the District. The settlement hierarchy is based on the use of a 'check box' system against a limited number of indicators such as proximity to a post office, petrol filling station and convenience shopping, reduces the question of sustainable growth to an isolated consideration of a limited set of settlement characteristics, with no appreciation of the wider context or interactions. The insinuation that a settlement's capacity for growth is a direct consequence of its ability to meet a set of criteria, based around the provision of a medley of facilities (of varying significance to the ways in which people now live their lives), is not a sound basis for the Local Plan's spatial strategy. Not only are the qualification criteria for the assessment of services and facilities seemingly random and at odds with the ways in which people now live their lives, the assessment also fails to appreciate the resources available to residents outside of tightly drawn settlement boundaries. Many smaller villages are reliant on nearby larger settlements for a proportion of their service provision. It is not desirable or viable to have settlement-specific provision of key services in all settlements across the District, rather to ensure that these services can be accessed by travelling to larger settlements when necessary. Such an overly simplistic approach does not recognise the potential of settlements that fall outside of these exacting indicators. It appears that there has been some consideration of the need for affordable housing and level of constraint affecting a settlement when categorising the settlements into one of the five categories. The need for affordable homes and the physical and policy constraints affecting each settlement are stated to form part of the Council's reasoning for their calculation of an appropriate level of growth. However, the level of constraint and need for affordable housing varies considerably between settlements and there are examples where settlements have been classed as lower on the settlement hierarchy despite illustrating a remarkable lack of constraints to development. An example of this is Sculthorpe, as we will address in the section below. The deliverability of sites is directly linked to the level of constraint in individual settlements, so this is a key indicator that a settlement can support further growth. Furthermore, while these factors are important indicators when looking at the distribution of housing, the delivery of homes is more dependent on the availability of suitable sites and this element should be given appropriate weight. The categorisation against the settlement hierarchy has already excluded the consideration of all sites put</p>	<p>Consider comments in the development the policy approach. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.</p>

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				<p>forward, as it does not assess all sites that are located in Small Growth Villages. Small Growth Villages are limited, due to their place on the hierarchy, to sites providing 'infill development and new allocation of between 0-20 dwellings'. This categorisation does not take account of the fact that there are Small Growth Villages that are remarkably less constrained than settlements higher up the settlement hierarchy that can provide suitable larger sites for development. In any event, the figure of 20 (dwellings) is arbitrary and unjustified, and in some instances development of a larger scale will be much more appropriate. For settlements higher up the settlement hierarchy, the assessment of capacity seems to have regarded the classification of settlements as less important than the availability and deliverability of sites. For example, Wells-next-the-Sea is classed as a Small Growth Town and has been allocated a total of 80 dwellings, while Briston and Melton Constable together are classed as a Large Growth Village and have been allocated the same number of homes. The disparity in the figures between different settlements must therefore be a result of analysis that took into account the settlement hierarchy factors alongside the availability and suitability of sites put forward. It therefore does not make sense that, for Small Growth Villages, this opportunity is seemingly written off with the Council exclusively accepting smaller sites. Surely, given that the hierarchy is only part of the argument, a balanced approach that considers all sites put forward in Small Growth Villages as there may be larger sites that are suitable. It is not appropriate to limit the approach and therefore risk not allocating the best sites to support growth. However, whilst the Council proposes to restrict the size of the sites that are appropriate for Small Growth Villages, it has not indicated any restriction in terms of the number of sites that can come forward in any one settlement. This means that a number of small sites could be developed in tandem but it would be better to recognise the potential benefits of such larger-scale development, especially in terms of bringing about coherent developments that include appropriate infrastructure. In summary, the Council's approach to the distribution of growth has used the settlement hierarchy to justify decisions without adequate consideration of available and deliverable sites. The fact that the settlement hierarchy is, in the case of Small Growth Villages, used as the sole indicator for the level of growth is simplistic and isolated from the reality of the availability of unconstrained sites in sustainable locations. Sculthorpe is categorised as a Small Growth Village. Whilst it is positive to see that the role that Sculthorpe plays in the District has, to a point, been recognised, the Council's assessment of the settlement does not accurately represent its potential. As the assessment of Sculthorpe in the Distribution of Growth Background Paper indicates, there are already a range of services and facilities in Sculthorpe. The assessment, however does overlook some services that Sculthorpe can offer both in the settlement and the wider area. For example, Sculthorpe is not scored as 'Yes' to either 'Convenience Shopping' or 'Other Shopping'. There is a shop selling a range of home, garden and car products within the settlement of Sculthorpe (Thurlow Nunn Standen on</p>	

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				<p>Creake Road). The assessment also does not allocate a score of 'Yes' for a 'Petrol Filling Station'. There is also a petrol filling station with a small convenience store within five minutes of Sculthorpe towards Fakenham, that is within the parish of Sculthorpe. Importantly, Sculthorpe's proximity to Fakenham is a key factor that has not been taken into account. The Council seems to have considered the proximity of nearby services in other areas, such as in their approach to Briston and Melton Constable as one settlement, resulting in their categorisation as a 'Large Growth Village'. The distance between the central areas of the two villages is approximately a 20 minutes' walk, with some of the facilities and services a longer walk from some of the residents' addresses. The GP surgery for instance, in Melton Constable, is located over a 30 minutes' walk from the residents in the south of Briston. The centre of Fakenham is a 30 minutes' walk from the settlement of Sculthorpe or 10 minute cycle ride. There is an excellent bus service on the X29 route between Kings Lynn to Fakenham (and on to Norwich) as well as a local service on the 27 route. Not only is it near Sculthorpe, Fakenham is an important centre, being one of only three Large Growth Towns in the District. The services that Fakenham provides to Sculthorpe's residents cannot be ignored in the assessment of sustainability. The failure to consider its context so near to Fakenham has led to the settlement of Sculthorpe being overlooked in terms of its ability to meet the need for further growth. The Distribution of Growth Background Paper illustrates the lack of constraints affecting Sculthorpe and the high number of people on the waiting list for affordable housing expressing a preference to live in the settlement. The Paper states that in terms of functional sustainability Sculthorpe has a Primary School and a range of secondary and desirable services yet classes it as a Small Growth Village, noting that due to its size there is generally less housing need. However, there are a total of 686 people on the housing waiting list that have expressed a preference for living in Sculthorpe and the assessment notes that the limited constraints identified would not limit the principle of development within the settlement. This is inconsistent with its categorisation as a Small Growth Village and again brings into question the Council's insistence on using the settlement hierarchy to restrict the level of development due to a settlement's place on the hierarchy. The lack of constraints affecting the settlement, such as flooding or environmental designations, is a key factor that is not recognised in the emerging Local Plan strategy. There are two alleged infrastructure constraints identified for Sculthorpe, namely the A148/A1065 Shell Garage roundabout congestion and the lack of capacity within Sculthorpe Primary School. These requirements for minor infrastructure improvements could be easily overcome by supporting new developments in the village to secure contributions. The Draft Local Plan Part 1 fails to recognise the potential of Sculthorpe as a suitable location for development that relates well to Fakenham and lacks significant constraints, for the reasons set out above. Adding to this, the settlement hierarchy categorisation of Sculthorpe means that it is not favoured in the consideration of sites for allocation.</p>	

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SD3	WSP Indigo, Miss Emily Taylor (1217127)	LP632 LP633	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: There is land available in Sculthorpe that could contribute towards meeting the pressing housing needs. Previously undeveloped, entirely within Flood Zone 1, with very limited areas of surface water flooding. There are no other environmental or landscape designations affecting the site. Adjacent to the Sculthorpe Village Conservation Area and there are two listed buildings located in the built development that lines Moor Lane and Creak Road. The site is well-screened, and large enough to for a layout to avoid having unacceptable impacts on heritage assets. Assessed through HELAA, H0216 or SCU01, shown in Figure 2. Assessment is included in Appendix 1 to these representations. Overall, the Council assesses the site as a 'less constrained development site' as opposed to a 'constrained site not suitable for development'. Despite this being the more favourable score for sites assessed as part of the HELAA, H0216 was not assessed in the Local Plan as a result of its place in the settlement hierarchy. Site H0216 risks being entirely overlooked by the Council as Sculthorpe is classed as a Small Growth Village where only small sites will be assessed for allocation, despite its positive assessment in the HELAA. This removes the chance to consider the best sites for development that are in sustainable locations but disregarded by the Council's current methodology. The site therefore generally scores highly against the various tests included in the assessment, however there are a number of indicators against which the site has been given a score of 'Amber' when 'Green' would be more appropriate. See WSP Indigo attachment for assessment which states that development of the site would not have any harmful effect upon the heritage significance of the Conservation Area. In relation to potential impact upon the setting and significance of other designated heritage assets, it would be possible through a sensitive masterplan and landscape planning-led approach to ensure that any contribution made to their significance by the open, rural character of the site is preserved, and potentially enhanced. The development of the site could be planned so that it would have no negative impact upon the historic townscape of the Conservation Area. The HEELA assesses the site as being large enough to accommodate up to 472 dwellings. This highlights the opportunity for a large scale, coherent scheme to come forward on the site. A sensitive master-planning process would identify the most appropriate sub-areas that could be developed. The site is clearly suitable for residential development, as demonstrated by the lack of constraints affecting its developable area and its excellent location in relation to the existing built form of Sculthorpe. It can also provide necessary infrastructure enhancements to support growth in the settlement. The Distribution of Growth Background Paper identifies that the school is lacking capacity but the site is large enough to accommodate a new school as part of development proposals. The existing Sculthorpe Primary School is a popular and successful school and its offer could be further enhanced by the provision of new premises and a playing field. Early Delivery As well as its suitability and availability, as established in the Council's own evidence</p>	Noted. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

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				<p>base, the site is also deliverable in the short term. The site is under single ownership and the owner is committed to progressing proposals for the site if it were allocated, so it could deliver housing within the first five years of the Local Plan period. There are no constraints that would pose a risk to the delivery of housing on the site and copious amounts of evidence-based work has already been undertaken to provide a strong basis for a fast-tracked delivery of housing. The site is a key opportunity to allocate land for housing that can be brought forward in the short term.</p>	
SD3	Norfolk Land Ltd, Mr A Presslee (1216618 1216614)	LP531	Object	<p>Hoveton is identified as a 'Small Growth Town' in the proposed settlement Hierarchy, in which the Plan proposes "a more limited amount of additional development", together with Holt, Sheringham, Stalham and Wells-next-the-Sea. The draft Plan proposes just one new residential allocation of 150 dwellings (site HV01B). It is our contention that Hoveton is capable of sustainably accommodating additional housing growth through the emerging Local Plan, to which end Norfolk Land Ltd. puts forward a site on Horning Road, Hoveton for approximately 150 dwellings (including a possible Car Home) and public open space, in addition to that already identified in the draft Local Plan (HV01B), thereby increasing the overall housing allocation in Hoveton to approximately 300. The current Core Strategy – at Policy SS1 – identifies Hoveton as a secondary settlement, along with Sheringham, Stalham and Wells-next-the-Sea. Hoveton is acknowledged (in the current and draft Plans) as a sustainable settlement, and whilst it may be realistic to continue its position in the settlement hierarchy as a Secondary Settlement (now Small Growth Town) within an emerging North Norfolk Local Plan, in at least planning/cross-boundary/cooperation terms it ought to be considered in conjunction with Wroxham, with which it is physically, economically and socially 'conjoined'. Hoveton sits on the border of the Greater Norwich Housing Market Area (as identified in the Central Norfolk Strategic Housing Market Assessment) - in which Wroxham is located - and ought therefore to be more realistically considered in that context, or at least being given regard to insofar as the relative Housing Market Areas and OAN are concerned. Put simply, Hoveton demands additional scrutiny given its somewhat different context – in these respects – than perhaps other similar settlements in North Norfolk, and ought to be accommodating a greater share of housing to meet identified needs, than is indicated in the Working Party report. Hoveton particularly promotes itself having: a substantial employment base; an excellent range of shops (including a supermarket); a primary school and high school; railway station with services to Norwich and Sheringham/Cromer; a newly constructed medical centre; and well placed for recreation. Combined with Wroxham and its significant employment, retail, recreation and other services/facilities, they offer significant economic and social dimensions to sustainably supporting a good level of new growth. Environmentally it is acknowledged that the area of the Broads is highly sensitive; however, our site is detached from this and sufficiently distant from the Broads area and its designations so as to avoid any material impacts (the HELAA acknowledges this). Other parts of Hoveton (and indeed</p>	<p>Noted: The distribution of growth is informed by the guiding principles of the NPPF , including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing , jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>Wroxham) are more environmentally constrained, and those (of the sites put forward in the respective Calls for Sites and discarded in the Alternatives Considered volume of the Draft Local Plan) which are not, are more distant from the centre and from other services/facilities, and thereby less sustainable in that respect. Compared with the Draft Plan's focus for development in North Walsham and Fakenham, Hoveton is very much closer to Norwich and has excellent public transport links thereto (including a regular - hourly - train service, of 15 minutes duration). That proximity makes Hoveton an excellent housing market, with un-met demand. There is also excellent housing market demand in Hoveton, where strong/sustained demand will ensure early and continued delivery of housing to meet identified needs. We see considerable merit in having more than one site identified for allocation in Hoveton. The highways related work (and which we have submitted previously) identifies technical capacity for at least 350 additional dwellings at the Stalham Road/Horning Road mini-roundabout junction, subject to some minor engineering alterations. We strongly believe that the intended limited growth for Hoveton merits, indeed warrants, re-assessment, in light of the above/below, and where the settlement scores well in any sustainability and services matrix. Norfolk County Council Education Department has confirmed that the additional housing we propose in Hoveton is achievable with regard to school places: St John's Primary has scope for an additional form of entry and NCC has plans for expansion of Broadland High School. This is acknowledged in the Draft Local Plan (paragraph 15.10). Norfolk Land Ltd. has a legal agreement with the landowner to promote and develop the site in question for housing and related uses. Norfolk Land has a track record in this regard and has a clear intention to seek planning permission for the site and to provide houses at the earliest opportunity, assisting North Norfolk District Council in meeting its housing delivery obligations. Given the clear intention to provide sufficient land in the Local Plan together with sufficient flexibility to provide additional land concurrent with and/or thereafter, it makes greater sense to 'build in' said flexibility/choice into the Plan-making process through the allocation of housing sites. Our site - when viewed in the context of combined accessibility to services/facilities – ought to be the most favourably located. It is a short walk to St John's Primary School, the Medical Centre and Recreation Ground/Village Hall and a shorter walk to shopping and related facilities than the draft allocated site (HV01/B). The proximity of the site to St John's Primary School (just 75 metres at the nearest point) increases the likelihood - compared to the other sites - of residents/children walking rather than driving to school, thus minimising or at least reducing the prospect of exacerbating the existing, well-documented parking/drop off/pick up problems thereof. Furthermore, it appears that insufficient consideration has been made – in undertaking the relative assessments of sustainability - of the recent grant of planning permission for commercial development immediately to the north (PF/16/0733), or that to grant planning permission for construction of 25 no. dwellings, church car park and graveyard extension on land to the south of Horning Road</p>	

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>(PF/17/1802). These developments will change the context of our site – in landscape and other sustainability terms, not least the setting of the heritage assets – and ought to be given proper consideration and amended Sustainability Appraisal scoring accordingly. The Indicative Masterplan accompanying this representation illustrates how the site can be developed for approximately 150 dwellings (possibly including a care home) and public open space in a way so as to address the particular ‘negative’ scoring relating to landscape and heritage assets. It also illustrates how development of the site would be undertaken in relation to existing and approved development – notably the FW Properties developments south of Horning Road (25 houses) and extension to Stalham Road Industrial estate (employment) (see above). In addition, it shows how the landscape, heritage and ecological resources can be protected/enhanced through design and proposed extensive landscaping and new woodland planting, as well as more formal public open space.</p>	
SD3	White Lodge (Norwich) Ltd (Ms Kathryn Oelman, Lawson Planning Partnership (1217091 1217088))	LP291 LP293	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: White Lodge (Norwich) Limited are the sole owner of ‘the Former Nursery site’ identified in Appendix 1. The site, located north of Selbrigg Road and the Cromer Road (A148), in the settlement of High Kelling, occupies a land area just under 1ha in area. The Four Seasons Nursery horticultural business, which previously occupied this land, and has been vacant since 2012, despite being actively marketed as a horticultural nursery. A slightly larger site submitted under 2016 Call for Sites (HKG04), though some areas of the site neither practical nor desirable to develop. Considered suitable in HELAA. Evident recently, to remain in line with National Policy not sufficient to restrict development to only handful of larger towns and villages. Quotes paragraph 78 of NPPF. High Kelling has good range of services including post office, shop, village hall and church. Holt hospital to the west of village include; medical practice, pharmacy and dental practice. Easy walking distance from site to these services. Well placed to support Kelling Primary School, 2.6 miles away accessible by bus. Holt is 2.5km away, accessible on foot via a continuous footway along the Cromer and Old Cromer Road, but is more likely to be reached by a small car journey, cycle or bus ride. Range of services in Holt. Plan acknowledges that North Norfolk is a predominantly rural district. Sensible to maintain the vitality of these rural communities by allocating housing development within their boundaries. Allowing those who grow up in these villages a chance to remain. Quotes paragraph 68(a) NPPF. Policy SD3 seeks positively to address this issue by allocating sites of under 1 hectare within the Small Growth Villages and we regard this to be an appropriate solution to meeting the identified housing need. It is therefore apparent that, by locating development in High Kelling, this would enhance and maintain existing services in the village and other surrounding villages. Support the principles of Policies SD3 and HOU1, which seek to deliver sustainable development in rural areas and are sound by virtue of their consistency with national policy approach to this issue. Request that land identified at the Former Four Seasons Nursery is allocated as a small</p>	Support noted. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>site for up to 20 units within the Local Plan. The site is available for development now, and prior to adoption of the plan, and its suitability and deliverability have been recognised in HELAA. Transport statement provided in May 2016, demonstrated that traffic generated by development of the site for housing purposes would result in an overall decrease in vehicle movements, both accesses appropriate and are capable of being provided. Indicative layout provided, site capable of providing 16 dwellings. Final numbers will be influenced by the chosen mix, scale and layout of development proposed at a later stage and could increase or decrease in response to these detailed considerations. Retain area of land immediately east of Woodland Lodge to ensure separation likely to become garden area. Sufficient separation between dwellings can be achieved. No heritage assets in vicinity. Trees subject to TPO and substantial area of woodland designated as County Wildlife Site on opposite side of Selbrigg Rd. Trees on northern and southern boundaries would be retained and trees planted. Site within Flood Risk 1, surface water could be directed away from proposed dwellings. The Former Nursery site proposes development of previously occupied land, which is located between existing residential dwellings, and is not subject to significant environmental constraints. This site should therefore be considered for allocation to provide much needed housing within the Small Growth Village of High Kelling. An additional site (HKG01/1) was proposed in Call for Sites 2016. Due to its location within the AONB boundary, site reference H0088 (and any others north of the Cromer Road) would not be preferable for allocation in comparison to other identified suitable, available and deliverable sites which lie outside the AONB boundary, such as the Former Nursery site as proposed.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD3)
Objection	9	<p>Key issues raised: a) The requirement to locate growth in the identified the sustainable settlements in the AONB was commented on and organisations such as Natural England, Norfolk Coast partnership, advised that supporting documentation such as the SA and HRA should justify site selection (and distribution - our emphasis) on the least environmental or amenity value and site selection should avoid most versatile agricultural land protected landscapes. b) General support for growth in smaller rural settlements, but for many different reasons, land owners and promoters supported larger scale growth especially in higher valued areas in order to support rural economies and their development needs and sought the removal of the overall prescriptive and restrictive cap in footnote 21 as well as suggesting a number of further settlements which the council should include in the settlement hierarchy e.g. Great Ryburgh and some provided reasoning for the exclusion of others including recognising their commercial interests and hence marketability of settlements , others however used the opportunity to support the identification of smaller villages as in the policy through expressing support and analysis of service provision and local connections. Others expressed concern and sought lower numbers due to concerns around landscape impact and estate housing. c) Those promoting estate management sought more flexibility and a policy commitment facilitating appropriate estate growth and the recognition of the role larger estates make to the District d)The principle of broadly focussing growth in and close to the larger settlements was generally supported, however the challenge was again to ensure the Plan facilitates appropriate levels of growth in the correct locations with commentary closely linked to HOU1 and the Plans deliverability of substantial growth at North Walsham. Some commentary supported a more flexible approach seeking the Plan to adopt a more</p>
Support	12	
General Comments	7	

		<p>flexible approach to longer term growth and support development by allowing for residential development adjoining or close to the existing built up confines of [list settlements] will be acceptable provided that a set of criteria was met and one respondent commented that the reliance on the provision of key services to identify settlements for growth was an over simplification of reality and promoted the wider contribution surrounding villages could make subject to a review of accessibility and transport network. e) The high reliance on windfall in the strategy and the longer delivery expectations of the large growth towns was used to help justify responses around more flexibility around the approach to large and medium growth towns and the identification of a greater number of selected settlements. One lager urban extension was proposed crossing Into Broadland District Council at Coltishall and the village of Badersfield.</p>
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Policy SD4 - Development in the Countryside

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD4	Environment Agency (1217223)	LP449	General Comments	Policy SD 4 – Development in the Countryside We are pleased to see that point 3 in the policy makes reference to the provision of infrastructure for drainage, coastal and flood protection. It should be noted that the applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Whilst this policy specifically relates to development in the countryside, these comments apply for any development, in under or over of a main river or within 8m of a fluvial or 16m of a tidal main river including those within townscapes. Application forms and further information can be found at: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits .	Noted: Consider comments in the development the policy.
SD4	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	Point two of Policy SD 4 refers to 'the extraction of minerals and the disposal of waste in accordance with the Minerals and Waste Local Plans'. The County Council would like the whole of point 2 to be removed from the policy because suitable locations for minerals extraction and waste management development will be covered by policies within the Norfolk Minerals and Waste Local Plan and therefore are not matters to be included within the North Norfolk Local Plan	Noted:- Consider comments in the finalisation of the policy
SD4	Gladman Developments, Mr Craig Barnes (1217131)	LP275	Object	Collectively Policies SD3 and SD4 of the Local Plan provide for a highly restrictive approach to development within the open countryside which does not reflect the positive approach to sustainable development which is set out within the NPPF. Gladman consider that this issue can be effectively remedied by the Council by the adoption of the suggested policy wording as set out above in relation to Policy SD3. Gladman agree that locations in the open countryside which are isolated or do not relate well to existing sustainable settlements should only be considered suitable for limited forms of development which require a countryside location. If Policy SD3 is altered as set out above, Gladman believe Policy SD4 can be considered as sound.	Noted Consider comments in the finalisation of the policy. Consider the extent to which Policy SD 3 is flexible enough and consider the approach set out within the recently adopted Ashford Local Plan in the preparation of the policy.
SD4	CPRE (Mr Michael Rayner) (1204056)	LP298	Support	We strongly support this policy as worded in the First Draft Local Plan (Part 1), as it should ensure that only needed housing is built in areas designated as 'countryside'. It is important that affordable homes, as suggested by this draft policy, are included as being possible to develop in 'countryside' as a means of ensuring the continued vitality of smaller rural communities, whilst market housing is not permitted. CPRE Norfolk is strongly opposed to the alternative option SD4A which would allow for more growth in the Countryside Policy Area, as this would undermine the rural character of the District, and endanger the positive actions taken elsewhere in the draft Plan to combat climate change. In	Support noted

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				particular the alternative option SD4A would lead to an increase in the number of vehicle journeys to and from places of work, schools and for shopping and leisure, as well as through a greater number of delivery journeys.	
SD4	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Please find attached an updated Representations to the Draft Local Plan (Part 1) on behalf of our clients Kelling Estate LLP. If this could replace the letter issued/dated 14 June 2019. The updated relates to a policy from the South Downs Local Plan (Policy SD25), which we reference in the attached representation. The Inspectors Report has since been published which endorses the policy approach as explained in the attached updated representation.. A copy of the Inspectors Report is attached for ease of reference. The Kelling Estate Masterplan still applies .I write on behalf of our clients Kelling Estate LLP and their extensive landholdings amounting to around 817ha of land, which includes the Grade II* Kelling Hall, Kelling Village, The Pheasant Hotel and Holt Garden Centre, surrounding countryside and buildings. The Estate has been the subject of significant investment since the current owners acquired the property around 11 years ago, taking steps to restore the countryside and buildings including designated heritage assets to a condition befitting of their inherent qualities and enhancing the local setting. They have also made significant investment in acquiring and upgrading existing businesses including The Pheasant Hotel and Holt Garden Centre. Understanding the careful balance which needs to be struck between the need for economic returns sufficient to ensure long-term sustainability and the conservation of the sensitive environment in which the Estate is located the Estate has prepared a masterplan to provide a coordinated strategy for its future Understanding the careful balance which needs to be struck between the need for economic returns sufficient to ensure long-term sustainability and the conservation of the sensitive environment in which the Estate is located the Estate has prepared a masterplan to provide a coordinated strategy for its future. The document is intended to provide an agreed reference point and shared vision for how the Estate will be managed in the future including the bringing forward of key development projects. Policy SD25: (South Downs) Development Strategy in that Local Plan makes special provision for the consideration of development outside settlement boundaries (within the countryside) where proposals are part of an Estate Plan, endorsed by the National Park Authority. The supporting text to the policy explains its inclusion is an acknowledgement of the important role such estates play in the conservation of the landscape and the development of a sustainable rural economy. In his report the Inspector has endorsed the development strategy as sound and does not recommend any modifications to policy SD25 (a copy of the Inspectors Report is enclosed). Such</p>	Comments noted: Consider comments in the finalisation of the policy and the approach to countryside development through large estate management. See also commentary on ECN9

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				<p>an approach is consistent with national policy, most notably NPPF paragraph 83 which identifies four key elements through planning policies and decisions which enable a prosperous rural economy. This serves to highlight the importance of including an appropriate policy in the Local Plan which allows their positive contribution to be realised in a planned way bringing a greater level of certainty for Estate's committing to long-term investment projects. An Estates Policy could be included in the Local Plan as a stand-alone policy or through an amended Policy SD4, which we propose be amended as follows: Policy SD4 – Development in the Countryside In areas outside of the defined development boundaries and designated as Countryside development will be limited to that which complies with the policies of this Plan and is for one or more of the following: 4. Affordable homes, replacement dwellings, conversion of existing buildings to dwellings, sub division of dwellings, key workers accommodation, and temporary and permanent accommodation for gypsies and travellers; 8. Re-use or replacement of existing buildings 10. Development proposals which are in accordance with an Estate Masterplan which has been endorsed by North Norfolk Council. With supporting text as follows: Rural Estate Masterplans will provide an overarching strategy to achieve the future aspirations of the Estate. They will inform the role that different development projects will play in achieving that aspiration and the wider community benefits which can be achieved. Estate masterplans which have been endorsed by the Council will be afforded material weight in planning decisions</p>	
SD4	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning (1218489, 1218491)	LP803	General Comments	<p>To ensure that Policy SD4 complements the other policies of the LPP1 and avoids conflict with the future LPP2 we consider it necessary to add the following Criteria 10: "In areas outside of the defined development boundaries and designated as Countryside development will be limited to that which complies with the Policies of the Local Plan as a whole and is for one or more of the following: ... 10. Land allocated in the Part 2 Plan for residential development adjacent to the defined boundaries of the Small Growth Villages</p>	Noted: consider comments in the finalisation of the policy
SD4	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP483	Support	<p>There is concern that replacement dwellings and extensions in the countryside can have a detrimental impact to the visual amenity as they are often much larger than the dwelling they are replacing. We therefore would like the policy to stipulate that evidence is provided in the form of LVIA to ensure that adverse impact is avoided and mitigated.</p>	Support welcomed: Consider comments in the finalisation Plan
SD4	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Acknowledges the need to protect and conserve the character of rural areas but is also aware that some development may be necessary to ensure rural communities prosper and thrive in a sustainable manner. Policy SD4 should facilitate and not be limiting towards development, provided it is necessary, appropriate, respectful of its location, and be of</p>	Support noted. Consider comments in the finalisation of the policy.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				benefit to rural communities. There should be consistency with NPPF paragraphs 77-79 to achieve soundness. Policy should therefore make reference to the ability of neighbourhood plans to allocate small scale development to be consistent with NPPF paragraph 69.	
SD4	Broads Authority (321326)	LP806	General Comments	Supporting text para 7.27 should include reference to the Broads	Noted: Consider clarification in future iteration of the Plan
Statutory & Organisations					
Number Received		Combined Summary of Responses (Policy SD4)			
Objection	1	General support expressed but suggest that their needs to be some development necessary to ensure rural communities prosper in a sustainable way. The view that growth should only be promoted in the countryside in order to meet identified need was promoted by some, others sought the provision of a policy or specific wording to support estate management and the contribution they bring to sustainable development. The development industry sought greater flexibility and a more positive approach to growth (rather than restrictive). Norfolk coastal partnership are concerned around the potential impact of business extensions and wish further consideration given to the requirement for a landscape Visual impact assessment in the policy. Norfolk County council, Mineral and waste team requested that bullet point 2 be removed in its entirety.			
Support	3				
General Comments	5				

Policy SD5 - Developer Contributions & Viability

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD5	Environment Agency (1217223)	LP450,451	General Comments	Paragraph 7.34 We are pleased to see the inclusion of this paragraph. However, this should be further enhanced; we would like to see reference that the developer is responsible for creating new habitat if it cannot be provided on site. There may not always be an opportunity to mitigate or enhance existing habitat elsewhere, but contributions could be made for additional land purchase in proximity to the development such as tree planting, creation of wildflower/pollinator corridors, meadows or wetland areas or enhancement of water bodies. We would like to see reference that the developer is responsible for creating new habitat if it cannot be provided on site. Policy could be enhanced by making reference to blue-green infrastructure	Noted: Consider comments future iteration of the Plan
SD5	Norfolk County Council (931093)	LP739	Support	NCC welcomes this policy and the recognised importance of delivering infrastructure in a timely manner. The policy clearly sets out that “where infrastructure deficiencies exist, the Council is committed to achieving a coordinated approach to providing new or improved infrastructure through partnership working”. 8.2. Norfolk County Council Planning Obligations - Notwithstanding the above comments it is felt that the Local Plan should refer directly to the County Council’s Planning Obligation Standards (which are reviewed annually) and it is recommended that the District Council engage with key service providers (for example, Norfolk Fire and Rescue Services; Library Services, Children’s Services and Highways) ahead of taking the plan forward. - Health Provision - The County Council welcomes the inclusion of health provision and the use of the Joint Norfolk Health Protocol as a tool “to assist the Council, developers and health sector organisations to participate in discussions and to consider the relative merits of different sites and policies properly against public health related issues. EDUCATION - Children’s Services (CS) – The level of housing proposed in the emerging Local Plan (Policy HOU.1) and its distribution, as set out in the Settlement Hierarchy (Policy SD3), does not raise any fundamental concerns to Children’s Services subject to securing appropriate developer funding towards the improvement of existing schools or the provision of new school/s through Policy SD 5.	Support welcomed
SD5	Gladman Developments, Mr Craig Barnes (1217131)	LP276	General Comments	Gladman welcome the flexibility provided within the policy to enable negotiation of policy requirements should market conditions or site-specific issues demonstrate that the delivery of these would be unviable. This flexibility is important to ensure that the Local Plan is adaptable to change and that its overall deliverability is protected. The Local Plan is supported by an interim Viability Assessment. Whilst this is welcome, having examined this assessment, it is evident that the full policy requirements of the Local Plan do not appear to have been tested for their collective impact on viability. As such,	Noted: Consider comments in the future iteration of the Plan as the policy approaches are reviewed finalised and appropriate costs included. The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging polices on the

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				it is unclear whether the requirements of the Local Plan are viable. Specifically, Gladman has concerns with the approach of the viability assessment in testing the following policies of the Local Plan: • Specialist elderly care as required through Policy HOU2; • The lack of assessment made for Policy HOU8 for 5% M4(3); • Sustainable build costs imposed through Policy HOU11; • The lack of assessment made of Policy SD16 for electric vehicle charging.	economic viability of the development expected to be delivered through the Local plan. This includes an allowance for adaptable and accessible homes (HOU8) a review of elderly accommodation and a 5% contingencies as standard. Additional costs through increased building regulations and the move toward low carbon homes should be reflected in the Land value as per Government guidance contained in the PPG Paragraph: 012 Reference ID: 10-012-20180724 and NPPF para 57.
SD5	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP750	General Comments	To make the policy clearer and consistent with national policy and the CIL regulations, part 3 of the policy should be amended as follows: 3. Developer contributions will be required to secure infrastructure, where this meets the tests set out at part 1 of this policy, which are necessary to ensure: The first bullet point should be amended or omitted as it is unclear what is expected; Second bullet point should be amended to a policy compliant level of affordable housing (subject to viability) As a generality the bullet points below part 3 of the policy are unduly open-ended and do not provide the requisite degree of precision or detail on what level of developer contribution will be required. Nor do they direct the reader to where that requisite detail can be found	Disagree. Its not possible or appropriate to pre-empt the circumstances of an individual proposal and the list as indicated is indicative of the required considerations but not exhaustive and line with PPG Paragraph: 035 Reference ID: 23b-035-20190901 Revision date: 01 09 2019. which details what can be considered as infrastructure for the purposes of developer obligations. Detailed pre application advice should be sought in line with national policy to inform any submission of proposals. The bullet clearly links to the required site specific allocation policy. Affordable housing thresholds are set as minimums in Policy HOU2 - The council will seek the highest level of affordable housing.
SD5	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP485	Support	We support the delivery of environmental infrastructure and the need to reference the mitigation and monitoring strategy.	Support welcomed
SD5	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP680	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet supports Policy SD5, but recommends that Section 2 ' Viability' of the Policy is amended to enable the submission of a viability appraisal at a later date within the application process. The concern is that the full extent of developer contributions is only identified at the post	Noted, disagree. As set out in para. 7 .47 of the emerging LP and in line with expectations from national policy the LPA expects that the viability methodology, details and standard inputs of any viability

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				submission of a planning application, through statutory consultee comments. As a result, developers would be unable to submit a comprehensive viability appraisal at the validation stage.	appraisal are discussed upfront at pre-application stage. The policy allows for additional submissions at later stages. Consider comments in the finalisation of the policy
SD5	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP462	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) support the HBF's comments in response to Policy SD5 of the DLP. Persimmon Homes (Anglia) emphasise the need for North Norfolk to revisit their viability evidence following this consultation to take account of all the costs being imposed, as required by paragraph 34 of the NPPF.</p> <ul style="list-style-type: none"> • Suggest that further work will need to be undertaken to engage with the development industry on the evidence set out in this local plan. Paragraph 10-002 of NPPG outlines the importance of engaging with developers with regard to viability and evidence will need to be provided as how this has been undertaken; • Policy SD 5 should be amended to include a mechanism that allows the final viability appraisal to be submitted later in the planning application process when the full extent of planning obligations has been identified. For the purposes of validation, • Suggest that the requirement for an initial (draft) viability appraisal would suffice, or, the policy should be reworded to indicate acknowledgement that there may be a need to update the initial viability appraisal as the planning application process progresses. 	Noted, partly disagree: Consider comments in the future iteration of the Plan as the policy approaches are reviewed finalised and appropriate costs included. The Council has undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging policies on the economic viability of the development expected to be delivered through the Local plan. This included workshops with the development industry at which Persimmon Homes (Anglia) were represented. As set out in para. 7.47 of the DLP, the Authority expects that the viability methodology, details and standard inputs of any viability appraisal are discussed upfront at pre-application stage. The advice service for major applications would encompass consultations from both internal and external consultees, which would inform the developer of any necessary contributions.
SD5	Historic England (1215813)	LP705	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Include contributions to the historic environment in Criterion 3</p>	Noted - consider the addition of the Historic Environment to the list within bullet 3 in the preparation of the policy.
SD5	RSPB (1217391)	LP411	General Comments	The principle of developer contributions to address recreational impacts and other pressures on protected areas due to new development is well established. It is encouraging to see this is being defined in the Local Plan, but it is essential that a clear mechanism will be in place to not simply secure funding but ensure that this will be used to deliver projects on the ground to manage and monitor the provisions for which contributions were provided. The Council need to ensure that a fully developed strategy will be in place by the time the plan is ready for submission. The RSPB is concerned by the "viability" text. We note the HRA has also commented on this issue and support the need for clarity on how this proposed approach will be compatible	Noted - consider further clarity regarding the viability context and consider the need to produce, with the RSPB, a mitigation and monitoring strategy that outlines not only how developer contributions will be secured, but the measures that will be funded by the contributions that are gathered.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				with the need for the Council to ensure impacts to protected areas will be fully mitigated. This will need clarifying in future iterations of the Plan. Proposed changes: Provision of a fully worked up mitigation and monitoring strategy that outlines not only how developer contributions will be secured, but the measures that will funded by the contributions that are gathered.	
SD5	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Acknowledge that NNDC has not adopted a CIL charging regime, therefore S106 developer contributions are an important means of funding and delivering infrastructure provision to support new development. Recognises the need for well-serviced settlements to ensure the needs of communities are met locally and sustainably. The use of planning conditions to ensure the acceptability of development is supported. However, Part 1 of the policy should refer to the tests set out at paragraph NPPF 56 (which are determined from the CIL regulations). In stipulating the requirements and criteria for developer contributions, NNDC should ensure that contributions are related to the development, necessary and should not prejudice the delivery of development in accordance with NPPF paragraphs 54-57 and the relevant CIL regulations. Reference to the Norfolk Health Protocol should be justified – what is the purpose of this and why does it relate only to developments over 50 residential dwellings? Has the Protocol been independently examined? The wording of the policy should have greater clarity and accuracy, as per NPPF paragraph 16. Suggested that this policy is amended: For example: Point 2, what constitutes “large scale” proposals?; Point 3 bullet 1 is not clear and does not appear to make sense; Point 3 bullet 2 appears to conflict with Policy HOU2 which states affordable housing requirements. Accordance with this bullet point would require every application to include a viability test stating the maximum level of affordable housing the development could deliver, regardless of whether it is proposing to be compliant with Policy HOU2. We don’t envisage this is the intention of the policy and would like to highlight that there should be consistency between policies to ensure the plan is sound; Point 3 bullet 4 should only be relevant if the space is being adopted by the Local Authority. If it is private land, it should be up to the owner how it is managed and maintained; With regard to viability, it is considered that Point 1 should refer to the standard “red book” valuation approach; and To achieve soundness, the policy should be consistent with NPPF paragraph 34.</p>	Support noted. Consider amendment to policy SD5 in the preparation of the policy.
SD5	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP614	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We note that the anticipated contributions are expected to be directly related to the development; and necessary to make a scheme acceptable. However, to conform to the NPPF (section 56), the Council may</p>	Consider comments in the development of the policy.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>wish to consider a change to the policy to also confirm that obligations need to be 'fairly and reasonably related in scale and kind to the development'. Pigeon also notes that the NPPF (section 34) requires that Plans should set out the expected 'levels' as well as the 'type' of contribution. As written, the Policy does not include the 'levels' of contributions expected. Whilst the levels of affordable housing are set out in Policy HOU 2, there is little further information about the levels of contributions that may be expected for other types of contribution. We suggest that the Council may wish to consider providing more information about the levels of contributions that will be expected, either within the Local Plan itself or within an updated Infrastructure Delivery Plan.</p>	
SD5	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The 2012 NPPF recognised the need for the viability testing of the policies in a local plan to ensure the cumulative impact of the policies in such plans did not impact on the deliverability of development. Whilst paragraph 34 of the 2019 NPPF maintains this position paragraph 57 sets out that when considering viability of an application decision makers can assume that development that accords with local plan policies are viable. This paragraph places far greater emphasis on the need for viability to be considered as part of the preparation and examination of the local plan compared to the previous framework where there was more acceptance that policies could be negotiated at the application stage. The Government goes on to confirm this approach stating in paragraph 10-002 of PPG that: "The role for viability assessment is primarily at the plan making stage" Fundamentally the Government want far fewer applications to require negotiation with regard to affordable housing and other S106 contributions in order to speed up delivery and ensure that what is written in local plans is delivered. It is therefore vital that the Council considers viability very carefully and makes certain that the cumulative impact of the policies in the plan will not make development unviable. It will also be important that policies then reflect this evidence given that the Government expectation is that negotiation will be the exception rather than the rule. After examining the Council's Interim Viability Assessment, we do have some concerns that the Council has not adequately tested the cumulative impact of the policies in the plan on viability as well as underestimating some of the financial inputs into the model. These concerns include: • Developer profit. The Council have applied a profit margin of 17.5% and whilst we recognise that government guidance suggests a range of between 15% and 20% can be considered applicable many of our members will need to show a minimum of 20% profit margin in order to obtain finance. The Council must provide evidence as to why a lower profit margin is</p>	<p>Noted: Consider comments in the future iteration of the Plan as the policy approaches are reviewed finalised and appropriate costs included. The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging polices on the economic viability of the development expected to be delivered through the Local plan. This includes an allowance for adaptable and accessible homes (HOU8) a review of elderly accommodation and a 5% contingencies as standard. Additional costs through increased building regulations and the move toward low carbon homes should be reflected in the Land value as per Government guidance contained in the PPG Paragraph: 012 Reference ID: 10-012-20180724 and NPPF para 57.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>considered appropriate in North Norfolk; • Specialist elderly care. have not been considered within the relevant residential scenarios outlined in paragraph 4.14 ; • Sustainable construction costs through HOU11; • The lack of assessment made of Policy SD16 for electric vehicle charging; • The lack of assessment made for costs for Mitigation for designated habitats and biodiversity net gains; • The lack of assessment made for Self-build and custom housebuilding; • The lack of assessment for Policy HOU8 for 5% M4(3). • Open space standards, does not state whether these reflect the Council's expectations that would result from the implementation of ENV7 of the draft Local Plan. A higher level of provision than tested in the viability assessment would reduce the net developable area; decreasing the number of units that are able to be provided which would impact on development viability. Recommendation Given that viability assessments are sensitive to changes in any inputs the Council will need to revisit their viability evidence following this consultation to take account of all the costs being imposed, as required by paragraph 34 of the NPPF. We would also suggest that further work will need to be undertaken to engage with the development industry on the evidence set out in this local plan. Paragraph 10-002 of PPG outlines the importance of engaging with developers with regard to viability and evidence will need to be provided as how this has been undertaken.</p>	
SD5	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP313	Object	<p>Issues and concerns were raised at the Council-run Viability Workshop (29 August 2018) about the basis and assumption by NCS (authors of the Plan Wide Viability Assessment, July 2018). Errors and omissions were identified but it is unclear if/how those have been addressed. Consequently, there must be question-marks about the conclusions drawn and therefore the basis of it, including the 35% affordable housing level proposed by the draft Plan in Affordable Housing Zone 2. This particular so as the Draft Plan notes that: "Applications that accord with the site specific policies and this Local Plan will be assumed to be viable and the full policy requirements sought." (paragraph 7.42; and "The approach is intended to provide added certainty around viability and delivery, by setting clear affordable housing and other infrastructure requirements so that they can be accurately accounted for in the price paid for land. For the avoidance of doubt, it is the Council's intention to set affordable housing requirements at the highest viable level in order to increase the delivery of affordable homes across the District." (paragraph 7.43) To what extent, therefore, can the viability of all proposed allocated sites be relied upon, particularly those larger allocations (North Walsham and Fakenham) relying upon significant supporting infrastructure? (We have - elsewhere through this consultation exercise – indicated that there should be a better distribution of proposed housing allocations, particularly within the</p>	<p>The council have undertaken a proportionate assessment of plan viability as laid out in the PPG and as is the nature of plan development further iterations of the study are expected to inform the finalisation of policies including where necessary detailed site specific appraisals. The council took on board comments made at the viability stakeholder event, a revised study informed the emerging policies and was republished alongside the draft plan consultation documents. Detailed feedback including the revised costings are included in the Interim consultation statement Appendix L. and the study is available in the Councils web site. Following the event, the study appraisals were subsequently re run with updated assumptions in relation to the suggestion of increased build costs along with a review of other inputs. The revised</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>Large Growth Towns and Small Growth Towns categories of the Settlement Hierarchy, including an additional allocation in Hoveton). Paragraph 7.43 notes that: "The intention is that this [Assessment of Plan Viability] is kept up to date to inform plan making at each stage of the plan preparation process and the subsequent delivery of growth." How will this be kept up to date, through what process and how will this be scrutinised/consulted upon/examined? We have concerns about the apparently open-ended form of expected developer contributions in paragraph 3 of the Draft Policy, especially given the footnote that "this list is not exhaustive". In the absence of a Regulation 123 List for the provision of infrastructure through CIL monies under the Community Infrastructure Levy Regulations 2010, we are concerned that there is insufficient clarity about the types, extents and expected contributions. References are made in the draft policy and supporting text to "healthcare" and "health provision". It is noticeable that NHS England has – latterly – started to request financial contributions through planning application, to address primary healthcare impacts arising from a proposed development. However, it is our view that financial contributions to doctor and dental surgeries (private businesses) is not a planning matter, and does not meet the tests under Regulation 122 of the Community Infrastructure Levy Regulations 2010. For doctor and dental practices, it is anticipated that the market will respond to the increased demands arising from proposed development. Consequently, broad policies that seek such (expressly or implicitly) should be avoided. We also seek clarification for the basis on which a requirement of a Health Impact Assessment to support applications for 50 dwellings or more (hitherto the threshold is 500 dwellings) is set out in draft policy SD5. Updated national Planning Practice Guidance on viability was published on 09 May 2019. Policy SD5 and supporting text will need to be reviewed to ensure that it is up-to-date in that context.</p>	<p>costs are based on independent data provided through BCIS as advised in the updated Planning Practice Guidance plus a percentage allowance for additional external costs. A further £10 sqm is added for category 2 Accessible and adaptable housing. Section 106 contributions were reviewed in light of the additional inclusion of costs for externals and in line with the updated and refinement of the policy requirements in the emerging allocations. A 17.5% developers profit is used, reflecting the reduced risk of building in North Norfolk as agreed at the meeting. The revised study also reflects the areas of higher value areas outside the main indicative zones. The affordable housing mix was reviewed to ensure it remains NPPF (July 2018) compliant and reflect the more realistic requirements of North Norfolk. The larger strategic typologies include a requirement for flats which are now based on the lower national space standard of 50 sq m for a 1 bed rather than a 2 bed. Sales values, fees, finance etc. were not at this stage reviewed, given the iterative nature of plan making further work in refining values as well as costs will be undertaken at a stage to inform policy development. The study clearly identifies different affordable housing zones. The Council has signed up to the Joint Norfolk health protocol and developments should be informed by the healthy planning checklist contained in the protocol when preparing development proposals. The PPG identifies Health as a component of infrastructure for the purposes of developer obligations Paragraph: 035 Reference ID: 23b-035-20190901 Revision date: 01 09 2019</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD5	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP578	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: It is critical that infrastructure is delivered in a timely manner to support and service proposed development, and on this basis a phased approach to its delivery is supported. Whilst clarity on the viability assumptions proposed in relation to development is important to the timely determination of planning applications, Trinity College question the reliability of submitting a comprehensive viability appraisal in support of an outline planning application (for strategic development in particular) at validation, given the potential uncertainty at that stage on the associated infrastructure costs.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD5)
Objection	3	Statutory bodies were supportive of the approach, some sought further enhancements and clarifications around specific developer responsibilities i.e. around the creation of new habitat (EA) and specific reference to NCC's Planning obligation Standards. Site promoters and developers welcomed the flexibility in the policy and the recognition of a level of negotiation, however some wished to see greater clarity on the specific precision and the level of developer contribution that will be required. The Development industry sought variations to enable the submission of a viability appraisals at a later date within the application process, for strategic / outline development specifically. Organisations sought clarity on monitoring framework and how future developer contributions will not only be secured but what mitigation measures will be funded. Some responses challenged the Local Plan viability assessment to ensure appropriate inputs are used and that all policies are costed and represented in the "proportionate" assessment required.
Support	6	
General Comments	6	

Policy SD6 - Provision & Retention of Local Facilities and Services

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD6	Broads Authority (321326)	LP806	General Comments	SD6 part1 –We had something in our Publication version PUB43 d that is similar to SD6 1. The Inspector discussed this at the hearings and requested we take it out as it was too permissive. See our adopted DM44.	Concerns Noted: Consider feedback in the development of this policy
SD6	Norfolk County Council (931093)	LP739	Support	The County Council supports those emerging Local Plan policies which aim to protect the rural economy and services/facilities such as public houses, local shops and valued facilities, as asset out in the Provision & Retention of Local Facilities & Services section	
SD6	Theatres Trust (1217114)	LP273	Support	North Norfolk is home to a number of theatres of different scales including Auden Theatre, Sheringham Little Theatre and the Pavilion in Cromer. These provide opportunities for local people to participate and engage in the arts, as well as attracting visitors to the area which benefits other businesses. The Trust therefore welcomes the strong protection afforded to these facilities through this policy. We support this policy, which we consider to give adequate support to protect theatres and other venues from unnecessary loss and is reflective of paragraph 92 of the NPPF.	Support noted

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD6)
Objection	0	Responses supported the inclusion of a policy and the strong protection given to local facilities and services. The Boards Authority suggested the approach may be too permissive.
Support	2	
General Comments	2	

Policy SD7 - Renewable Energy

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD7	Broads Authority (321326)	LP806	General Comments	Supporting text 7.58 – needs to mention the Broads. • SD7 – is para 3 (in the case of...) actually allocating land for wind power?	Concerns Noted: Consider feedback in the development of this policy
SD7	Environment Agency (1217223)	LP452	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy SD 7 – Renewable Energy Policy SD 7 could be further enhanced by encouraging all new developments should have some form of renewable energy or heating system. The solution should be appropriate for the development and setting and have no adverse effects as listed within the bullet points in the policy.	Noted: Consider comments in the development the policy.
SD7	Natural England (1215824)	LP711	General Comments	We agree that applications relevant to this policy should consider impacts to the special qualities of the Norfolk Coast AONB. Potential impacts to designated sites should be considered and appropriately assessed both alone and in combination with any other plans or projects. Impacts to Sites of Special Scientific Interest and Marine Conservation Zones should be evaluated where necessary. We strongly advise that projects likely to negatively impact the Cromer Shoal MCZ are avoided. We recommend that renewable energy projects are considered strategically in terms of timing of works, in particular cable lines and grid connections to minimise disturbance. Air quality impacts should be considered both during construction and decommission, specifically the effects on local roads within vicinity of the proposal on nearby designated nature conservation sites. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species. The results of the assessment should inform updates to the HRA and SA, both of which will need to identify appropriate mitigation to address any predicted adverse impacts to the natural environment, including statutorily designated sites. Net gain is embedded in the Governments 25 Year Environment Plan (25YEP) as a key action for ensuring that land is used and managed sustainably. National Infrastructure Projects can make a significant contribution to delivering the environmental ambition in the Government's 25 YEP through net gain. We advise Policy EN4 is referenced in Policy SD 7 to facilitate delivery.	Noted: Consider comments in the development of the policy.
SD7	Creting and Coast, Mr John Fairlie (1217414)	LP520	Object	The renewable energy policy should reflect the Councils declaration to become a zero carbon District and the Council's declared 'Climate Emergency'. As such terminology within the Policy needs to be more carefully worded. In its draft form, this Policy is unreasonable and restrictive. Significant effects on visual amenity can be perceived as beneficial, adverse or neutral and this depends largely on the perceptions and opinions of the individual receptors and, to a	Noted Consider comments in the finalisation of the policy. The policy approach is one that emphasises the importance of the landscape and recognises its sensitivity to wind turbine development of all scales. The approach has been informed by the 2019 landscape

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>certain extent, on the type of development proposed. The polarisation of public opinion on renewable energy is such that it is difficult to define significant changes in a view as having a definitely beneficial or definitely adverse effect on visual amenity for all members of the public who may experience that view. It is widely accepted that it would be impossible to locate a renewable energy development without some significant effects on landscape character and/or visual amenity. Applications for renewable energy developments that are accompanied by an LVIA will define a threshold of significance, and this would never be zero. However significant effects are not necessarily adverse, and adverse effects are not necessarily unacceptable. However significant effects are not necessarily adverse, and adverse effects are not necessarily unacceptable. The renewable energy policy should reflect the Councils declaration to become a zero carbon District and the Council's declared 'Climate Emergency'. As such terminology within the Policy needs to be more carefully worded in particular 'no significant adverse effects'. Without this amendment the policy is unreasonable and restrictive. The policy reiterates footnote 49 of the NPPF, as this is already stated within the NPPF it does not need to be repeated. If the Council choose to quote this footnote, then it should also define what it means by 'affected local community' and how it will establish that a proposal has the 'backing' of the local community. To reflect the NPPF it should also ensure that the policy does not restrict the repowering of existing wind energy sites. Insert the word 'unacceptable' prior to significant adverse effects in both cases where it is raised in the Policy. Delete the phrase 'All planning applications for wind turbines should demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal should have their backing. SD7 does not reflect the repowering of existing wind turbines in line with the NPPF. It is suggested that this line is removed</p>	<p>Character assessment and landscape sensitivity Study.</p>
SD7	<p>Norfolk Coast Partnership, Ms Gemma Clark (1217409)</p>	LP486	Support	<p>We support the delivery of environmental infrastructure and the need to reference the mitigation and monitoring strategy.</p>	<p>Support welcomed</p>
SD7	<p>Historic England (1215813)</p>	LP705	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Welcome the reference to heritage assets and their settings</p>	<p>Support noted</p>
SD7	<p>Norfolk Wildlife Trust (1217447)</p>	LP691	Support	<p>Recognising the impacts of climate change on wildlife, we are concerned that the renewable energy policy does not provide sufficient support for renewable energy provision. In the Vision, it states that 'the challenge for the Local Plan is to devise ways to ensure that the carbon footprint of existing and new</p>	<p>Noted- consider amendments to the renewable energy policy to include targets for energy efficiency improvements and renewable energy provision aligned with</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>development is reduced'. However, whilst the policy text starts with support for renewable energy proposals, the majority of the policy (and the supporting text) appears to focus on the range of circumstances where wind energy would not be permitted. This does not appear to be a progressive policy which would encourage the uptake of renewable energy provision in the district over the plan period, and misses opportunities to support community scale renewable energy provision such as solar panels on new buildings. The government carbon reduction targets set out in the 2008 Climate Change Act committed the UK to an 80% reduction by 2050, Recent government targets have committed the country to net zero carbon by 2050, with five-yearly carbon budgets to 2032, by when a target reduction below 1990 levels of 57% is set. Subsequent to the publication of the draft plan, the government has now committed to a net zero carbon target by 2050. In order to contribute to national targets, we recommend that the plan sets targets for energy efficiency and renewable energy generation (e.g. the Merton rule) in order to provide clear support for these measures in the plan. Positive examples of existing and draft policies that could be used as models can be found in the 'Rising to the Climate Crisis – A guide for local authorities on planning for climate change' report produced in 2018 by the Town & Country Planning Association and the Royal Town Planning Institute. For example, draft policy GM-S 2 of the Greater Manchester Spatial Framework Revised Draft 2019 sets an aim of delivering a carbon neutral plan area by no later than 2038, supported by measures including the promotion of retrofitting existing buildings to improve energy efficiency and generate renewable or low carbon energy, increasing carbon sequestration through restoration of habitats and tree-planting and seeking carbon reductions in new dwellings. We are concerned that the renewable energy policy does not match the aspirations in the Vision and Aims & Objectives, and will not result in any significant reductions in the carbon footprint of existing or new development. Suggested Change: We recommend that the renewable energy policy is revised to include targets for energy efficiency improvements and renewable energy provision, aligned with national targets set by the government, and in line with best practice established by other local authorities, and to include support and highlight opportunities for other forms of renewable energy compatible with new development, such as solar panels on new build roofs. This would allow the Council to demonstrate that the plan will result in a reduction in carbon emissions and an increase in the renewable energy provision in the District.</p>	<p>national targets set by the government and in line with the best practice to include support and highlight opportunities for other forms of renewable energy compatible with new development such as solar panels on new build roofs. Consider the extent to which these are covered within the North Norfolk Design Guide and/or consider the need to refer to this guide within the policy itself.</p>

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD7)
Objection	1	Key issues raised including the linking of policies to ensure delivery and consistency (ENV4/ SD7) and that the approach needs more careful wording to accord more closely with the declared climate change emergency and not to be seen as unreasonable and restrictive in order to provide more support for renewable energy provision.
Support	3	
General Comments	3	

Policy SD8 - Fibre to the Premises (FTTP)

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD8	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP751	General Comments	The first sentence of the policy should be amended to recognise that it is subject to availability and may be impracticable in some instances, as reflected in later sections of the policy. Amend first sentence as follows: All residential developments and all new employment generating development will enable FTTP at first occupation, subject to availability.	Disagree, the policy uses the word enable which in this case refers to the appropriate FTTP telecommunication infrastructure being installed at time of construction including that to the edge of the curtilage.
SD8	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP472	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) support the requirements of the second paragraph of Policy SD 8 and is committed to designing and constructing new developments with the technological infrastructure necessary to enable the delivery of FTTP. However, Persimmon Homes (Anglia) consider the requirement to enable FTTP at first occupation (stipulated under the first paragraph of SD 8) to be unreasonable, as the ability to provide FTTP is, to a large extent, dependent upon the supporting telecommunications technology being available from the fixed broadband telecoms infrastructure provider, which will fall outside of the control of the developer. Persimmon Homes (Anglia) suggest that the first paragraph of SD 8 should be removed or reworded in such a way that requires residential developments to be 'FTTP ready' at first occupation.	Noted. Building Regulations (BR) may potentially be changing to cover how FTTP is delivered on new developments and any new BR will influence final policy.
SD8	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP615	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Broadband service providers are ultimately responsible for installing a Fibre broadband service and it may not always be possible for all developments to have FTTP enabled at first occupation. The Council may therefore wish to consider a change to the Policy to confirm that the requirement will be for new development to provide the necessary ducting etc., to allow FTTP to be enabled on first occupation, subject to the availability of a Fibre service in the vicinity; and that the Council and developers will be encouraged to work with broadband service providers to secure FTTP at first occupation, where feasible.	Consider comments in the development of the policy.
SD8	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports modern and progressive approaches to development and technology infrastructure. However, it is considered that Policy SD8 is too narrowly defined; it is suggested that the policy be made more specific to individual sites and that FTTP should be provided where possible, with the expectation only to meet Building Regulations. It should also	Support noted. Consider amendment to policy SD8 in the preparation of the policy

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				recognise that there is reliance on the network provider to be willing to facilitate the connection. This would avoid placing any unnecessary burden on the developer. Further clarity is needed on what constitutes "special circumstances" as referenced in the third paragraph.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD8)
Objection	3	The aim of the policy to ensure new dwellings are designed and constructed in a way that enables the provision of FTTP was supported. The key Issue raised was that the approach is too onerous on developers. Broadband (infrastructure - our emphasis) installation is the responsibility of telecommunication industry and the requirement for connection at first occupation is not at the gift of the development industry. One response suggests that the policy is made more specific to address known sites/areas of deficiency.
Support	0	
General Comments	1	

Policy SD9 - Telecommunications Infrastructure

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD9	Broads Authority (321326)	LP806	General Comments	SD9, 2 – needs to mention the Broads. It is mentioned in the final paragraph so mentioning it here would be consistent	Noted: Consider clarification in future iteration of the policy
SD9	Natural England (1215824)	LP712	General Comments	Telecommunications Infrastructure We agree that telecommunications infrastructure should avoid impacts to the AONB and that the least environmentally intrusive option is selected. A project level HRA should also be undertaken where there is a likely significant effect to European and Ramsar sites.	Noted: Consider comments in the development of the policy
SD9	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP752	General Comments	The requirement in the opening paragraph of the policy requiring developers of housing and employment to demonstrate sufficient Telecommunications Infrastructure is considered unduly onerous and beyond developer's individual control. The first paragraph of the policy should be omitted	Disagree: The demand for mobile communications and the implications on a sustainable economy are important considerations in the selection of residential and employment properties., as such it is highly appropriate that new developments should consider the mobile telecommunications requirements and seek to ensure sufficient coverage so as to enhance provision and marketing of developments
SD9	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP491	Support	We support the avoidance of unacceptable impact on the AONB from new telecommunications infrastructure	Support welcomed
SD9	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP484	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) support the plan's recognition that high speed mobile infrastructure is key to supporting a sustainable local economy, social welfare, home working and education. However, Persimmon Homes (Anglia) suggest that the first part of Policy SD 9 should be revised to take account of the fact that the ability to ensure and demonstrate adequate mobile internet coverage in an area would sit with the service provider themselves and not with the developer.	Noted. Consideration given to review Policy SD9 in light of the representation and its practical implications.
SD9	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP616	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports the Council's ambition to ensure all new residential developments have access to mobile telecommunications; and accept that it is a customer expectation. However, mobile phone service providers are responsible for providing a mobile service. The Council may wish to consider amending the Policy's first paragraph to clarify this and confirm	Support noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				that the Council will work with developers and telecommunications companies to seek to provide good levels of mobile coverage.	
SD9	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The wording of Policy SD9 is ambiguous and should be revised, as per NPPF paragraph 16. It is suggested that the first paragraph is removed as it does not relate to the rest of the policy. Its inclusion raises concern that unnecessary burdens regarding telecommunications infrastructure could be placed on residential developers.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD9)
Objection	1	Natural England and Coastal partnership support the avoidance of unacceptable impacts on the AONB, NE, raise the advice that a project level HRA will need to be undertaken where there is likely to be significant effects to European sites. The key Issue raised was that the approach is too onerous on developers. It was recognised that telecoms infrastructure plays an important part in supporting the local economy and social welfare etc. but that the approach placed unnecessary burdens on the residential developers.
Support	3	
General Comments	3	

Policy SD10 - Flood Risk & Surface Water Drainage

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD10	Anglian Water (1217129)	LP352	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We welcome the reference made to developers having to follow the surface water hierarchy. Anglian Water considers that specific reference to sewer flooding should be included in Policy SD10 as well as number of specific changes in respect of surface water management. It would be helpful it is made clear that discharge to SuDS is the preferred method of surface water disposal and that discharge to the public sewerage network would be considered as a last resort only ensuring that there is no detriment from the additional surface water flows. With applicants having to demonstrated they have followed the surface water hierarchy as outlined in Part H of Building Regulations and the NPPG. This is made clear in Footnote 21 of the First Draft Local Plan and should be included in the wording of the policy. We would also recommend that Policy 22 includes reference to foul sewerage systems and the potential risk of flooding from all sources including sewer flooding. The final paragraph of the policy appears to relate to the requirement to demonstrate that the sustainability benefits to the community outweigh flood risk which forms part of the exception test. This would only apply where it is not possible to locate a development in flood zones with a lower risk of flooding. Recommended addition include after point 2 add new text: incorporates Sustainable Drainage Systems (SuDS) unless it can be demonstrated that it is not feasible;]. .add after 5 [6. That adequate foul water treatment and disposal already exists or can be provided in time to serve the development;] [new text] [7. That no surface water connections are made to the foul system;] [new text] [8. That suitable access is safeguarded for the maintenance of water supply and drainage infrastructure; [new text]. penultimate paragraph Evidence of how the hierarchy [could be achieved] [delete text]]has been followed [new text] is required and where a drainage option is not feasible evidence of all alternatives considered should be submitted could be achieved is required and where a drainage option is not feasible[new text] [cannot be provided],[deleted text] evidence of [an] [deleted text] all [new text]alternatives [plan] [text deleted] considered [new text] should be submitted. Where there is no alternative option but to discharge surface water into [a surface water] [new wording] or combined sewer, developers will need to engage with the [appropriate bodies] [delete text] Anglian Water and the LLFA [new text] and demonstrate why there is no alternative. Clear evidence depicting the above and that the discharge of surface water will be limited to attenuation rate, including climate change allowance, will need to be submitted.;' Delete last para and update footnote 21 to include . Including but not limited to Lead Local Flood Authority (LLFA)</p>	Noted: Consider feedback in the development of the policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				guidance 2017 and updates, NNDC–SFRA, PPG and Sustainable Drainage Systems, Non-statutory technical standards for sustainable drainage systems, March 2015, Department for Environment, Food and Rural Affairs, [Anglian Water’s Suds Adoption handbook, Anglian Water’s Surface Water policy and Sewers for Adoption v8 and any successor documents] [new text]	
SD10	Environment Agency (1217223)	LP453	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 7.70 We welcome the inclusion of this paragraph which outlines the need to avoid inappropriate development in areas at risk flooding. It would be useful to include reference that the Environment Agency would object to any new development in Functional floodplain (Flood Zone 3b) as this would be against policy. Water compatible development can be allowed in Flood Zone 3b if: In accordance with the footnotes of Table 3: Flood risk vulnerability and flood zone ‘compatibility’ of the PPG. • Beneficial to include reference that flooding can result in major impacts to the environment from pollution events from associated industrial activities, in particular from sites storing hazardous substances in significant quantities, it is important that these are located appropriately so that pollution pathways do not occur during flood events. It is important to ensure that flood risk is not increased and so that water quality does not deteriorate as a result of the cumulative impacts of development in growth areas. The local plan should emphasise the need for a strategic and co-ordinated approach to water management (including supply, wastewater drainage and river quality) to ensure that environmental standards are not compromised. This section should emphasise the importance of drainage strategies/flood risk plans when individual development areas are being assessed. Paragraph 7.74 The plan should provide more detail in terms of what is required to make a development more resilient in flood risk areas. All development proposals within the Flood Zone (which includes FZ 2 & 3, as defined by the EA) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment. New development and extensions in areas of high flood risk must be designed to be resilient in the event of a flood and ensure that, in the case of new residential development, that: • there are no bedrooms at ground floor level • ground floor should ideally be raised above the design flood level, including allowances for climate change • an area of refuge should be provided (often on a first floor) above the extreme 0.1% (1 in 1000) annual probability flood level (inclusive of climate change) • a flood evacuation plan should be accompanying a flood risk assessment to address any concerns in relation to access to and from the site Paragraph 7.75. The paragraph states that the default position is that SuDS are provided. It should be ensured that this is for clean surface water only and that</p>	Noted: Consider comments in the future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>there may be a requirement for additional treatment before discharge such as oil separators from large car parks. We recommend that, as well as LLFA guidance, developers must consider the EA's requirements (copied in the advice to applicant section below) for SuDS schemes to ensure that groundwater is protected. The paragraph would also be further enhanced by referencing the need to separate disposal routes for foul and clean surface water which will also help alleviate the risks of surface and foul water flooding. For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2018), in particular Position Statements G1 and G9 – G13 available at: https://www.gov.uk/government/publications/groundwater-protection-position-statements Paragraph 7.76 We are in support of the statement that states 'SuDS should form an integral part of the green infrastructure framework of a site, and provide wider amenity, recreational and biodiversity benefits where appropriate'. SuDS, wetlands and water features can bring huge benefits to biodiversity provided they are appropriately managed. They are also invaluable in protecting local waterbodies from increased rates of runoff and associated pollution which can result from housing development. Given that many of North Norfolk's waterbodies are UK BAP priority chalk streams habitat, it is critically important to ensure that there is no net deterioration in water quality as a result of development. This section would be improved by making reference to permeable hard surfaces to increase infiltration and provide rainwater systems and water butts to capture and reduce water use as well as run off. Paragraph 7.77 This paragraph would be enhanced by stating that the degree to which any solution may be considered appropriate will depend on its impacts on water quality. In some cases, infiltration drainage will not be appropriate on a site – for example, where ground is affected by contamination.. Paragraph 7.79 With regards to reference 21 and the statement which says "The LLFA also consider that deep infiltration (infiltration greater than 2m below ground) is similar to discharging to a surface water sewer". Surface water drainage using deep drainage, including deep bore soakaways is our least preferred method of drainage and should only be considered as a last resort when all other methods have been considered. This is because deep drainage systems bypass the soil zone and increases the potential for pollution of groundwater to occur. We recommend that the local plan refers to our groundwater position statements G1, G9-G13 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf.</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD10	Environment Agency (1217223)	LP454	Support	We recommend that the first bullet point is amended to read "all development will be located to minimise the risk of flooding, mitigating any such risk through avoidance, design of mitigation and include sustainable drainage (SuDS) principles, where appropriate". In situations where the council consider sustainability benefits outweigh flood risk, development will still need to be resilient to flood risk and aim to achieve as many flood risk reductions measures as possible. We welcome the comments confirming that a drainage strategy should be provided at the pre-application and outline stage details. Although we no longer comment on surface water strategies, we realise the benefit of this statement.	Noted: Consider comments in the development the policy.
SD10	Natural England (1215824)	LP713	General Comments	We agree that SuDS can provide wildlife benefit if appropriately designed and recommend that the key requirements of local wildlife are identified and incorporated. We recommend that Policy SD 10 includes a requirement for proposals to demonstrate that the method of surface water disposal will not have any adverse effect on European and nationally designated sites where appropriate.	Noted: Consider comments in the development of the policy
SD10	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP739	Support	The County Council welcomes Policy SD 10 which deals with Flood Risk and Surface Water Drainage	Support noted
SD10	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP831	Support	Please see below the suggested text for Brownfield development: Brownfield sites should aim to reduce runoff as close to greenfield rates as possible. The discharge rate for brownfield sites should be no more than the rate prior to any new development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals for brownfield sites. The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant sewerage undertaker. Anglian Water Surface Water Drainage Policy (Nov 2017) for discharging to sewer also states 'Where a Brownfield site is redeveloped no historic right to connection will exist and any sewer connection be treated as new. The site will be treated as if it was greenfield and therefore the discharge rate limited to the equivalent to the 1 in 1 year greenfield rate'.	Noted:-Additional commentary updating commentary on this policy (Lp739) from LLFA 16.10.19. Consider comments in the finalisation of the policy
SD10	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning)	LP746,LP753	General Comments	The policy imposes a requirement to provide details of a drainage strategy at the pre-application stage. This should be omitted. It is both inappropriate and unduly onerous for inclusion in a Local Plan for use to guide decision making. The final paragraph of the policy should be amended to be explicit that the requirements relate to sites at risk from flooding (Zone 3) recognising that	Comments noted: The Council has fully engaged with key service providers in the development of this policy including the lead Local Flood Authority and Environment

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	(1218427, 1218424)			'more vulnerable' uses like dwelling houses are appropriate in flood zones 1 and 2	Agency. Consider comments in the finalisation of the policy
SD10	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning (1218489, 1218491)	LP803	General Comments	Whilst the general principles of Policy SD10 are supported it is important that the requirements of the policy do not overstep those set out as part of national policy. Specifically, paragraph 165 of the NPPF is clear that "major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate". This firstly suggests that the threshold for SuDS on residential developments is on schemes of 10 or more homes or sites of 0.5ha or larger. It then also suggests that SuDS is not an absolute requirement as part of major developments if it may not represent a practical and implementable solution to site drainage. To this end these provisions and flexibilities should be built into the wording of Policy SD10. Our suggested amends are set out below: "All new development will: be located to minimise the risk of flooding, mitigating any such risk through avoidance, design of mitigation and with all major developments include incorporating sustainable drainage (SuDS) principles unless it is inappropriate to do so;	Noted Consider comments in the finalisation of the policy: The Council has engaged fully with the Lead Local Flood Authority and other relevant key professional bodies/persons in the development of this policy.
SD10	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP491	Support	We agree that SUDS should be an opportunity to incorporate ecological net gain through design.	Support welcomed
SD10	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP489	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) identify discrepancies between the provisions of Policy SD 10 and the current guidance provided by Norfolk County Council (NCC) as Lead Local Flood Authority (LLFA), in 1. Point 2 of the policy, which states that 'Developers will be required to show that the proposed development: does not increase green field run-off rates and vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows.' needs to be consistent with Section 15 of the NCC LLFA Guidance Document (2019), which relates to runoff rates from greenfield and brownfield sites. 2. Policy SD 10 sets out a requirement to "provide at the pre application and outline stage details of a drainage strategy/statement showing at least one achievable drainage solution with evidence and sketch layout plan including proposed means of adoption and maintenance of the systems over the lifetime	Noted: consider comments in the finalisation of the policy. 1. Noted. The Council has fully engaged with LLFA in the development of this policy. 2. The wording within Policy SD10 requires a Drainage Strategy/ Statement, including for pre-application and outline proposals, where drainage proposals are submitted which consider flood risk and proposed sustainable drainage systems. The requirement for a Drainage Strategy/ Statement in the LLFA Guidance Section 10, Table 2 is supported for outline/ masterplan and full applications, which links to section 12 of the guidance,

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				of the development". Persimmon Homes (Anglia) are concerned that this requirement is inconsistent with Table 2 of NCC's LLFA Guidance Document (2019), which sets out that a detailed maintenance programme and ongoing maintenance responsibilities are required at 'Full Application' and 'Discharge of Conditions' stages and not at the pre-application and outline stage of the planning process. Therefore, it is suggested that Policy SD 10 be revised to align with Table 2 of LLFA guidance to provide clarity for developers.	which is the SuDS Disposal Destination. Para. 12.2 states that "It should be clearly demonstrated in any submission how the proposals follow the hierarchy. Adequate justification and evidence, will be required should surface water be proposed to be discharged using methods lower down the hierarchy than infiltration. We expect that at least one option is demonstrated to be feasible can be adopted and properly maintained and would not lead to any other environmental problems."
SD10	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Reference should be made to consideration of archaeology in planning for SuDS, not only in terms of excavation of lane but also in terms of dewatering waterlogged archaeology.	Noted - consider the addition of a footnote in the preparation of the policy.
SD10	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports this approach. Policy appears to rewrite much of national policy. It is suggested that the policy could be simplified by just referring to NPPF paragraphs 155-165.	Support noted. Consider comments in the development of the policy.
SD10	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP314	General Comments	Paragraph 7.80 – It should be noted that that Anglian Water's Sewers for Adoption v8 is not yet available, although expected to come into effect 'mid-2019'. The policy wording reads as slightly confusing as references to Flood Risk and SuDS appear interchangeable. The impression gained is that are two policies: one on flood risk/sequential test, and one about SuDS. At the moment it lacks a little clarity. With regard to the maintenance and management of surface water drainage systems, the draft policy notes that: "Funding will be via planning conditions and or (sic) planning obligations". The policy needs to be clearer about this: Planning Practice Guidance states: "No payment of money or other consideration can be positively required when granting planning permission. However, where the 6 tests will be met, it may be possible use a negatively worded condition to prohibit development authorised by the planning permission until a specified action has been taken (for example, the entering into of a planning obligation requiring the payment of a financial contribution towards the provision of supporting infrastructure)." (Paragraph: 005 Reference ID: 21a-005-20140306)	Noted. Consider comments in the future iteration of the Plan.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD10)
Objection	2	Statutory bodies generally welcomed the policy and provided some useful suggestions around clarity such as the recommended inclusion of reference to sewer flooding and clarification in the policy that discharge into SuDs is the preferred method of surface water management along with the need to separate disposal routes for foul and clean surface water. Foot note 21 should also be included within the policy. Generally the supporting text could be enhanced by promoting the need for strategic and coordinated approach to water management and could include more detail around what constitutes flood resilient development. Reference to permeable hard services and linkages to other relevant policies were promoted as was the recognition that proposals to demonstrate that the method of surface water disposal will not have any adverse effect on European and nationally designated sites where appropriate. A useful addition suggested was the inclusion of a reference to the acceptable discharge rate for brownfield sites and linking to LLFA guidance document 2019. Further clarity was sought by Anglian Water on the approach to maintenance and management of the surface water drainage system. Whilst the general principles were supported by the development industry, some responses sought changes around the onerous requirements to consider and supply a drainage strategy at pre application stage.
Support	6	
General Comments	5	

Policy SD11 - Coastal Erosion

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD11	Natural England (1215824)	LP714	General Comments	The Plan should consider the marine environment and apply an Integrated Coastal Zone Management approach. Where Marine Plans are in place, Local Plans should also take these into account. More detail about the East Inshore and East Offshore Marine Plans can be found here.	Noted: Consider comments in the development of the policy
SD11	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP492	Support	Can geology be mentioned? Exposure and erosion of geology through coastal erosion and inappropriate development/projects and possible loss of geological records. There is a need to involve the Norfolk Geodiversity Partnership in applications and projects.	Support welcomed: Consider comments in the finalisation of the policy
SD11	RSPB (1217391)	LP425	General Comments	The RSPB recognises the need to protect particular areas of the coast and that this needs to be appropriate to location and ensure no increased erosion along other stretches of the coast. This will require more detailed assessments that consider changes to coastal processes and seek to understand changes in the offshore environment as well. Changes to sediment inputs offshore can affect fish spawning areas and in turn affect success for tern colonies. Any assessments regarding coastal change must also consider these wider issues, especially in a changing climate and weather patterns. We note that the policy states no "material adverse impact". This is not consistent with Habitats Regulations terminology and should be amended. Proposed changes: We recommend the policy makes it clear that all potential impacts from coastal changes will be assessed. We recommend that "adverse impact" is used in the policy and "material" is removed.	Noted- consider the removal of the word 'material' from the policy wording.
SD11	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP362	Object	Blue Sky Leisure notes that the Policy's reference to the 'Coastal Change Management Area, as defined on the Policies Map', equates to the Policies Map Coastal Erosion Constraint Area. This affects part of the Woodhill Park, operated by Blue Sky Leisure. The Coastal Change Management Area is presumably a composite of the 2025; 2055; and the 2105 Coastal Erosion zones (i.e. the area likely to be affected by development over the next 100 years). Blue Sky Leisure is currently working on proposals that seek to address the impact the erosion zones have on its operation at Woodhill Park, East Runton; and is very concerned that the Plan's policy as currently drafted, is overly restrictive and limits opportunities for the staged 'roll back' or possibly relocation of existing tourist related businesses within the Coastal Change Management Area. For instance, the Policy fails to explicitly acknowledge the potential for development such as static caravans and touring caravan pitches, to be safely moved from the most vulnerable areas of the Coastal Change Management Area (the 2025 Coastal Erosion Zone), to less vulnerable areas in the Coastal Change Management Area (the 2055; and the 2105 Coastal Erosion	Noted - consider the flexibility of the wording of Policy SS 11 and whether this would inhibit future tourism development in the area.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>Zone); in a managed and phased way. For many businesses along the North Norfolk Coast, a staged/phased 'roll back' of development within the Coastal Change Management Area will be more feasible, viable and deliverable, than a complete move outside of the Area, particularly given some of the Plan's other restrictive policies, including Policies for new/relocated/replacement tourist accommodation; and policies that seek to protect the character and appearance of the North Norfolk AONB and Countryside. As currently drafted, the Plan will make it incredibly difficult to find suitable alternative and viable sites outside of the Coastal Change Management Area and close by the coast, where visitors want to stay. Much of the area close to the coast and outside of the Coastal Change Management Area is AONB and designated Countryside. The Plan has restrictive policies that seek to protect the character and appearance of the AONB. Recent experience would suggest that opportunities for the relocation of tourist accommodation from vulnerable areas, to other less vulnerable coastal locations are few and far between, with very little take up and even where sites have been found they have not always been supported. It is going to be virtually impossible for tourist accommodation operators to find suitable and affordable potential sites within or adjacent to settlements close to the coast. Such sites often have a 'hope value' or are already optioned for residential development. A relocated caravan and camping site cannot compete with the expected land values that residential development would generate, particularly given the considerable costs of relocation. The Plan needs to acknowledge the special circumstances that affect the relocation of tourist business and be more understanding and supportive, if it is to deliver the 'roll back' policy. Also, Blue Sky Leisure is concerned that for relocation/replacement proposals to be acceptable they need to be supported by a Coastal Erosion Vulnerability Assessment demonstrating that the proposal will not result in an increased risk to life, or a significantly increased risk to property AND also demonstrate, substantial economic, social and environmental benefits to the community. It is not clear what these benefits may be or how the scale of the benefits will be judged, in order that proposals may meet this requirement. The Council's own evidence acknowledges the importance of tourist accommodation to the North Norfolk accommodation, and it is not clear what other evidence will be required. Furthermore, for those businesses seeking to relocate (or expand) from the Coastal Change Management Area to another coastal location outside of it, the Policy requires them to demonstrate that the long-term implications of coastal change on the development have been addressed. However, on the basis that the Coastal Change Management Area deals with coastal change over a 100 year period (up to 2105); and the Plan's period is only up to 2036, it is not clear why this is requirement is needed within the policy. Any development outside of the</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>Coastal Change Management Area must be 'safe' from coastal change by definition for at least 100 years. Predicting implications of coastal change beyond 100 years is going to be almost impossible. Blue Sky Leisure acknowledges that there may be opportunities to relocate existing threatened clifftop businesses to alternative sites further away from the coast, but even this is a complex and difficult process, that involves an extremely high level of risk, as well as cost. Relocations sites have to be attractive and viable locations or people will not stay in them. Unfortunately, most of the attractive locations in North Norfolk are covered by restrictive policies and zonings such as the AONB, the Coastal strip etc. which realistically means the finding of alternative sites is virtually impossible. Blue Sky Leisure therefore suggests that the policy needs to be more supportive of businesses operating within the Coastal Change Management Area, particularly those providing tourist accommodation. These businesses are a vital component of the District's economy; and the Plan should be helping such businesses to deal with Coastal Change rather than hinder them through overly restrictive planning policies. Proposed change: Blue Sky Leisure suggest that an additional provision is included in the policy after point 5 to explicitly support existing tourist accommodation businesses operating within the Coastal Change Management Area, along the lines of".....planning permission will be granted for development proposals subject to:.....6. Proposals being for the phased roll-back of tourist accommodation within the Coastal Change Management Area, provided they are from the more vulnerable parts of the area (2025 Coastal Erosion Zone) to the less vulnerable parts of the area (2055 and 2105 Coastal Erosion Zones) and will not result in an increased risk to life." Also, that the requirement for proposals to demonstrate that "...substantial economic, social and environmental benefits to the community..." is not applicable to existing businesses, particularly those providing tourist accommodation; and the part of the policy that requires "...New development, or the intensification of existing development in a coastal location, but outside the Coastal Change Management Area, will need to demonstrate that the long-term implications of coastal change on the development have been addressed..." is deleted.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD11)
Objection	1	Greater recognition of East Inshore and East Offshore marine management plan was suggested. Representations related to concerns around the management of existing caravan business and the ability to operate a phased retreat / relocation due to the restrictive policy wording and impacts of other countryside policies in the document. As such consideration should be given to the explicit support for existing tourist accommodation after point 5.
Support	1	
General Comments	2	

Policy SD12 - Coastal Adaptation

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	
SD12	Environment Agency (1217223)	LP455	Support	<p>We welcome the inclusion of these paragraphs and support the sustainable approach to coastal adaptation described in paragraphs 7.92 to 7.94. Restricting inappropriate development within Coastal Change Management Areas (CCMAs) is critical, however, there is also a need to promote adaptation to change within areas subject to erosion, particularly with regards to the diversification of businesses, such as diminishing arable farms, or within rural coastal communities within managed realignment or no active intervention frontages. It is important that this need is reflected within local planning policies that actively promote adaptation within CCMAs. Within a managed realignment or no active intervention frontage it is important that development proposals have the opportunity to demonstrate wider benefits, through a sustainability appraisal or similar, when compared to the 'do nothing' scenario associated with no development. For example, rural properties in coastal change areas can be affected by blight, subject to crime and require costly demolition. An opportunity to develop a more suitable land use or construct a moveable dwelling, prior to decline of the existing property, should not be discounted. Paragraph 7.91 indicates that the Coastal Change Management Area is identified on the Policies Map. It is important that there is the facility to update this map in accordance with new, reputable and scientifically robust evidence. A digital, GIS based map (as per the Environment Agency Flood Zones) provides an ideal resource and avoids accidental use of old, paper copies of plans.</p>	
SD12	Environment Agency (1217223)	LP456	General Comments	<p>Policy SD 12 – Coastal Adaptation We have some concerns that policy SD12 is impracticable for some commercial and business uses, for example, private landlords. Relocation costs, including construction and purchase of a site, often make a rollback opportunity unfeasible. This results in the rollback not being utilised; loss of housing stock and the original asset remaining within the risk zone. Some Local Authorities are considering offering 2 for 1 property rollback opportunities to try to offset the high cost of relocation and encourage uptake of rollback opportunities; to retain housing stock and remove assets from the risk zone. The second section of Policy SD12 (focused on dwellings) also states that new development must be in a location that is well related to the coastal community from which it was displaced. We recommend inclusion of 'or, that the relocated dwelling should be in a location which exhibits a similar or improved level of sustainability', or similar. Relocation close to an existing community is often difficult for various reasons; appropriate land may not be available, permissions must be obtained and may be constrained by other policies, the potential rollback site landowner will expect a significant return on the site and like for like development is rarely possible or feasible. This can result in the rollback opportunity not being utilised, the property remaining within the risk</p>	

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	
				<p>zone and a loss of housing stock. Therefore, extending this principle elsewhere within the district, if local land is unavailable or purchase not feasible, should encourage rollback and early adaptation for the benefit of the wider area. Policy SD12 also states that 'the new development (must be) beyond the Coastal Change Management Area'. It is important that that this sentence does not preclude the possibility of replacement of a residential property with a re-locatable dwelling. A property that can be easily lifted and wholly removed from the erosion risk zone represents a considerable improvement in the sustainability of a residential site versus a landowner taking no action to adapt. The construction of permanent dwellings using a rollback opportunity is often prohibitively expensive and local land may not be available, therefore this solution offers a viable adaptation opportunity, particularly if taken as early as possible within the forecasted risk zone. We recommend that North Norfolk District Council considers the development of a Coastal Change Supplementary Planning Document, as per other coastal authorities in East Anglia. Furthermore, we recommend that the Norfolk and Suffolk Coastal Authorities, Statement of Common Ground, Coastal Zone Planning is referred to within this section of the document.</p>	
SD12	Natural England (1215824)	LP715	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We welcome a policy that facilitates coastal adaptation and roll back options for housing and infrastructure in areas vulnerable to coastal erosion. Shoreline adaptation can provide opportunities to improve sustainability, create and maintain crucial coastal habitat and biodiversity. We suggest that the Local Authority consider such opportunities on a strategic scale where feasible and appropriate.</p>	
SD12	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP493	Support	<p>We support in ensuring no detrimental impact on landscape.</p>	
SD12	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP363	Object	<p>Blue Sky Leisure is concerned that the policy as currently drafted, is overly restrictive and limits opportunities for the staged 'roll back' of development from the Coastal Change Management Area into the Countryside. The Policy as drafted only allows for the relocation of proposals from the Coastal Change Management Area that will be affected by coastal erosion in the next 20 years of the date of the proposal. However, this may not be the most economically viable or feasible approach to relocation of certain uses. For instance, in some circumstances, it will be more economical and feasible to move development within the Coastal Change Management Area that is not directly affected until after 20 years, and perhaps affected by the next erosion epoch (i.e. the 2055 Coastal Erosion Zone).</p>	

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)
				<p>Blue Sky Leisure suggests that this time limit requirement should be deleted, or extended, and/or provisions included within the policy to allow for development not affected until after 20 years to be relocated to the Countryside, where it can be demonstrated that it is not feasible or viable to restrict relocation to just that development affected within 20 years of the proposal. Furthermore, the Policy includes additional onerous requirements that will need to be met in order for a 'roll back' proposal to be supported. As currently drafted, proposals will need to result in "...no detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations...". Blue Sky Leisure consider that demonstrating that there is no detrimental impact will be a high hurdle to address, and potentially impossible given the nature of certain developments and coastal landscapes. The impact of all these additional requirements and potentially cost burdens, coupled with the considerable costs of relocation could have the effect of making relocation proposals unfeasible and/or unviable and effectively, undermine the 'roll back' strategy. The Plan should be more helpful and proactive in its approach and properly support the continuation of businesses threatened by Coastal Erosion, rather than hinder them. Blue Sky Leisure suggests that the policy should be drafted in a way that allows for the benefits of removing development away from the Coastal Change Management Area, including the continuation of an existing viable business, and the landscape benefits of removing development from coastal areas; to be weighed against the impacts on the landscape, townscape or biodiversity in the Countryside. Proposed changes: In other words the policy should refer to "...no net detrimental impact...taking into account the landscape, townscape or biodiversity benefits resulting from removal of development from the Coastal Change Management Area...", rather than "...no detrimental impact...". Additionally, the Policy should also acknowledge that achieving the Policy's requirements will be weighed up and balanced with the viability of relocation, with the ability for requirements to be relaxed where it would help with the viable relocation of an existing business out of the Coastal Change Management Area.</p>

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD12)
Objection	1	Restricting inappropriate development within Coastal Change Management Areas (CCMAs) is critical, however a key issue raised was for the policy to promote more active adaptation with CCMAs and for the Council to reflect on more incentives to make the approach of roll back more deliverable e.g. 2 for 1. Suggestions include the consideration of relocation to a location that exhibits similar or improved sustainability rather than restrictions on to the coastal community it replaces. The environment Agency support the consideration of a further SPD in coastal management and the reference to the Norfolk and Suffolk Coastal Authorities, Statement of Common Ground, & Coastal Zone Planning is referred to within this section of the document. One representation
Support	2	
General Comments	2	

		raised concerns around the prescriptive 20yr limit highlighting that this may not be the most economically viable or feasible approach to relocation of certain users.
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Policy SD13 - Pollution & Hazard Prevention and Minimisation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD13	Anglian Water (1217129)	LP353	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Anglian Water is generally supportive of Policy SD13. It is suggested that applicants should also demonstrate that development proposals would not be adversely affected by the normal operation of Anglian Water's existing assets. Proposed amendments include adding new section: Proposals for development adjacent to, or in the vicinity of, existing uses will need to demonstrate that both the ongoing use of the neighbouring site is not compromised, and that the amenity of occupiers of the new development will be satisfactory with the ongoing normal use of the neighbouring site, taking account of the criteria above'	Noted: Consider feedback in the development of the policy
SD13	Broads Authority (321326)	LP806	General Comments	7.101 and 7.102 and SD13 – parts of NNDC area in the Broads are good or very good dark skies as referred to in DM22 of our Local Plan and shown at Appendix I of our Local Plan . Please mention this in these sections of the Local Plan. What happens outside the Broads can affect the Broads as per 8.10. • I have not seen mention of the Horning Knackers Wood Water Recycling Centre capacity issue or mention of the Joint Position Statement.	Noted: Consider feedback in future iteration of the Plan
SD13	Environment Agency (1217223)	LP457,458	General Comments	Paragraph 7.99 It is worth noting that air quality requirements are likely to become stricter within the window of this plan and restrictions on particulate matter and NOx may need reviewing in light of those changes. It would be useful to include reference to the fact that air quality is important to the Environment and Human Health and will therefore be reviewed against any changing guidelines. Paragraph 7.100 We are pleased to see the inclusion of reference to the Water Framework Directive (WFD) here. The wording should also state that developments impacting the water environment must carry out a WFD compliance assessment in accordance with the Planning Inspectorates advice note 18. The section on WFD would also benefit from some expansion. Two requirements of WFD are that the development should not cause a deterioration and should not prevent the future 'good' target status from being achievable. The local plan needs to consider this and provide evidence that the developments within the growth areas and their associated increase in wastewater flows from WRCs will not cause a deterioration the receiving rivers or waterbodies. It would be useful for the local plan to include relevant River Basin Management Plan (RBMP) 2 baseline WFD status for these North Norfolk waterbodies to be highlighted to provide context (for example, overall ecological status, fish, water quality determinants). It is important that growth and development does not cause a deterioration in these individual statuses. We would also expect to see the Habitats Directive mentioned here as this directive is especially important for North Norfolk with the close proximity of the Broads and associated sensitive SSSIs/SACs. In terms of industrial activity – it should be ensured that industrial development within an area takes into account the need	Noted: Consider comments in the future iteration of the Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>to be sustainable. Any location must allow the industrial activity to be sustainable so that material flows can make the plant as efficient as possible. Where possible, the plan should encourage the use of energy efficient technology such as Combined Heat and Power (CHP) at energy intensive industries so that efficient use of fossil fuel is optimised. Wastes in the form of effluent and process wastes should be recovered into the circular economy and where possible any treatment facility should be co-located, or at least situated nearby, to minimise transport impacts of moving wastes around the country. • Policy SD 13 – Pollution & Hazard Prevention and Minimisation We are pleased to see reference to water quality within the policy. The policy should also reference the WFD and the habitats directive. Specifically, the 2 two objectives of WFD, no deterioration and improvement in status should be referenced. In relation to Major Hazard Zones, we will be asked to comment on any inappropriate development highlighted in partnership Health & Executive as part of our role as competent authority enforcing the CoMAH Regulations.</p>	
SD13	<p>Norfolk Coast Partnership, Ms Gemma Clark (1217409)</p>	LP497	General Comments	<p>7.102 – We would like to see standard conditions on all applications where external light is proposed. National Planning Policy Framework Clause 125 and Norfolk County Council's Environmental Lighting Zones Policy both recognise the importance of preserving dark landscapes and dark skies. In order to minimise light pollution, we recommend that any outdoor lights associated with proposed development should be: 1) fully shielded (enclosed in full cut-off flat glass fitments) 2) directed downwards (mounted horizontally to the ground and not tilted upwards) 3) switched on only when needed (no dusk to dawn lamps) 4) white light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources Please also refer to the Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights which gives guidance for lighting in an AONB. https://www.theilp.org.uk/documents/obtrusive-light/ https://www.theilp.org.uk/resources/free-resources/ilp-guidance-notes/ This has been nationally tested and is used as guidance for developers to reduce impact in designated areas. Dark Sky Discovery Sites – can we please ask to be particularly vigilant regarding proposed lighting within a 2km radius of any Dark Sky Discovery Site? DSDS are not statutory but they are a clear indication of the high quality dark skies, which is directly linked to the special qualities of the AONB. NNDC officers requested that they be put on a GIS layer so that planners are aware of them when assessing applications, please let us know if you are using them. No need to mention the specific Dark Sky Discovery sites specifically as hopefully we will be adding more sites over time.</p>	Support welcomed: Consider comments in the finalisation Plan and policy ENV10
SD13	<p>RSPB (1217391)</p>	LP431	General Comments	<p>The RSPB notes that section 7.100 states "developer must strive" to meet requirements of the WFD. Water quality remains a serious issue for the Broads and other watercourses. It is important to ensure that all new development will ensure that there will be no deterioration in water quality. the policy should also</p>	Noted - consider the removal of the wording 'must strive' and state that new developments will be required to WFD targets and support water quality

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				ensure that new development contributes towards measures to complement action to improve water quality and make improvements. Proposed change: Remove "must strive" and state that developments will be required to WFD targets and support water quality improvements in line with net gain requirements for the environment.	improvements in line with the net gain requirements for the environment.
SD13	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP617	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports the need for a Pollution and Hazard Prevention and Minimisation Policy but suggests that the Council may wish to consider providing more guidance in the Policy's justification on what an unacceptable level of impact may be, i.e. the standards, targets to be applied etc.	Support noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD13)
Objection	0	Feedback was supportive of the approach however more emphasis could be given to air quality, dark skies and further detail given around the Water Frame Directive and the Habitats Directive included especially given the close proximity to the Broad's. One representation suggested that more prescription and guidance should be considered around how the approach would be implemented and quantified e.g. what are the standards/ targets that need to be reached.
Support	2	
General Comments	4	

Policy SD14 - Transport Impact of New Development

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD14	Natural England (1215824)	LP716	General Comments	Transport Impact of New Development We would expect the Plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the Plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Natural England advises that one of the main issues which should be considered in the Plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic ¹ , which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.	Noted: Consider comments in the development of the policy. A reference to the detriment to European sites could be added to bullet 4. Air quality impacts have been ruled out in the Interim HRA, however it also concludes that future HRA work should continue to revisit this conclusion.
SD14	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP498	Support	Chapter 7 – We would be happy to work in partnership and with other partners to improve opportunities and raise awareness of public transport options.	Noted: Support welcomed
SD14	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP494	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes Anglia support the broad objectives of Policy SD 14, but object to criterion 4 of the Policy as it would place an excessively onerous test upon new developments and would exceed the standards stipulated under paragraph 109 of the NPPF. The criterion should align with the requirements of the NPPF, which states that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” As such, it is suggested that criterion 4 is revised to require avoiding 'significant' detriment to the amenity or character of the surrounding area or highway safety. In addition, Persimmon Homes (Anglia) suggest that criterion 2 should be revised in a similar way, to read as “the proposal is capable of being served by safe access	Noted, disagree - consider comments in the development of the policy. For information: Policy SD14 relates to the Transport Impact of New Development, where development proposals would be assessed against 5 criterion. Point 2 states 'the proposal is capable of being served by safe access to the highway network without detriment to the amenity or character of the locality.' Point 4 states that 'the expected nature and volume of traffic generated by the proposal could be accommodated by the

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				to the highway network without 'significant' detriment to the amenity or character of the locality".	existing road network without detriment to the amenity or character of the surrounding area or highway safety.' Para. 109 is quoted from the NPPF, which relates to the prevention or refusal of development on highway grounds in relation to an unacceptable impact on highway safety or the residential cumulative impacts on the road network would be severe. Para. 109 refers to an unacceptable impact and not a 'significant' impact on highway safety and therefore, it is considered that the Policy wording accords with para. 109 in this regard.
SD14	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP618	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports the Transport Policy's main aims and principles of increasing sustainable transport modes; and increasing travel choice. However, that the Council may wish to consider whether elements of the Policy go beyond what is expected by the NPPF without sufficient justification. The NPPF (section 109) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. The Plan's Policy as drafted would suggest that development proposals will be judged on the impact access and traffic may have on the 'amenity or character of an area', as well as highway safety and network capacity. Whilst it is accepted that they may be important considerations, it is suggested that the Council may wish to reconsider the Policy so that it is restricted to issues of highway safety and capacity of the road network, and be written in a way that, in terms of traffic impacts, development would be allowed unless there was a demonstrable adverse impact on highway safety or the residual cumulative impact on the road network is judged as severe. The written justification could usefully advise on what may be considered a severe impact in North Norfolk.</p>	Support noted. Consider comments in the development of the policy. For information: Policy SD14 relates to the Transport Impact of New Development, where development proposals would be assessed against 5 criterion. Point 2 states 'the proposal is capable of being served by safe access to the highway network without detriment to the amenity or character of the locality. Point 4 states that 'the expected nature and volume of traffic generated by the proposal could be accommodated by the existing road network without detriment to the amenity or character of the surrounding area or highway safety.' Para. 109 is quoted from the NPPF, which relates to the prevention or refusal of development on highway grounds in relation to an unacceptable impact on highway safety or the residential cumulative impacts on the road network would be severe. Para. 109 refers to an unacceptable impact and not a 'significant' impact on highway safety and therefore, it is considered that the Policy wording accords with para. 109 in this regard.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD14	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supported and is conducive to good place-making. The policy should be consistent with NPPF paragraph 104 to achieve soundness.	Support noted.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD14)
Objection	1	Feedback was supportive of the approach and general principles however more emphasis could be given around how the impacts of air quality could be addressed through this policy. Criteria 4 was objected to as onerous and above that required through national policy. Further consideration of Para 104 of the NPPF which promotes high quality walking and cycle parking and the recognition of other forms of transport network was promoted for the Council's consideration.
Support	3	
General Comments	1	

Policy SD15 - Parking Provision

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD15	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP499	Support	7.112 – Mitigation of impacts is needed in regards to lighting and signage in car parks in the AONB. See our comments for 7.102 (SD13) – same guidance applies	Support welcomed
SD15	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy SD15 requires new development to provide adequate vehicle parking to serve the needs of the development. The starting point for provision should be the Council's parking standards. However, local conditions such as availability of local public transport should be considered. This is consistent with NPPF paragraph 105. Supports the flexibility of the policy, as each development site has individual characteristics regarding connectivity and local sustainable transport opportunities.	Support noted. Consider amendment to policy SD15 in the preparation of the policy

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD15)
Objection	0	Limited comments were received on this policy. Both representations were supportive. The further consideration of the potential impacts of external lighting was supportive as was the requirement to remain flexible on parking provision in line with site specific characteristics and sustainable transport considerations.
Support	2	
General Comments	0	

Policy SD16 - Electric Vehicle Charging

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD16	Broads Authority (321326)	LP806	General Comments	Could electric charging points be lit? Boat electric points tend to be. If they are lit, this could add to light pollution.	Noted: Consider clarification in future iteration of the Plan
SD16	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning (1218489, 1218491)	LP803	General Comments	Our client is generally supportive of the inclusion of electric vehicle (EV) charging points as part of new residential development proposals. It is, however, important to ensure that the policy lends itself to levels of EV parking provision that is both proportionate and practical in respect of both delivery and management. Our client is generally supportive of the inclusion of electric vehicle (EV) charging points as part of new residential development proposals. It is, however, important to ensure that the policy lends itself to levels of EV parking provision that is both proportionate and practical in respect of both delivery and management.	Noted Consider comments in the finalisation of the policy: It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments.
SD16	Blakeney Hotel (Mr John Long, John Long Planning Ltd) (1216065 & 1216646)	LP228	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Blakeney Hotel supports Policy SD16's aims and is keen to provide additional electric vehicle charging points at the Hotel. However, the Hotel has concerns over the potential costs that would be incurred in providing the capacity in the electricity supply and distribution network needed to provide such charging points, which may be prohibitive. The Hotel requests that the policy is amended to only require the provision of electric charging points where it is technically feasible and financially viable to do so, taking into account the cost of electricity infrastructure reinforcement and upgrades. The Hotel note that the Policy includes provision for an 'in lieu' payment to be made, but there is no indication of what the level of contribution would be; or how it would be calculated. Blakeney Hotel therefore also requests that the Plan includes more detail on the level of contribution and/or how it would be calculated.	Support noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The local plan seeks to promote sustainable development and is reflective of the rural nature of the District where there is an overreliance on the private car
SD16	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP681	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet provide general comments on Policy SD16 as follows: There is a cost to this in terms of the network within the parameters of a housing development , but the network outside of the site and generating capacity will	Noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				also need to be sorted and at the moment this seems unlikely to happen. Providing electrical chargers on every home is not realistic as not every household will have an electric car for many years to come and by the time a significant proportion do so, the technology will have advanced so much that plugging a car in to charge will be redundant. In the long term, with autonomous vehicles the need for parking at home is questionable and this could fundamentally change the urban design of future developments, freeing up significant amounts of land which would otherwise be used for the storage of vehicles.	that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to address a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The local plan seeks to promote sustainable development and is reflective of the rural nature of the District where there is an overreliance on the private car. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan
SD16	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP495	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) recognise the environmental importance of ensuring that all new cars are zero carbon by 2040 and share the Government's ambition to achieve this target. However, Persimmon Homes (Anglia) emphasise the need for Policy SD16 to be informed through consultation with UKPN to ensure that the provisions of the policy are achievable and the network has capacity to accommodate the associated increase in domestic electricity demand that would result from the policy.	Noted, Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future.
SD16	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP619	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports the ambition to ensure all new residential developments have access to electric charging points; and accept that it will become a customer expectation. However, the Council may wish to consider a change to the Policy to acknowledge that the provision should be subject to technical feasibility, for instance, by taking account of the additional loading necessary to deliver the requirement and the available capacity of local electricity infrastructure.	Support noted. Consider comments in the development of the policy.
SD16	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee	LP315	General Comments	The implementation of a policy promoting the provision of electric vehicle charging in new development is to be welcomed. Norfolk Homes has already started to make provision for electric charging points in the garages of new schemes (detached homes); such provision more widely for private	Support noted. Consider comments in the future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	(1216619 1216614)			<p>drives/garages ought not to present any general difficulties. It is less easy in the absence of a garage, however, and we raise concerns about how the management of communal charging points will operate in practise. In the cases where affordable houses are grouped and controlled by an RSL, then this is more easily managed. The policy suggests that “passive charging points ... should be made available to all residents in accordance with a management agreement.” In theory this could be done via a management company but is open to criticism from those residents who do not charge cars having to subsidise those that do. This is a Common Pool Resource (CPR), where a resource benefits a group of people - in this case car charger users - but provides reduced benefits to everyone else. The non-users still need to pay into the scheme/maintenance of the charging ports. The policy notes: “For major developments, details of how the required electric vehicle charging points will be allocated, located and managed should be included within the relevant Transport Assessment or Transport Statement. The management of the charging points, including the mechanism/procedure for taking payments, will be the responsibility of the developer/occupier”. Does this mean the statutory definition of ‘major development’, as Transport Assessments/Statements will not necessarily be required for all such? If the provision for communal spaces is to be passive” (see definition at footnote of the policy) how is the management and the taking of payments to be the responsibility of the developer, including when the developer has completed and sold the development? We emphasise support for the principle of electric vehicle charging provision but believe that further thought needs to be given to the issue of active/passive provision, and to the subsequent management/payment processes (avoiding superfluous/onerous expectations on the developer post provision). For further note/consideration: the reference in paragraph 7.120 to the use of street light columns to accommodate charging points is somewhat at odds with the trend of reducing street lighting. Depending upon design, such might encourage on-street parking and may require estate roads to be widened to accommodate cars parked on the road to charge. Possible amendments required to clarify meaning/intent</p>	
SD16	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports facilitating the use of new, sustainable technologies such as electric vehicles.</p>	Support noted.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD16)
Objection	0	Responses were generally supportive of the inclusion of electric vehicle (EV) charging points as part of new residential development proposals, highlighting the important to ensure that the policy lends itself to levels of EV parking provision that is both proportionate and practical in respect of both delivery, technically and practical and management. Some responses raised concerns around the potential costs associated with the required infrastructure around existing locations and expansion of parking and sought clarity on the levels of any in lieu payment allowed. House developers confirmed willingness to support the approach , (much of which is in the general direction of national policy) especially where private garages are concerned but raised delivery and maintenance issues around communal parking areas and suggested that further thought needs to be given in the finalisation of the policy to the issue of active/passive provision, and to the subsequent management/payment processes (avoiding superfluous/onerous expectations on the developer post provision).
Support	4	
General Comments	4	

Policy SD17 - Safeguarding Land for Sustainable Transport

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD17	Natural England (1215824)	LP717	Support	Safeguarding Land for Sustainable Transport We support the safeguarding of disused railway routes and the use of these routes as sustainable transport links and facilities. We also highlight the potential of these routes as footpaths, cycle ways and bridal ways as an option for improving GI, biodiversity networks and connectivity. We recommend direct communication with King's Lynn Borough Council where routes cross boundaries.	Support welcomed
SD17	Wells & Walsingham Railway, Mrs Jo Meakin (1217469)	LP579	Support	WWLR comments on Local Plan Wells and Walsingham Light Railway (WWLR) is a unique tourist attraction in Wells, and has operated now for 37 years. It is entirely self-financing and makes no call on public funds. For over eight months of the year it provides daily scheduled public transport between Wells, Warham, Wighton and Walsingham; offering up to five return trips per day at the height of season. It is a local employer, brings tourists to Wells and Walsingham and spends the majority of its money in Wells or nearby. The primary, secondary and tertiary benefits of the railway are not insignificant to the local tourist economy and infrastructure. In our view it offers potential relief to traffic congestion in peak season by serving as a park and ride service for day trippers. Visitors to Wells could park in Walsingham and complete the last four miles of their journey by train. There is scope to increase car parking beside the coach park at the old goods shed in Walsingham. Additionally, a large overflow car park at our Wells terminus on the Stiffkey Road offers short-term relief at the height of season with potential for pay to park spaces with a 15-20 minute walk to the harbour. The original station, on Polka Road, is now a pottery and bookshop. The former trackbed to it has been partly built on in Maryland, but there is also a trackbed to East Quay, which is currently designated a byway open to all traffic. It could serve as an excellent arrival point for pedestrians using the railway as a park and ride. In other coastal resorts, such as St Ives in Cornwall, the branch line railway serves as a park and ride in high season, allowing many more visitors to reach the town than could be provided with car parking spaces. The WWLR requests that no building takes place on any of the former railway routes in Wells, to keep these open for eventual park and ride services, which the railway looks forward to operating.	Comments noted consider comments in the finalisation of policy SD17

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD17)
Objection	0	Limited comments were received on this policy. The safeguarding of sustainable transport routes was supported highlighting the potential for footpaths and Green infrastructure. The addition of Wells next the Sea and in particular land at Wells & Walsingham railway was put forward for consideration as a further location to protect.
Support	2	
General Comments	0	

Environment Policies

Policy ENV1 - Norfolk Coast AONB & Broads National Park

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV1	Broads Authority (321326)	LP806	General Comments	As this is a planning document, suggest you say that the 'Broads has a status equivalent to a National Park' or that the 'Broads is a member of the National Park family' rather than 'Broads National Park'. • ENV1 – our special qualities are listed in 7.4 of our Local Plan if that helps. DM1 is our Major Development policy. Might be helpful to refer to these? https://www.broads-authority.gov.uk/data/assets/pdf_file/0007/1571299/FINAL-Local-Plan-for-the-Broads-May-2019-Appendix-1-ba170519.pdf . Some of the wording in ENV2 is quite strong compared to ENV1 that says impact on special qualities 'will be carefully assessed'. But there is no instruction to developers to 'demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance....' as written in ENV2. Assessing something is different to protecting, conserving and enhancing it. So ENV1 seems weaker than ENV2. How do ENV1 and ENV2 work together? Do they repeat each other or complement or contradict each other	Noted: Consider feedback in the development of this policy
ENV1	Natural England (1215824)	LP718	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Approach supported. Development proposals brought forward through the Plan should avoid significant impacts on protected landscapes, including those outside the Plan's area and early consideration should be given to the major development tests set out in paragraph 172 of the National Planning Policy Framework (NPPF).	Support welcomed
ENV1	Norfolk County Council (931093)	LP739	Support	We support the policy and supporting text (8.16) to protect and enhance Landscape and Settlement Character, particularly in relation to the area defined as the setting of Sheringham Park which is particularly susceptible to pressures	Support noted
ENV1	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP500, 501,502, 504	Support	8.5 – More of an observation but our Integrated Landscape Character Assessment which was undertaken with our partner Local Authorities meant that our character types all dovetailed and enabled a more coordinated response to planning applications. With the changes to the new LCA it has meant that a couple of the character types are now different to our character types. A decision needs to be made as to whether we commission a new LCA and work to integrate these new changes, or whether we don't have our own LCA for the AONB and refer to the Local Authorities LCA'S. This is a conversation that can be had with the Landscape Officers to decide a way forward. 8.6- Could the newly formed county GI and Monitoring group be mentioned? 8.11 We welcome the mention of NPPF para 172. - Policy ENV1 – 'Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced'. Would like to see the words 'where possible' deleted, as this is too vague for developers. Biodiversity net gains means developers SHOULD be enhancing. Also in the last paragraph of this policy please add that appropriate studies including	Comments noted : consider comments in the finalisation of the LCA SPD, consider comments in the finalisation of policy ENV1

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>HRA/LVIA are undertaken. Another example of an AONB policy that has been tested is as follows and could be adapted or partly adapted: Permission for major developments in the Norfolk Coast Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it: a. conserves and enhances the Norfolk Coast AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation; b. is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment; c. meets the aims of the statutory Norfolk Coast AONB Management Plan and design advice, making practical and financial contributions towards management plan delivery as appropriate; d. in keeping with the Landscape Character Assessment by being of high quality design which respects the natural beauty of the Norfolk Coast, its traditional built character and reinforces the sense of place and local character; and avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.</p>	
ENV1	Environment Agency (1217223)	LP459,460,461	General Comments	<p>One missing aspect which should be included is the consideration of designated bathing waters (bathing water directive) and Shellfish water sites in relation to the importance of maintaining good water quality to preserve the standards of these sites. North Norfolk has several designated bathing waters where the bacterial content of any waters discharging nearby can affect the status. Any development in the area draining close to a bathing water should be required to ensure that their discharges do not increase the bacterial content of the waters discharging to the sea where at all possible, in order to safeguard the quality of the bathing water Bathing waters are important for local tourism to this district. Paragraph 8.2 This section could be enhanced to include policies relating to other priority habitats including: • Chalk streams • Traditional Orchards • Ponds In addition, 'green infrastructure retention' and enhancement' could also be widened to include the creation of new green infrastructure, beyond what is already there. It is noted that reference to new and enhanced green infrastructure is made in paragraph 8.9. We have included further comments here. Paragraph 8.4 We are pleased to see that the plan is acknowledging the need for a Habitats Regulation Assessment. The Environment Agency would welcome the opportunity to comment on the HRA once complete. • Paragraph 8.9 We are pleased to see that following on from our response to paragraph 8.2, this section does include 'new' as well as enhanced green infrastructure. It would be beneficial if this point was made consistently throughout the document. Creating new habitat is essential in reaching the target of biodiversity 'net gain', and linking existing habitats through the creation of new woodland or wildflower corridor, field margins or even recreational greenspace. Paragraph 8.10 This paragraph acknowledges that</p>	Noted: Consider comments in the development the policy and future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				development in North Norfolk can affect the Broads in a variety of ways. We agree that development and subsequent population growth may increase visitor pressures on the Broads National Park (as well as other designated sites). The paragraph should also include impacts associated with abstraction. Any smaller scale developments without connection to mains water that will rely on de-minimus abstraction of 20 cubic metres per day of unlicensed water use should have requirements to minimise water usage for example rainwater harvesting or the re-use of grey water. The plan should identify if there are areas where the de-minimus level of abstraction would cause unacceptable harm and allow scope to restrict development or activity where this is the case. This should also apply to other sensitive waterbodies that might fall outside the Broads designation. • Policy ENV 1 – We welcome the inclusion of this policy, specifically where it refers to opportunities to enhance.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV1)
Objection	0	The approach was supported. References to "were possible" could be strengthened to should in order to emphasis developers should be enhancing Biodiversity.
Support	3	
General Comments	2	

Policy ENV2 - Protection & Enhancement of Landscape Character

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV2	Broads Authority (321326)	LP806	General Comments	What are the settlement character studies referred to in this report? Some of the wording in ENV2 is quite strong compared to ENV1 that says impact on special qualities 'will be carefully assessed'. But there is no instruction to developers to 'demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance....' as written in ENV2. Assessing something is different to protecting, conserving and enhancing it. So ENV1 seems weaker than ENV2. How do ENV1 and ENV2 work together? Do they repeat each other or complement or contradict each other	Concerns Noted: Consider feedback in the development of this policy
ENV2	Natural England (1215824)	LP719	General Comments	We welcome the commitment to enhance connectivity to surrounding green infrastructure and Public Rights of Way networks. We suggest that enhancement also facilitates wildlife through management of footpath edges/verges to increase biodiversity where possible.	Noted: Consider comments in the development of the policy
ENV2	Gladman Developments, Mr Craig Barnes (1217131)	LP281	Object	Gladman acknowledge the need to ensure that the environment is sufficiently protected through new developments with net gains provided where possible. Gladman broadly support Policy ENV2 and the list of criteria to be considered in the design of new development and consider it helpful to avoid later delay and potential refusal of development. Gladman is however concerned that the current wording of the policy referring to gaps between settlements (as set out in Point 2 of the Policy) may be confused to mean any gap between settlements, no matter how significant a distance it is, as a reason to resist development proposals. The interpretation of the policy in this way may place significant constraints on new development leading to a blanket and unjustified protectionist policy. Proposed changes: To address this, Gladman consider that Point 2 of the Policy should be reworded to make clear that only the most sensitive of gaps will be considered under this policy, where settlements are visible from one another and/or the gap between settlements perceptibly small/weak. The scale and type of development proposed should also be a key factor by the Council in determining the suitability of a development against this policy.	Noted: Consider feedback and clarification in relation to bullet 2 in the development of this policy
ENV2	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP505	Support	Policy ENV 2 -Again strike out 'where possible' enhance as too vague. There is an onus on developers to enhance now so this needs to be clear. We welcome the mention of nocturnal character and also support the expectation to demonstrate mitigation and enhance connectivity to GI	Comments noted : Consider comments in the finalisation of the policy
ENV2	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Amend Criterion 7 from Historic Parks and Gardens to Registered Parks and Gardens.	Noted- consider amending the wording in the preparation of the policy
ENV2	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Presume Setting of Sheringham Park is based on the Zone of Visual Influence identified	Noted - consider discussions with Historic England regarding

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				by the National Trust in 2005/6. The setting of heritage assets can change over time and also the setting is more than just visual links but encompasses other factors such as noise, odour, light and how an asset is experienced. We would therefore be cautious about including this on the policies map and suggest that we discuss this matter further with you in advance of the next iteration of the plan.	Sheringham Park through the preparation of the policy.
ENV2	RSPB (1217391)	LP434	General Comments	This is a positive policy, but the position on enhancements should be stronger. There are many options that can be low cost that could deliver enhancements for the environment. This should be required and would be compatible with net gain requirements set out in the NPPF. Proposed change: Remove "must strive" and state that developments will be required to WFD targets and support water quality improvements in line with net gain requirements for the environment.	Noted - consider the removal of the wording 'must strive' and state that new developments will be required to WFD targets and support water quality improvements in line with the net gain requirements for the environment.
ENV2	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Acknowledges the importance of protecting landscape and settlement character, particularly in designated areas, and the policy should reflect this. However, the policy should also be formulated in such a way that development is not limited where landscape constraints can be addressed by appropriate mitigation. This will ensure the policy is effective and consistent with national policy (NPPF chapter 15). The supporting text to Policy DS7 acknowledges at paragraph 13.26 that the Duchy of Cornwall's site at Fakenham is not constrained in terms of landscape.	Support noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV2)
Objection	3	The approach was recognised as giving strength to protection & enhancement of landscape & settlement character. objections and advice focused on references to "were possible" and "must strive "could be strengthened to should in order to emphasis developers should be enhancing Biodiversity. Further clarity could be considered and the policy formulated in such a way that development is not limited where landscape constraints can be addressed by appropriate mitigation. Clarification sought on bullet 2 making clear only the most sensitive gaps.
Support	2	
General Comments	3	

Policy ENV3 - Heritage & Undeveloped Coast

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV3	Broads Authority (321326)	LP806	General Comments	Figure 5 could helpfully show the Broads	Noted : Consider feedback in the future iterations of the Plan
ENV3	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP754	General Comments	This is considered to represent an unduly restrictive policy, particularly given the overlap with the AONB offering a national statutory designation reinforced by Local Plan policy which provide an adequate safeguard against which to assess development proposals as they come forward. The policy should be omitted.	Disagree. The purpose of the policy is to protect the character of the Undeveloped Coast and recognises that the undeveloped coast is an important national and international resource. Developments that do not require a coastal location should be directed elsewhere to protect the appearance, character and environment of the area.
ENV3	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP506	Support	Support	Support welcomed
ENV3	Historic England (1215813)	LP705	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Broadly welcome this policy	Support noted

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV3)
Objection	0	Limited comments received, no substantive issues raised. The approach was broadly supported, however one respondent thought the approach was unduly restrictive given the existence of national policy approach to the AONB.
Support	2	
General Comments	2	

Policy ENV4 - Biodiversity & Geology

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV4	Broads Authority (321326)	LP806	General Comments	8.23 – is the Landscape Character Assessment date correct? Should it be 2019? Could refer to Broads Landscape Character Assessment, Broads Landscape Sensitivity Study and Broads Biodiversity Action Plan too. • ENV4: is 'should' a strong term? Could it say something like 'are required to' or 'shall'? ENV5 for example says 'will'.	The LCA is dated 2018. Consider additional comments in the finalisation of the Plan
ENV4	Environment Agency (1217223)	LP463,464	General Comments	We welcome the inclusion of policy ENV 4. This should be further enhanced to extend the policy to include non-statutory designated sites (CWS and UK BAP habitats). Any development proposal that is put forward for a CWS or UK BAP site could be scoped out at an early stage. If future development is restricted to agricultural land, maintaining existing green infrastructure (for example, hedgerows), there is a far greater potential that the development could bring overall net gain for biodiversity. • Paragraph 8.20. We would also like to see protection extended to non-statutory designated sites such as County Wildlife Sites (CWS) and UK BAP priority habitats (including chalk streams). Paragraph 8.21 and 8.22 We are pleased to see the reference to Biodiversity net gains in these paragraphs. The paragraph would be further enhanced by being extended to include scope for habitat creation to occur beyond the boundary of the development site. This has the potential to allow for a greater expansion and connectivity of existing habitats expected through the creation of new green corridors and habitats for new legislative measures. In addition, it would also be beneficial to include the provision of a buffer of 8 to 20 meters of undeveloped land (e.g. grassland or woodland) between the boundary of new development and the water environment. This would further help maintain the connectivity for species along the riparian corridor, and help protect the watercourse from being over-managed. This section should also seek opportunities for and promote tree planting alongside rivers. Trees are important in helping to keep rivers cool and therefore improving the state of the river for biodiversity. By providing shade, trees are able to moderate the extremes in water temperature which can be detrimental to fish spawning. Their underwater root systems provide valuable habitat to fish and invertebrates whilst stabilising the banks. Shading can also be helpful in the control of aquatic vegetation and well as bringing benefits for people. In addition, shading can help combat blue-green algae. Paragraph 8.23 We fully support the use of Ecological network mapping and linking existing priority habitats as identified in the Norfolk BAP. We support the prioritising of enhancement and expansion of existing resources as well as re-connecting habitats where they have been destroyed.	Noted: Consider comments in the development the policy and future iteration of the Plan.
ENV4	Natural England (1215824)	LP720	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Protection afforded to designated sites and the commitment to a strategic approach to mitigate recreational visitor impacts to European site is welcomed. Developmental growth in the area is likely to cause adverse effects to designated sites and should be appropriately assessed to identify impacts and mitigation, resulting in the delivery of a costed suite of measures. We understand that a report to facilitate a Norfolk Wide Green Infrastructure and Recreation Management Strategy is currently being	Noted. Consider feedback in the development of this policy and monitoring requirements. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and this policy area in relation to European Sites

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>researched and drafted. The strategy should be assessed to determine the suitability in mitigating the effects of increased recreational disturbance to North Norfolk's designated sites as a result of strategic growth. The effects of growth on other statutorily designated sites, including Sites of Special Scientific Interest (SSSIs), should also be assessed and measures to address adverse impacts identified, applying the mitigation hierarchy in accordance with paragraph 175 of the NPPF. We support the recommendation to split Policy ENV 4 to cover designated and non-designated biodiversity assets at later iterations of the Plan and HRA. We strongly advise the Local Planning Authority instigates a suitably proportionate interim payment per dwelling in the absence of an established strategy to ensure new residential development and any associated recreational disturbance impacts on European designated sites are compliant with the Habitats Regulations, to address cumulative and in-combination impacts arising. We value the enhancement of biodiversity and geodiversity and the opportunity to create/improve habitats to support wildlife through biodiversity net gain. We encourage links to existing ecological networks to reduce fragmentation and facilitate wildlife movement on a strategic scale. The Local Planning Authority should develop an evidence base around biodiversity net gain that includes mapping assets and opportunities for habitat creation. Calculating biodiversity net gains and losses requires access to good data such as a phase 1 habitats survey that includes habitat condition. Where risks cannot be avoided or mitigated onsite, compensation may be required offsite for residual losses to achieve a biodiversity net gain outcome. In these cases, access to up to date ecological baseline data about any offset receptor site(s) will be needed. The mechanism of delivery should also be considered including the application of a metric to secure a net gain of biodiversity. We recommend CIRIA/CIEEM/IEMA 10 good practice principles when applying biodiversity net gain approaches. The approach to net gain should be monitored and reviewed. • Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The Plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 170.</p>	
ENV4	Norfolk County Council (931093)	LP739	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: para 8.22 'A development with limited or no impacts on biodiversity should still seek to demonstrate a biodiversity net gain wherever possible. Remove 'wherever possible' – the word should already indicates it is optional. Where ever possible does not add anything to the sentence. Include 'measurable' net gain – so that we can record/request quantitative data on the loss and gains. Biodiversity net gain comes from 'enhancement' i.e. 'restoring habitats not affected by construction – for example, an area of ancient woodland that is in poor condition'. The other, more common meaning of 'enhancement' is 'providing environmental benefits over and above the measures</p>	Noted:- Consider comments in the finalisation of the policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>required for mitigation'. Such enhancements do not constitute mitigation or compensation. Mitigation is carried out to limit and compensate for impacts, prior to any enhancement. (four steps of the mitigation hierarchy — avoid, minimize, restore and offset). Avoiding/protecting hedgerows, ponds etc. is mitigation, not net-gain. Creating an additional pond, woodland is net gain. - Recommendation: we would strongly recommend that text to the effect that 'enhancement and mitigation measures should, where available, be evidence based' is included. There is a wide range of published information available relating to mitigation and conservation strategies that must be incorporated into strategies to maximise chances of success. Para 8.23 Recommendations: Please remove references to the Norfolk Biodiversity Action Plans (BAPs). BAPs ceased to exist in 2012 with the publication of Biodiversity 2020: A strategy for England's wildlife and ecosystem service. You might want to add a footer along the lines of 'Priority habitats and species refer to those identified as being of principal importance in England, in Section 1 of the Natural Environment and Rural Communities Act 2006'. Comment: Soprano pipistrelle bats were identified as a UKBAP, but they are very common throughout Norfolk, so might not be a species requiring targeted conservation action. Other bat species would be a higher priority.- para 8.25 Replace ..."and replacement habitats may need to be provided to ensure no net loss of important habitats with '... and replacement habitats may need to be provided to ensure no net loss of important habitats.' - specific to the policy wording On the 13th March, in the Spring Statement, the Government confirmed that new developments must deliver an overall increase in biodiversity. https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/ we would therefore suggest removal of the word 'should. Recommendation: After '...ecological function' add 'and ecosystem services'. Bullet 2 add 'habitat and ecosystem functions'. Bullet 3 On the 13th March, in the Spring Statement, the Government confirmed that new developments must deliver an overall increase in biodiversity. https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/ we would therefore suggest removal of the words 'where appropriate. Plus replace wildlife homes with Nests and roosts. Remove also where ever possible from third para. footnote 56 Remove reference to Norfolk Biodiversity Action Plans as per previous comment. Could reference Section 1 of the Natural Environment and Rural Communities Act 2006. - second part of the policy should be updated in line with: Proposals whose principal objective to conserve /enhance biodiversity or geodiversity interests should not be given planning if it will result in significant detriment to nature conservation interests. I would suggest re-ordering the sentences: Development proposals where the principal objective is to conserve (add in) and/or enhance biodiversity or geodiversity interests will be supported in principle, unless Development proposals that would result in significant detriment to the nature conservation interests of nationally designated (and internationally designated?) sites will not be permitted.</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>However, if proposals that would otherwise be granted as their principal objective is to conserve and/or enhance biodiversity will have a significant detriment to the nature conservation interests of nationally designated sites, they will not be permitted. Last para re proposal for an Ecological environmental impact assessment ...and PEA...A PEA refers to the survey of the site. The result of the survey(s) are presented in a PEAR (Preliminary Ecological Appraisal Report) or EclA (Ecological Impact Assessment). A PEA cannot be submitted as it is not a report, just the survey. Recommendation: add in '...to assess effects on all sites of nature conservation value..' PEAs should be undertaken at all sites of conservation value, not just for European Sites.</p>	
ENV4	Gladman Developments, Mr Craig Barnes (1217131)	LP282	General Comments	<p>Gladman largely support the requirements of Policy ENV4 which seeks to protect, support and enhance biodiversity. Gladman consider that the overall thrust of the Policy is consistent with the aims of the NPPF for sustainable development which seeks to secure net gains for the environment. The policy is sufficiently flexible providing opportunity for mitigation where direct or indirect adverse effects on designated sites are unavoidable. Proposed changes: To ensure that requested contributions required by the policy to address visitor impact on European Sites is consistent with national policy on planning obligations, Gladman consider that the policy should be reworded to make clear that the contribution required should be linked to the proposed development and the increased usage of these sites which is associated with the development.</p>	<p>Noted, Support welcomed - disagree (partly): Evidence contained within the emerging Recreation avoidance and mitigation Strategy and in line with advice from natural England will be used to inform future iterations of the Plan and address impacts on European Sites</p>
ENV4	CPRE (Mr Michael Rayner) (1204056)	LP299	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: In our view rivers and the land around them are the most important features in considering the ecological network, and the network is the best hope for protecting and enhancing individual species, the habitats they need, and the room to adjust and survive. Therefore, greater recognition needs to be given to the role of rivers and the land around them in policy ENV 4. In our view rivers and the land around them are the most important features in considering the ecological network, and the network is the best hope for protecting and enhancing individual species, the habitats they need, and the room to adjust and survive. Our concerns arise from a generalised text which makes no mention of rivers at all, far less the importance of those in North Norfolk; and the overlay throughout of setting biodiversity activities solely through the prism of development and net environmental gain. See paragraph 8.21 in the draft as setting the scene: In 2018 the Government indicated that they intend to require developers how they are improving the biodiversity of a site, to deliver a biodiversity net gain. This is part of an ambition to embed the wider principle of environmental net gain in development. While this can be provide some opportunities it cannot, and need not, stand alone, as implied by the draft support text and policy. The developer will start with the development they want, and then see what can be bolted on in terms of biodiversity and net gain; and in the same way land for a new school or some other community benefit. This is different approach from starting from biodiversity as the core aim in the context of a wider long term strategy and its implementation. Much of has</p>	<p>Noted Consider comments in the finalisation of the policy</p>

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				comes from NGO s. This is missing now in the draft, but was and is present in the Core Strategy. We add a footnote on advances over the past ten years, and hope that may be helpful in considering our proposals in providing illustrative draft texts, should you accept in principle the points we make. ..Proposal for EN 4 policy text. This starts with three points under the heading of “All development proposals should”: We suggest the addition of a fourth point, namely: 4. In addition to the above the Council will promote and engage with the contribution to be initiated and implemented by NGOs in the enhancement of biodiversity, both in terms of longer term biodiversity strategies and priorities for the District and their delivery. These aims will also support the assessment and value of the net gains offered by a developer in support of determination of their application. This includes potential contributions which would support the ecological network..	
ENV4	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP507	Support	Support	Support welcomed
ENV4	Norfolk Wildlife Trust (1217447)	LP692, LP693	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We support the principle of this section but the wording needs changing to ensure it complies with the Plan Vision. In order to ensure the plan vision of conserving and enhancing Norfolk’s distinctive and bio diverse environments is achieved, we strongly recommend that the wording here is changed from should to will, so that the end of the paragraph reads i.e. ‘development proposals will deliver net gains in biodiversity’. The policy wording needs to demonstrate that Biodiversity Net Gain (BNG) will be mandatory and expected (proportionally) from all development. In the proposed methods set out in the recent DEFRA consultation, the requirement to deliver net gain is proportional to the scale of the development, so we do not regard there as being any particular threshold below which this proposal should not apply. Where BNG is not achievable on site, in particular on small sites or where there is a need to maximise the use of the developable area, then a mechanism to allow contributions pooled towards off-site BNG should be provided. In addition, any BNG should be measurable, in line with the terminology used in best practice (see recent guidance issued by CIEEM), in order to demonstrate that BNG and allow for monitoring of progress towards the Vision, Aims & Objectives of the plan. We support the inclusion of requirements for wildlife homes in new development, such as swift and bat boxes, which will help integrate wildlife into new development, providing people with more opportunities to encounter wildlife on a daily basis, improving their quality of life, as well as making new development more permeable and less of a barrier to wildlife movement. We support the commitment to developer contributions regarding visitor impacts from new development on European sites and support the recommendations in the accompanying HRA regarding the incorporation of the developing county-wide Recreational Impact Avoidance &	Support noted- consider strengthening the wording of policy ENV 4 to deliver biodiversity net gains. Consider a standalone policy in regard visitor pressure impacts on European Sites as recommended in the HRA. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and this policy area in relation to European Sites

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				Mitigation Strategy into the next draft of the local plan. We also support the recommendation made in the HRA for the separation of this element out into a separate policy, for clarity. Proposed Changes: In order to ensure the plan vision of conserving and enhancing Norfolk's distinctive and bio diverse environments is achieved, we strongly recommend that the wording here is changed from should to will, so that the end of the paragraph reads I.e. 'development proposals will deliver net gains in biodiversity'. We recommend that in the second paragraph, the text is changed from 'biodiversity net gains and contribution to ecological networks should be sought' is changed to 'measurable biodiversity net gains and contribution to ecological networks will be sought' in order to provide consistent application of the policy and avoid any ambiguity. We also recommend that the treatment of visitor pressure impacts on European Sites is placed into a separate policy for clarity, as recommended in the HRA.	
ENV4	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports the need for protecting biodiversity and creating net-gain in new development through restoration and enhancement measures. As with Policy ENV2, Policy ENV4 should be clear in protecting biodiversity and should pursue opportunities for biodiversity net-gain as per NPPF paragraph 174. It should have sufficient flexibility so as not to limit development where constraints can be managed and addressed through an appropriate design solution. This will ensure the policy is effective and consistent with NPPF paragraphs 174-177.	Support noted. Consider comments in the development of the policy.
ENV4	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP316	Object	Policy ENV4 states that: "Developer contributions will be required to ensure that visitor impact mitigation on European sites from additional pressure on Natura 2000 sites is in line with the emerging Recreational Impact Avoidance & Mitigation Strategy for recreational impacts on those sensitive sites." We ask to what extent will that Strategy be subjected to appropriate public scrutiny and examination, including the justification/viability in asking for financial contributions from applicants? We raise this point as hitherto - via a somewhat nebulous provision in Site Allocations polices of the current Plan - developers have been asked for £50 per dwelling towards mitigation, without any apparent critical/assessment basis for the principle or value of the contribution sought. Seek clarification on developer contribution/mitigation measures	The council is working jointly across Norfolk authorities and with Natural England to develop an evidence base to inform local plans to ensure that residential planning applications which have the potential to impact on European designated sites are compliant with Habitats Regulations and a strategic solution to deliver mitigation necessary to avoid the likely significant effects from in-combination impacts of residential development that is forecast across Norfolk. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV4)
Objection	1	The approach was largely supported, with statutory bodies requesting some clarifications around background documents and sought stronger wording around the requirement to provide enhanced biodiversity and habitat creation on and off site, thus better linking the policy to the Plans Vision. Wording such as "wherever possible, where appropriate" should be removed. The adoption of a strategic approach to mitigate recreational visitor impacts to European sites was welcomed by Natural England and should be set out further in the policy following finalisation of the joint Norfolk study. A monitoring strategy should be developed in order to measure biodiversity net gain over the Plan period. Greater recognition around the contribution and opportunities rivers provide in ecological network was also sought. Developers largely supported the approach as being consistent with the NPPF and providing flexibility so as not to limit development where constraints can be managed and addressed through appropriate design and mitigation, but suggested that in places it could be more prescriptive around the planning obligations, seeking also to limit and Es contribution to be site specific.
Support	5	
General Comments	4	

Policy ENV5 - Green Infrastructure

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV5	Natural England (1215824)	LP721	General Comments	GI is central to the planning process and policy points should include requirement for monitoring and evaluation of new GI especially in the case of habitat creation. We welcome the safeguarding and provision of Green Infrastructure delivered through Policy ENV 5. We agree that all development should include GI principals and deliver proportionate requirements. We recommend the Green Infrastructure Partnership as a useful source of information when creating and enhancing GI.	Noted
ENV5	Norfolk County Council (931093)	LP739	General Comments	Could additionally make reference to the Public Rights of Way network as a location for offsite enhancement where required	Noted:- Consider comments in the finalisation of the policy
ENV5	Gladman Developments, Mr Craig Barnes (1217131)	LP283	Support	The role of Green Infrastructure in supporting health and wellbeing of residents, together with the benefits for wildlife is recognised by Gladman. As such, Gladman always promotes sites which provides substantial amounts of high-quality green infrastructure, and which can connect to and complement existing green infrastructure. Gladman therefore broadly support the aims of this policy. Given its role within the policy, the Council will need to ensure that the Green Infrastructure Background Paper is made available and continues to be made available following adoption of the Local Plan. The Council should ensure that this evidence its kept up-to-date through future reviews of the Local Plan. Care should be taken by the Council in setting the language for the policy. The policy requires a detailed scheme setting out the Green Infrastructure provision for a development, however this wording does not account for the fact that some developments will be promoted as outline applications initially, where matters of scale, layout and landscape will often be offset to be determined at the reserved matters stage. Proposed changes: The policy should be reworded to account for this, requiring only sufficient information at the outline application stage to allow for decision makers to determine that the proposed development is capable or responding to Policy ENV5 at the detailed application stage.	Noted: support welcomed - Disagree (partly) - Consider comments in the development the policy and the finalisation of the approach to GI. Background paper no 5 Green Infrastructure was published as supporting information at the time of the consultation
ENV5	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP508	Support	Policy ENV 5 – We support but there needs to be monitoring in place to ensure this is carried out	Consider comments in the finalisation of the policy and monitoring Framework
ENV5	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Encourages the provision of green infrastructure and recognises it can enhance individual developments as well as having a cumulative positive impact across the District. The policy should be formulated in such a way to ensure that green infrastructure provision on individual sites should however be proportionate and appropriate to the scale of development and should not overburden developer at the expense of other aspects of sustainable development. This will ensure individual	Support noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				developments remain viable and that the policy is effective and consistent national policy (NPPF paragraph 34).	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV5)
Objection	0	The approach of providing GI and its role in wider benefits both health and environmental was recognised and the policy aims supported. A monitoring strategy should be developed and further requirements around GI improvements set out in a background paper.
Support	3	
General Comments	2	

Policy ENV6 - Trees & Hedgerows

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV6	Environment Agency (1217223)	LP465	General Comments	Policy ENV 6 – Trees and Hedgerows Opportunities for tree planting alongside rivers should be promoted. Riparian tree cover helps shade the river and keep water temperature cool in the summer. This can help reduce the effects of climate change and could become increasingly important as summer temperatures rise. Riverside tree roots also provide important refuge for fish fry and aquatic invertebrates, as well as mammals and bird species.	Noted: Consider comments in the development the policy.
ENV6	Norfolk County Council (931093)	LP739	Support	We support this policy protect trees and hedgerow that are already afforded a certain level of protection. We would also encourage the addition of wording to encourage development to protect and retain trees and hedgerows that whilst may not have protection, are still considered important landscape and or biodiversity features.	Noted:- Consider comments in the finalisation of the policy
ENV6	Gladman Developments, Mr Craig Barnes (1217131)	LP284	General Comments	It is always the intention of Gladman to retain existing trees and hedgerows within developments as far as possible. The retention of trees and hedgerows is beneficial for the desirability of the development as a place to live and also benefits wildlife by providing corridors through the Site. It is not always possible to avoid every tree and all hedgerows within a development, such is the need for access, drainage requirements and the need to make best use of the site. It is therefore important that the Policy is sufficiently flexibility to allow for mitigation to ensure that otherwise sustainable developments can take place. Whilst acknowledged that the Policy is connected to valued and high-quality tree/hedgerows, it is unclear to Gladman what the Council would consider to be “public benefit” which is required by the Policy to prevent a refusal. It is unclear for example whether the role of the Site in meeting the objectively assessed needs of the authority is considered sufficient to meet the definition of “public benefit”. Proposed changes: The Council should clarify what is meant by "public benefit" in the context of this policy, as this could be particularly important should any allocated sites be affected by the trees/hedgerows sought for protection in this policy, where the loss is unavoidable.	Noted: support welcomed Consider clarification around public benefits in the finalisation of the policy
ENV6	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP509, LP510	Support	Support	Support welcomed

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV6)
Objection	0	The approach was supported, further clarity could be provided around the meaning of "public benefit" and the retention of trees that are important to the landscape/ biodiversity.
Support	2	
General Comments	2	

Policy ENV7 - Open Spaces & Local Green Spaces

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV7	Natural England (1215824)	LP722	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: all new development should provide adequate and proportionate open space provision. Green Infrastructure (GI) should be well-designed and multifunctional facilitating a variety of recreational activities whilst supporting biodiversity. Recommended that large developments include green space that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed site. The Suitable Accessible Natural Green Space (SANGS) guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in Nature Nearby, including the minimum standard of 2ha informal open space within 300m of everyone's home. As a minimum, we advise that such provisions should include: High-quality, informal, semi-natural areas · Circular dog walking routes of 2.7 km ² within the site and/or with links to surrounding public rights of way (PRoW) · Dedicated 'dogs-off-lead' areas · Signage/information leaflets to householders to promote these areas for recreation · Dog waste bins · to the long term maintenance and management of these provisions	Noted: Consider comments in the development of the policy
ENV7	Norfolk County Council: Norfolk Property Services (931093)	LP739	Support	Holt – Primary School and Playing field It is recognised that NNDC have proposed site H04 Land south of Beresford Road for residential development and provision of 2 hectares of land for a two-form entry primary school. If a new school were to be provided on this or an alternative site, there would be potential for the existing school site (alternative site H26) and playing field (alternative site H29) to be closed and redeveloped for residential use. NCC requests that the Local Plan state that should an alternative site be provided for a school that the existing school and playing field would become available for residential use. Notwithstanding the above, NCC is supportive in principle of policy ENV 7 of the First Draft Local Plan which would allow development on education and/or formal recreation areas where: 'the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity, quality and local accessibility and made available for use prior to the loss of the Education and Formal Recreation Area to be built upon.'	Noted the existing school site and playing field is within the settlement boundary. The sports ground is covered by an existing open land designation. Any changes to this will need to be assessed in line with the policy position on a case by case basis which states replacement by equivalent of better provision will need to be provided and in line with the requirements of the school provision and requirements of NCC as education authority.
ENV7	Gladman Developments, Mr Craig Barnes (1217131)	LP285	Support	The open space requirements of the Policy are acknowledged. Gladman note and welcome the flexibility provided within the policy to allow for off-site provision where supported by evidence. Gladman however consider that greater flexibility be provided, without the need for further work on the applicant's behalf. Examining Table 6 of Appendix 6, it is clear that there are certain typologies of open space that would not be appropriate or would not be possible to accommodate on small-medium scale sites. This includes parkland provision and facilities for outdoor sport. Where the scale of provision required, significantly exceeds that available on small-medium scale sites. Where this	Noted: The plan positively promotes the provision of high quality on site open space GI , enhancement and improvement of the existing strategic network in a flexible way. Evidence contained within the North Norfolk Open Space and Sport Recreation a study will be used to

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				<p>matter of fact issue arises, it should not be upon the applicant to demonstrate the need for off-site provision. Proposed changes: To improve the effectiveness of Policy ENV7, the Council should include a simplified version of Table 6 within the policy which sets out the Council's generalised expectations for open space provision according to type and scale of development. The adoption of this approach would provide for greater clarity and beneficial for the design process. Beyond this, Gladman consider that the Council should only require contributions towards various typologies of open space where it is demonstrated that there is insufficient supply, the development will create an insufficient supply, or where existing provision is of an insufficient quality. Where ample open space of that sought already exists there should be a zero requirement for new development to contribute to this type of open space. The adoption of this approach would provide for greater flexibility and could increase the scope provided for a development to provide a type of open space where there is a deficiency. The adoption of this approach would therefore significantly enhance the effectiveness of the Policy in addressing open space needs.</p>	<p>inform future site specific requirements including appendix 2</p>
ENV7	<p>Norfolk Coast Partnership, Ms Gemma Clark (1217409)</p>	LP511	Support	<p>Policy ENV 7- Would like to see biodiversity improvements included which will also offset damage to more sensitive sites.</p>	<p>Comments Noted: The council is working jointly across Norfolk authorities and with Natural England to develop an evidence base to inform local plans to ensure that residential planning applications which have the potential to impact on European designated sites are compliant with Habitats Regulations and a strategic solution to deliver mitigation necessary to avoid the likely significant effects from in-combination impacts of residential development that is forecast across Norfolk. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan.</p>
ENV7	<p>Blakeney Hotel (Mr John Long, John Long Planning Ltd) (1216065 & 1216646)</p>	LP226	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Blakeney Hotel owns a significant area of land at the northern part of The Pastures in Blakeney which is sectioned off from the rest of The Pastures area by a substantial fence. The Hotel strongly objects to the Local Plan's inclusion of its land at The Pastures within the Open Land Area's designation (Policy ENV 7). The Hotel considers that the area of land does not meet the definition of 'Open Land Area' as it is not an area of open land, it is enclosed by a substantial fence and is not publicly accessible. As such, it does not form part of the wider open space, has a different character and function than the</p>	<p>Noted, disagree: Under current Core Strategy (2008) the land forms part of the wider Pastures designation as an Open Land Area (OLA) - Policy CT 1 states 'Development will not be permitted except where it enhances the open character or recreational use of the land. The land also falls</p>

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				<p>rest of The Pastures and does not make a positive contribution to the wider landscape character of the area. The Hotel wishes to use the land in connection with its business operation, which would not be permissible under Policy ENV 7. The Hotel considers that change of use of this area to car parking should be considered appropriate and the Local Plan changed to accommodate it, by allocating the land for hotel use, including parking.</p>	<p>within the North Norfolk AONB and Blakeney Conservation Area. The emerging Plan positively promotes the provision of high quality Open Space and improvement and is informed by the Amenity Green Space Study, 2018 identifies Blakeney Pastures (B1 AGS/BLA01) as Amenity Green Space. It is described as 'Accessible and highly valued amenity green space centrally located within the settlement. Forms a defining edge and green setting to the historic village core and gives a degree of separation from the later development to the south. Highly significant being one of the few areas of open space within the Conservation Area. Collectively the section forms an important part of the notable composite green space within the settlement and as ' Areas of open land make an important contribution to the appearance of an area and may provide opportunities for informal recreation. It is proposed to protect such land principally as a result of being free from built development and because of their wider contribution to the character of the area.' DLP – ENV 7 includes that 'Development on visually important Open Spaces (un-designated and those designated as Open Land Areas and Local Green Spaces) will not usually be supported.'</p> <p>In addition, the relevant part of Para 97 of the NPPF states that existing</p>

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					open space should not be built on unless an assessment proves it is surplus to requirements, has better or equivalent replacement or that alternative. In conclusion, the current CS designation, along with the special qualities set out in the Amenity Green Space Study strongly support the retention of the Hotel owned land within the wider Pastures designation as OLA.
ENV7	Sport England (1215863)	LP127	Support	Sport England supports this policy which seeks to protect, enhance and provide new spaces for formal and informal sport and physical activity. Suggested amendment: In criteria (a) we would recommend the word 'appropriate' is changed to 'appropriate ancillary development' as it appears that this policy allows for development that would support the use of the open space, for example, changing facilities, storage sheds, toilets or ancillary car parking.	Support noted - consider the amended changes to the wording of criteria (a) of policy ENV7
ENV7	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Appreciates the role open space plays in creating high quality places as it provides a variety of functions and benefits including recreational, ecological, and visual. The importance of an existing open space that performs a particular function is recognised. However, development of land that could be used more efficiently to meet a demonstrated need should not be stifled. Care should therefore be taken in the formulation of the policy to ensure its requirements are clear, but that there is sufficient flexibility so as not to limit development provision or quality. This will ensure the policy is effective and consistent with national policy (NPPF paragraphs 96-101). The policy is considered to be ambiguous and inconsistent with site allocation policies. For example, the open space requirement for site F03 set out in Table 6 appears to be greater than the size of the site. It is suggested that open space requirements should be consistent with recognised industry guidance, such as the Fields In Trust Standards, to avoid any doubt or confusion on the necessary level of provision. It is also considered that greater accuracy is need in the policy wording. For example, in Point 1, the reference to "11 or more dwellings" should be 10 or more dwellings to align with the NPPF.	Support noted. Consider comments in the finalisation of the policy.
ENV7	Norfolk County Council: Norfolk Property Services (931093)	LP739	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Holt – Land off Swan Grove The site has not been included as a potential site for development within the draft Local Plan and has been allocated as an Open Land Area. NCC object to the open land area allocation as there would appear to be no demonstrably special justification for its inclusion and this would prejudice the potential to develop the site for a mixed-use scheme with both housing, formal open space and informal link to the town centre. In June 2018 and April 2019 NNDC undertook an amenity green space	Disagree: The site has been assessed for both its suitability for residential allocation and the continuation of its existing open space designation. The details of the residential assessments are contained in the Alternative Considered Document

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				<p>study. The study looked at amenity green spaces drawn from the existing Core Strategy, a call for sites process allowing parish and town councils to nominate and from officer review in the higher order settlements. The site was suggested as Amenity Green Space AGS/HLT02. NCC was not consulted upon the amenity green space study with regard to the current use of the site and future aspirations. This was despite NCC having put forward the land for residential development when considering sites for allocation in the Site Allocation DPD, adopted in February 2011 and subsequent in the 'Call for Sites' exercise, undertaken by the District Council in May 2016. NCC would have objected to its inclusion as an open land area had they been consulted. It should also be noted that this area of land was not previously included as an area of open space on the Core Strategy Proposals Maps (adopted 2008) and that there is no shortage of amenity green space in this area. Furthermore, in line with the requirements of the NPPF and national planning guidance, in considering areas for nomination Paragraph 100 states that the Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used where the green space is; b) 'demonstrably special to a local community and holds a particular local significance for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife. The following justification was provided by NNDC for allocating the land as Amenity Green Space AGS/HLT02; 'Semi natural grassland and woodland. Informal recreation, biodiversity and dog walking.' The land is located on the corner of Hempstead Road and the A148 and consists of a tree belt facing the main road and a grassed area. The site is not considered demonstrably special to the local community as it is not of local significance because of its beauty or tranquillity or richness of wildlife (the site has not been assessed by an ecologist for biodiversity and is located adjacent to a main road with streetlights). With regard to recreational value, the site has only been used for dog walking and as a link to land to the east. Therefore, it would appear difficult to argue that the area is demonstrably special to the local community. NCC would therefore object to the Amenity Green Space allocation and would request it be deleted. The site has not been included as a potential site for residential development within the draft Local Plan. The site had been put forward by NCC for residential development following NNDC's 'Call for Sites' exercise, undertaken by the District Council in May 2016. Following this exercise, NNDC published its Housing and Economic Land Availability Assessment (HELAA) June 2007. As outlined in Appendix 4, NNDC HELAA (Part 1 Assessment of Housing Land) highlights that 'the site is considered suitable and available' for development. Furthermore, it states; 'The site is well related to Holt, has access to facilities and utilities. No major constraints have been identified at this stage. However, development on the site would result in the loss of Open Space and replacement would be required. The site also falls within a moderate sensitive landscape on the edge of town and development proposals should reflect this (avoiding development, which affect or impinge on skyline views). Limited</p>	<p>site ref H10 and a separate Amenity Green Space background paper - both of which form part of this consultation and are included in the town strategies. It is concluded that the site does not form part of the preferred sites for residential allocation The HELAA is an assessment of potential capacity and the report does not determine whether a site should be allocated in the Local Plan or be granted planning permission. The site is currently designated open space adjacent to the A148 and County wildlife site. It has not been proposed for Local Green Space designation</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				visibility of site from main road due to mature hedgerow along boundary'. Whilst the HELAA does not allocate land for development, it does clearly identify land that has strong potential for allocation. In view of the above, the site continues to offer strong development potential. A mixed development could be provided which provides a mix of housing in a sustainable location, retains the woodland screen to north and east, provides part as a formal amenity use and includes a formal footpath route. The site is available for development with no significant constraints and could be delivered within the next five years. NCC would request that the land be reconsidered for residential development.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV7)
Objection	2	The approach received general support. Natural England advised consideration of including an appropriate standards into the policy and green infrastructure should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in Nature Nearby, including the minimum standard of 2ha informal open space within 300m of everyone's home. Signage requirements and minimum provisions were put forward for consideration. Other Responses noted that the policy does allow some flexibility which was welcomed i.e. offsite provision but noted that not all sites are able to support open space provision. Clarity and the simplification of table 6 was sought. A number of responses suggested alternative wording such as in bullet a- the addition of appropriate ancillary development instead of appropriate. Objections to the policy mainly focused on site specific issues around the designation of land as Open Space rather than the policy approach.
Support	5	
General Comments	1	

Policy ENV8 - Public Rights of Way

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV8	Natural England (1215824)	LP723	Support	We appreciate the protection and enhancement of Public Rights of Way and the creation of additional footpath networks and accessible green space through Policy ENV 8.	Supported welcomed
ENV8	Norfolk County Council (931093)	LP739	Support	Policy could make reference to the importance and opportunity of accommodating Public Rights of Way within developments. It should also be noted that developments should contribute towards infrastructure improvements where there will be increased footfall on public rights of way adjacent to the development	Noted:- Consider comments in the finalisation of the policy
ENV8	Norfolk Local Access Forum, Mr David Hissey (1217490 & 1217491)	LP639	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Norfolk Local Access Forum agree with the environment policies, including Policy ENV8 - Public Rights of Way (PRoW) and request that the Forum is consulted about any planning application that involves a PRoW.	Noted.
ENV8	Norfolk Police (1217249)	LP734	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Request the heading Safety be replaced with Security • 'In town centres covered by CCTV systems, developers will be required to consider these facilities in their design and/or contribute to the siting/re-siting of cameras where appropriate'. This sentence appears connected to SBD/Norfolk Constabulary, suggest extra line for clarity. 8.73 – PARKING (pg 106) • No reference to security which is integral to its functionality – request wording 'secure or safe' to be incorporated.	Noted- consider inclusion of the additional wording proposed through the preparation of the policy.
ENV8	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ENV8 aims to protect and enhance public rights of way (PROW) and encourage well connected, permeable development. This is through new development creating convenient and attractive links to surrounding areas, connecting to walking, cycling and public transport networks. This is conducive to good, sustainable urban design and placemaking which aligns with the Duchy of Cornwall's development principles. Any requirement for a developer to improve a PROW as part of a development scheme should be proportionate, necessary to make the development acceptable, and should not overly burden to developer to ensure it remains deliverable. This will ensure the policy is effective and consistent with national policy. Policy DS7 states that improvements to a PROW are a site-specific requirement. This is questioned given in our comments to Policy DS7 given the site's distance from Rudham Stile Lane.	Support noted. Consider comments in the finalisation of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV8)
Objection	1	The approach was largely endorsed by those that responded. In finalising the policy it was suggested further commentary on the inclusion of public right of way and the opportunities for development to provide proportionate improvements to PROWs.
Support	3	
General Comments	1	

Policy ENV9 - High Quality Design

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV9	Environment Agency (1217223)	LP466	General Comments	Policy ENV 6 – Trees and Hedgerows Opportunities for tree planting alongside rivers should be promoted. Riparian tree cover helps shade the river and keep water temperature cool in the summer. This can help reduce the effects of climate change and could become increasingly important as summer temperatures rise. Riverside tree roots also provide important refuge for fish fry and aquatic invertebrates, as well as mammals and bird species.	Noted: Consider comments in the development the policy.
ENV9	Gladman Developments, Mr Craig Barnes (1217131)	LP286	Support	Gladman is in broad support of this Policy. The NPPF places significant weight on the need to secure well designed, high quality development. The implementation of this Policy will help secure this. Notwithstanding this, there is a need for the approach of the Policy to be adjusted to reflect the scale and type of development which will come forward over the plan period, and a recognition of the different approach that will be taken by applicants to secure planning permission. At present the policy applies in full towards all development proposals. As such the policy is inflexible as it fails to recognise that not all developments will be capable, by way of their type, scale, form and location or even the type of planning application submitted (for example an outline planning application), of responding to the requirements of the North Norfolk Design Guide or policy criteria. Proposed changes: Mindful of this, Gladman consider that the policy needs to be reworded to set out that the North Norfolk Design Guide/policy criteria apply “where relevant”.	Comments noted. Disagree: Design principles should be considered from the outset. The creation of high quality built environment is fundamental to sustainable growth in North Norfolk. In conjunction with the emerging Design guide SPD, the purpose of this policy is to provide a set of design principles which when followed will result in improved design and ensure the special character and qualities of North Norfolk are maintained and enhanced.
ENV9	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP512, 513,514	General Comments	8.57 West Norfolk has a Design Panel made up of architects, officers, elected members and Civic Society members who look at applications for innovative new design and are able to offer technical and professional advice. Does a similar group exist in North Norfolk that could offer support for this type of development? 8.71 When looking at sustainable building techniques and criteria specialists in this field should be approached in order to ensure that proposals are deliverable. ENV 9 – Please consider materials, for example timber cladding is not vernacular and can be at odds in traditional settings and excessive glass in proportion to wall area can cause inappropriate glare and light pollution across the landscape which in turn can have adverse impacts on the landscape character by interrupting the nightscapes and urbanising the rural settlements, as well as being detrimental to wildlife such as bats and migrating birds detracts.	Comments noted, such design panels sits outside the scope of the Local Plan. The creation of high quality built environment is fundamental to sustainable growth in North Norfolk and the policy approach is one that promoted conformity with the emerging Design guide SPD,
ENV9	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 3.65: Welcome this paragraph. Suggest that more detail is given in relation to local materials and vernacular	Noted- consider the addition of text on local materials and vernacular in paragraph 3.65 in the preparation of the plan
ENV9	Historic England (1215813)	LP705	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Welcome the policy and Design Guide. Welcome criterion 6 relating to the historic environment and criterion 7 referring to distinctive local character	Support noted

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV9	Designworks (1217232)	LP303	General Comments	The 2019 version of the National Planning Policy Framework places much greater emphasis than previously on the vital issues of good design and constructive engagement with applicants. In view of the thorough and commendable objectives set by the Draft Local Plan, it is therefore disappointing to note little reference to the need to strive for design excellence and a creative interaction between professionals. A collaborative approach in which the architect, client, and planning authority develop an early understanding and common set of goals is the most logical and rewarding path to good buildings and environments. It is almost impossible to achieve the excellence that NNDC is clearly striving for without embracing this approach. To be effective, consultation needs to be at the earliest possible stage, and to be meaningful. Too often in some authorities there is a token process in which pointless non-committal comment is made at arm's length on a design already evolved, the stage at which it can be too late for the planning authority to influence the fundamental design, There are important economies to be had in the constructive approach described. For the planning authority: greater efficiency, with a reduction in potentially time-consuming conflict with applicants, sometimes leading to a costly appeal. For applicants: greater certainty that early engagement will lead to a speedier and more successful outcome.	Noted - The North Norfolk Design Guide provides the detailed guidance to support policy ENV 9. Consider the addition of wording regarding guidance in the policy wording itself.
ENV9	Norfolk Police (1217249)	LP294	General Comments	I would like to make you aware that I am submitting comments on the Local Plan Draft and Interim Sustainability Appraisal via the planning policy email. In particular comments on Detailing and Residential Development).	Comments noted
ENV9	Norfolk Police (1217249)	LP734	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Intro States "All development proposals should respond to current best practise and demonstrate that they are in conformity with the design principles set out in established..... Or other design guidance endorsed by the Council" • Seek confirmation that North Norfolk Council endorses Secured By Design Guides,(8.67 Safety states SBD principles are expected to be incorporated within all schemes") Also/ Draft Design Guide: 12) Signposting & Glossary: Placemaking - includes reference to SBD guides and therefore within point 8 of policy ENV 9 there is specific reference to SBD principles Policy Env 9 point 8 states: reduces opportunities for crime, terrorism and antisocial behaviour, creating safe, secure and accessible environments; request addition of 'reflecting principles of Secured By Design'.	Noted- consider inclusion of the additional wording proposed through the preparation of the policy.
ENV9	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP621	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Seeks to set out the requirements necessary for good 'place making'. It serves as a 'catch all' anchor policy for the related, North Norfolk Design Guide Supplementary Planning Document (SPD) and issue specific policies set out elsewhere in the emerging Local Plan. We support the policy and its aspiration to achieve high quality design, which aligns with Pigeon's aspirations for site C10/1. However, we would highlight that the reference to development complying with the SPD is not compliant with the Regulations, which do not allow development plan status to be applied to supplementary guidance which have	Support noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				not been the subject of examination. As such, the Council may wish to consider stating within Policy ENV 9 that the SPD is guidance.	
ENV9	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ENV 9 seeks to ensure new development is designed to the highest standard, successful in its function and respectful of the local environment, character and context. Further design guidance is set out in NNDC's Design SPD which supports architecture and design that retains and reflects traditional architectural values. This approach is supported, as it aligns with the development and design principles for DS7. Acknowledges the importance of high-quality design, but also recognises that all sites are individual with different characteristics and challenges that require different design solutions. The policy should be worded in such a way to allow this flexibility and should not impose specific design solutions, as per paragraphs 124 and 125 of the NPPF. Furthermore, the design process involves the balancing of issues that sometimes compete, and the policy does not appear to recognise this; it reads as a list of criteria that all development should meet. However, often certain criteria might have to be prioritised due to site-specific challenges. The policy should be framed to recognise this and acknowledge the rationale behind how a particular solution is reached. To be effective and sound, the policy should be clear in its requirements as per NPPF paragraph 16. For example, the need for adaptive and accessible homes is supported, however, Point 10 seeks to "ensure" compliance of an "optional" document. It is suggested that this point is reworded to ensure that development complies with the appropriate national Building Regulations standard.	Support noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV9)
Objection	2	The approach was generally supported with the recognition that the NPPF places significant weight on the need to secure and improve design through high quality development. Some concern was raised around the ability of all proposals due to scale and stage of application in being able to confirm to the NNDC Design Guide and suggested consideration of the additional wording "where relevant" and noting that the policy should be worded in such a way to allow this flexibility and should not impose specific design solutions, as per paragraphs 124 and 125 of the NPPF, Others suggested and in cases offered the consideration of assistance and policy requirement through appropriate Design Panels and requested consideration of including more detail in the policy around the use of local material and distinctive local character. To be more effective it was suggested that the policy could link in stronger to overall objectives and should seek to proprietries certain criteria so that it is clear these are essential across the Plan thus introducing some certainty around the expected approach and allowing flexibility around other criteria due to site specific challenges.
Support	4	
General Comments	4	

Policy ENV10 - Protection of Amenity

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV10	Broads Authority (321326)	LP806	General Comments	8.80, 8.81, 8.82 – also mention the Broads and dark skies – we have intrinsically dark skies and a light pollution policy (DM22)	The NNDC LP only covers the areas outside the Broad's consideration however could be given to referencing any approach in the emerging LP for the broad's
ENV10	Environment Agency (1217223)	LP467,468	General Comments	Paragraph 8.84 There are lots of food and drink businesses within the plan area so amenity issues from odours is likely to be our biggest concern. It is important that any potential issues are addressed in the planning process rather than delegating responsibility wholly to the permitting process which may mean it's too late to resolve planning issues. This also allows issues to be flagged at the design stage which is more efficient and less costly. • Policy ENV 10 – Protection of Amenity We recommend that water pollution and the maintenance of water quality is also included within point 8	Noted: Consider comments in the development the policy and future iteration of the Plan.
ENV10	Norfolk County Council (931093)	LP739	Support	Para 8.81 - Consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas, sky lights etc., and be sensitive to the impacts on biodiversity. [More information is available at https://www.bats.org.uk/news/2018/09/new-guidance-on-bats-and-lighting and the Institution of Lighting Professionals (ILP) has published guidelines].	Noted:- Consider comments in the finalisation of the policy
ENV10	Creeping and Coast, Mr John Fairlie (1217414)	LP606	Support	The policy provides a list of detailed assessment criteria, but not all are discussed within the Design Guide. If these criteria are to be used to assess the acceptability of a scheme then clear thresholds or guidance should be provided. For example, what is an acceptable level of overshadowing on private amenity space (particularly noting that some shading is now encouraged to support climate change mitigation)? This is clearly covered within the BRE Guide 'Site layout planning for daylight and sunlight: a guide to good practice (BR 209)', but there is no guidance from the Council with respect to what they consider to be acceptable.	Noted Consider comments in the finalisation of the policy consider consistency between policy and North Norfolk Design Guide

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV10)
Objection	0	The inclusion of the policy was generally supported. More prescription was suggested and further enhancement of expected standards included in the Design Guide on issues such as acceptable level of overhanging and access to sunlight etc. Consideration could also be given to ways of minimising light pollution. The EA. suggested that water pollution and the maintenance of water quality is also included within point 8.
Support	2	
General Comments	2	

Policy ENV11 - Protecting and Enhancing the Historic Environment

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV11	Broads Authority (321326)	LP806	General Comments	8.89 – might need to refer to shared Conservation Areas with us at Ludham, Horning, Stalham and Neatishead.	Noted: Consider clarification in future iteration of the Plan
ENV11	Norfolk County Council: Historic Environment (931093)	LP739	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: For greater clarity and accuracy, we recommend that Section 8 is sub-divided into three categories; Natural Environment (Sub-Categories as listed in the Plan) Built Environment High Quality Design Protection of Amenity Historic Environment Protecting and Enhancing the Historic Environment This structure would give appropriate emphasis to the whole of the historic environment and would ensure that each category title accurately reflected the content of the policies presented within it. PARA 8.3 This paragraph only mentions built-heritage designations (Conservation Areas and Listed Buildings). To be consistent with other parts of the Plan and the Sustainability Appraisal, it should also mention, as a minimum, Scheduled Monuments and Registered Parks and Gardens, and as with 5.15 above, it would be beneficial to mention the importance of non-designated elements of the historic (and natural) environment. PARA 8.85 Suggested changes in red “The Local Plan aims to ensure that North Norfolk’s built heritage historic environment is conserved or, wherever possible enhanced and that new development is of high quality design. Paragraph 185 of the NPPF states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment”. The NPPF also states that Local Plans should include strategic policies to “make sufficient provision for ...conservation and enhancement of the ...historic environment” (Paragraph 20). The quality of the built environment and the presence of historic archaeological heritage assets make a valuable contribution to the appeal and character of North Norfolk.” PARA 8.86 The importance of all non-designated heritage assets should be emphasised. Suggested changes in red; “There are 81 Conservation Areas, 2265 Listed Buildings, including 94 Grade I and 202 Grade II*, 86 Scheduled Monuments and 33 Historic Parks and Gardens within the District. There are also numerous non-designated heritage assets (comprising both built- and archaeological heritage) including 190 buildings on the Council’s Local List. These are buildings that do not fully meet the criteria for being nationally listed but are considered of architectural or historical importance for the local area. Local Listing does not introduce any additional powers of control, instead it acts as a means of identification and plays an important role in the assessment of development proposals. The effect of an application on the significance of a non-designated heritage asset is a material consideration when deciding planning applications, and, in the case of built-heritage, Local Listing strengthens the case for retention of a historic building. The number of non-designated heritage assets on the list is likely to increase over time as new buildings and other assets are identified. The requirements of the policy equally apply to any local heritage assets identified and listed in adopted Neighbourhood Plans.” POLICY ENV11 – The County Council consider that this is a well-worded policy that makes appropriate</p>	Support for Policy ENV11 is noted and welcomed. Consider feedback around supporting section text in the finalisation of the Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				reference to the full breadth of the historic environment and acknowledges the importance of non-designated heritage assets. We particularly welcome the inclusion of Point 4 - that the aims of the policy will include, "increasing opportunities for access, education and appreciation of all aspects of the historic environment, for all sections of the community." This will help to ensure that appropriate levels of public engagement and dissemination are achieved on development-led archaeological projects	
ENV11	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP516	General Comments	ENV 11- The addition of extensive glass and modern extensions clad in materials such as aluminium, copper and wood are damaging our historic environment and locally distinctive settlements. Although these additions are seen as minor when considered in isolation, they are cumulatively eroding the character of these places. How can this be considered in the policy?	Comments noted. Consider comment in the finalisation of the Policy.
ENV11	Historic England (1215813)	LP705	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</p> <p>Paragraph 8.85 change 'built heritage' to 'historic environment'. Paragraph 8.87 We welcome the clear interpretation of the NPPF tests for harm in this paragraph. This paragraph should also state that harm should be avoided in the first instance. Only where harm cannot be avoided should mitigation be considered. Amend paragraph to make it clear that harm should be avoided in the first instance. This is a very comprehensive policy but as such is quite long. The policy may be easier to navigate with the use of subheadings.</p> <p>We welcome the mention of settings. The policy is broadly consistent with the tests for harm in the NPPF, although no differentiation is made between those assets where substantial harm should be exceptional (Grade II) or wholly exceptional (Grade II* and Grade I). This differentiation should be made for consistency with the NPPF.</p> <p>There is currently no policy framework for addressing heritage at risk. We recommend the inclusion of a policy basis to address Heritage at Risk. The National Heritage at Risk Register can be found and searched here by local authority: www.historicengland.org.uk/advice/heritage-at-risk We also recommend the creation and management of a local Heritage at Risk register for Grade II listed buildings. Similarly, we welcome positive local solutions for addressing all heritage at risk, whether nationally or locally identified.</p> <p>We are pleased to see that you have a Local List of buildings. It would be helpful to include the criteria for Local Listing in an Appendix.</p> <p>It would also be helpful to have more detail in relation to archaeology.</p>	Noted - consider change to wording in the preparation of the plan. Consider the following in the preparation of the plan: use of sub headings; differentiating between exceptional and wholly exceptional scenarios; including a policy to address to address heritage at risk; including local list criteria in appendix and include a hyper-link to the list; adding more on archaeology.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV11)
Objection	1	Historic England noted that the policy was comprehensive and broadly consistent with the test for harm in the NPPF, never the less they objected to the approach. Key issues included no differentiation is made between those assets where substantial harm should be exceptional (Grade II) or wholly exceptional (Grade II* and Grade I) and there was no policy framework for addressing Heritage risk. The inclusion of local list was welcomed though it was suggested the criteria of inclusion could be a useful addition in an appendix. NCC in its statutory roll on the Historic environment supported the approach, seeing it as a well-rounded approach. Further clarifications mainly in the supporting text were provided for consideration.
Support	1	
General Comments	2	

Housing Policies

Policy HOU1 - Housing Targets for Market & Affordable Homes

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU1	Broadland District Council (1216187)	LP171	General Comments	The two mixed use sites proposed for North Walsham NW62 and NW01/B for 1800 and 350 homes respectively could significantly increase the traffic volumes felt on the arterial routes into Norwich, particularly the B1150 and also the B1145/A140 and A1151, as new residents will likely use these routes for both commuting and leisure purposes. Currently, the plan refers to traffic in relation to the town but not more strategically. The Plan should consider and address any potential impacts on these roads; In addition, a strong emphasis should be placed on utilising the existing public transport options available in North Walsham with the aim of relieving this pressure.	Noted: The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan. The Council is working through the Norfolk Strategic Framework and the Duty to co-operate on strategic and cross boundary issues.
HOU1	Broads Authority (321326)	LP806	General Comments	Considering the draw of Norwich to many in Norfolk, there will be increased pressure on roads further from the urban areas, particularly at Hoveton/Wroxham and Coltishall area. It is not clear how the transport impact on an area wider than the immediate locality of the urban areas that are set to grow has been considered. How will this impact be mitigated	The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan.
HOU1	Norfolk County Council (931093)	LP739	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The above upper figure (2016-2036) equates to around 550 dwellings per annum. While the County Council supports the broad housing figures, it is suggested that Local Plan period should be amended to 2018-2036. It is also suggested, for clarification purposes, that there should be further explanation contained in the Plan setting out how the housing figures (per annum) have been derived and how this reflects the Government's methodology. While the County Council supports the broad housing target set out in the Local Plan, it has some concerns with the above approach of not setting a final housing provision target until closer to the Local Plan's submission. This approach creates a degree of uncertainty and the potential for change in respect of site allocations etc. This in turn makes planning for County Council infrastructure difficult. The County	Comments noted. The approach to setting the draft housing target is detailed in full in the background paper no1. The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan. The

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>Council as with other infrastructure providers needs greater certainty on the level of housing and its specific location in order to be able to plan for its own infrastructure requirements including, for example, transport; schools; libraries etc. 3.4. Therefore, the County Council would like to see further clarification on the level of housing proposed and the derivation of any final housing provision target. The County Council broadly supports the settlement hierarchy (Policy SD3) and distributions of housing growth set out in Policy HOU.1. These comments, however, are subject to the County Council undertaking a further detailed technical assessment of individual site allocations in respect of: • highway/transport matters; and • flood risk/surface water drainage issues. EDUCATION - Children’s Services (CS) – The level of housing proposed in the emerging Local Plan (Policy HOU.1) and its distribution, as set out in the Settlement Hierarchy (Policy SD3), does not raise any fundamental concerns to Children’s Services subject to securing appropriate developer funding towards the improvement of existing schools or the provision of new school/s through Policy SD 5.</p>	<p>Council has used current evidence base and engaged with Children services to identify where additional social infrastructure may be required in order to ascertain the level of support as a result of new development.</p>
HOU1	Gladman Developments, Mr Craig Barnes (1217131)	LP277	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy HOU1 sets out that over the plan period the Council will aim to deliver between 10,500 and 11,000 dwellings. Gladman consider that the policy as drafted fails to reflect the approach of national planning policy and as such is unsound. Firstly, the lower end of the range identified in the policy at 10,500 dwellings is below the Local Housing Needs assessment currently identified for the District. Though the difference is marginal, national planning policy is clear that the housing need figure indicated by the Standard Method forms the absolute minimum housing requirement; Secondly, the policy is unsound due to the use of the word “aim”. Gladman consider that this language is too loose and departs from national planning policy which is clear that in order to meet the tests of soundness the authority should seek to meet the authority’s OAN. The housing requirement must be expressed as a minimum. It is only where the constraints of the authority area prevent full delivery of housing need should a lower housing requirement be adopted than the standard method. Where this is the case, the Council is required to engage the Duty to Cooperate in order to ensure that any unmet need is accommodated by neighbouring authorities. In the case of North Norfolk, the level of supply planned is above the level of housing need and as such, the constraints of the District do not</p>	<p>Noted - Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. Consider feedback and clarifications requested in the finalisation of the approach including the use of a minimum housing target, the consideration of a 20% buffer in terms of housing numbers and the exclusion of windfall within the first three years of the housing trajectory along with clarification of the expected supply.</p>

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				<p>therefore, in the Council's view, form sufficient justification not to meet the identified housing need in full. This is confirmed within the Norfolk Strategic Planning Framework with each LPA confirming that they will meet their own OAN - HOU1 sets out the proposed distribution of development across the District. In broad terms, Gladman consider the proposed distribution to be sound. The total level of development proposed at each settlement reflects the position of that settlement within the settlement hierarchy as set out in Policy SD3. Broadly, settlements within the Large Growth Towns are to accommodate a higher level of development than those settlements designated as Small Growth Towns. etc. There are examples of settlements which receive proportionately more or less than other settlements which are included within the same tier. Gladman consider this to be a sound approach taking into account the constraints and opportunities of settlements and their functionality and connectivity with other settlements. In particular, Gladman welcome and support the Council's proposal for 823 dwellings to be accommodated at Holt. The level of housing identified for the town reflects its role within the wider rural central part of the District, responsive to the constraints such as the AONB and reflects land availability & opportunities to address existing infrastructure capacity issues. Policy HOU1 advises that part of the housing requirement will be made up from windfall sites. This is permitted by the NPPF where there is a record of historic delivery from windfall sources and policy makers are satisfied that contributions from windfall supply is likely to continue. Gladman do not therefore object to the inclusion of a windfall allowance within the supply provided this is sufficiently justified. A total of 2,295 dwellings is expected by the Council at windfall sites . This equates to an average of 135 dwellings per year representing roughly a quarter of the proposed housing requirement. Evidence illustrating the rate of windfall delivery in North Norfolk is provided within Appendix B of the 2017/18 Interim Statement of Five-Year Land Supply. No detail is however provided to support these figures. It is therefore unclear whether this rate includes garden development now resisted by policy. Gladman acknowledge and welcome the discount made by the Council towards the contribution likely in the future from infill sites, redevelopment and change of use. This rightly recognises the change in local policy which reduces significantly the locations in the District where development would be permitted. Windfall development is however by its nature uncertain</p>	

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				<p>and forms a diminishing source of housing land supply. Gladman would expect that as part of the plan preparation process some of these potential sources for windfall may have been assessed and potentially allocated for development through the Draft Plan. The rate of windfall delivery may therefore be expected to automatically reduce over the course of this plan period in comparison to historic levels of delivery. - Indeed, owing to changes in national planning policy, there is now a need to review the potential deliverability and allocate smaller sites through the Local Plan process to provide 10% of the supply on sites of less than 1 hectare . It is however unclear from the Council's evidence how this change in national planning policy has been considered by the Council in its review of Windfall development. The absence of such a review is a flaw in the evidence given the potential over estimation of windfall supply on account of double counting allocations made through the Local Plan. Notwithstanding the above comments, should the Council apply the suggested change in direction to Policy SD3 in its treatment of development proposals located beyond settlement boundaries as set out in Section 4.2 of this representation, then the prospect for full delivery of the identified windfall allowance would be substantially increased owing to the greater scope provided for windfall development. - Gladman's final concern with the windfall allowance is the contribution made towards the short-term housing land supply. The table shows that a windfall allowance is made from 2019 to the end of the plan period. Whilst windfall development will inevitably occur in the short term, the inclusion of a windfall allowance from year 1 of the five-year period significantly increases the risk of double counting. This is because the committed supply will include sites considered as windfall, but which have yet to deliver. The Council however count the delivery from these sites in its windfall allowance, as well as being an existing commitment for the entirety of the five-year period. The approach is therefore unsound and provides for an artificial and untrue inflation of the housing land supply. The table in Policy HOU1 illustrates that in total a supply of 11,611 dwellings is to be provided over the plan period. This includes contributions made by completions, committed development, allocated sites, and windfall site. Based on the Council's position, 611 dwellings will be delivered in addition to the upper range of the housing requirement. The supply proposed provides a 7% buffer in excess of assessed housing need. Gladman is supportive of the aim of the Council to deliver its locally assessed housing needs</p>	

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				<p>figure in full. Gladman however question whether there is sufficient flexibility provided within the supply to ensure full delivery of the housing requirement over the plan period. As set out above, Gladman question whether there is evidence to support the level of windfalls expected by the Council over the plan period. Furthermore, as set out above Gladman do not believe that it is sound for the Council to include a windfall allowance in each year of the five-year supply. To address this, the windfall allowance should not be included for the first three years of the five-year period, thereby reducing the overall housing land supply by 405 dwellings. A further oversight is the absence of any deduction made to the commitment housing land supply as a result of non-implementation. Gladman consider that it is unrealistic for the Council to believe that 100% of its committed sites will be built as intended. A lapse rate should be factored in and is consistently factored in by other local planning authorities. Research conducted by MHCLG (then DCLG) in 2015 on a national basis suggests that between 10 and 20% of consents are not built out. Taking the lowest end of this range and applying a 10% deduction to the committed supply would lower the supply provided by commitments to 2927 dwellings. Applying the conclusion made above, the supply provided over the plan period is at least 730 dwellings less than set out in the Local Plan, meaning that the supply provided is only marginally above the assessed housing need with only a 2% buffer provided. The above findings illustrate how precarious the Council's housing land supply position is and is arrived at without examining the deliverability and delivery rate of the planned supply (noting the absence of a housing trajectory). Proposed Changes Re housing requirement: the Council should revise the Policy to read, "at least 10,860 dwellings will be delivered over the plan period". This wording makes clear the Council's commitment to meet its housing need in full and wholly reflects the NPPF. Re Windfall Gladman consider that a windfall allowance should not be applied for the first three years of the five-year period. The rationale of this approach is to completely avoid the three-year timeframe within which existing consents can be implemented before they lapse, thereby reducing the potential for double counting. The application of this would reduce the windfall contribution by 405 dwellings based on the Council's current windfall allowance. Re: Supply. in order to secure the deliverability of the Local Plan the amount of supply should be increased to provide for a 20% buffer against the housing</p>	

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				requirement as a minimum. Based on the above position, Gladman consider that there is a need for further sites sufficient to accommodate around 2,150 additional dwellings. The Council should also ensure that a housing trajectory is published as part of the publication version of the Local Plan, to provide transparency on how it assumes the Local Plan will be delivered in order to demonstrate its deliverability and effectiveness.	
HOU1	CPRE (Mr Michael Rayner) (1204056)	LP296	Object	We consider that there is no reason why new sites allocated in the Local Plan should not be phased. They would then be available for development should building rates increase and the vast majority of existing allocated sites are built-out, but if house completions remain at existing rates these newly-allocated sites could stay on a reserve list and valuable countryside would be protected. This would be particularly important if Government predictions of population and household growth are reduced further. We note that a number of proposed allocated sites in the new Local Plan are already in the existing Local Plan. These sites should be prioritised (along with any currently unallocated brownfield sites) to be developed before other newly allocated sites and would not need to be put onto a reserve list. This reserve list would be for sites which have not been previously allocated in the existing Local Plan. Twenty Parish Councils across the District support this proposal as demonstrated by their signed pledges (copies posted to NNDC) as part of the CPRE Norfolk Alliance. Brownfield First. We acknowledge that the NNDC's Brownfield Register has only 9 sites on it for a total of 131 houses. These should be prioritised for development and need not be placed on a reserve list	Comments noted: Plan making is Iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.
HOU1	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP559	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Housing Requirement para 9.16 - the Council has assessed its local housing need to be 543 homes per year which equates to 10,860 homes over the 20 year plan period. Background Paper 1 'Approach to setting the Draft Housing Target' identifies at Figure 3 that if the 2018 mean affordability ratio is applied to the calculation of the standard methodology the housing needs increase to 553 dwellings per annum, equates to 11,060 homes over plan period. It is stated Council aims to deliver between 10,500 and 11,000 new homes over the period however using the most up to date data it is advised that the Council plans to meet the need of at least 11,060 new homes over the emerging plan period. para 10.63states that "The Council recognises the importance of	Comments noted : Consider comments in the finalisation of the housing targets and site approach to Wells • The distribution of growth is informed by the guiding principles of the NPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential

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				<p>maintaining vibrant and active local communities during off-peak tourism months and of striking a balance between providing permanent housing for local people and providing tourist accommodation to support the local community.” It is considered that this is a key consideration . It is recommended that a detailed assessment of Tourist Accommodation and the interrelationship with residential properties is commissioned. Housing Supply table at Policy HOU1 suggests that an allowance for approx. 5% buffer (11,611 dwellings compared to up to date need figure of 11,060 homes). It is suggested that the Council increases this buffer through the identification of additional sites for allocation. Position regarding the supply is as follows: • Completions (1st April 2016 to 30th January 2019) = 1,200 dwellings • Commitments (January 2019) = 3,252 dwellings • Total = 4,452 dwellings In order to meet the Council’s stated aim to deliver 11,000 new homes it would be necessary to identify new sites to accommodate a further 6,548 dwellings. However the Council is only proposing sites sufficient to accommodate 4,864 dwellings and is reliant on 2,295 dwellings to be brought forward as windfall development. Whilst this allows a degree of flexibility for sites to come forward , there is less certainty about the deliverability of new homes within the plan period. Paragraph 70 of the NPPF makes it clear that the Council needs to have compelling evidence that windfall sites will provide a reliable source of supply and consequently the District has to be realistic in such a position bearing in mind the scale of windfall it assumes will come forward and the importance of such an element as part of housing land supply. It is requested that the Council produces a Housing Trajectory to demonstrate how and when new homes, commitments and suggested allocations will deliver across the plan period in accordance with paragraph 73 of the National Planning Policy Framework. It certainly remains the case that the provision of new homes is a key priority with the NPPF and as set out in paragraph 59 of the NPPF confirms that it remains imperative that a sufficient amount and variety of land comes forward to meet he Governments objective of significantly boosting the supply of homes. In order to provide increased certainty it is requested that the Council reconsiders the potential Land south of Warham Road, Wells-next-the-Sea (Site Ref: W11) for mixed use development comprising 50 dwellings and some light industrial commercial workspace. The Large Growth Towns are anticipated to receive 47.12% of all growth . In comparison, the Small</p>	<p>to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. * Plan making is Iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.</p>

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				<p>Growth Towns are only anticipated to receive 17.04% a much smaller proportion of growth particularly when compared to the expected 19.76% growth to come forward as windfall development. Paragraph 6.8 of the Background Paper 1 'Approach to setting the Draft Housing Target' states "At any given time, between 8% and 11% of dwellings in North Norfolk are not available as permanent dwellings, although this figure is much higher in many of the coastal communities between Sheringham and Wells." This suggests that there may be a need to specifically increase the amount of housing directed to Wells-next-the-Sea to meet the needs of local people. It is requested that the Council reconsider its approach to housing distribution at Wells. In addition, the Council's Background Paper 2 'Distribution of Growth' states: "At a local level, 915 people on the housing waiting list have expressed a preference for living in Wells-next-the-sea, of which 55.19% require a 1-bed property with a further 28.96% requiring a 2-bed property. There are a total of 134 people on the housing waiting list with a local connection to Wells-next-the-sea and 76 people who currently live in Wells-next-the-sea. Of these two groups the vast majority, 49.25% and 52.63% respectively, require 1-bed properties." (Page 54) Despite the above suggestions that there is a need for more housing to be directed to Wells, the Council notes that the settlement is constrained by environmental considerations which has influenced the Council's approach to the distribution of housing at Wells. Whilst we acknowledge there may some environmental constraints, we also consider that the site put forward by the Holkham Estate at Warham Road can be designed in such a way to minimise its impact bearing in mind the sensitivities of other edges of the town which in our view have more significant impacts. In such a context, it is noted that the majority of ecological designations are situated to the north of Wells. The Council's current evidence base, HRA recognises that further assessment of all the proposed allocations is required going forward. If it is found that Wells is capable of accommodating additional development it should do so to better respond to the need for housing and to seek to reduce the impact of residential properties being used as holiday accommodation. We consider that the reference should be made to "approximate" number of dwellings within the table in HOU1. In respect of Wells, the Council is asked to consider more dwellings in the town and which is our view would not impact upon the broad thrust of the policies in the plan.</p>	

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HOU1	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP755	General Comments	Paragraphs 9.7 and 9.8 Consistent with our comments on policy SD3 above it is considered that the Local Plan should allow for infill housing. The safeguards imposed by the criteria from Policy SD3 together with other policy controls will be sufficient to control against inappropriate or harmful developments. They would however enable and encourage the provision of modest infill schemes of housing which could help sustain existing small settlements and support local service provision in an area characterised by a dispersed pattern of development and variable levels of service provision. It is also consistent with the Government's support, through paragraph 68 of the NPPF, for small sized sites which can be built-out relatively quickly	Comments noted : Development is directed towards the selected settlements outlined in SD3 • The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel.
HOU1	Rentplus UK Ltd (Mrs Meghan Rossiter, Tetlow King Planning) (1217083, 1217080)	LP262	Support	We support the Council in setting a separate minimum target for the delivery of affordable housing over the Plan period through Policy HOU 1. This will assist the Council in monitoring and targeting any actions required to boost delivery, should supply fall below expectations in the future.	Support noted
HOU1	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning) (1218489, 1218491)	LP803	General Comments	The housing target for the plan period is described by Policy HOU1 as being "between 10,500 and 11,000 new homes over the plan period". This is based on a figure derived from the District's annual local housing need of 543 dwellings per annum, resulting in a precise requirement for the 20-year plan period of 10,860 dwellings. As a start point paragraph 60 of the NPPF states that "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance...". To this end, the use of a range to describe the housing target for the plan period, starting at 10,500 dwellings, conflicts with the requirement of the NPPF that the local housing need of 10,860 should be a minimum. Secondly, the Council's own evidence base (Background Paper 1: Approach to Setting the Draft Housing Target, Figure 3) describes that, using the most up-to-date affordability ratio for the District, the annual local housing need figure actually increases to 553 dwellings per annum, resulting in a revised requirement for the 20-year plan period of 11,060 dwellings. To ensure that the Plan complies with the NPPF and plans for the delivery of this number of homes as a minimum this figure must comprise the lowest end of the range forming the District's housing target. It is also noted that the Council's adoption of the raw local housing need figure as the housing	Comments noted :Phasing Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. Consider comments in the finalisation of this policy.

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				<p>requirement for the plan period fails to consider any additional economic or social factors that may necessitate an additional uplift in the target. Paragraph 2.11 of Background Paper 1 states that “the Council has concluded that because of the large size of the uplift resulting from Stage 2 of the standard methodology, further upward adjustments beyond the OAN requirement are neither necessary or supported by the evidence”. Whilst we acknowledge that the local housing need figure already includes an adjustment to account for affordability issues of approximately 35% this in-built uplift is purely intended to balance existing pressures on the local housing market – it responds to current market conditions only. It does not therefore account for any future increase in housing demand because of economic growth strategies, unmet needs in adjacent districts or the requirement to meet affordable housing targets. Whilst the baseline housing need set out in the Council’s Strategic Housing Market Assessment (SHMA) has since been superseded by the local housing need figure the document’s assessment in relation to market signals uplift therefore remains relevant. Figure 96 of the SHMA identifies that, above and beyond demographic projections, an upward adjustment of 593 additional dwellings will be required prior to 2036 to allow a balancing of supply to account for the Norwich City Deal as well as broader market signals. Added to the updated baseline local housing need figure this would result in a revised housing target for the plan period of 11,653 dwellings. To this end Alternative Option 2 (HOU1B), referring to a housing target of 12,000 dwellings, should be included in the Plan to adequately address the objectively assessed needs of the District. Housing supply Firstly, and most fundamentally, it is noted that the supply across all sources detailed in Policy HOU1 amounts to 11,611 dwellings for the plan period. This figure falls below both the revised housing target of 11,653 set out above as well as the rounded target of 12,000 homes described by Option 2 of ‘First Draft Local Plan (Part 1) Alternatives Considered’ background paper. Allied with a significant reliance on unidentified windfall sites – 2,295 dwellings, or approximately 20% of supply – it is clear that there are sufficient grounds for concern that the plan presents no certainty that the minimum housing requirement can be achieved. This shortcoming should be addressed through the inclusion of additional demonstrably deliverable allocations across the District within both the LPP1 and forthcoming LPP2. We also have specific concerns in respect of the ability to achieve a minimum of 2,150 new homes at North Walsham</p>	

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				<p>by 2036, a figure which represents approximately 40% of all new homes to be delivered by way of new allocations. We understand that significant concerns are harboured by members of the development industry and Officers alike who universally regard the target for North Walsham as challenging. Growth at the town is to be delivered across two substantial sites of 350 and 1,800 dwellings respectively. The respective draft policies covering each site require the preparation of a comprehensive development brief to lead the schemes, to be agreed by the Council before any permission can be granted. The brief for the 1,800 dwelling site must also be subject of its own separate public consultation. Unusually for a comprehensive draft plan the LPP1 is not currently supported by any form of suggested housing trajectory demonstrating the rate at which new homes will be delivered at these sites or across the District as a whole. This conflicts with the requirements of paragraph 73 of the NPPF, that strategic policies should include evidence illustrating the expected rate of housing delivery over the plan period. Lack of such a trajectory suggests that the Council are not entirely confident in the ability of some of their sites to deliver within the plan period. . In the absence of the Council's own projections we have undertaken our own analysis of delivery at the North Walsham sites to understand how realistic the estimation is that over 2,000 homes can be delivered at the town by 2036. In terms of timescales, and drawing on the same evidence as before, we would anticipate that it is highly unlikely that first completions will take place on site until at least 2027. This accounts for the time taken to agree the development brief, the gestation period of any planning application and the delivery of up-front infrastructure.</p> <p>In respect of delivery it is once again expected that market interest in the site will be low. The up-front infrastructure cost will inevitably be substantial and the likely timescales until first delivery will require a significant level of developer commitment and faith in the continued buoyancy of the local housing market to see the project to fruition. At most we do not consider that more than two developers will be on site at any one time due to the presence of the other North Walsham allocation, with each developer delivering at a similar rate as stated above – approximately 40 dwellings per annum totalling 80 dwellings per annum across the site. This build rate would therefore represent a significant shortfall in delivery over the plan period, of just over 1,000 dwellings. The LPP1 is proposing a level of growth at North Walsham</p>	

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				<p>that is entirely unrealistic and certainly more than the market can accommodate. Based on our assumptions that first delivery will take place at the town in 2025 this would require the completion of 195 dwellings per annum across both sites. The average rate of completions at the town over the last 6 years is 56 dwellings per annum.</p> <p>On the basis that an individual housebuilder delivers at the rate assumed by the Council's most recent Housing Land Supply Statement (June 2018) – that is a maximum of 40 dwellings per annum – this would require the involvement of a minimum of 5 separate developers active at the town at any one time. This scenario in itself is entirely unrealistic considering both the low numbers of volume housebuilders active in the District and the level of competition this would create at the town.</p> <p>Our client therefore has concerns that the Council's heavy reliance on delivery at North Walsham will result in a significant deficit in housing supply across the plan period as a whole. Our estimate is that this would be in the region of 1,000 dwellings. In addition, neither site should be relied upon to contribute towards the delivery of new homes during the first five years of the plan period due to the extensive lead-in time prior to first completions . Suggested amended policy wording</p> <p>To ensure that the LPP1 plans for the correct level of housing need across the District the housing target should be revised and the first paragraph of Policy HOU1 amended to read as follows: "The Council will aim to deliver between 12,000 and 12,500 new homes over the plan period 2016-2036. A minimum of 2,000 of these will be provided as affordable dwellings. To achieve this specific development sites suitable for not less than 5,250 new dwellings will be identified as follows..."</p> <p>This includes a requirement to deliver a further 750 dwellings on new allocations across the District to account for the uplift.</p> <p>In addition, the distribution of development should be amended to take into account the likely deficit in delivery at the North Walsham Western Extension. This would result in around 1,000 dwellings being redistributed across all other settlements in the hierarchy.</p> <p>Proportionately, the requirement to deliver 1,750 additional homes across the remainder of the settlement hierarchy, away from North Walsham, would require approximately 150-200 homes to be</p>	

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				delivered by way of allocations across the 15 most sustainable Small Growth Villages identified earlier in this submission	
HOU1	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP517	General Comments	9.8 The Norfolk Partnership have undertaken a study of the issues of second homes which is available. A high proportion of second homes does affect the vibrancy and sustainability of local communities and we suggest that there is a policy restricting numbers of second homes, as has been implemented elsewhere in the country.	Comments noted: Occupation of homes is not a matter for land use planning and there is no justification for the limitation of occupation in national planning policy. • Other policies actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need in neighbourhood plans and through community land trusts
HOU1	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP682	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet comment that regardless of the uncertainty regarding the figures of housing need and supply, North Norfolk still require new development to support the distribution of growth within the region. They comment that the background paper 1 (Approach to Setting the Draft Housing Target), submitted as evidence for the DLP suggests the new Plan requires the consistent delivery of around 550 dwellings per annum (somewhat lower than the SHMA figure) and comments that the deliverability of this figure has rarely been achieved in the past. Whilst the Council considers that the figure of 550 units per annum is appropriate bearing in mind the use of the Standard Methodology, this is likely to change as the Government has indicated it will amend it shortly.	Comments noted.
HOU1	Persimmon Homes Anglia (Mr John Long, John Long Planning Ltd) (1216065 & 1216066)	LP161	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) suggests that the DLP's approach to only deal with the Objectively Assessed Housing Needs (OAN) plus the affordability adjustment is perhaps a little conservative, given the identified housing need in Hoveton; second homes rates in the district; the need to support employment growth; and the potential for certain settlements to accommodate 'cross boundary' growth needs, where settlements are more constrained, for instance Wroxham. Persimmon Homes (Anglia) suggests that the Plan should be accommodating around 40% more than the projected household formation/demographic based requirement, rather than the current 35%. This additional 'buffer' would help to further mitigate the impact of second homes in the area; provide opportunities to meet cross boundary growth needs; assist with dwelling affordability and take account of changing affordability ratios; help deliver additional affordable homes; and address the	Noted: Consider comments in the finalisation of the policy. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. The Council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.

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				<p>potential needs of a growing workforce. It would also act as a 'buffer' should identified housing sites/windfall etc. not come forward at the anticipated rates.</p> <p>Persimmon Homes (Anglia) accepts that the Plan, as explained by the Background Paper, seeks to address the District's Objectively Assessed Housing Needs (OAN) in full, with an adjustment for affordability.</p> <p>Persimmon Homes (Anglia) also accepts that the Plan's final housing target is not yet finalised.</p>	
HOU1	Richborough Estates (Mr Tom Collins, Nineteen 47) (1217387 & 1217389)	LP662	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Richborough Estates support the approach to focusing development on North Walsham, as the largest and most sustainable settlement, but a wider range of allocations are required to reduce the risk arising from over-reliance on a single Sustainable Urban Extension to deliver the significant majority of housing.</p>	<p>Disagree.</p> <p>The development brief for the SWE will provide further certainty on delivery.</p> <p>Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.</p>
HOU1	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: It is acknowledged that the housing need figure for the District accords with the national standard method (543 dwellings per annum); supports consistency with the national Standard Method and supports the provision of at least 680 new homes at Fakenham. 2.2.15 However, the total growth at the Large Growth Towns (5,471 homes) falls slightly under the majority (as noted in Policy SD3) given that the Council aims to deliver 10,500-11,000 new homes. The proposed allocations, such as site F03, will therefore be necessary to meet the housing need in these towns. The impact of windfall sites is unclear and should not be relied upon – further clarity and evidence should be provided regarding windfall sites, consistent with NPPF paragraph 70.</p>	<p>Support noted. Consider feedback and clarification on windfall requested in the finalisation of the approach</p>
HOU1	Firs Farm Partnership (Ms Becky Rejzek, Lanpro) (1218497 1218496)	LP805	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The overall housing requirement of between 10,500 and 11,000 new homes within the plan period is supported together with the methodology for calculating this number as set out within Background Paper 1 – Housing Numbers. It is noted that the overall number has increased following calculation of the requirement via the standard national methodology. We note the Council's concerns regarding the ability to deliver this higher target of housing. Hitting the target will require the consistent delivery of around 550 dwellings per annum and "this figure has rarely been achieved in North Norfolk" (paragraph 6.14, Background Paper 1). In our view this</p>	<p>Support noted. Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan. Alternative site</p>

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				<p>makes the identification of an adequate range of sites, particularly smaller sites within the Small Growth Villages like Sutton all the more important. These sites can generally deliver housing faster than large scale housing sites which may require significant upfront infrastructure before house building can commence. Therefore, we consider it is important to allocate a sufficient number of smaller sites and this site at Sutton is immediately available and deliverable to help meet this requirement. Furthermore, we consider that the Council should treat the 10,500 – 11,000 homes as a minimum number to be exceeded in terms of identifying an appropriate number of allocations.</p>	<p>suggestions put forward will be considered in future iterations of the emerging Plan</p>
HOU1	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP620 LP622	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Provides the framework for housing delivery through the Plan period and identifies the C10/1 allocation. As per our response to policy DS 3, we support the identification of site C10/1, land at Runton Road / Clifton Park, Cromer. Further evidence to support the delivery of site C10/1 is included in the accompanying Delivery Statement. Supports the Plan's aim to address the Objectively Assessed Housing Needs (OAN) in full. However, the Council may wish to consider whether a further uplift is required, given the identified housing need in Cromer (1,479 people on the housing waiting list expressing a desire to live in Cromer); second home rates in the district, the need to support employment growth in North Norfolk and the wider area; the need for the plan to take account of the latest affordability ratio (2018) published earlier this year; and to potentially address the under delivery that has occurred in previous years . Whilst we note that the Plan's housing target is not yet finalised, and some of these issues may be taken into account as the Plan progresses, the Council may wish to consider whether an uplift of 40% more than the projected household formation/demographic based requirement would be appropriate, given that this is a relatively modest increase above the 35% uplift currently proposed. This additional 'buffer', would help to further mitigate the impact of second homes in the area; assist with dwelling affordability and take account of changing affordability ratios; help to deliver additional affordable homes; and address the potential needs of a growing workforce within North Norfolk and neighbouring authorities, including potentially North Norfolk's contribution to help meet the Norwich City deal, if the uplift in housing numbers to support the City Deal cannot all be met within the Greater Norwich</p>	<p>Support noted. Consider comments in the finalisation of the policy. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.</p>

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				<p>area. It would also act as a further 'buffer' should identified housing sites/windfall etc., not come forward at the anticipated rates; and potentially to take account of previous housing under delivery. A 40% uplift would equate to 563 new homes per annum (11,260 over the Plan period), which would help to bring the housing requirement more in line with the Strategic Housing Market Assessment (2017) figure of 574 dwellings per annum, which the SHMA suggests could be required to plan for growth arising from the Norwich City Growth Deal. We have also reviewed the Background Paper 2 Distribution of Growth. Pigeon supports the Council's assessment of Cromer as contained in the Plan and background material. Cromer provides a range of services, facilities, and a considerable range of job and leisure opportunities sufficient to meet the day to day needs of residents and visitors without the need to travel long distances, particularly by the private motor car. Walking, cycling and public transport are all viable options for travel for people to meet their day to day needs, with many of Cromer's services, facilities and opportunities within walking and cycling distance of all parts of the town; and for travel beyond the town, regular bus services are available to Holt, Sheringham, North Walsham and Norwich; and regular train Services are available to Cromer, Sheringham, North Walsham and Norwich. As such we support the growth target for 909 new homes in Cromer over the plan period (592 on new allocations). However, as per our response to policy SD3, the Council may wish to consider whether more growth should be directed to Cromer given the extensive employment opportunities in the town (including the headquarters of North Norfolk District Council, which is a significant employer) and the number of people on the Council's housing waiting list who have expressed a preference for living in Cromer. Notwithstanding, the comments above, we confirm that land at Runton Road/Clifton Park (site C10/1) is capable of delivering approximately 90 homes as part of a mixed-use scheme that will contribute to the housing target set out within policy HOU1, as set out in the Delivery Statement that accompanies this submission.</p>	
HOU1	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>Paragraph 9.16 states that its local housing needs assessment is 543 homes per annum - 10,860 homes over the plan period. On the basis of this level of housing needs the Council have set a housing requirement in HOU1 of between 10,500 and 11,000 new homes between 2016 and 2036. Whilst we consider the Council to have applied the standard method correctly, we note that this assessment</p>	<p>Noted - Plan making is Iterative -Housing Trajectory is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. Consider feedback and clarifications requested in the</p>

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				<p>uses the median affordability ratio from 2017 rather than the 2018 ratio that were published earlier this year. We would agree with the later assessment of needs and it will be important that the Council plan for this higher number. PPG states that Councils can rely on this figure for two years following submission. However, if further evidence is published prior to submission the Council will need to reconsider housing needs to ensure consistency with paragraph 60 of the Framework and its associated guidance. The Council recognise in the local plan that the standard method results in the minimum level of housing needs. Councils must therefore consider, as established in paragraph 60 of the NPPF and paragraphs 2a-010 and 2a-024 of PPG, whether the level of housing delivered will need to be higher in order to:</p> <ul style="list-style-type: none"> • Address the unmet needs arising in neighbouring areas; • Support the delivery of growth strategies or strategic infrastructure improvements; and • Help ensure the delivery of the Council's affordable housing requirements <p>Unmet needs Whilst it would appear that there are no unmet needs within neighbouring authorities at present it will be important for the Council to continue to monitor this situation through statements of common ground. Should it become evident that there is likely to be unmet needs arising within any neighbouring areas the Council will need to consider increasing its housing requirement. Economic growth. Paragraph 9.17 has considered whether employment growth within the Borough will require an uplift to the baseline housing needs assessment resulting from the standard method. The Council note in 'Background Paper 1' that they do not expect economic activity to change over the plan period. However, the Council continue to seek increased economic activity through the allocation of an additional 93 ha of employment land in policy ECN1, which when developed will generate a substantial number of new jobs. The Council will need to consider the impact of these allocations on jobs growth in North Norfolk and whether an uplift in the Council's housing requirement is needed to ensure there are sufficient working age people to support these aspirations. Alongside this the Council will need to consider the areas ageing population and the fact that this sector of the population will lead to a shrinking workforce and potentially increase the need for housing growth beyond the established baseline. The Council outline in HOU1 their intention to deliver a minimum of 2,000 affordable homes over the plan period. What is not clear from the Local Plan or the Council's evidence base is</p>	<p>finalisation of the approach including the use of a minimum housing target, the target for affordable homes, windfall assumptions and the consideration of a 20% buffer in terms of housing numbers.</p>

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				<p>whether this level of delivery will meet the affordable housing needs for North Norfolk. The Central Norfolk SHMA identifies the need for 17,450 additional affordable homes between 2015 and 2036. However, we could not find within the SHMA a separate breakdown of the need for affordable housing within each LPA covered by this assessment. The Council must state how many affordable homes are needed during the plan period to meet its own needs and the degree to which its proposed housing requirement and affordable housing policies will meet this need. If affordable housing needs are not being met in full then the Council will have to consider increasing its housing requirement to better meet affordable housing needs as mandated by paragraph 2a-024 of Planning Practice Guidance. Recommendations</p> <p>Firstly, any housing requirement must be stated as a minimum to ensure that this figure is not seen as a cap beyond which further development should not be delivered. Secondly, further evidence will need to be provided with regard to affordable housing needs and economic growth and whether either of these factors will require the Council to increase its housing requirement in HOU1. Housing Supply (HOU1) Policy HOU1 sets out in table 1 that the Council expects to deliver 9,316 new dwellings through existing permissions and new allocations. In addition to this supply the Council expects a further 2,295 homes will be delivered through windfall sites delivering a total of 11,611 new homes across the plan period. Whilst the HBF does not comment on the deliverability of specific sites we do consider it important that reasonable assumptions are made with regard to the deliverability of allocated sites and that windfall assumptions are justified. Whilst the Council will be aware that paragraph 73 the 2019 NPPF requires Local Plans to include a housing trajectory we also consider it helpful to include within the plan, or supporting evidence, detail of how each allocated site delivers over the plan period. In our experience this helps not only those commenting on the local plan but also the inspector tasked with examining it. Windfall The NPPF allows windfall to be included in anticipated delivery where there is compelling evidence that they will form a reliable source of supply. The Council's statement on five-year housing land supply indicates that the level of windfall is expected to be 135 dpa. This accounts for 22% of the homes expected to be delivered over the remaining plan period - 2019 to 2036. Whilst we recognise that delivery on windfall sites has been high in previous years the plan should be seeking to reduce the level of windfall and increase the number of small site</p>	

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				<p>allocations within the local plan in line with paragraph 68 of the NPPF. This requires the Council to identify in the development plan sites of less the 1ha that will deliver a minimum of 10% of its housing requirement. We would therefore recommend that the Council seek to allocate smaller sites across the Borough and reduce the level of windfall expected to come forward. This would provide greater certainty in the delivery of new homes with North Norfolk and allow any windfall to be considered a bonus rather than a necessity. Flexibility in supply The Council's proposed supply indicates that the Council have 5.5% buffer across the plan period. This is insufficient and provides limited flexibility within supply should any of the proposed allocations not come forward as expected. We would suggest that the Council needs to allocate further sites and reduce its reliance on windfall. We generally recommend that Councils identify delivery (including windfall) for at least 20% more homes than the stated housing requirement. Recommendations Whilst the Council states it has sufficient supply to meet its housing needs over the plan period, we do not consider there to be a sufficient buffer to for such a statement to be made with any certainty. At present the Council is reliant on high level of windfall to come forward in order to meet needs and has limited flexibility should delivery not come forward as expected. We would therefore suggest that the Council allocates sufficient sites to ensure a 20% buffer across the plan period to provide the necessary certainty that its housing needs will be met.</p>	
HOU1	Glavenhill Ltd (Hannah Smith, Lanpro) (1218811)	LP736	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The overall housing requirement of between 10,500 and 11,000 new homes within the plan period is supported by Glavenhill Limited together with the methodology for calculating this number as set out within Background Paper 1 – Housing Numbers. It is noted that the overall number has increased following calculation of the requirement via the standard National methodology. Glavenhill note the Council's concerns regarding the ability to deliver this higher target of housing. Hitting the target will require the consistent delivery of around 550 dwellings per annum and "this figure has rarely been achieved in North Norfolk" (paragraph 6.14, Background Paper 1). As such, and in order to give the Council the best chance of meeting its identified housing needs, Glavenhill consider that the Council should allocate sufficient sites to meet a minimum of 10,500 – 11,000 homes over the plan period. Furthermore, the setting of this target makes the identification of an adequate range of sites,</p>	<p>Support noted. Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan</p>

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				<p>particularly smaller sites within the Small Growth Villages like Badersfield all the more important. These sites can generally deliver housing faster than large scale housing sites which may require significant upfront infrastructure before house building can commence.</p>	
HOU1	<p>WSP Indigo, Miss Emily Taylor (1217127)</p>	LP632	Object	<p>In the context of the national housing shortage, with a need for as many as 340,000 new homes to be built per year, there is serious and immediate pressure on Local Planning Authorities (LPAs) to deliver adequate amounts of land for housing. The housing need in North Norfolk has increased substantially compared to its historic requirement and levels of delivery. Previously the Council's Local Plan requirement amounted to 400 dwellings per annum. The Local Plan Part 1 identifies a housing need for 550 dwellings per annum, which is some 30% higher than the adopted Local Plan requirement. The significance of this increase is apparent in the Council's net additional dwellings as calculated in the Government's latest Housing Delivery Test results. North Norfolk District Council (NNDC) has delivered a total of 486, 442 and 555 dwellings over each of the past three years, only once meeting the target of 550 set in the emerging Local Plan. Clearly, it will be difficult for the Council to consistently meet this uplift unless the Local Plan adequately addresses this issue. The Draft Local Plan Part 1 identifies total growth, including allocations and windfall, to deliver 11,611 dwellings against a requirement of 10,680 dwellings based on the standard methodology. However, the Council states that it 'will wish to carefully consider the deliverability of the final housing target before submitting the Plan for examination'. This is not a reassuring stance to take and should be addressed by providing an adequate 'buffer' of suitable sites for development in the Local Plan, which will mitigate constraints to delivery. The Council is currently not identifying enough land for housing to ensure that a consistent rate of delivery is achieved across the Plan period. Paragraph 11 of the National Planning Policy Framework (NPPF) (2019) requires that LPAs should as a minimum meet their Full Objectively Assessed Housing Need (FOAHN) in their Local Plans in line with a presumption in favour of sustainable development. There should be no question of whether the Council is accepting its housing need as defined by the standard methodology given that this is a key feature of national policy and a requirement on all LPAs. The Council should not be challenging the number of homes it is required to provide but should be focusing on being proactive in identifying a</p>	<p>Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.</p>

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				considerable reserve of allocation sites to ensure that it does not under deliver, especially given its own stated concerns on the rate of delivery. Allowing for a buffer of sites will protect the Council against future uncertainties and risks to the implementation of permissions and allocation sites.	
HOU1	WSP Indigo, Miss Emily Taylor (1217127)	LP632	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Council has not published an up-to-date calculation of its five-year land supply position in light of the new standard methodology target. This is a key flaw and omission in its evidence base and there is no justification as to why the latest supply calculation has not been provided alongside the Draft Local Plan Part 1. We have undertaken independent analysis of the Council's Interim Statement published in June 2018. Given that the Council has not supplied an update now that the standard methodology is established in the NPPF (2019), it is pertinent to consider the Council's supply against the updated housing need figure only. When assessed against the standard methodology figure of 538 dwellings per annum, the Council cannot demonstrate a five-year housing land supply when a 5% buffer is applied, as demonstrated in Figure 1. The Council's capability to provide land for housing declines considerably when higher buffers are applied. This puts immense pressure on the Council for sites to come forward through the Local Plan, given the many variables affecting the calculation of supply. It is essential that the Council identifies sufficient deliverable sites and plans for enough housing to maintain a robust rolling five-year housing land supply (inclusive of a 5% buffer) throughout the Local Plan period. In order to do this, NNDC must identify sites in its emerging Local Plan in sustainable locations that can come forward within the first five years of the Plan. Given that the latest completion data for 2018/19 has not been published, the table below may present a more positive position, particularly if completions for the past year have fallen short of the 538 dwelling target. As Figure 1 shows, the Council can only demonstrate 4.87 years' supply if a 5% buffer is applied. However, this assumes that all 2,837 homes included within the supply are deliverable in the next five years. Based on an initial assessment, we do not consider that all of these homes will be delivered in the next five years. Therefore, there is a clear shortage which is likely to be more severe than the shortfall identified using the standard methodology indicates. The Council must identify further sites that</p>	The Five Year Land Supply Statement 2019 has been published and is available on the Council's website, the Council can demonstrate a 5.73 year land supply.

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				can come forward within the first five years of the Plan to rectify this position.	
HOU1	White Lodge (Norwich) Ltd (Ms Kathryn Oelman, Lawson Planning Partnership (1217091 1217088))	LP291	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: White Lodge (Norwich) Limited are the sole owner of 'the Former Nursery site' identified in Appendix 1. The site, located north of Selbrigg Road and the Cromer Road (A148), in the settlement of High Kelling, occupies a land area just under 1ha in area. The Four Seasons Nursery horticultural business, which previously occupied this land, and has been vacant since 2012, despite being actively marketed as a horticultural nursery. A slightly larger site submitted under 2016 Call for Sites (HKG04), though some areas of the site neither practical or desirable to develop. Considered suitable in HELAA. Evident recently, to remain in line with National Policy not sufficient to restrict development to only handful of larger towns and villages. Quotes paragraph 78 of NPPF. High Kelling has good range of services including post office, shop, village hall and church. Holt hospital to the west of village include; medical practice, pharmacy and dental practice. Easy walking distance from site to these services. Well placed to support Kelling Primary School, 2.6 miles away accessible by bus. Holt is 2.5km away, accessible on foot via a continuous footway along the Cromer and Old Cromer Road, but is more likely to be reached by a small car journey, cycle or bus ride. Range of services in Holt. Plan acknowledges that North Norfolk is a predominantly rural district. Sensible to maintain the vitality of these rural communities by allocating housing development within their boundaries. Allowing those who grow up in these villages a chance to remain. Quotes paragraph 68(a) NPPF. Policy SD3 seeks positively to address this issue by allocating sites of under 1 hectare within the Small Growth Villages and we regard this to be an appropriate solution to meeting the identified housing need. It is therefore apparent that, by locating development in High Kelling, this would enhance and maintain existing services in the village and other surrounding villages. Support the principles of Policies SD3 and HOU1, which seek to deliver sustainable development in rural areas and are sound by virtue of their consistency with national policy approach to this issue.	Support Noted.
HOU1	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design)	LP581	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: It is important that the target for the provision of new homes in the District over the plan period to 2036 reflects the most recent housing evidence base and the standard methodology set out in the NPPF. Notably the standard methodology identifies a	Noted. Consider comments in the development of the policy.

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	(1210089 1210087)			minimum housing need figure and, as such, the upper threshold of that housing need must be stated within the policy, rather than proposing a range of housing provision as currently drafted. The current draft is at risk of being interpreted as a fixed requirement, which is not in accordance with the standard methodology approach, and should be amended.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU1)
Objection	6	<p>Mixed commentary was received around this policy. In relation to the housing target organisations suggested that wording should be altered to demonstrate that any target is set as a minimum and that the council should aim for the higher end of the range. Most commentary accepted that the approach was in line with the standard methodology, however some challenged the lack of any uplift due to future economic growth. The justification being that an uplift was required to address a diminishing workforce brought on by the aging population and the requirement for further in migration. One comment suggesting that alternative approach HOU1b at 12,000 homes was more appropriate to address the identified OAN. Others however acknowledged the council's position brought on through the adoption of the Housing Standard methodology and recognised the challenges that the preferred option would bring with regard to historical delivery rates and supported the 10,500 – 11,00 homes range provided sufficient allocations to meet it were made. As such some commented that the distribution was considered sound and reflected the position of each town in the settlement hierarchy. Connected to the challenges around the numbers, the council was also challenged around the reliance on large sites growth, commenting that the approach provided little to no certainty that the housing target will be delivered and that the council was not identifying enough land for housing to ensure consistent rate of delivery. A solution suggested further consideration to additional deliverable allocations and a wider distribution / numbers of adequate sites, particularly in higher valued and rural areas and or a buffer of sites should also be considered. In particular, one developer challenged that the amount of growth proposed in North Walsham was unrealistic and more than the market can accommodate and reliance will result in a significant housing deficit over the plan period. Clarity needs to be given around the expected delivery and housing trajectory</p> <p>The high reliance on windfall development over allocation was also raised as an issue.</p> <p>Some commentary raised the issue that of cumulative impacts on the road network should be taken into further account in the setting of settlement targets</p>
Support	8	
General Comments	8	

Policy HOU2 - Housing Mix

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HOU2	Broads Authority (321326)	LP806	General Comments	Affordable Housing – suggest you mention that the Broads Authority defers to/refers to/has regard to policies of NNDC in relation to Affordable Housing. • Figure 6 – please show the Broads Authority Executive Area on this map as we will apply this policy.	Noted: Consider feedback in the finalisation of this policy
HOU2	Norfolk County Council (931093)	LP739	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The County Council welcomes the importance of delivering affordable homes and it is understood from the District Council Annual Monitoring report 2018 that the target of 300 affordable homes per annum was not met between 2012 and 2018. The emerging Local Plan has as a target of 200 homes per annum, which is around 20% of total planned growth. This is a significantly higher figure than achieved in previous years and as such is welcomed	Support noted. Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community
HOU2	Norfolk County Council: Adult Social Care (931093)	LP739	Support	The County Council recognises the need to increase housing options for older people and values schemes, which allow an older person's independence to be maintained in the community. The council is especially keen to promote the development of extra care housing, which are independent homes (rented or owned) where residents have a minimum care need (four hours per week) and are also covered by on-site staff for any emergency care need. The County Council also recognises that a proportion of these units need to be affordable – covering both rent and shared ownership – in order for the needs of all of the local population to be met. 10.2. The County Council have recognised that there is a need for 486 units of extra care in North Norfolk, which have a minimum site requirement of 60 units per site, with sites being 2-3 acres with ample communal space both inside and out. Attached (Appendix 3b) is a (draft) planning position statement and a general position statement for extra care in Norfolk (Appendix 3a). The County Council also recognises a need for care homes to be considered in line with new developments, particularly the provision of nursing homes, in line with older people's population growth. It is also expected that these will have similar unit and size requirements as extra care, although sites could start at 1.5 acres if required. 10.3. The County Council's Adult Social Care team would like to meet with NNDC Planners to discuss the above issues and how best these could be identified in the emerging Local Plan	Noted. Support welcomed. Further evidence included in the June 2019 position statement on developing extra care housing in Norfolk is welcomed and will be used to help finalise and support the policy approach.
HOU2	Gladman Developments, Mr Craig Barnes (1217131)	LP278	Object	Policy HOU2 sets the housing mix requirements of the Policy. The Policy sets out the requirements for affordable housing, housing mix, affordable housing mix, self-build requirement and specialist elderly/care provision requirements for each site according to the scale of the development. Gladman broadly agrees that the evidence is in place to justify the requirements set for affordable housing and housing mix. The requirements should however be reviewed should the updated SHMA suggest the need for a different housing mix, and the policy should be applied flexibly to account for site/development specific issues or changing needs over time. A scaled approach recognises the differences in viability and opportunity to accommodate a range of housing products	Noted - Consider feedback and clarifications requested in the finalisation of the policy and approaches. The Council has used current evidence base, including the age profile of the District and engaged with relevant bodies including Health and Adult social services and collectively through the

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				<p>within a development. Its application is therefore important to enhance the deliverability of development in the plan period. Gladman also support the proposal to establish different zones for affordable housing requirements of the District. This recognises that values vary across the authority area and as such affects the financial capacity of development to viably accommodate required levels of affordable housing. Gladman is however concerned with the requirements set out within the policy for self-build plots and specialist elderly/care provision. For Self-build, the Policy advises that at least one plot or 2% of total units on sites of 26 to 300 dwellings will be required as self-build plots, with an additional plot or 2% provided per additional 150 dwellings. Gladman is concerned that the policy requirement will deliver an oversupply (89) of self-build when compared to need. The latest register shows a total of 9 individuals on the register with a need for self-build plot. The register also shows the preferred location of the plot provided. This significantly outstrips demand for self-build in the District and excludes the potential for additional contributions from windfall development. Not considered that the requirements of the Policy are justified by the evidence of need. A further problem with the approach applied through the policy is its ability to respond to the preferences of those on the Self-build register. Examining the most recent register, it is clear that there is demand for self-build plots in lower order settlements. The proportionate basis of the policy means however that the no self-build plots will be delivered in these settlements through this policy given that the scale of development required to deliver this would be in in conflict with Policies SD3 and HOU1 of the Local Plan. As a result, the policy does not respond to needs for self-build in rural areas reducing the effectiveness of the Policy. It is also unclear how the requirement would be addressed where there is no evidence of interest for self-build in the location where the development is proposed. If this is the case would these plots revert to market dwellings? If so how, &when? It is also unclear when and how self-build plots are to be dealt with through the planning application process. Further detail is necessary to set out how this policy is to be implemented to ensure that it is effective in securing self-build plots. In terms of the requirements of Policy HOU2 for elderly provision, Gladman accept the pressing need for elderly accommodation within the District, however consider that the Policy should hold greater flexibility in requiring such provision on-site. It may not always be the case, owing to the location/characteristics of the site and proposed development that the site would be a suitable location for elderly/specialist provision. The policy is also imprecise about the types of elderly/specialist provision that can be provided in response to its requirements referring only to the dwellings needed as "bedspaces". Whilst this provides welcomed flexibility, it also introduces uncertainty for applicants should the type of dwellings provided not reflect the Council's expectations. Proposed Changes: Gladman consider that the following two approaches should be taken: Firstly, the Council should seek to allocate small sites (in agreement with the landowner) which are entirely comprised of self-build plots. This would avoid</p>	<p>Norfolk Strategic Framework in the development of the approach to elderly /specialist accommodation needs. Consider the level of need identified and how that relates to the potential provision and the locational requirements as detailed through the council's self build register and potential amendments to the policy . Consider further clarification around types of elderly accommodation /specialist accommodation that could be acceptable to the council and the supporting evidence base.</p>

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				<p>the potential problems of disposal of self-build sites by the housebuilders. It would also overcome potential concerns regarding health and safety as well as site security by avoiding the need to accommodate self-build plots within a larger scale development. Gladman consider that it would be helpful for the types of elderly/specialist provision desired to be listed by the Council. This list should be expansive and not focused on traditional C2 accommodation (because the evidence doesn't support this) but should also include modern types of elderly/specialist provision such as flats to purchase and rent, and communal living accommodation. Secondly, the Council should seek to encourage self-build through windfall development by relaxing its open countryside policy where the development of a self-build plot would not lead to adverse effects on biodiversity, landscape, heritage, and flood risk. This may encourage self-build proposals on an ad hoc basis fulfilling needs which cannot be met through the Local Plan especially within rural areas. The approach would also increase the level of windfall development achieved during the plan period.</p>	
HOU2	Creting and Coast, Mr John Fairlie (1217414)	LP533	Object	<p>Paragraph 63 of the NPPF states: Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). Page 68 of the NPPF defines Major Development as: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. The affordable housing provision should therefore be zero for sites of less than 10 units.</p>	<p>Noted - North Norfolk is a designated rural area and therefore emerging policy is consistent with Paragraph 63 of the NPPF.</p>
HOU2	Homes for Wells, Mr David Fennell (1217420)	LP528	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: (Support with Conditions) Homes for Wells Housing Needs Survey published 2018 showed an immediate requirement for 33 extra affordable homes. The previous five-yearly survey showed very similar results. The main differences were that the percentage of second homes and holiday lets has since risen to over 30%, house prices have accelerated even faster while wage growth was almost static and the main social housing provider is tending to sell off its dwellings in Wells. Homes for Wells is valiantly trying to grow and will meet demand to the extent that land and grants are available. Extrapolating the results of the Housing Needs Surveys, it is reasonable to expect that at least the same level of need will be demonstrated again in the next three five-yearly Housing Needs Surveys. Therefore, over the 20 year period of the Local Plan, the requirement for affordable homes is most likely to be in the region of 90 to 120 dwellings. Even in the event of a major cyclical downturn in the housing market, the least impact will be in smaller, family homes, because the shortage of smaller homes is greatest, and demand is inflexible...." In 9.6...." a significant proportion of the limited number of new homes....will be subject to affordable housing occupancy restrictions".....The key question here is what is considered to be a significant proportion? In 9.6 the fear is expressed that the imposition of permanent occupancy conditions would deflect demand for second homes on to the existing stock. The counter argument is that "it is better to do what is possible, rather than to do nothing".</p>	<p>Comments Noted. Policy HOU2 sets out the affordability requirement of 35%. Development in flood risk areas is subject to the sequential approach and exception tests as set out in national policy where those areas least at risk are prioritised. Use classification is a matter for law and is outside the scope of current land use planning. The Council is actively supporting the provision of rural exception sites and affordable housing provision through grant funding and working with local communities in the identification of and delivery of sites to address local need. Such sites can also be brought forward through the emerging neighbourhood plan. The use of a second home is not defined in</p>

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				<p>Given the growing scale and urgency of the problem, we feel it is essential to do something - the reason why Homes for Wells was originally set up. In 9.7 infill growth is allowed on brownfield sites. In our Housing Needs Survey, the derelict units at Maryland were commented on by many responders. We are aware that the Flood Defence Agency opposes any development in this area but respectfully point out that there are many coastal areas where development takes place in flood risk areas - the homes have parking on the ground floor and the only inhabited parts of the dwelling are on the first floor or above. In 9.8 the Council...would welcome comments on this area of policy. Homes for Wells supports housing growth from many different sources and believes that a variety of smaller developments is preferable to any single large site, in terms of access on foot or bicycle to the town centre, limiting damage to wildlife and the natural environment and avoiding intrusion into the landscape. As to the impacts of second home ownership, the first is that parts of Wells are increasingly becoming 'dark' out of season; people no longer have neighbours, businesses no longer have customers, school numbers fall, family members move away to find work or affordable homes and the permanent population falls. The second is that, in high season, the isolated residents are disturbed at all hours of the day and night by strangers driving in and out; nobody knows who their neighbours are; in daytime, the roads gridlock and all available parking is taken; in short, the income and employment gained from tourism has to be smoothed out over the year. Providing more second homes for holiday lets in peak season does not smooth out the pressure - it adds to it - and it undermines the community and its services outside peak season</p>	<p>planning legislation, the occupation of residential dwellings is not a matter of land use planning and there are no planning controls that can be utilised to control the use of the existing housing stock as second homes. The approach through national guidance is one where an uplift is applied to the overall housing target to account for those homes lost through second homes ownership. Wells is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers where there is an opportunity to bring forward additional growth in response to local issues and evidence. The Local Plan continues to address strategic needs of the District.</p>
HOU2	<p>Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd)</p> <p>(1216793, 1216790)</p>	LP235	Support	<p>Support the principle of introducing a sliding scale for affordable provision. However, the figures set out in the table do not allow sufficient flexibility to meet local needs. it is appropriate in North Norfolk that affordable housing targets allow for greater flexibility in respect of the scale of development proposed and affordable housing contributions sought on the basis of a sliding scale however, the figures set out in the table to not allow of sufficient flexibility to suit local needs</p>	<p>Support (partial) welcomed: The Council aims to ensure that the dwelling built reflect the identified need. The aim of Policy HOU2 is to closely match the type of homes, which are built with the identified need for homes of different sizes and tenures. The Strategic Housing Market Assessment (SHMA) provides information in relation to the number and type of homes required, including their size and tenure. It concludes that there is likely to high levels of need for two and three bedroom properties and a growing need for single bedroom homes and flats in the affordable sector. Also, meeting the housing</p>

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					needs of an aging population, in terms of the traditional housing stock and specialist types of elderly care will become increasingly important throughout the Plan period.
HOU2	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP565	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Holkham Estate is supportive of the 'Built to Rent' concept. The Planning Practice Guidance states: "As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent. Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidence-based planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups. If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent. "Paragraph: 001 Reference ID: 60-001-20180913 (Revision Date: 13 09 2018). The North Norfolk District Council Strategic Housing Market Assessment (June 2017) provides commentary about the private rented sector (PRS) across Central Norfolk over the period 2001 to 2011 at pages 86 and 87. It is stated at paragraph 4.57 that "The rate of increase in the PRS is revealing: over the period 2001-11, the PRS sector in Central Norfolk has grown by 45%". It is stated at paragraph 4.58 that "It is important to recognise that the private rented sector in Central Norfolk is growing via the conversion of other tenures rather than new build." The SHMA indicates that there may be a need to accommodate additional growth to specifically respond to the growth of private rented sector. Unfortunately there is no analysis of the Private Rented Sector within the North Norfolk District in isolation. The Draft North Norfolk District Council Draft Local Plan is silent in respect of 'Build to Rent'. Build to rent is defined within the National Planning Policy Framework (Glossary) "Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control." The concept of 'Build to Rent' is different to traditional development schemes where houses are built for sale. This sector of housing can play a role in accelerating delivery where there is a particular need for rental properties</p>	Comments noted: Consider feed back in the development of policy and supporting text .The Council supports the provision of rented accommodation in meeting the identified need of affordable housing. A high proportion of affordable rent is included in the plan wide viability testing. Consider adding text references and or policy requirement on tenure mix to the final policy approach
HOU2	Wells Neighbourhood Plan,	LP302	Object	Respondents to the questionnaire, (clarification added, Wells NP survey) counted 125 first preferences for affordable housing for rent by local people, 89 second preferences and 24 third preferences. By contrast houses for sale on the open market attracted 14	Comments noted. Addressing housing needs, both market and affordable is an important

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	Questionnaire. (Mr Peter Rainsford) (1216818)			first preferences, 9 second preferences and 5 third preferences. The survey response reflects concerns about the very limited amount of land available for affordable rental accommodation. This could be resolved if all sites are designated "exception sites".	consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community. Wells is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers to bring forward additional sites to support local affordable housing where they are justified by appropriate evidence.
HOU2	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP683	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet object to the stringent nature of policy HOU2 and suggest that there is a greater need for flexibility to ensure development is viable on a site-specific basis and believe housing mix percentages should be addressed on a case by case basis. As an example, the number of required self-build and specialist properties, defined in this policy as a need, should be weighed against the need for affordable homes.	Noted, consider comments in the development of the Policy HOU2. The Council aims to ensure that the dwellings built reflect the identified need. The aim of Policy HOU2 is to closely match the type of homes, which are built with the identified need for homes of different sizes and tenures. The Strategic Housing Market Assessment (SHMA) provides information in relation to the number and type of homes required, including their size and tenure. It concludes that there is likely to be high levels of need for two and three bedroom properties and a growing need for single bedroom homes and flats in the affordable sector. Also, meeting the housing needs of an aging population, in terms of the traditional housing stock and specialist types of elderly care will become increasingly important throughout the Plan period.
HOU2	Persimmon Homes (Anglia),	LP496	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) request that the discrepancy between the housing mix requirements of HOU2 and other relevant policies within the plan are revised so that	Noted: Consider clarification in future iteration of the Plan HOU2 &

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	Mr Kian Saedi (1217416)			<p>they align:</p> <ul style="list-style-type: none"> • HOU2 does not require the provision of specialist elderly/care provision on schemes of between 26-150 dwellings with the trigger for the provision of this type of accommodation being 151 dwellings and up. However, this is inconsistent with Site Policy DS13, which requires the provision of land for elderly accommodation despite the allocation including only 150 dwellings, which would not trigger the need to provide elderly accommodation under Policy DS13. • Persimmon Homes (Anglia) acknowledge the role that self-build housing plays in meeting the needs of groups with specific housing requirements, but consider that self-build housing is likely to be more appropriately delivered as part of smaller housing schemes or housing schemes that are exclusively self-build. Persimmon Homes (Anglia) therefore suggest that a more appropriate approach would be for the plan to include a separate policy, specifically supporting the delivery of self-build housing where it can be demonstrated that self-build housing would be appropriate to its locational and developmental context. • Persimmon Homes (Anglia) consider that the imposition of a requirement to provide a certain proportion of self-build plots on larger schemes (26 +) is not necessary or the most appropriate mechanism to meet the demand for self-build and custom housebuilding in the North Norfolk area, particularly given the most recent self-build registers (2017 & 2018) indicate demand has generally been for single plots in more rural locations and that the level of demand has been low. Therefore, Persimmon Homes (Anglia) consider that the requirement is likely to result in self-build plots being provided in locations where there is not a demand for self-build plots, which would potentially result in self-build plots being left empty where they are not sold. Additionally, this could reduce the overall number of houses that could otherwise be delivered on an allocated site by the developer. • Persimmon Homes (Anglia) also echo the recommendations of the HBF in that if the self-build element of the policy is retained it must include a mechanism for the return of self-build plots to the developer where these are unsold. It is important that plots should not be left empty to the detriment of neighbouring dwellings or the development as a whole. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site." 	DS13. Provision for elderly care accommodation is required on DS13.
HOU2	Taylor Wimpey UK Ltd, Mr Daniel Hewett (1210813)	LP088, LP089, LP090	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Taylor Wimpey UK Ltd consider that the Council should seek to provide a range of housing tenures, in accordance with the most recently published SHMA, and that the precise percentage of housing mix should be dealt with on a case by case basis and be informed by site location.</p> <ul style="list-style-type: none"> • When allocating sites that are controlled by developers or notable house builders, 	Noted, consider comments in the development of the Plan. The Council aims to ensure that the dwelling built reflect the identified need. The aim of Policy HOU2 is to closely match the type of homes,

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				<p>these should be viewed favourably as this would significantly de-risk the site in terms of deliverability.</p> <ul style="list-style-type: none"> It is considered that, if allocated sites are not coming forward at the anticipated rate of the adopted housing trajectory or if the Council is unable to demonstrate a 5 year housing land supply, this should trigger the delivery of the reserved sites for consideration. This would ensure that the Council are meeting their housing need, whilst also ensuring that housing is coming forward in the most sustainable locations, as this would have been a factor in determining the location of the reserve sites. <p>Mechanisms to avoid a shortfall in housing development and delivery are vital to consider at this stage of the emerging Local Plan. Taylor Wimpey UK Ltd object to the prescriptive nature of policy HOU2. Greater flexibility on a site by site basis is required to ensure schemes are viable. For example, the need to provide self build plots and the provision of specialist elderly/care beds in accordance with this policy needs to be weighed against the need to provide the prescribed level of affordable housing. As required by National Planning Policy, we consider that the Council should seek to provide a range of housing tenures, in accordance with the most recently published SHMA, and that the precise percentage of housing mix should be dealt with on a case by case basis and be informed by site location.</p>	<p>which are built with the identified need for homes of different sizes and tenures. The Strategic Housing Market Assessment (SHMA) provides information in relation to the number and type of homes required, including their size and tenure. It concludes that there is likely to high levels of need for two and three bedroom properties and a growing need for single bedroom homes and flats in the affordable sector. Also, meeting the housing needs of an aging population, in terms of the traditional housing stock and specialist types of elderly care will become increasingly important throughout the Plan period. The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging polices on the economic viability of the development expected to be delivered through the Local plan. Government policy is clear in that the policies of adopted plans are expected to be reflected in land purchase price and as such developers should take account of the policies in developing proposals and negotiating land sales.</p>
HOU2	Rentplus UK Ltd (Mrs Meghan Rossiter, Tetlow King Planning) (1218446,	LP764, LP265	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</p> <p>Rentplus UK Ltd supports the Council's aspiration to deliver more affordable housing across North Norfolk. This should translate to the supporting text and policies supporting the delivery of the full range of affordable routes to home ownership, including rent to buy, such as at para. 9.25. The affordable rent to buy tenure meets needs for affordable rented housing, with the full expectation of purchase. We support the Council in setting a separate minimum target for the delivery of affordable housing</p>	<p>Noted: Consider comments in the development the policy and percentage of home ownership products supported if rent plus model was seen as appropriate for home ownership Policy HOU2 prioritises rented</p>

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	1217083, 1217080)			<p>over the Plan period through Policy HOU 1. This will assist the Council in monitoring and targeting any actions required to boost delivery, should supply fall below expectations in the future.</p> <ul style="list-style-type: none"> • Rentplus UK Ltd provides affordable rent to buy housing, through a 'rent - save – own' model, renting at an affordable rent, set at the lower of 80% market rate (affordable rent) or LHA and a gifted 10% deposit upon purchase, with options to purchase at years 5, 10, 15 and 20. The main difference to other affordable options is that households are able to save for the mortgage deposit while renting the same home. The inclusion of affordable rent to buy provides greater choice and flexibility. The affordable rented period provides security of tenure, with management and maintenance by a local partner Housing Association (HA) and the opportunity to save towards purchase. Two supporters of the model are Plymouth City Council and Sedgemoor District Council. • The SHMA is out-dated in assessing affordable housing need in light of the amended definition of affordable housing in the NPPF (2019). It is important for the Council to consider seeking an additional review of local affordability and how these new tenures can help to meet the wide range of local housing needs. As this Plan will be tested against the new NPPF it is important that the evidence base assesses the need for and potential provision of such housing in order to effectively plan to meet those needs. This differs from the models of low cost home ownership set out in the 2017 SHMA. • The Rentplus model offers the opportunity for the Council and local HAs to diversify the housing offer to meet local housing needs without recourse to public subsidy, helping to reduce the housing waiting list and assisting households in other affordable tenures to move on with rent to buy, freeing up those homes for others in need. • The Council should consider the opportunities that exception sites may offer in delivering more affordable housing in areas not covered by AONB designation, as part of Policy HOU 2. This may increase the delivery of affordable housing over the plan period without adding to the numbers of open market housing that may need to be delivered. In Policy HOU2 the expectation that 'not more than' 10% 'low cost home ownership' housing is to be delivered on major residential developments is inconsistent with the NPPF which expects 'at least' 10% affordable home ownership to be delivered. This element of the policy should be amended to refer to 'affordable housing for sale, including other affordable routes to home ownership' as this would widen the scope of the policy to allow for delivery of the full range of ownership options. The percentage cap should also be removed in favour of figures that best reflect local needs, suggested by Footnote 1 of the table. The emphasis on meeting local affordable needs for rented accommodation can be met through a combination of social and affordable rent, and affordable rent to buy. We recommend that the Council include reference to rent to buy within the policy. 	affordable and is considered inline with the NPPF as set out in para. 64 of the NPPF (February 2019) but, as worded, does limit ownership products to 10% of total affordable housing. Consider clarifications in line with future policy development and consideration of rentplus model / evidence base .
HOU2	Firs Farm Partnership (Ms	LP805	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Draft Policy HOU2 sets out strict requirements for the mix of house sizes and tenures on a	Noted. Consider comments in the development of the policy.

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	Becky Rejzek, Lanpro) (1218497 1218496)			development site including in some cases requirements for serviced self-build plots and specialist elderly care provision. It is considered that this policy is overly prescriptive and there needs to be the ability to give consideration on an individual site basis as to whether there is an identified need for self-build plots, elderly care in a particular location.	
HOU2	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The landowner supports development at Fakenham. However, alongside this, the Plan should ensure that the needs of the rural areas of the District, such as affordable housing, are considered and adequately met to ensure the fostering of thriving communities. This would support a positively prepared plan that is justified and sound. Supports provision of new housing to meet local need and acknowledges that the housing need figure of 543 per annum is consistent with the national Standard Method. Recognises the need for a mix of housing in new developments to ensure balanced communities are created and maintained, and to ensure needs of all population groups in the District are adequately met. However, the policy should not be overly prescriptive to ensure there is flexibility to respond to the changeable market situation and any changes in the District's demographics over the Plan period. Policy HOU2 should encourage all different routes to affordable housing to ensure those in need have the best access possible to affordable housing. This would also ensure consistency with the updated NPPF which is much broader in defining affordable housing (paragraph 62 and Annex 2). Policy language should be consistent with NPPF paragraphs 62-64. Exemptions, including those for self-build, should be identified as per NPPF paragraph 62, and vacant building credit should also be referenced as per paragraph 63. There is also ambiguity regarding the "agreed dimensions" in table footnote 2 – what are such agreed dimensions and how are they justified? With regard to the different affordable housing zones, NNDC should ensure this responds to previous affordable housing delivery trends, so that affordable housing is delivered in areas of greatest need. The supporting text of Policy SD3 notes that larger towns have the greatest need for affordable housing, but also have the greatest supply. However, care should be taken to ensure that the affordable housing needs of village and rural communities are not neglected, particularly those with high demand and low land availability, such as Mundesley. While Background Paper 2 - Distribution of Growth states there is greatest demand for affordable housing in the Large Growth Towns, there does not appear to be any evidence to support this notion and affordable delivery rates in these areas are not discussed. NNDC must be certain that affordable housing can be successfully delivered in areas of greatest need to ensure a justified and effective Plan. Sites like F03 (Fakenham) can, of course, help support such delivery in the short term.	Support noted. Consider comments in the finalisation of the policy wording. Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community.
HOU2	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP623	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Formulated based on the SHMA and other evidence base documents. It identifies site C10/1 being located within Affordable Zone 2 and cross references tenure mix	Support noted. Consider comments in the development of the policy.

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				<p>dependent on the size of scheme. We support the policy and confirm that the Concept Masterplan, which accompanies this submission provides for a scheme that complies with policy HOU2, notably the provision of 35% affordable housing and the requirement for 50% of market homes to be two and three bedrooms. The Council may, however, wish to consider amending the policy to provide flexibility in order to reflect housing needs in the District over the life of the Local Plan. Policy HOU 2 also requires at least one plot or 2% of the total number of units to be provided to be self-build. We support the aspiration to increase the delivery of new homes through the provision of self-build and custom-build housing and Pigeon are involved in a number of schemes that include self-build plots and confirm that these can be provided as part of site C10/1. However, the Council may wish to consider amending the policy to allow any plots that are unsold after a period of time to be brought forward as conventional housing.</p>	
HOU2	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: It will be important that the affordable housing policy reflects any updated evidence on viability taking into account all the additional costs resulting from the new local plan. This may require the Council to reduce its requirements in both areas to ensure that the Council can satisfy paragraphs 34 and 57 of the NPPF. We would suggest that the affordable housing requirement in zone 1 does not reflect the Council's evidence. The table at paragraph 5.4 suggests that a 15% affordable housing requirement on residential development in the low value submarket will make brownfield land unviable and could have an impact on the delivery of green field sites. In order to ensure compliance with paragraph 57 the evidence indicates that a 10% requirement would be most appropriate and reduce the need for negotiation in zone 1. Would also support the delivery of brownfield sites in the lower value zone and ensure the Local Plan is consistent with paragraph 117 of the NPPF. The requirement for development from 6 units upwards to contribute to affordable housing provision regardless of location is contrary to paragraph 63 of NPPF which states that the lower threshold can only be applied in designated rural areas. Whilst there are parts of North Norfolk that will be designated as a rural area it cannot be applied to the entire borough. The policy should therefore identify the designated rural area to which the lower threshold will be applied. Outside of the designated rural areas contributions should only be applied to major development. Recommendation The Council will need to reconsider its affordable housing requirements against a revised viability assessment that considers the cumulative impact of the policies in the local plan. The policy will also need to be amended to remove the requirement for small sites outside of designated rural areas to pay a contribution towards affordable housing provision. Policy HOU2 requires developments of 6 or more units to provide no less than 50% of the market homes as either 2 or 3 bedroomed units. Firstly, the mix of market homes to be provided on each site should be a matter for the developer to consider, who understand the market for new homes and what is needed within the location they are developing. Whilst the</p>	<p>Noted - Consider comments in the future iteration of the Plan as the policy approaches are reviewed finalised and appropriate costs included. North Norfolk is a designated rural area and therefore emerging policy is consistent with Paragraph 63 of the NPPF. Consider the level of need identified and how that relates to the potential provision and the locational requirements as detailed through the council's self build register and potential amendments to the policy .</p>

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				<p>Council should seek to ensure a broad mix of housing is provided across the Borough this should be achieved through allocating sites that will achieve this mix. Whilst we do not agree with the imposition of a mix requirements on market housing on any sites it is even more onerous on smaller sites where development viability can be greatly affected by the mix if there is no market for such homes at the location the development is being delivered. Recommend that the housing mix requirements for market homes in HOU2 are deleted. HOU2 requires at least 1 plot or 2% of the total number of units provided to be self-build. Whilst the HBF is supportive of the self and custom house building industry we are concerned that the expectation to deliver such plots is being placed on the house building industry. PPG sets out in paragraph 57-025 a range of approaches that must be considered to support the delivery self-build plots, such as examining whether delivery could be achieved on their own land or if their landowners willing to provide development land specifically to support the self-build market. The Council will need to provide evidence as to the extent they have considered delivery through other mechanisms if this policy is to be found sound. In addition to considering how to deliver plots for self-builder the Council must also provide evidence as to the demand for such plots. We are particularly concerned that across the Country the level of need outlined on self-build registers is inflated and does not reflect demand. We have noted that when Councils have revisited their registers in order to confirm whether individuals wish to remain on the register numbers have fallen significantly. This has been the case at the EIP for both the Hart and Runnymede Local Plans. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the numbers of interested parties on the register fell from 155 to just 3. There are also concerns that self and custom build registers alone do not provide sufficient evidence with paragraph 57-011 of PPG requiring additional data from secondary sources to be considered to better understand the demand for self-build plots. In particular we are concerned that planning policies, such as the ones proposed in the draft local plan, will deliver plots on major house building sites whereas the demand for self-build plots may be for individual plots in more rural locations. Without the necessary evidence to show that there is demand for self-build plots on such sites the policy cannot be either justified or effective. The Council will need to provide further evidence if it wishes to take this policy further. Without the necessary evidence the policy must be deleted. If the policy is retained it must include a mechanism for the return of self-build plots to the developer where these are unsold. It is important that plots should not be left empty to detriment of neighbouring dwellings or the development as a whole. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site.</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU2	National Custom & Self-Build Association (Ms Sally Tagg, Foxley Tagg Planning Ltd) (1218368 1218503)	LP704	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</p> <p>NaCSBA's mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process. The Self-build and Custom Housebuilding Bill is an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. NaCSBA are pleased to note that North Norfolk do keep a self-build register and that demand identified through the self-build register is published. It is however a concern that at present one cannot register on the North Norfolk Self-Build Register at http://localselfbuildregister.co.uk . The lack of presence on this website can give the impression that the LPA does not have a self-build register, and may send the wrong message in respect of the Council's commitment to the register and to custom- and self-build. Comments from the Planning Minister alongside the Right to Build legislation clearly demonstrate how the government intended LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination. The Housing and Planning Act 2016 conferred on LPAs the responsibility to: "Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority's area..." The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act. The Housing White Paper entitles 'Fixing Our Broken Housing Market' published in February 2017 stated that: "the Government wants to support the growth of custom built homes. These enable people to choose the design and layout of their home, while a developer finds the site, secures planning permission and builds the property." The paper further went on to acknowledge that: "The main barriers to custom built homes are access to land and finance." Finally, the paper demonstrated the importance with which the Government treats provision of self-build opportunities by councils by stating that: "If we do not believe local authorities are taking sufficient action to promote opportunities for custom-building and self-building, we will consider taking further action including possible changes to legislation." More recently, Housing Minister Kit Malthouse stated in the House of Commons (13th May 2019) that: "Self and custom builders have a vital role to play in delivering new homes that are welcomed in their communities, rather than resisted, and built to last." He went on to state that: "Custom and self-build can and should be a mainstream housing option in this country." Paragraph 61 of the revised NPPF sets out the requirement for LPA to plan for a wide choice of high quality homes to support sustainable communities and provide greater</p>	Noted - Consider feedback. Consider the level of need identified and how that relates to the potential provision and the locational requirements as detailed through the council's self build register and potential amendments to the policy .

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>opportunities for home ownership. It goes on to state (underlining is our emphasis): “The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).” Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders. Critique of policies Whilst the plan does make reference to custom and self-build in Policy HOU 2 – Housing Mix, in the form of a requirement for medium and large sites to deliver 2% of units (or at least 1 plot) as serviced self-build plots, this is the sole reference to custom and self-build in the plan. As such, the opportunities for those wishing to build their own home might be limited, given that the only plots that the local plan will help to deliver will be those on large sites. Plots on large developments do not always suit the needs of prospective custom and self-builders, and consequently more choice should be offered, with smaller sites being facilitated too. It is concerning that no other mention of custom and self-build is made within the plan. Given the emphasis that the government wishes to place on custom and self-build it is considered crucial that housing policies within the emerging plan make reference to the fact that LPAs have a duty to meet the needs of those wishing to build their own homes. It is therefore considered appropriate that policy HOU2 should be adjusted in order to ensure that it is made clear that self-build is supported and actively encouraged to come forward through windfall sites. As such there is currently no provision within the plan to ensure that the needs of those wishing to build their own home are met, unless those prospective self-builders want a site on one of a handful of large sites expected to be brought forward during the plan period. The NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and positive promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders. North Norfolk DC should give serious consideration to a policy which encourages small and medium sites specifically to meet the needs of custom and self-builders. At present NaCSBA are concerned that the emerging Local Plan does not meet the needs of those wishing to build their own home, does not meet the council’s responsibilities in this regard and could not be considered sound at examination as a result. Conclusion The Local Plan does not support custom and self-build other than limited provision on a small number of large sites. Policy HOU2 should be altered to make clear that custom- and self-build proposals within the district are encouraged and will be supported in order to comply with the NPPF, the Housing & Planning Act and the Right to Build.</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU2	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP308	Object	<p>Issues and concerns were raised at the Council-run Viability Workshop (29 August 2018) about the basis and assumption by NCS (authors of the Plan Wide Viability Assessment, July 2018). Errors and omissions were identified but it is unclear if/how those have been addressed. Consequently, there must be question-marks about the conclusions drawn and therefore the basis of the - in particular – 35% affordable housing level proposed by the draft Plan in Affordable Housing Zone 2. It is evident that a substantial proportion of proposed allocations (notably in North Walsham and Fakenham) are in Affordable Housing Zone 1, meaning that proportionately lower affordable housing rates will be delivered, even from the large allocations proposed therein. We have - elsewhere through this consultation exercise – indicated that there should be a better distribution of proposed housing allocations, particularly within the Large Growth Towns and Small Growth Towns categories of the Settlement Hierarchy (including an additional allocation in Hoveton). This point is reinforced by the implications thereof – as proposed by the Draft Plan – insofar as affordable housing provision is concerned: some redistribution away from single large allocations in Zone 1 towards Zone 2 will result in an increased provision of affordable housing. The Housing Incentive Scheme introduced by the Council was both innovative and effective. It is our view that its 25% level of affordable housing – which proved so effective in securing early delivery of housing (both market and affordable) should be maintained in Zone 2 through the new Local Plan.</p>	<p>The council took on board comments made at the viability stakeholder event, a revised study informed the emerging policies and was republished alongside the draft plan consultation documents. Detailed feedback including the revised costings are included in the Interim consultation statement Appendix L. and the study is available in the Council's web site. Following the event, the study appraisals were subsequently re run with updated assumptions in relation to the suggestion of increased build costs along with a review of other inputs. The revised costs are based on independent data provided through BCIS as advised in the updated Planning Practice Guidance plus a percentage allowance for additional external costs. A further £10 sqm is added for category 2 Accessible and adaptable housing. Section 106 contributions were reviewed in light of the additional inclusion of costs for externals and in line with the updated and refinement of the policy requirements in the emerging allocations. A 17.5% developers profit is used, reflecting the reduced risk of building in North Norfolk as agreed at the meeting. The revised study also reflects the areas of higher value areas outside the main indicative zones. The affordable housing mix was reviewed to ensure it remains NPPF (July 2018) compliant and reflect the more</p>

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					realistic requirements of North Norfolk. The larger strategic typologies include a requirement for flats which are now based on the lower national space standard of 50 sq m for a 1 bed rather than a 2 bed. Sales values, fees, finance etc. were not at this stage reviewed, given the iterative nature of plan making further work in refining values as well as costs will be undertaken at a stage to inform policy development. The study clearly identifies different affordable housing zones.
HOU2	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP584	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The policy proposes a significantly reduced proportion of affordable housing in conjunction with residential developments compared to the current Core Strategy (adopted Policy HO 2 requiring 45% for developments of 10 dwellings or more), based upon their location within the District. Within Fakenham the policy proposes at least 15% affordable homes are provided. This is considered to be more representative of the viability of development in this location. As such, support this approach on the basis that all development will remain subject to the normal viability tests and, therefore, treated on a site-by-site basis. In practice the policy may result in the viability of development being tested only in exceptional circumstances, however, the residual potential need for a viability appraisal should remain explicit within this policy.	Support noted. Noted Consider comments in the finalisation of the policy.
HOU2	White Lodge (Norwich) Ltd (Ms Kathryn Oelman, Lawson Planning Partnership) (1217091 1217088)	LP292	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Local Plan acknowledges that affordability is an issue throughout the district. In order to address this, Policy HOU2 (Housing Mix) seeks to ensure that small sites of 6-25 dwellings provide either on-site or off-site contributions to affordable housing, dependent upon whether their provision exceeds 10 dwellings or not. HOU2 restricts mix and applies affordable housing requirement. Difficult to identify which zone the Former Nursery site lies. Paragraph 9.26 of the draft local plan describes how, to date, it has only proved possible historically to achieve 18% affordable dwellings on new development sites. Paragraph 9.27 explains that 20% is a rate which is supported by the current evidence base. It is therefore unclear how provision levels of 15-35% have been arrived at, and are thus necessary or justified, other than the fact they are the maximum viable levels arrived at in the NCS Interim Plan Wide Viability Assessment. Paragraph 63 of the NPPF directs that affordable housing should “only be sought on major developments of ten dwellings or more”. Central government’s approach acknowledges that critical viability	Noted- North Norfolk is a designated rural area and therefore emerging policy is consistent with Paragraph 63 of the NPPF.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>issues are commonly experienced on smaller sites. Their delivery is therefore encouraged by relaxation of the affordable housing requirements, as these sites make an important contribution to meeting the housing requirement of an area. HOU2 restricts flexibility in the mix to be provided on smaller sites. Restrictions in Policy SD3 are justified to meet paragraph 68 targets and ensure densities proposed reflect the rural character. However, we remain unclear as to how thoroughly the impact of these restrictions has been assessed: the NCS Viability Assessment does not specifically evaluate these constraints in combination. Thus, we are concerned that the approach adopted will not be an appropriate solution to meeting the identified affordable housing need in the District, as it will not encourage small sites to be brought forwards due to viability concerns in Small Growth Villages. We therefore raise objection to the housing mix requirements of Policy HOU2 regarding sites of 6-25 dwellings on the basis that it is not consistent with approach advocated in national policy, which would suggest that no forms of affordable housing should be sought on sites comprising 0-9 dwellings. Failure to address this inconsistency raises potential issues for the legality of the plan and its soundness. We also request that a separate viability assessment is commissioned to examine the policy interaction on small sites in Small Growth Villages, to ensure the plan is effective in meeting the identified affordable housing need on a District level.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU2)
Objection	8	<p>Mixed commentary was received around this policy. The approach seeking to increase housing options across a range of need was generally recognised and welcomed by statutory bodies and some developers (in relation to need). Issues raised included: The inclusion of self-build numbers which was challenged as disproportionate to the level of identified need. Many developer's responses included commentary on the need for the final policy to remain more flexible on housing mix, which was stated should remain informed by up to date evidence. The lack of detail on type and tenure of affordable housing was criticised and it was suggested more prescription could be given and or a separate policy included. The policy should allow for flexible models to deliver affordable housing and home ownership models such as Rent Plus. Comments around viability. The lower threshold for affordable housing and inconsistencies around the split for specialist housing in relation to some allocation polices was also raised.</p>
Support	7	
General Comments	6	

Policy HOU3 - Affordable Homes in the Countryside (Rural Exceptions Housing)

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU3	Norfolk County Council: Highways (931093)	LP739	Support	<p>The County Council broadly supports the settlement hierarchy (Policy SD3) and distributions of housing growth set out in Policy HOU.1. These comments, however, are subject to the County Council undertaking a further detailed technical assessment of individual site allocations in respect of: • highway/transport matters; and • flood risk/surface water drainage issues where a holding objection is raised . Housing in North Walsham. Members will be aware of the County Council’s Network Improvement Strategy work covering a number of market owns across the County, one of which is North Walsham. The County Council has concerns about a lack of engagement and evidence base regarding the proposed allocation. No evidence has been submitted to demonstrate the impact of the link road or the mechanism by which it or other infrastructure could be delivered. Therefore, further discussion between the County Council and District Council will be needed to clarify the delivery of the key supporting infrastructure (link road and school site) associated with the above allocation of 1,800 homes and employment provision. In addition, low bridges are a constraint to HGV movements in the town and impact on the economy, growth and quality of life. The County Council would like to work with NNDC to ascertain how far the proposed or potential allocations can help overcome this issue</p>	<p>The Council continues to work with Highways for detailed technical comments and through the development brief work for North Walsham. A further extension has been agreed for detailed technical comments by 11.12.19 in relation to the site specific work from both Highways . Additional commentary updating the specific objection from LLFA was received 16.10.19 and incorporated into this schedule for sites DS18, DS17, DS21, DS30 . North Walsham - Many of the issues are long standing issues and detailed work is ongoing both at a county level and authority level where NCC is involved in commissioning some of the agreed evidence required and is a member of the development brief steering group.</p>
HOU3	Gladman Developments, Mr Craig Barnes (1217131)	LP279	Support	<p>Gladman is broadly supportive of Policy HOU3 which seeks to support affordable housing provision by creating additional opportunities for the development of affordable housing within the open countryside. Gladman consider that the implementation of this policy will help deliver a boost in affordable housing delivery. To ensure full accordance with the NPPF, exception sites permitted in the open countryside should be expanded to include entry level housing for first time buyers. Whilst it is acknowledged that the definition of affordable housing has been expanded within the NPPF to include starter homes and discounted market sale homes however these types of dwellings do not necessarily cover those purchased by first time buyer. To ensure that sufficient opportunity is provided for first time buyers (in line with national planning policy) the policy should be expanded to also refer to homes for first time buyers. To ensure full accordance with the NPPF, exception sites permitted in the open countryside should be expanded to include entry level housing for first time buyers. Whilst it is acknowledged that the definition of affordable housing has been expanded within the NPPF to include starter homes and discounted market sale homes however these types of dwellings do not necessarily cover those purchased by first time buyer. To ensure that sufficient opportunity is provided for first time buyers (in line with national planning policy) the policy should be expanded to also refer to homes for first time buyers.</p>	<p>Support noted - consider expanding the policy to refer to first time buyers in line with the NPPF in the preparation of the Policy.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU3	Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd) (1216793, 1216791)	LP236	Support	Criteria 4. Should be reworded to ensure that the Local Plan is positively prepared and consistent with other policies in the Plan Suggested modification. 4. The size of the scheme would not lead to the number of dwellings in the settlement significantly exceeding the identified housing target	support (partial) noted. Disagree. The approach is one which recognises the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities.
HOU3	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP518	Support	Ensure the development will not compromise landscape and designated sites. Ensure the development will not compromise landscape and designated sites	Comments noted. Consider comment in the finalisation of the Policy.
HOU3	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP684	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet welcome the provision of policy HOU3 as this will give a greater degree of flexibility to the Council's spatial strategy and enables development which meets a local need and welcome the fact that this is in effect an 'exception' policy for both affordable and market housing.	Support noted.
HOU3	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The provision of affordable housing in rural areas is supported to ensure that the housing needs of these communities are met. It is necessary that these developments are viable, that they meet the local needs of the area, and they respect the local identity and character of the location. Policy HOU3 should be consistent with NPPF paragraphs 77-79 to ensure soundness.	Support noted.
HOU3	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	suggest the following amendment to policy HOU3: "The Council will consider developments including dwellings below space standards where these are well designed or are required to ensure the viability of the development."	Noted: Noted Consider comments in the finalisation of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU3)
Objection	0	The approach that delivers additional housing opportunities for affordable housing in the countryside and flexibility to the spatial strategy was supported. some respondents suggested that the policy should be more prescriptive on the tenure of homes to be allowed, while other sought clarification that growth would not exceed identified local need
Support	6	
General Comments	1	

Policy HOU4 - Agricultural & Other Key Worker Accommodation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU4	Broads Authority (321326)	LP806	General Comments	Broads have an equivalent policy that has just been found sound that might be of interest: DM38	Noted: Consider comments in the development the policy.
HOU4	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP519	Support	Insert in policy Ensure the development will not compromise landscape and designated sites.	Comments noted. Consider comment in the finalisation of the Policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU4)
Objection	0	Limited feedback received - No issues raised. Consideration of some amended wording with regard to landscape and designated sites was suggested.
Support	1	
General Comments	1	

Policy HOU5 - Gypsy, Traveller & Travelling Showpeople's Accommodation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU5	N/A	N/A	N/A	No comments received.	N/A

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU5)
Objection	0	No comments received.
Support	0	
General Comments	0	

Policy HOU6 - Replacement Dwellings, Extensions & Annexed Accommodation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU6	Broads Authority (321326)	LP806	General Comments	Broads have a residential ancillary accommodation policy that has just been found sound and might be of interest: DM39	Noted: Consider comments in the development the policy.
HOU6	Environment Agency (1217223)	LP470	General Comments	This policy should be reference flood risk. The combined impacts of flood risk of multiple extensions should be considered in areas with known flood risk concerns. Whilst an individual extension may have limited impacts on flood risk, the cumulative impact of multiple extensions in known flood risk areas could result in increases in flood risk or changes to flood risk characteristics (for example through the diversion of flood waters. Extensions in areas identified as functional flood plain areas should be avoided. In terms of replacement dwellings, it would be beneficial for the policy to state that replacement dwellings should demonstrate improvements in flood risk mitigation when compared with the original dwelling. It should demonstrate that improvements are still evident when the impacts of climate change over the development lifetime are considered.	Noted: Consider comments in the development the policy.
HOU6	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP521	Support	Insert in policy Ensure the development will not compromise landscape and designated sites.	Comments noted. Consider comment in the finalisation of the Policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU6)
Objection	0	No issues raised. Consideration of some amended wording with regard to landscape, designated sites and flood risk mitigation was suggested
Support	1	
General Comments	2	

Policy HOU7 - Re-use of Rural Buildings in the Countryside

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU7	Creeting and Coast, Mr John Fairlie (1217414)	LP542	Support	Existing rural buildings within the Countryside that are vacant or no longer in use can quickly become dilapidated. Notwithstanding existing permitted rights under Class Q, a positive policy to support their re-use should be encouraged. Within the supporting text it would be helpful to distinguish between existing permitted rights under Class Q and the application of this Policy	Noted: Consider comments in the finalisation of the policy consider distinguishing between existing permitted development rights under class Q and the application of this policy

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU7)
Objection	0	Limited feedback received - No issues raised. Consideration of wording within the supporting text to distinguish between Class Q permitted development rights and the application of the policy was suggested.
Support	1	
General Comments	0	

Policy HOU8 - Accessible & Adaptable Homes

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU8	Gladman Developments, Mr Craig Barnes (1217131)	LP280	Object	<p>Gladman acknowledge the general need to ensure that homes are provided to meet the needs of a diverse population. As such, Gladman support the Council's aim to ensure that new homes are built to standards which reflects the needs of the population. That said, PPG is clear that optional standards which are to be applied in excess of building regulations need to be sufficiently justified , and as a result evidence is required to justify the level of provision which is proposed. Whilst it is accepted that the population of North Norfolk is to age significantly over the plan period, Gladman question whether this provides sufficient justification to require 100% of new homes to be developed to M4 (2) standards. This is especially the case given that a large part of the housing requirement reflects an uplift made in response to affordability issues. This uplift is required largely to provide opportunity for younger households to form and access the housing market. As such whilst natural growth in population is driven by an ageing population, market transactions will be more mixed. Furthermore, the mix of dwellings provided over the plan period will include types of dwellings which by their character and location would not be suitable for elderly people. It would be inappropriate to require larger dwellings to be provided to accessible homes standards given the under occupation of dwellings this would promote. A 100% requirement is therefore not justified.</p>	<p>Noted Consider comments in the finalisation of the policy. the approach is supported by detailed evidence contained in background paper no 7: Housing Construction Standards published with the consultation documents :</p>
HOU8	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP756	General Comments	<p>National guidance advises that local plan policies for Category 3 homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (NPPG Ref ID: 56-009). It would therefore be contrary to national policy to seek a proportion of category 3 dwellings in housing other than affordable housing to which the local authority has nomination rights. In addition national guidance indicates that optional requirements in part M should not be applied to non-lift serviced multi-storey housing developments. The policy should acknowledge that the policy requirements will not apply to such developments above ground floor. A modification is therefore required to the wording of this policy to make it sound</p>	<p>Disagree - national policy may state that optional requirement M4(3) can only be applied where the local authority is responsible for nominating a person to live in that dwelling. The evidence estimates a wheelchair accessibility need (current and future) of approx. 10% of households in order to meet unmet and future need in an affordable property across the District . This could arguably be seen as a lower end of potential need range given the projected large increase in over 65 age cohorts and in particular the over 85s . A policy requiring 5% M4(3) dwellings on schemes of 20 allows for the provision of one full unit in most allocations . Such a provision would fall into the higher affordable</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					housing percentage required in policy HOU2.
HOU8	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP535	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) suggest that Policy HOU8 be revised to provide greater clarity as to whether it requires all residential proposals to include a separate document setting out how a proposal would accord with relevant standards as detailed in Building Regulations, or, whether such a document would only be required when exemptions are being sought. If the separate document is required on all residential proposals (regardless of whether exemptions are being sought), Persimmon Homes (Anglia) would object to this policy on the grounds of it placing excessively onerous requirements upon developers at the application stage. The policy requires compliance with the Building Regulation standards and this mechanism for delivery is considered sufficient without the need to submit additional information at the application stage.	Noted: consider clarification in future iteration of the Plan, regarding whether the separate document is required on all residential proposals (regardless of whether exemptions are being sought). It is considered
HOU8	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP624	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Whilst we support the aspiration of providing homes that will meet the needs of the older population and confirm that this requirement can be accommodated within site C10/1, imposing this standard on all dwelling types (including market homes) may not deliver the required homes in the correct location. For example, an ageing population does not automatically correspond to more households that require accessible homes and often people that require more accessible homes will choose to adapt their existing home, rather than to move to a new build home that has been built to accessible or adaptable standards.	Noted. Consider comments in the finalisation of the policy.
HOU8	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy HOU8 requires all new homes to be built to part M4(2) of the Building Regulations and 5% of dwellings on sites of over 20 units to be provide wheelchair adaptable homes in line with part M4(3). When the optional technical standards were introduced the Government stated in the relevant Written Ministerial Statement that their application must be based on a clearly evidenced need for such homes and where the impact on viability has been considered – a position that is now reflected in footnote 46 of the 2019 NPPF – with further detailed guidance being provided in PPG. In addition to needs and viability PPG requires the Council to also consider: • the size, location, type, and quality of dwellings needed; • the accessibility and adaptability of the existing stock; and • variations in needs across different housing tenures. The evidence on need provided by the Council in the draft local plan is based principally on the Council ageing population. Yet just because there is an ageing population does not necessarily mean that there is an increase in the proportion of households requiring more accessible homes. For example, the English Home Survey, which examined the need for adaptations in 2014/151, noted that 9% of all households in England had one or more people with a long-term limiting disability that required adaptations to their home and that this had not changed since 2011-12. The survey also found that in 2014-15, 81% of	Noted: Noted Consider comments in the finalisation of the policy. Disagree- Background paper no 7 sets out the evidence base for this requirement. The national space standards are intended to ensure that new homes provide a flexible and high quality environment in line with the NPPF, capable of responding to occupants needs. The population of North Norfolk aging at one of the fastest rates in the country, invoking the minimum national space standard through the Local Plan is also considered to be important in relation to long term adaptability and sustainability.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs. In addition, the survey indicated that those over 65 that required an adaptation to their home were more likely to consider their home suitable for their needs. So, whilst there is an ageing population there may not be a consequential increase in the need for adaptations or more adaptable homes. Many older people are evidently able to adapt their existing homes to meet their needs or find suitable alternative accommodation. A new home built to the mandatory M4(1) standard will therefore be likely to offer sufficient accessibility for the rest of their lives and as such to require all new homes to comply with Part M4(2) is disproportionate to the likely need within the plan period. Recommendation The Council should reduce the proportion of new homes to be provided as part M4(2) as there is insufficient evidence to justify all new homes being built to this optional technical standard.</p>	
HOU8	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP309	Object	<p>Policy HOU8 seeks to apply what is already an optional standard, to 100% of new dwellings conform to the requirements of Part M4(2) of the 2015 Building Regulations. This represents a radical and unwelcome approach to addressing an existing shortfall. At present all of Norfolk Homes Ltd.'s open market and shared equity houses comply with Part M 2004 Regulations, which is the same as the current mandatory Part M4(1) 2015 Regulations. Its current Affordable Rented house types are designed to comply with the Lifetime Homes Standards and will satisfy the new Part M4(2), which is what draft Policy HOU8 is seeking to apply. Meeting the requirements for the WC/cloakroom provision on smaller house types is extremely challenging (as minimum finished footprint area requirement is to be not less than 1450 x 1800mm). All 1, 2 and some 3 bed dwelling types will require enlarging/remodelling to achieve this. Further reworking of bathrooms and bedrooms will also be needed. All of which have implications for viability. The second bullet point of Draft Policy HOU8 requires that 5% of dwellings on sites of 20 or more units should be wheelchair adaptable. Whilst Norfolk Homes has already applied this design requirements on existing dwellings (notably at Roughton Road, Cromer), it should be borne in mind that these require larger plot area allocations on a site-by-site basis. Sloping sites will in particular be a challenge, in respect of access and parking. The draft policy should bear in mind constraints such as the topography of a site. Before seeking to apply such a policy across the board, the Council ought to be aware of the practical and financial implications to a housebuilder. Additional work/cost is required by the policy: "All residential proposals should be accompanied by a separate document setting out how proposals (including each dwelling type) accord with each of the standards...". "Applicants must submit appropriate supporting evidence of sufficient details to enable consideration, including a viability appraisal". A requirement for even more supporting documentation is entirely at odds with the Government's state intention of reducing the burden on house builders and ensuring the planning system is quicker, efficient and more responsive in delivering houses. The policy is an example of</p>	<p>Noted: Consider comments in the future iteration of the Plan as the policy approaches are reviewed finalised and appropriate costs included. The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging polices on the economic viability of the development expected to be delivered through the Local plan. This includes an allowance for adaptable and accessible homes (HOU8) a review of elderly accommodation and a 5% contingencies as standard. Additional costs through increased building regulations and the move toward low carbon homes should be reflected in the Land value as per Government guidance contained in the PPG Paragraph: 012 Reference ID: 10-012-20180724 and NPPF para 57.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				planning seeking to interfere with issues squarely in the remit of the Building Regulations, and for which a planning policy is entirely superfluous. Planning policies should go no further than being prescriptive on the affordable rented dwellings; everything else should be left to housebuilders, Building Regulations and the market/s in which they operate. An unintended consequence of this policy would be an adverse effect on the provision of smaller dwellings, resulting in fewer being built, and those being more expensive. I believe the problems inherent in the policy are demonstrated by the caveats setting out exemptions and viability constraints (e.g. "Exemptions will only be considered where the applicant can robustly demonstrate that compliance would significantly harm the viability of the scheme" [our emphasis]). Draft Policy HOU8 is excessive, onerous and superfluous. The Council should be cautious in readily dismissing viability impacts: not only would M4(2) and M4(3) increase build costs but in practise likely increase dwelling and curtilage sizes, and thereby reduce build density on site (reducing the number of houses to be built), with various implications	
HOU8	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Recognises the importance of providing accessible and adaptable homes. The requirement to meet the necessary Building Regulations is supported to ensure homes can be lived in by all members of the community.	Support Noted.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU8)
Objection	2	The council's aim was generally supported across the development industry, but caution was raised as to the justification and application particular across all development. Although the age structure was acknowledged the significant uplift in the housing target in order to address affordability was used to suggest that the approach should not seek higher adaptable standards across all housing and the policy should be reduced to apply to only a proportion of properties. Other comments focused on the Council providing more detail and prescription of the requirements. Norfolk Homes however thought the approach was "an unwelcome approach to addressing an existing shortfall " and an interference with issues that sit with Building Control, though confirmed that their affordable homes already comply to M4(2) and previous developments in Cromer the M4(3) requirement which the policy is seeking to apply, extending the approach to market housing would utilise extra space and unwelcomed costs. They suggested that the requirements would lead to fewer smaller homes being built and more expensive housing. It was inferred that further consideration of viability and unintended consequences should be looked at in the finalisation of the policy.
Support	3	
General Comments	2	

Policy HOU9 - Minimum Space Standards

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU9	Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd) (1216793, 1216792)	LP237	Object	The policy as worded is overly prescriptive and places a burden on applicants to provide additional and unnecessary information in support of applications. The 2015 Ministerial Statement set out to simplify the planning process by reducing the amount of supporting evidence required to be submitted by applicants	Comments noted. The provision of sufficient space and storage through the evocation of the Government's minimum space standards in dwellings is an important element of good design, reflects the specific circumstances of North Norfolk and helps to provide the type of homes required. Being transparent at application stage is an important factor in determination. Consider the inclusion of supporting statement in Design and access statement
HOU9	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP685	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet suggest that policy HOU9 should be worded in such a way as to allow flexibility when determining planning applications, as prescribing space standards for homes can impact upon the affordability of such homes. It should be noted that Homes England take a flexible approach to applying the standards in respect of affordable homes. Larkfleet believe the uniform approach of the policy does not take into account the viability on a site-by-site basis. This policy requires additional work and costings as information on how the planning application meets minimum space standards is required for validation.	The provision of sufficient space and storage through the evocation of the Government's minimum space standards in dwellings is an important element of good design, reflects the specific circumstances of North Norfolk and helps to provide the type of homes required. The approach is included in the viability assessment.
HOU9	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP538	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) share the views of the HBF that there is insufficient evidence to suggest that homes slightly below national space standards have not sold or that such homes are not meeting their owner's requirements; <ul style="list-style-type: none"> Persimmon Homes (Anglia) agree with the HBF that the Council's approach of collating evidence of the size of dwellings completed does not accurately and robustly reflect need, the requirement for which is set out in the NPPG or local demand as set out in the NPPF, and that it would be expected that the evidence base should also take account of market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the standards; In terms of supporting evidence, the Council's evidence base fails to take account of market information reflecting customer levels of satisfaction for new homes. In 	Noted, consider comments in the finalisation of Policy HOU9. Disagree- Background paper no 7 sets out the evidence base for this requirement. The national space standards are intended to ensure that new homes provide a flexible and high quality environment in line with the NPPF, capable of responding to occupants needs. The population of North Norfolk aging at one of the fastest rates in the country, invoking the minimum national space standard through the Local Plan is also

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>neglecting to take account of customer satisfaction levels, Persimmon Homes (Anglia) contend that the Council have failed to demonstrate a need to adopt an internal space standard, as required by the NPPF (footnote 46).</p> <ul style="list-style-type: none"> Persimmon Homes (Anglia) contend that if a space standard were to be imposed on all new houses, this would inevitably inflate sale prices to take account of increased land take for each dwelling and an increase in construction costs. This is likely to disadvantage those people wishing to get onto the housing ladder with an affordable, high-quality property. 	considered to be important in relation to long term adaptability and sustainability.
HOU9	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports high quality design that delivers functional and liveable homes; being spacious and well-proportioned is a key tenet of this	Support Noted.
HOU9	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP625	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Whilst we support the policy aspiration to provide high-quality well-designed homes and confirm that site C10/1 can comply with the emerging policy, the implications and potential site-specific circumstances in respect of the policy need to be taken into account. In the absence of specific evidence to justify a blanket approach to minimum space standards, we would suggest that this policy aspiration may be better delivered through a requirement for details of individual dwellings (using the criteria set out in the draft policy) to be provided at the planning application stage to enable space standards to be assessed on a scheme-by-scheme basis. This would also take into account the fact that small houses can also contribute to meeting housing needs and can often be more affordable, helping to increase access to home ownership, in particular for first time buyers. A further consideration that the Council may wish to be mindful of is the implication of the policy on the number of bedrooms that can be provided in a property of an equivalent size if the minimum space standard is applied, with potential implications for overcrowding. For example, a four-bedroom home may become unaffordable to a family that requires that number of bedrooms, if a home that would have otherwise been a small entry level four-bedroom home becomes a large three-bedroom home as a result of the application of the standards. As such the policy could result in market homes becoming less affordable or result in family units occupying overcrowded accommodation, contrary to the aims of the policy. There are also potential implications for affordable housing delivery as a result of the space standards potentially resulting in larger, but fewer, affordable homes.	Support noted. Consider comments in the development of the policy.
HOU9	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	Minimum space standards (HOU9) proposes to adopt national minimum space standards (NDSS) for residential development in North Norfolk. The Council suggests that the application of these standards will ensure a reasonable level of amenity and quality of life. However, there is no evidence or justification confirming that the introduction of the NDSS will improve the quality of housing or that these will improve the living environment for residents. There is also no evidence presented to indicate	Noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>that homes slightly below space standards have not sold or that such homes are not meeting their owner's requirements. We consider that additional space does not necessarily equal improvements in quality. There must be concerns that the introduction of the NDSS could lead to people purchasing homes with a smaller number of bedrooms, but larger in size due to the NDSS, which could have the potential to increase issues with overcrowding and potentially lead to a reduction in quality of the living environment. Need is generally defined as "requiring something because it is essential or very important rather than just desirable". The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. The HBF consider that the Council's approach of collating evidence of the size of dwellings completed does not, in itself, identify need as set in the PPG or local demand as set out in the NPPF. It would be expected that the evidence includes market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the standards. The HBF in partnership with NHBC undertake a Customer Satisfaction Survey annually to determine the star rating to be given to individual home builders. This is an independently verified survey and regularly demonstrates that new home buyers would buy a new build home again and would recommend their homes builder to a friend. The results of the 2017/18, the most up to date information available, asked how satisfied or dissatisfied the buyer was with the internal design of their new home, 93% of those who responded were either fairly satisfied (28%) or very satisfied (65%). This does not appear to suggest there are significant number of new home buyers looking for different layouts or home sizes to that currently being provided. We consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. Essentially it could mean that those families requiring a higher number of bedrooms will have to pay more for a larger home. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market. Recommendation We do not consider that this policy is required and that local needs can be met without the introduction of the nationally described space standards. However, if the policy is considered to be justified, we would suggest that the policy is made more flexible to allow for support development schemes including smaller well-designed homes where it is required to make a development viable and deliverable.</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU9	Creeting and Coast, Mr John Fairlie (1217414)	LP543	Support	There should not be a requirement for a separate document. For major development, this can be discussed within the Design and Access Statement.	Noted Consider comments in the finalisation of the policy: Consider whether this could be included within the Design and Access Statement.
HOU9	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP586	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The requirement to meet nationally described space standards is considered to be reasonable and reflects a broader shift by LPAs towards a standardised approach to their housing policy on this matter. The relevant information proposed to accompany development proposals in this regard is also considered reasonable, but it is considered unnecessary to prescribe that this is set out in a separate document (when ordinarily it should be included within a Design & Access Statement), or that this should apply to all applications, as at outline planning stage this information will not be available.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU9)
Objection	3	Feedback from development industry offered mixed view to the proposed approach. Although high Quality design, functional and spacious homes were supported along with the Council's aspiration some suggested there was no evidence to suggest that adoption of the standards will improve the quality of housing or living conditions and the unintended consequences of people purchasing larger homes but with less bedrooms leading to overcrowding. The HBF point to high levels of satisfaction in internal design of new homes as justification to their general comment as well as raising issues around affordability and that the council's review of size does not reflect need. They suggest that more flexibility is required in the application of the policy around deliverability and viability. Others objected to the requirement to submit a separate document setting out how proposals would comply, suggesting that the requirement was too prescriptive and placed a burden on applicants. Consideration should be given to including this requirement in the Design and Access statement as a solution. Support was also given for the ambition and some advised that the approach was reasonable and support the shift towards liveable homes.
Support	4	
General Comments	1	

Policy HOU10 - Water Efficiency

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU10	Anglian Water (1217129)	LP354	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. We would fully support the optional water efficiency standard being applied within the North Norfolk Local Plan area. To support this we are offering financial incentives for residential developers that demonstrate that water use would be 100 litres/per person/per day at the point of connection. As outlined in our current Developer charges the fixed element of zonal charge for water supply would be waived where this can be demonstrated. We are also actively working with developers to install green water systems in new homes including rainwater/stormwater harvesting and water recycling systems. Further details of Anglian Water's approach to green water proposals is available to view at: https://www.anglianwater.co.uk/developers/green-water.aspx. We would ask that Policy HOU 10 be amended to refer to specific measures which would allow developers to improve go beyond this standard which has wider benefits and that these will be encouraged by the District Council. Proposed that Policy HOU10 be amended as follows: 'For residential development, proposals should demonstrate that dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G2 Water reuse and recycling and rainwater and stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.'</p>	Support welcomed: Consider feedback in the development of the policy
HOU10	Natural England (1215824)	LP724	General Comments	We understand that a water cycle study is being prepared to form part of the North Norfolk Local Plan evidence base. This information should feed into the evolving HRA and Sustainability Appraisal.	The Council has worked with infrastructure providers and the EA. to consider constraints and capacity issues including water supply, wastewater and its treatment in the development of the Plan

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU10)
Objection	0	Limited feedback received - No issues raised. Support for this approach was received from Anglian water who provided for consideration some amended wording which would encourage developers to go beyond the national standard which has wider benefits to the District.
Support	1	
General Comments	1	

Policy HOU11 - Sustainable Construction, Energy Efficiency & Carbon Reduction

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU11	Anglian Water (1217129)	LP355	Support	Anglian Water is supportive of Policy HOU 11 which will help to reduce demand on water resources by demonstrating greater water efficiency.	Support noted
HOU11	Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd) (1216793, 1216793)	LP238	Support	Requirement of separate Energy Statement places a burden on applicants to provide additional and unnecessary information in support of applications. The 2015 written Ministerial Statement set out to simplify the planning process by reducing the amount of supporting evidence required to be submitted by applicants. It is sufficient to include reference to these matters within a Design and Access Statement	Support (partial) welcomed. Consider comments in the finalisation of the policy wording. Consider the inclusion of supporting statement in Design and access statement
HOU11	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP541	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) are broadly supportive of Policy HOU 11. However, Persimmon Homes (Anglia) draw attention to the potential viability implications of allowing an adjustment to the 19% reduction in the event of being superseded by national policy or legislation in the future. Development viability is assessed taking account of the measures that would be necessary to achieve the 19% reduction in emissions. If this figure were to change in the future (post plan adoption), it would inevitably carry a cost implication for new development, which, in turn, may carry implications for development viability. Persimmon Homes (Anglia) would therefore expect North Norfolk to consider the potential implications of any future adjustment to the 19% reduction figure and to acknowledge and make provisions for, the associated viability implications within the supporting text of the Policy.	Noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. The Government has recently consulted on moves towards reducing reliance on fossil fuel heat sources and introducing carbon zero homes through building regulations . The consultation document indicates that such additional costs should be borne by the land owner in the price of land. (in line with the NPPF.PPG)
HOU11	North Norfolk Constituency Labour Party (1215750)	LP120	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The North Norfolk Labour Party feel that the current building standards are not of a level that will substantially reduce energy use. <ul style="list-style-type: none"> • New builds should include solar thermal (solar heated hot water), solar PV (electric) air source & ground source heat pumps, and these should be policy requirements for all new builds. 	Noted, Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future. In accordance with the 2015 written ministerial statement policy Hou11

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<ul style="list-style-type: none"> • There should be carbon off-set modelling for an entire project, so that we work towards a whole development being carbon neutral. We are losing a lot of land and we will be generating a lot of greenhouse gases, which must be offset this somehow. • There is also the case of our area experiencing ever increasing water stress, therefore, new builds should be designed for maximum water capture and recycling. 	<p>seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. Policy HOU10 restricts water uses through design. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole.</p>
HOU11	Historic England (1215813)	LP705	Object	<p>Listed buildings, buildings within conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. These considerations/exceptions should be reflected in the policy.</p> <p>In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings</p>	<p>Noted - consider the wording of Policy HOU 11 and how this relates to the Historic Environment in the preparation of the policy.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partL.pdf/ to be helpful in understanding these special considerations.	
HOU11	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The approach set out in Policy HOU11 of prioritising “designing out” emissions followed by use of low carbon technologies is supported. As with several other policies, it is suggested that HOU11 could be simplified through referencing NPPF paragraphs 150-154.	Support Noted.
HOU11	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP626	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Whilst we support the policy aspiration to achieve high standards of environmental sustainability, further evidence is required on why the target of a 19% reduction in CO2 emissions has been selected (other than to achieve an equivalent to the Code for Sustainable Homes Level 4) to fully understand whether the draft policy is the best way to achieve the Council’s objectives, bearing in mind that this will not help to reduce the energy efficiency of existing housing stock and the fact that Government is expected to consult on a new Part L of the Building Regulations later in 2019 with an updated document to be published in 2020.	Support noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. The Government has recently consulted on moves towards reducing reliance on fossil fuel heat sources and introducing carbon zero homes through building regulations.
HOU11	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP311	Support	The implementation of an energy hierarchy whereby energy efficiencies through design/fabric over renewable energy/low carbon ‘add-ons’ is welcomed; it is an approach promoted by Norfolk Homes through its own designs and development proposals during the course of the current Core Strategy, if not before. However, the Council should be aware that the provisions of Policy HOU11 (19% reductions below the Target Emission Rate of the 2013 Building Regulations (Part L)) are likely to necessitate a significant proportion of applications seeking flexibility via constraints of technical feasibility and viability. The draft policy’s provision will have a significant impact on the approach to site layouts, where dwellings will need to be orientated in a more energy efficient manner, but also affect building design in order to maximise building orientation. It will also potentially restrict the materials pallet to be used on a development. In turn, these will impact on density and viability issues. Building orientation will be paramount in future schemes, in particular in order to avoid a	Support noted. Consider comments in the future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				predominance of bland, grid formations in housing schemes. The requirement that “all development proposals should be accompanied by a separate Sustainability Statement...” appears especially onerous. Does the policy actually mean all development proposals (i.e. all planning applications)?	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU11)
Objection	0	All respondents from the development industry were supportive of this policy and the designing out of emissions followed by the use of low carbon technologies. No substantive issues were raised. A number of issues were put forward for further consideration, these included: The removal of the requirement to include a separate energy statement (on all development) - instead allow developers to incorporate supportive information in the Design and access Statement. Further consideration around the impacts on viability and density due to the impacts on site layout and potential restrictions on development materials. One organisation suggested that the policy should be more prescriptive in its use of renewable technology and a demonstration how development twill achieve carbon neutrality.
Support	6	
General Comments	0	

Economy Policies

Policy ECN1 - Employment Land

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN1	Norfolk County Council (931093)	LP739	General Comments	– ECN1 the County Council generally supports the Local Plan approach to employment land supply, ensuring quality, quantity and distribution so that there are opportunities for employment development throughout the District to meet the needs of today and throughout the Plan period	Support noted
ECN1	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP567	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ECN 1 identifies that the sites which will be designated and retained for employment generating developments. Support is given to the identification of Egmore Enterprise Zone for 16.5Ha of employment land. It is stated within the table that 5Ha of the 16.5Ha designation is currently undeveloped which provides opportunity for expansion within the plan period.	Support Noted
ECN1	Wells Neighbourhood Plan, Questionnaire. (Mr Peter Rainsford) (1216818)	LP306	General Comments	Responses to the survey (clarification added- Wells NP survey) said 172 in favour of more land for industrial or other employment purposes in or around Wells and 112 against. Suggested locations were Maryland 94, more at Egmore 17, carrot wash or other redundant farm buildings 13	Comments noted
ECN1	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP591	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The policy identifies a relatively limited area of existing employment land (under 10ha) that has yet to be development within Fakenham and proposes no new allocations. Table 3 clearly indicates that Fakenham has delivered the highest quantum of employment development within the District and, as such, the town evidently attracts and supports employment growth in the District. This is reinforced in paragraph 13.5 of the draft Local Plan (Proposals for Fakenham), which notes that Fakenham has seen one of the strongest take-up rates of employment land within the District in recent years. Given the emphasis on the town to accommodate a large proportion of growth to reflect its status within the settlement hierarchy, and the scale of housing growth proposed within the draft Local Plan, there is a clear need to identify further employment land within or adjoining the town to support that growth potential. This could be accommodated through the broader development parameters for mixed use development on Land North of Rudham Stile Lane (Proposed Allocation F01/B that lies to the west of Water Moor Lane) and/or on Land East of Clipbush Lane (Site F07), which is currently discounted as one of the alternative sites considered for mixed use by the Council. Site F07 to the east of the town is particularly well located, being immediately adjacent to existing employment land. This site offers an opportunity to deliver employment generating uses, either as a single use or as part of a more extensive mixed use	Noted. The approach to Employment across the District is set out in Background Paper 3 . The 2015 Business Growth and Investment Opportunities Study sets out that the employment land allocated through the LDF (2008) would provide sufficient employment land over the plan period in Fakenham. Therefore, through the Local Plan it is proposed to designate the employment land that was allocated through the LDF. This, alongside the protection of existing employment land should help to offer choice and flexibility to the market over the plan period.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				development and should be reconsidered in conjunction with a more detailed review of potential new employment land allocations for Fakenham. (Refer also to representations in response to Policy DS 6 and Alternatives Considered).	
ECN1	Kingsland Engineering Company Ltd (Mrs Nicola Wright, La Ronde Wright) (1217492 & 1209984)	LP804	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Kingsland Engineering premises at Weybourne Road are no longer fit for purpose. The site at Weybourne Road is ideally located to be allocated for residential development as it is well-situated close to local amenities and facilities and the site benefits from proximity to the neighbouring residential, recreational and leisure uses. Indeed, the site offers the potential to improve the connectivity between the neighbouring land uses. We therefore submit that the site be allocated for residential development. It is a much better alternative than SH18/1A &1B. The site also supports proposed Policy SD3 which seeks to focus larger scale proposals in and around larger settlements. It prioritises the development of previously developed land (brownfield sites) within the built up areas of Selected Settlements.	Noted. Consideration given to Kingsland Engineering site at Weybourne Road for residential growth.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN1)
Objection	2	Broad support for the proposed policy approach. One representation raised the opportunity for further employment land to be allocated at Fakenham given that Fakenham has one of the highest historic take up rates.
Support	2	
General Comments	1	

Policy ECN2 - Employment Areas, Enterprise Zones & Former Airbases

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN2	Broads Authority (321326)	LP806	General Comments	Neatishead airbase is quite close to the Broads. We would appreciate reference to this and something about involving us early on in the process.	Noted: Consider clarification in future iteration of the Plan
ECN2	Environment Agency (1217223)	LP471	General Comments	We recommend this policy would be enhanced by adding another requirement for business development within this policy stating that there will be no adverse impact on ground or surface waters. This is because the policy currently includes amenity issues but does not include water.	Noted: Consider comments in the development the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN2)
Objection	0	Limited responses received - No objections were raised regarding the policy. However, the Environment Agency would like to ensure that ground and surface water is also mentioned in the policy wording and the Broads Authority would like to see reference to Neatishead being in close proximity to the Broads Authority.
Support	0	
General Comments	2	

Policy ECN3 - Employment Development Outside of Employment Areas

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN3	Environment Agency (1217223)	LP473	General Comments	This policy references Bacton Gas Terminal. Bacton Gas Terminal is critical infrastructure for energy supply to the UK. The site is permitted by the Environment Agency and any expansion of the installation would have to be justified before we are allow any variation to the permit. An Environmental Impact Assessment will need to be completed, and consulted upon, before any changes are made at this site.	Noted: Consider comments in the development the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN3)
Objection	0	Limited responses received to this policy - No objections were raised regarding the policy. However, the Environment Agency highlighted that Bacton Gas terminal is permitted by the Environment Agency and that any expansion of the installation would have be justified and subject to an Environmental Impact Assessment.
Support	0	
General Comments	1	

Policy ECN4 - Retail & Town Centres

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN4	Broads Authority (321326)	LP806	General Comments	10.25 – suggest you say ‘Hoveton Town Centre spans Local Authority boundaries and part falls under the Broads Authority Administrative Area’. • 10.46 – needs to mention the Broads. •	Consider clarification in future iteration of the Plan
ECN4	Norfolk County Council (931093)	LP739	Support	The County Council supports the enabling economic growth aim and objective contained within the emerging Local Plan and the need to provide sustainable economic development. 4.2. The Local Plan acknowledges that economic activity rates are lower in the district than the national average and the County Council welcomes the vision of providing accessible better paid local jobs and the aspiration set out in section 10 to broaden the economy to offer a wider choice of employment opportunities and achieve a more balanced economy and population in the future. 4.3. Policy ECN 4 – The County Council supports the inclusion of a Policy for town centres and the objectives of the policy .This policy can work successfully alongside the County Councils Network Improvement Strategies (currently being produced for North Walsham and Fakenham) focussing on transport issues including town centre improvements for all modes of transport. This continues with a town centre first approach in line with the National Planning Policy Framework (2019) (NPPF), for retail, leisure and cultural uses.	Support noted
ECN4	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP757	General Comments	Bullet point 4 of the policy refers to the capacity available to support the proposal and how it seeks to enhance expenditure retention. These are inconsistent with national policy which does not require consideration of need for the proposals. The policy should be amended to make it clear that proposals outside of the designated centres will be subject of an impact assessment and sequential test (taking account of the market and locational requirements of the operator). If these are satisfied permission will be granted	Disagree. The policy is clear that proposals should follow national policies. Support for out of town development is dependent on how it reflects the capacity to support such a proposal i.e. the impact. Impact Thresholds are included in the table within the policy. ADD Impact Threshold header to table in the policy.
ECN4	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP630	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The policy appropriately aims to maintain and enhance the vitality and viability of town centres, particularly given their significance as service centres to support the wider area. However, in growth areas, such as at Fakenham, supporting retail development should be commensurate to the scale and form of development taking place. In this regard, the largest growth proposed at Fakenham lies to the north of the settlement and the scale of development proposed has the potential to support some additional out-of-centre local retail provision. Trinity College supports a policy approach that enables out-of-centre retail provision in conjunction with other development, but proposes that the threshold for Fakenham should provide greater flexibility in order to support the significant growth proposed to the north of the town.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN4)
Objection	0	The approach was largely endorsed by those that responded with only minor amendments put forward for consideration.
Support	2	
General Comments	2	

Policy ECN5 - Signage & Shopfronts

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN5	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP522	Support	Policy ECN5 –Consider impact lighting has on visual amenity.	Comments noted. Consider comment in the finalisation of the Policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN5)
Objection	0	Limited response received to this policy - Support for the policy by the Norfolk Coast Partnership.
Support	1	
General Comments	0	

Policy ECN6 - New-Build Tourist Accommodation, Static Caravans & Holiday Lodges

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN6	Broads Authority (321326)	LP806	General Comments	When you say 'static caravans' do you mean those used for holiday use or for permanent residential use? You might want to state which	Noted: consider clarification in the finalisation of this policy
ECN6	Environment Agency (1217223)	LP475	General Comments	The policy states that new accommodation will be supported where "the proposal is for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3". Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' so are not permitted in Flood Zone 3, and require the exception test in Flood Zone 2, this is because they are very difficult to make safe through raised flood levels. For any caravan site used for short-let or holiday use there should be a reference to the need for any site proposal to provide confirmation that there are adequate warning and evacuation arrangements. If caravan sites in coastal areas are likely to become unsustainable due to increasing flood risk over time, then it would be useful for local plan policies to be open to adaptive measures such as relocation to areas at lesser risk of flooding.	Noted: Consider comments in the development the policy.
ECN6	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP558	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the emerging Local Plan Review for North Norfolk. As a major landowner in the District would wish to continue to engage with Officers and Members about the progress of the emerging Local Plan.. It is recommended that the Council commissions a detailed assessment of Tourist Accommodation and the interrelationship with residential properties. The National Planning Policy Framework (NPPF) recognises at paragraph 83 that planning policies should seek to sustainable rural tourism and leisure developments which respect the character of the countryside. In addition paragraph 172 of the NPPF advises that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It states that the scale and extent of development within these designated areas should be limited. Within this context the Council has proposed the following tourism policies: • • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the emerging Local Plan Review for North Norfolk. As a major landowner in the District would wish to continue to engage with Officers and Members about the progress of the emerging Local Plan. It is stated at paragraph 10.63 that "The Council recognises the importance of maintaining vibrant and active local communities during off-peak tourism months and of striking a	Noted Consider comments in the finalisation of the policies

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>balance between providing permanent housing for local people and providing tourist accommodation to support the local community.” It is considered that this is a key consideration for the emerging North Norfolk District Council Local Plan. It is recommended that the Council commissions a detailed assessment of Tourist Accommodation and the interrelationship with residential properties. The National Planning Policy Framework (NPPF) recognises at paragraph 83 that planning policies should seek to sustainable rural tourism and leisure developments which respect the character of the countryside. In addition paragraph 172 of the NPPF advises that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It states that the scale and extent of development within these designated areas should be limited. Within this context the Council has proposed the following tourism policies: • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Support is given to Policy ECN 7 which provides additional flexibility for the provision of caravans and camp sites beyond settlement boundaries, where the site does not lie within the AONB, to reflect the seasonal nature of this tourist accommodation. Some support is given to the flexibility of the criteria at Policy ECN 6 and ECN 7 for expansion of existing tourist accommodation. Whilst recognised that there is a need to conserve and enhance the AONB it is requested that additional flexibility is incorporated to draft Policy ECN7 to allow for appropriate high quality new tourist development which complies with other relevant Local Plan policies, including Policy ENV 2 ‘Protection & Enhancement of Landscape & Settlement Character’ and Policy ENV 4 ‘Biodiversity and Geology’ to come forward within the AONB, particularly if the accommodation is seasonal in nature. Footnote 93, referenced at Policy ECN7, defines ‘touring caravan and camping sites’ as sites for touring caravan and camping sites, glamping, yurts, tepees and shepherd’s huts. We welcome this definition for clarity. On a more general basis, in respect of sites situated beyond the settlement boundary, it is requested that the Council considers the potential for well-planned tourist accommodation to be located sites along main transport routes and in proximity to public transport links. Again it will be necessary for these sites to comply with other relevant Local Plan policies, including Policy ENV 2 ‘Protection & Enhancement of Landscape & Settlement Character’ and Policy ENV 4 ‘Biodiversity and Geology’. In the interest of farm diversification, we would welcome specific reference within policy to the reuse of appropriate scale agricultural buildings for tourist accommodation where proposals comply with other relevant Local Plan policies. Retaining an Adequate Supply and Mix of Tourist Accommodation In addition the Council is proposing a Policy ECN 9 to seek to retain an adequate supply and mix of</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				tourist accommodation. The Council acknowledges at paragraphs 10.62 of the Draft Local Plan "...that tourist accommodation is sometimes under pressure for conversion, often to residential, particularly in locations where new residential properties are more strictly controlled." The Council should commission evidence base documents which specifically considers the implications of tourism pressures upon existing housing stock and to ensure that sufficient housing planned for to meet the needs of local people.	
ECN6	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP524, 525	Support	Policy ECN6 – (New-Build Tourist Accommodation, Static Caravans & Holiday Lodges), other types of tourist accommodation mentioned the AONB. We would like to see the AONB protected similarly in this policy.	Comments noted. Consider comment in the finalisation of the Policy.
ECN6	Blakeney Hotel (Mr John Long, John Long Planning Ltd) (1216065 & 1216646)	LP227	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Blakeney Hotel has concerns regarding Policy ECN 6 and its potential impact on the Hotel's prospective proposals to expand and provide more tourist accommodation at the Hotel. The Policy specifically requires Hotel development to demonstrate compliance with the sequential approach in accordance with national and local retail policies. It is not clear whether this part of the policy is applicable to just 'new' hotels; or 'all' hotel development including existing hotel business expansion proposals. If it applies to 'all' hotel development including existing hotel expansion it would effectively restrict the Hotel's (and many other hotels not in town centre locations) ability to grow and expand to meet visitor needs. The Policy should be changed to confirm that the sequential test will not apply to existing hotel expansion proposals.	Noted: Proposals for new build and extensions to existing tourism buildings are also covered in ECN8 - Proposals are encouraged within settlements boundary of selected growth settlements first before seeking growth in the countryside.
ECN6	Caravan and Motorhome Club (1218484)	LP790	Support	This representation relates specifically to Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges and Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites. The Caravan and Motorhome Club has two well performing sites in North Norfolk District; the first is Seacroft Caravan and Motorhome Club Site (location plan enclosed); the second is Inleboro Fields Caravan and Motorhome Club Site (location plan enclosed). A brief site and surrounding description is outlined below. Site and Surroundings Seacroft Caravan and Motorhome Club Site is located to the west of the town of Cromer. The site is accessed off Cromer Road to the north, which provides access to the main town of Cromer to the east and West Ruston and Sheringham to the west. The site, circa 3.7hectares (9 acres), provides a total of 135 grass, all-weather and tent pitches. The site also includes internal tarmac roads, a reception/information room, toilets & shower block, a laundry room and a leisure complex comprising bar, restaurant, games room and heated outdoor swimming pool. The site is not only well set back from the road to the north, but it is also well screened by mature trees and hedgerows around the boundary of the site. The site is bound by the train lines to the south and development to the east and west. The area of land just to the east is allocated for mixed use development within the emerging local plan. The	Support noted - consider the proposed alterations to the text and potentially the addition of 'pods' within footnote 90 to ensure these are included within the definition of the policy.

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				<p>site is located within a short walk (15 minutes) from Cromer centre, which provides a wide range of services including restaurants, supermarkets, post office, banks and pubs. Furthermore, regular bus services (every 15 min) provide transport to Cromer (5 minutes) and from there train travel is possible to surrounding larger cities such as Norwich (45min). In respect of this site, the Caravan and Motorhome Club would like to extend its Seacroft Caravan and Motorhome Club Site located at Cromer Road, East Runton, Cromer, NR27 9NH – please find enclosed an indicative site plan for reference. This extension could include additional touring pitches, lodges and camping pods. These are generally small scale, permanent or semi-permanent structures of varying sizes, typically containing a bedroom as well as some cooking facilities and/or bathroom facilities depending on their size. The provision of this type of accommodation ensures that the Caravan and Motorhome Club can continue to meet the changing needs of its members. On this basis, the below policy changes discussed in the ‘Emerging Local Plan’ are sought. Inleboro Fields Caravan and Motorhome Club site is located to west of the Seacroft site, closer to the settlement of West Runton. The site is located within the Links County Park golf course and is accessed from Station Close to the north. The site extends to circa 8.5 hectares (21 acres) and provides a total of 261 primarily grass touring pitches for caravans and motorhomes. The site also includes an information/reception room, shower room, dishwashing area and toilet block. The site itself is well screened on all sides by dense vegetation and has an internal tarmacked circulation road which provides access to the touring pitches. The site is located just a short walk from West Ruston which provides services and facilities for visitors. The nearby towns of Sheringham and Cromer provide a greater range of facilities and services and both can be accessed in less than 20 minutes via a local bus service. In respect of this site, the Caravan and Motorhome Club would like to diversify their offer to provide pods and lodges. The site is well screened and therefore, static pods and lodges will have a limited impact on the surrounding landscape and ecology. There are existing touring pitches and therefore, the diversification to lodges will not impact on the surrounding landscape. On this basis, the below policy changes discussed in ‘Emerging Local Plan’ are sought. Policy ECN 6 is written in respect of existing static caravans and lodges. This policy should also take into account existing touring caravan sites which could diversify and improve their offer, to provide pods and lodges. While it is noted that static lodges can impact on the surrounding landscape, if this is considered appropriately within a submission, in principle the diversification should be supported. As such, the following sentence should be included within Policy ECN 6 or 7: The diversification of touring caravan pitches to static lodges or pods will be supported where:</p> <ul style="list-style-type: none"> • the proposals are for the expansion of an existing business; • there are no significantly detrimental impacts on the area’s landscape, ecology, amenity of neighbouring land uses, and the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network; and • the 	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>site lies outside the Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3 Overall, and considering the above, policies must be sufficiently flexible to allow businesses to adapt to changing economic trends and changes in the demands of tourists. As such, policy will enable the Caravan and Motorhome Club to support the growth of the local economy by ensuring the ability of its existing sites to be developed and enhanced. Overall, this ensures the future viability of the business, and supports the tourist industry within North Norfolk.</p>	
ECN6	Concept Town Planning (1217445)	LP544	Object	<p>Paragraph's 10.44 - 10.50 outline the LPA's support for tourist accommodation. In particular, paragraph 10.49 states that new tourist accommodation will be permitted in areas that can accommodate additional visitor numbers without detriment to the environment. However, Policy ECN6 then restricts this to within the settlement boundary of a selected settlement, if it is for a standalone development. The policy is, therefore, at odds with the supporting text as well as with the NPPF, which supports sustainable rural tourism that benefits the rural economy whilst respecting the character of the countryside. By only allowing tourist accommodation within a settlement boundary, it limits the type of accommodation that can be provided, as well as the experience of visitors to the area as they would only be staying within a built up environment. The fact that a number of proposed new housing allocations in settlements are necessitating extensions to settlement boundaries is further testament to the fact that there is already limited scope for a range of tourist accommodation in these areas. Amend Policy ECN6 to read, "New-build tourist accommodation, static caravans and holiday lodges will be supported where: 1. The site lies within the settlement boundary of a selected settlement or is well related to it."</p>	Noted- consider the wording of criterion 1 and the extent to which this is in conformity with the NPPF
ECN6	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP359	Support	<p>Blue Sky Leisure can support elements of the policy particularly point 3, the support for proposals where they are for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone. However, Blue Sky Leisure is concerned that other elements of this policy will apply to proposals for the relocation /replacement of tourist accommodation outside of the Coastal Change Management Area, (as well as the expansion of existing businesses); that represent further restrictions and burdens additional to those included in Policies SD 11 and SD 12, which incidentally, are also considered to stifle tourism accommodation development, and the application of the 'roll back' approach. As drafted, point 4 of the Policy requires proposals for the 'relocation/replacement' of tourist accommodation schemes to "...demonstrate a net benefit in terms of landscape and ecology." This is a further barrier to tourism development and goes beyond the existing Development Plan policy which requires proposals to demonstrate a minimal adverse impact on surroundings and not a net benefit. Proposed change: Blue Sky Leisure suggests that point 4 of the policy is removed, as it repeats provisions in Policy SD12.</p>	Noted - consider the removal of criterion 4 as this is set out within Policy SD 12

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN6)
Objection	2	Broad support for the proposed policy wording. Representations raised the need to clarify definitions within the policy. One respondent set out that the policy is too restrictive and should be made more flexible.
Support	4	
General Comments	2	

Policy ECN7 - Use of Land for Touring Caravan & Camping Sites

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN7	Environment Agency (1217223)	LP476	General Comments	Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' so are not permitted in Flood Zone 3. We are pleased to see reference to this within the policy. It should be noted that the exception test is required in Flood Zone 2. These can be difficult to make safe through raised flood levels. Appropriate measures should be in place to ensure occupation does not become permanent.	Noted
ECN7	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP558	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</p> <ul style="list-style-type: none"> • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites <p>These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the emerging Local Plan Review for North Norfolk. As a major landowner in the District would wish to continue to engage with Officers and Members about the progress of the emerging Local Plan. It is stated at paragraph 10.63 that “The Council recognises the importance of maintaining vibrant and active local communities during off-peak tourism months and of striking a balance between providing permanent housing for local people and providing tourist accommodation to support the local community.” It is considered that this is a key consideration for the emerging North Norfolk District Council Local Plan. It is recommended that the Council commissions a detailed assessment of Tourist Accommodation and the interrelationship with residential properties. The National Planning Policy Framework (NPPF) recognises at paragraph 83 that planning policies should seek to sustainable rural tourism and leisure developments which respect the character of the countryside. In addition paragraph 172 of the NPPF advises that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It states that the scale and extent of development within these designated areas should be limited. Within this context the Council has proposed the following tourism policies:</p> <ul style="list-style-type: none"> • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites <p>These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Support is given to Policy ECN 7 which provides additional flexibility for the provision of caravans and camp sites beyond settlement boundaries, where the site does not lie within the AONB, to reflect the seasonal nature of this tourist accommodation. Some support is given to the flexibility of the criteria at Policy ECN 6 and ECN 7 for expansion of existing tourist accommodation. Whilst</p>	Comments noted

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>recognised that there is a need to conserve and enhance the AONB it is requested that additional flexibility is incorporated to draft Policy ECN7 to allow for appropriate high quality new tourist development which complies with other relevant Local Plan policies, including Policy ENV 2 'Protection & Enhancement of Landscape & Settlement Character' and Policy ENV 4 'Biodiversity and Geology' to come forward within the AONB, particularly if the accommodation is seasonal in nature. Footnote 93, referenced at Policy ECN7, defines 'touring caravan and camping sites' as sites for touring caravan and camping sites, glamping, yurts, tepees and shepherd's huts. We welcome this definition for clarity. On a more general basis, in respect of sites situated beyond the settlement boundary, it is requested that the Council considers the potential for well-planned tourist accommodation to be located sites along main transport routes and in proximity to public transport links. Again it will be necessary for these sites to comply with other relevant Local Plan policies, including Policy ENV 2 'Protection & Enhancement of Landscape & Settlement Character' and Policy ENV 4 'Biodiversity and Geology'. In the interest of farm diversification, we would welcome specific reference within policy to the reuse of appropriate scale agricultural buildings for tourist accommodation where proposals comply with other relevant Local Plan policies. Retaining an Adequate Supply and Mix of Tourist Accommodation In addition the Council is proposing a Policy ECN 9 to seek to retain an adequate supply and mix of tourist accommodation. The Council acknowledges at paragraphs 10.62 of the Draft Local Plan "...that tourist accommodation is sometimes under pressure for conversion, often to residential, particularly in locations where new residential properties are more strictly controlled." The Council should commission evidence base documents which specifically considers the implications of tourism pressures upon existing housing stock and to ensure that sufficient housing planned for to meet the needs of local people.</p>	
ECN7	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP526	Support	Support	Support welcomed
ECN7	Caravan and Motorhome Club (1218484)	LP790	Support	<p>This representation relates specifically to Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges and Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites. The Caravan and Motorhome Club has two well performing sites in North Norfolk District; the first is Seacroft Caravan and Motorhome Club Site (location plan enclosed); the second is Inleboro Fields Caravan and Motorhome Club Site (location plan enclosed). A brief site and surrounding description is outlined below. Site and Surroundings Seacroft Caravan and Motorhome Club Site is located to the west of the town of Cromer. The site is accessed off Cromer Road to the north, which provides access to the main town of Cromer to the east and West Ruston</p>	Support noted - consider the proposed alterations to the text and potentially the addition of 'pods' within footnote 90 to ensure these are included within the definition of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>and Sheringham to the west. The site, circa 3.7hectares (9 acres), provides a total of 135 grass, all-weather and tent pitches. The site also includes internal tarmac roads, a reception/information room, toilets & shower block, a laundry room and a leisure complex comprising bar, restaurant, games room and heated outdoor swimming pool. The site is not only well set back from the road to the north, but it is also well screened by mature trees and hedgerows around the boundary of the site. The site is bound by the train lines to the south and development to the east and west. The area of land just to the east is allocated for mixed use development within the emerging local plan. The site is located within a short walk (15 minutes) from Cromer centre, which provides a wide range of services including restaurants, supermarkets, post office, banks and pubs. Furthermore, regular bus services (every 15 min) provide transport to Cromer (5 minutes) and from there train travel is possible to surrounding larger cities such as Norwich (45min). In respect of this site, the Caravan and Motorhome Club would like to extend its Seacroft Caravan and Motorhome Club Site located at Cromer Road, East Runton, Cromer, NR27 9NH – please find enclosed an indicative site plan for reference. This extension could include additional touring pitches, lodges and camping pods. These are generally small scale, permanent or semi-permanent structures of varying sizes, typically containing a bedroom as well as some cooking facilities and/or bathroom facilities depending on their size. The provision of this type of accommodation ensures that the Caravan and Motorhome Club can continue to meet the changing needs of its members. On this basis, the below policy changes discussed in the ‘Emerging Local Plan’ are sought. Inceboro Fields Caravan and Motorhome Club site is located to west of the Seacroft site, closer to the settlement of West Runton. The site is located within the Links County Park golf course and is accessed from Station Close to the north. The site extends to circa 8.5 hectares (21 acres) and provides a total of 261 primarily grass touring pitches for caravans and motorhomes. The site also includes an information/reception room, shower room, dishwashing area and toilet block. The site itself is well screened on all sides by dense vegetation and has an internal tarmacked circulation road which provides access to the touring pitches. The site is located just a short walk from West Ruston which provides services and facilities for visitors. The nearby towns of Sheringham and Cromer provide a greater range of facilities and services and both can be accessed in less than 20 minutes via a local bus service. In respect of this site, the Caravan and Motorhome Club would like to diversify their offer to provide pods and lodges. The site is well screened and therefore, static pods and lodges will have a limited impact on the surrounding landscape and ecology. There are existing touring pitches and therefore, the diversification to lodges will not impact on the surrounding landscape. On this basis, the below policy changes discussed in ‘Emerging Local Plan’ are sought. Emerging Local Plan The Caravan and Motorhome Club supports the overarching approach that is being taken through Policy ENC 7 – which reads as follows: The use of land for touring caravan and camping sites will be supported</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>where: 1. the site lies within the settlement boundary of a selected settlement; or 2. the proposal is for the expansion of an existing business; or 3. the site lies outside of the boundary of a selected settlement but does not lie within the AONB, Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3;(94) 4. in all cases there is no significantly detrimental impacts on the area's landscape, ecology, amenity of neighbouring land uses, and the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network. Taking the above points in order, the Caravan and Motorhome Club has no comment in respect of point 1, as it is seeking changes in policy to take into account existing sites more proactively. In terms of point 2, the Caravan and Motorhome Club supports the inclusions which allows for existing businesses to expand to take into account additional growth. In terms of point 3, the Caravan and Motorhome Club largely supports the approach being taken here, however, sites should be considered on a site by site basis. Where landscaping and surrounding vegetation surround sites within the AONB, policy should allow their expansion. The impact of increased caravans on the surrounding landscape will be limited due to the surrounding vegetation. In terms of point 4, the Caravan and Motorhome Club largely supports the approach being adopted here. However, this approach should be replicated for sites within the AONB. If there is no significant impact upon the landscape, ecology and amenity, then development proposals which seek to improve the offer, and thus the local economy, should be supported.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN7)
Objection	0	General support expressed with only minor suggestions raised in regard to the wording of the policy.
Support	3	
General Comments	1	

Policy ECN8 - New Build & Extensions to Tourist Attractions

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN8	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP758	General Comments	New-Build & Extensions to Tourist Attractions Part 1 under Countryside Policy Area should be omitted. There is no need to impose a blanket restriction on development in the AONB, Heritage Coast or Undeveloped Coast parts of the District. The blanket restriction imposed by part 1 is contrary to the NPPF, which expresses support for policies and decisions which enable sustainable rural tourism and leisure developments which respect the character of the countryside.1 In this regard and given the importance of tourism and leisure to the local economy parts 2 and 3 under Countryside Policy Area should be worded much more positively and replaced by the following wording: The scale and design of any new developments are sensitive to the character and setting of the local area	Noted consider comments in the finalisation of this policy
ECN8	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP527	Support	Support	Support welcomed

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN8)
Objection	0	Limited comments received, no substantive issues raised. The approach was broadly supported, however one respondent thought the approach was unduly restrictive in regard to the AONB, Heritage Coast or Undeveloped Coast.
Support	1	
General Comments	1	

Policy ECN9 - Retaining an Adequate Supply & Mix of Tourist Accommodation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN9	Wells Neighbourhood Plan, Questionnaire. (Mr Peter Rainsford) (1216818)	LP446	Object	In respect of 19.3 responding to the question (clarification added - in the wells NP survey)"do you think that tourism should in any way be restricted in and around Wells by controls over development?" 235 responded "yes"(77.8%) and 52 "no" (17.2%). Major reasons given for attempting to limit tourism were: lack of adequate parking (79 first preference, 83 second preference and 39 third preference), damage to natural environment (69 first preference, 40 second preference and 46 third preference), traffic congestion (64 first preference, 87 second preference and 58 third preference). It should be noted that instead of limiting tourism, some respondents preferred managing it, please see full survey attached	Comments noted. The Local Plan is informed by the guiding principles of the NPFF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. Wells is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers to bring forward local solutions to land use planning issues where they are justified by appropriate evidence.
ECN9	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP759	General Comments	To make it clearer that parts 1 and 2 are alternatives to be satisfied rather than both must be satisfied, 'or' should be inserted at the end of criteria	Noted consider comments in the finalisation of this policy
ECN9	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP760	General Comments	As indicated in the Kelling Masterplan, Kelling Estate own and operate the Pheasant Hotel which is the only 4* hotel in the locality with the space to improve and expand its range of facilities and accommodation. It is proposed that the hotel be expanded to provide: • Additional bedrooms; • Conference facilities; • Spa/Pool facilities; • Self-catering lodge accommodation; • Staff accommodation; • Additional car parking The provision of first-class conference and spa facilities will provide an important attraction in North Norfolk which it currently lacks and will improve the year around attractiveness of the venue to business customers and for short stay breaks. As outlined in the Kelling Masterplan a policy for the Pheasant Hotel site should be included in the Local Plan which expresses support for the expansion plans, as outlined below. This will provide a greater degree of certainty for the site owner to bring forward this significant positive new investment in accommodation facilities for North Norfolk with confidence. Policy XXX – Land at the Pheasant Hotel, Kelling Development	Noted consider commentary in the finalisation of the approach to countryside development through large estate management. See also commentary on SD4

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>proposals for the expansion of holiday accommodation, and related ancillary accommodation at the site, as outlined in the masterplan below, will be supported in principle, subject to complying with other relevant policies of the Local Plan. . As outlined in the Kelling Masterplan the Estate has plans to improve the quality of accommodation to meet modern day retail standards and improve the range and quality of products offered for sale. Providing an improved environment in which to display these goods is seen as key to the garden centres future success with improved retail display areas and replacement cafeteria -Holt garden centre is owned by Kelling Estate LLP. . The land to the south-east could accommodate an outside play area and wildlife trail. In addition a new stop could be provided for the North Norfolk Railway line. This could be brought forward in association with a longer walking trail through the estate improving public access to the countryside. The enhanced facilities would be particularly attractive to young families and railway enthusiasts, in addition to the garden centres existing customer base. Policy XXX – Holt Garden Centre Development proposals for expanded and improved facilities at the Holt Garden Centre, as outlined in the masterplan below, will be supported in principle subject to complying with other relevant policies of the Local Plan. We trust that these comments will be duly considered as the NNDC LP progresses. Should you have any further queries please do not hesitate to contact either myself or my colleague Roger Welchman.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN9)
Objection	1	No substantial issues raised. Respondents commented that the plan should be expanded to offer support for specific tourism opportunities.
Support	0	
General Comments	2	

Vision, Aims & Objectives

Vision, Aims & Objectives

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Vision & Aims	National Grid (931752)	LP737	General Comments	No comments to make in response to the consultation	Comments noted
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 2.16 Welcome reference to the character of the area but would be helpful to include specific reference to the natural and historic environment in this bullet point.	Noted - consider amendment to bullet 4 of paragraph 2.16 in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Aims and Objectives. Welcome reference to the character of the area but would be helpful to include specific reference to the natural and historic environment in this bullet point.	Noted - consider amendment to bullet 2 of the Aims and Objectives in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 2.19. Should specifically mention the historic environment and not just conservation areas and listed buildings	Noted - consider amendment to wording of paragraph 2.19 in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Duty to Co-operate: Should Historic England be mentioned in this paragraph relating to the Historic Environment.	Noted - consider amendment of the section regarding the Duty to Co-operate in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 3.8: Historic England would expect to see a comprehensive and robust evidence base and recommend the following are added to the evidence base: <ul style="list-style-type: none"> - National Heritage List for England. www.historicengland.org.uk/the-list/ - Heritage Gateway. www.heritagegateway.org.uk - Historic Environment Record. - National and local heritage at risk registers. www.historicengland.org.uk/advice/heritage-at-risk - Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas) - - Conservation area appraisals and management plans - Historic characterisation assessments e.g. the Extensive Urban Surveys and Historic Landscape Characterisation Programme or more local documents. www.archaeologydataservice.ac.uk/archives/view/EUS/ - Environmental capacity studies for historic towns and cities or for historic areas e.g. the Craven Conservation Areas Assessment Project. www.cravenc.gov.uk/CHttpHandler.ashx?id=11207&p=0 - Detailed historic characterization work assessing impact of specific proposals. - Heritage Impact Assessments looking into significance and setting especially for strategic sites or sites with specific heritage impacts - Visual impact assessments. 	Noted - A comprehensive document library will be compiled for the submission of the Local Plan. Consider Historic England suggested documents for inclusion within the document library.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				- Archaeological assessments. - Topic papers.	
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 3.8 Historic England advocate the preparation of a topic paper in which you can catalogue the evidence you have gathered and show this has translated into the policy choices you have made. It is also useful to include in this a brief heritage assessment of each site allocation, identifying any heritage issues, what you have done to address them avow this translates into the wording in your policy for that site allocation policy.	Noted- Consider the production of a topic paper in regard to the Historic Environment.
Vision & Aims	Historic England (1215813)	LP705	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 4.12 We very much welcome this excellent paragraph on local architectural style and traditions. A good understanding of the historic environment is key to ensuring future development is in keeping with this and builds upon this historic tradition.	Support noted
Vision & Aims	Historic England (1215813)	LP705	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 5.2 Historic England welcomes the paragraph on Climate Change	Support noted
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Protecting the Natural and Built Heritage of the District: Historic England suggest that the word built heritage is changed to historic environment. Historic Environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.	Noted - consider amendment to heading on page 35 in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 5.14: The current preferred term is Registered Parks and Gardens - delete the word historic	Noted - consider amendment to delete the word historic in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 5.14: Consider the inclusion of Felbrigg Hall in this paragraph	Noted- consider the inclusion of Felbrigg Hall in this paragraph in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 5.15 welcome this paragraph	Support noted
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Vision for North Norfolk: Add historic Environment, scheduled monuments and registered parks and gardens to paragraph three	Noted- consider amendment to paragraph 3 of the Vision for North Norfolk in the preparation of the Vision.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 6.3 change un-designated to non-designated in line with the NPPF	Noted- consider amendment to paragraph 6.3 in the preparation of the Aims and Objectives.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Vision & Aims	Norfolk Wildlife Trust (1217447)	LP689	Support	Climate change will result in significant impacts on our native wildlife, in combination with existing pressures from habitat loss and fragmentation. It is important that the plan takes every opportunity to provide for measurable net gains in biodiversity from all new development and contributes to the restoration of landscape scale ecological networks. Provision of green infrastructure can help contribute significantly to this by restoring and creating new ecological corridors between existing wildlife sites, providing opportunities for wildlife to use it to adapt to the changing climate. It is also important to recognise that natural habitats provide important ecosystem services which can contribute to climate change mitigation. The restoration and provision of new habitats, located appropriately, can help sequester carbon emissions. When considering the reduction of emissions from new development, we recommend that the provision of natural climate solutions are seriously considered. We support the statement in 5.2 that 'measures need to be taken to enable wildlife to adapt to future changes' and recommend the role of habitat restoration and creation is considering in climate change mitigation.	Support welcome
Vision & Aims	Norfolk Wildlife Trust (1217447)	LP690	Support	We welcome the inclusion of biodiversity net gain as an objective of the plan. Support the protection and enhancement of the natural environment as an objective of the plan.	Support welcome
Vision & Aims	RSPB (1217391)	LP381	General Comments	The RSPB is pleased to see reference to maintain the District's natural environment. However, there is no specific mention of the protected areas that need to remain important for the wildlife and habitats they support. There should also be mention of enhancing protected areas and important sites for wildlife, rather than simply maintaining them. This would be more in line with the NPPF requirements. Proposed changes: In addition to the AONB, make reference to Natura 2000 and SSSIs which are important for species and habitats, and mention that they will be maintained and enhanced.	Noted- Consider proposed amendments to the vision to include Natura 2000 sites and SSSIs which are important for species and habitats.
Vision & Aims	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP358	Support	Blue Sky Leisure successfully operates a number of tourism related businesses in Norfolk, including lodge, caravan and camping parks at Kelling Heath and at Woodhill, East Runton in North Norfolk district. The business is a significant local employer in the tourist and leisure sector, and employs around 125 people (including seasonal employment) in North Norfolk alone. During 2018, the business welcomed 50,000 staying visitors across its letting accommodation and touring & camping sites (excluding all privately owned holiday homes). These visitors contributed significantly to the local economy. Blue Sky Leisure therefore has a considerable stake in the Local Plan, and in particularly the application of its policies related to economy, tourism, tourism accommodation and coastal erosion. Blue Sky Leisure is pleased to be given the opportunity to comment on the First Draft Local Plan (The Plan). Blue Sky Leisure supports the Plan's acknowledgement (section 5.6-5.7), that North Norfolk's economy is dominated by tourism and the service sector; and that the economic prosperity of North Norfolk is irrevocably linked to the success of the tourism sector. The Council's	Noted- consider amendments to the Local Plan Issues section 'strengthening the local economy' and adding an additional sentence to the North Norfolk Vision along the lines of 'coastal communities and businesses affected by coastal erosion and flooding will have been supported by positive planning policies and decisions to enable their adaptation and relocation where necessary to become more resilient to coastal change.'

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>own evidence suggests that almost 30% of the District's employment is in the Tourism sector which employs over 8,000 full time employees (equivalent) (Economic Impact of Tourism in North Norfolk, 2017). However, Blue Sky Leisure considers that the Plan somewhat underplays the importance that tourism and tourist accommodation businesses are to the District's economic success. Also, the Plan does not fully acknowledge the challenges that tourist accommodation businesses face, including the needs to remain competitive and adaptive, to meet changing customer requirements, to take account of climate change, and to address the impacts of coastal erosion and flooding. The Council's own information (Economic Impact of Tourism in North Norfolk, 2017) shows the importance of overnight visitors to the North Norfolk Economy. In 2017, there was a total of 2,644,000 nights stayed by visitors in North Norfolk, a 9.5% increase on the previous year, with each overnight visitor spending an average of 4.3 nights in North Norfolk, contributing an average of £234.45 per stay to the local North Norfolk economy. Many of the overnight visitors are accommodated in static and touring caravan and camping parks along the coast. The following statistics demonstrate the importance of caravan and camping sites to North Norfolk: Trips by accommodation: • Static caravans: 119,600 19% of total (Joint 1st overall) • Camping 72,500: 12% of total (2nd) Nights by accommodation: • Static caravans: 610,000 23% of total (1st) • Camping: 347,000 13% of total (3rd) Spend by accommodation type: • Static caravans: £27,612,000 19% of total (2nd) • Camping: £19,694,000 14% of total (4th) Also, more recently, the UK Holiday parks and campsites 2019 Economic Benefit report has been released. The report called 'Pitching the Value' from UK Caravan and Camping Alliance (UKCCA) focuses on the economic impact of the sector. It shows that holiday parks and campsites around the UK generate £9.3 billion in visitor expenditure and support 171,448 full-time employees. The headline national statistics are: • Type of accommodation: 76% of visitors had stayed in a touring caravan, motorhome or tent over the course of the year. 16% per cent stayed in a rented or owner-occupied caravan holiday home, while 5% stayed in a rented or owner-occupied lodge/chalet/cottage. • Average group size: The average adult group size was 2.4, and 25% of all groups included children. Where parties were travelling with children, the average number of children in each group was 1.8. Thirty-five per cent of groups brought a pet. • Spending power: Visitors and their party who stayed in rented or touring accommodation spent, on average, £557 per visit (£101 per day), spending, on average, 4.5 days on a holiday park on each holiday. Visitors staying in owned accommodation spent, on average, £480 per visit (£89 per day) and stayed, on average 5.4 days. As a comparison, this is higher than the average daily spend by visitors to the UK at £63 and 3.1 days per holiday. • Health benefits: Health and wellbeing was improved, with visitors reporting doing more exercise and feeling more relaxed when staying on a holiday park or campsite. This is supported by park operators who provide easy access to a variety of sporting activities or support a range of health and wellbeing activities for their visitors.</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>If the national averages, particularly in terms of spending are extrapolated to the findings of the Economic Impact of Tourism in North Norfolk, 2017 findings, then the importance of caravan and camping parks to the North Norfolk economy are even more evident, with visitors to caravan and camping parks (combined) likely to spend more than visitors in other types of accommodation. Without a thriving caravan and camping park sector, the North Norfolk economy will be significantly compromised. Overnight visitors need accommodation options, and expectations continue to increase. Those choosing to stay in holiday parks and camping sites generally want up to date modern facilities, many want to be as close to the coast as possible, with easy access to the attractions it offers. The sector needs to respond accordingly, and needs the Council's support to do so. Blue Sky Leisure, hope that the Council can be more supportive of the holiday park, caravanning and camping sector, through more supportive planning policies and decisions. The emerging Plan as drafted could be far more positive in its support for such businesses. Proposed change: For instance: Blue Sky Leisure, suggests that the Council considers acknowledging more explicitly in the Plan's issues section: 'Strengthening the Local Economy,' the particular challenges that coastal erosion has on the district's tourism industry, particularly in terms of tourist accommodation, and the inevitable need to allow the 'roll back' of coastal tourist accommodation sites to areas less affected by erosion. If the Council is sincere about supporting the continuation of businesses threatened by Coastal Erosion, then the Plan needs to be helpful and proactive in its approach, particularly with regards to environmental enhancement, and understand that relocation is in itself a very costly process. The burden of additional costs or restrictions on existing enterprises may realistically make relocation unviable. The Plan should be more forthright in the need to encourage and support such tourism business. Blue Sky Leisure suggests that the Council consider adding an additional sentence to the Plan's Vision for North Norfolk along the lines of "...Coastal communities and business affected by coastal erosion and flooding will have been supported by positive planning policies and decisions to enable their adaptation and relocation where necessary to become more resilient to coastal change."</p>	
Vision & Aims	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP360	Object	<p>Blue Sky Leisure considers that the Delivering Sustainable Development objective (section 6.2), should be expanded to include provisions for the replacement of businesses at risks from coastal erosion and flooding, not just buildings. Proposed change: For instance text along the lines of "...Managing and adapting to the impacts of coastal erosion and flooding by restricting development in areas where it would expose people and property to risks and facilitating the replacement and relocation of buildings and businesses at risk..."</p>	Noted - consider amending text within Section 6.2
Vision & Aims	Timewell Properties (John Long Planning Ltd.)	LP361	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Blue Sky Leisure considers that the Enabling Economic Growth objective (section 6.5) should be expanded to express support for business affected by coastal erosions and flooding. Proposed change: "... Promoting and supporting economic growth, diversifying and</p>	Noted - consider amending the text within Section 6.5 to express support for business affected by coastal erosion and flooding.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	(1216647 (1216065))			broadening the economic base of the District, enabling inward investment and supporting the growth of existing businesses, and including those affected by coastal erosion and flooding”.	
Vision & Aims	Natural England (1215824)	LP706, 707	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Key Visions and Issues Natural England welcome key visions to maintain the natural environment and improve and/or enhance access to green space. The Plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Aims and Objectives We strongly support the objective to provide biodiversity net gain, including the enhancement of Green Infrastructure (GI) and ecological corridors. We recommend additional wording under protecting character as detailed in table 2 (page 35) of the HRA. We advise that the Planning Authority develops an evidence base for net gain so that biodiversity gains and losses can be calculated. The mechanism of delivery should also be considered including the application of a metric to secure a net gain of biodiversity. Further advice is provided below under Policy ENV 4.	Supported noted: Consider comments in the development of future iteration of the Plan
Vision & Aims	Norfolk County Council: Historic Environment (931093)	LP739	Support	Para 5.15 To be consistent with other parts of the Plan and the Sustainability Appraisal, this paragraph needs to reference the important contribution that non-designated heritage assets make to the character of the District.	Noted:- Consider comments in the finalisation of the policy
Vision & Aims	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP469	Support	We support the vision for North Norfolk and its aims and objectives. We strongly support enhancing and maintaining the unique qualities and character of the landscape and also the provision of net gains for biodiversity. We would like to add that these net gains include Green Infrastructure and ecological corridors and are strategically considered across Local Authority boundaries. We strongly support plans for work to aid understanding of, mitigation of and adaptation to climate change and coastal change and would support further strengthening this wording.	Support welcomed: Consider comments in the finalisation Plan
Vision & Aims	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP610	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports the Plan’s Aims and Objectives. However, the Council may wish to consider a change to the ‘Deliver Sustainable Development’ objective (paragraph 6.2), to specifically acknowledge that the development of greenfield land, in the right location, can achieve sustainable development; and that not all of the District’s development needs will be met on previously/already developed land. In fact, we note that only a limited amount of the District’s development needs will be met on previously/already developed land. The Council may also wish to consider a change to the ‘Protect the Character of North Norfolk’ objective (paragraph 6.3 bullet point 4), so that it is consistent with the Plan’s other design related objectives (Meeting Accommodation Needs (paragraph 6.4 bullet point 3)) and ‘Encourage’ high quality design, rather than ‘Ensure’ it. The Council may also wish to consider a change to the ‘Meet Accommodation Needs’ objective (paragraph 6.4) to acknowledge that accommodation	Support noted. Consider comments in the development of future iteration of the Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				needs will inevitably change over the Plan period, and that the Plan should be flexible enough to deal with changing needs without the need for a fundamental review.	
Vision & Aims	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Recognises the purpose of development management policies in guiding and managing development. However, North Norfolk District Council (NNDC) should take care when formulating these policies to ensure that policy wording is not overly prescriptive, which limits innovation, and site-specific approaches to delivering high quality and locally aligned development proposals that flow from future community consultation. In accordance with the NPPF (paragraph 16d), there is the need for conciseness and clarity to ensure soundness. However, policy wording should allow for a variety of solutions, rather than prescribing one approach that might not work as well for one site as it does for another. Several policies appear convoluted and ambiguous, or attempt to re-write national policy which results in inconsistencies. In some cases, policy wording should be comprehensively reviewed and simplified, with national policy referred to, rather than rewritten. Policies should also be easy to understand and not ambiguous, in accordance with NPPF paragraph 16.	Support noted. Consider comments in the development of future iteration of the Plan
Vision & Aims	Broads Authority (321326)	LP806	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The documents seem generally well thought out and well-presented and clear. Throughout: Would prefer 'Norfolk and Suffolk Broads' or just 'Broads 'Section 4: Perhaps this section can mention the Broads. Although, of course, not covered by this Local Plan, the Broads is still an asset to North Norfolk like the AONB mentioned in 4.6. We note the Broads is mentioned in the vision. What happens outside the Broads can impact on the Broads. • 5.11 to 5.15 – again, whilst acknowledging that the Broads are not part of the area covered by this Local Plan, the Broads is part of North Norfolk and are an asset and the Broads should be referred to in this section especially 5.14. We note the Broads are mentioned in the vision	Support welcomed and comments noted
Vision & Aims	Environment Agency (1217223)	LP440, LP441	General Comments	Paragraph 4.10 We welcome reference to North Norfolk's national and international designations. The section provides a broad overview and detail on the types of designations (for example SSSI, SPA and SACs is not included at this stage. The about Norfolk section could be enhanced by acknowledging the chalk streams that flow through North Norfolk such as the Rivers Wensum, Stiffkey, Glaven, Ant and Bure. There are only 200 chalk streams in the world and most of them are located in South East England. Paragraph 4.11 We welcome the inclusion of this paragraph. We would suggest that the last line of this paragraph could be enhanced by including the addition of "and sea level rise as a consequence of climate change". • Paragraph 5.2 We are pleased to see the inclusion of this section. This section should be expanded to better reflect the severity of the impacts of climate change. North Norfolk have declared a climate crisis, which will affect its residents, businesses and present challenges to the public sector. We would like to highlight the impacts of drier weather on North Norfolk's unique wetland areas and chalk streams	Noted: Consider comments in future iteration of the Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>• We would like to see an ambition to have new development that minimises consumptive water use, harvesting rainfall, re-using grey water and promoting technologies that reduce water use. Paragraph 5.2. This section should be expanded to better reflect the severity of the impacts of climate change. North Norfolk have declared a climate crisis, We would like to highlight the impacts of drier weather on North Norfolk’s unique wetland areas and chalk streams. There are only 200 chalk streams in the world with most located in South East England including the Rivers Wensum, Glaven, Ant and Bure. We would like to see an ambition to have new development that minimises consumptive water use, harvesting rainfall, re-using grey water and promoting technologies that reduce water use. In addition, with more frequent extreme rainfall events, developments will need to be designed to cope with high rainfall events with drainage systems that allow sediment and contaminants to settle out prior to the run-off discharging into the water environment. Climate Change could also impact water quality in watercourses. Prolonged periods of dry weather, and increased demand for water, reduce volumes in waterbodies affecting the ability to dilute contaminants generated through domestic, industrial and agricultural activity. Climate change can also have profound impacts on biodiversity. Part of ensuring climate resilience is finding innovative ways of extending and connecting habitats for wildlife. Biodiversity ‘Net Gain’ should be a central objective. This can be achieved through creating green corridors, woodland and hedgerows, pollinator banks, and new wetland habitat. Green roofs and walls can help to create green corridors. This will bring multiple benefits for wildlife and people. It should be highlighted that climate change can have detrimental impacts for water quality and knock on effects for drinking water and protected sites including local bathing waters. It should be noted that, the local plan should take into account the potential impacts of climate change using the latest UK Climate Projections available at the time. UKCP18 provides new projections for sea level rise. Further information regarding UKCP 18 can be found here https://www.metoffice.gov.uk/research/collaboration/ukcp. The allocation of land for development should be carefully considered in areas close to existing flood zones as these may change in extent as a consequence of future climate change, particularly in coastal areas. Your Strategic Flood Risk Assessment (SFRA) is a crucial tool in helping to determine whether land allocations are likely to be sustainable in the longer term close to these areas. This section could also elaborate that on the matter of industrial development, this can improve the local economy not just financially but by providing innovative resource efficiency strategies that can decarbonise the global economy at the same time, provide improvements to the local environment by investing in improved pollution control systems that are more resilient to climate change impacts.</p>	
Vision & Aims	Environment Agency (1217223)	LP443, 444,445,447,448	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Flood risk will increase over time and there should be a clear objective to take flood risk into consideration early. The vision needs to look at the future big picture and recognise	Noted: Consider comments in future iteration of the Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>that providing the right development types in the right places will be key to ensuring a sustainable future. The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. • Paragraph 5.10 specifically references Shoreline Management Plans (SMP). The plan should ensure funding is secured for flood defence improvements. The SMP policy is aspirational rather than definitive, so whether the defences are raised or reconstructed in the future will be dependent on the availability of funding. The level of funding that we can allocate towards flood defence improvements is currently evaluated through cost benefit analysis, and any identified shortfalls in scheme funding requirements would require partnership funding contributions from other organisations. Therefore, the local plan should note that funding will need to be secured. When determining the location of future development, the local plan should take this uncertainty over the future level of flood protection into account. Considerations should be given to CIL or S106 obligations to support the replacement or enhancement of flood defences for the future. The last sentence of paragraph 5.10 states that “...several properties and community facilities, as well as parts of the A149, are at risk from coastal erosion over the longer term”. The wording here should be strengthened and expanded by referencing the risk of designated bathing water sites being at risk of coastal erosion/flooding too due to cliff stability and water quality. • Para 5.14 should be enhanced to include Special Areas of Protection, Special Areas of Conservation and Ramsar sites In addition, UK BAP priority species and habitats should be included in this section.</p> <ul style="list-style-type: none"> • These are habitats that are identified as being the most threatened, and require conservation action under the UK Biodiversity Action Plan (UK BAP). Priority habitats include: chalk streams (North Norfolk has several chalk streams as referenced earlier in our response , ponds, arable field margins, hedgerows, traditional orchards and wet woodland. These habitats form an essential part of landscape character which brings in tourism as well as being essential for wildlife. A comprehensive list of UK BAP habitats can be found on the JNCC website: http://jncc.defra.gov.uk/page-5706 The plan should reference the need to protect the water environment. The plan should therefore include a specific section on this. • Paragraph 6.2 We are pleased to see the inclusion of this paragraph. Providing green infrastructure and opportunities’ for activities such as dog walking local to development is key to reducing the impacts on sensitive areas such as the North Norfolk Coast. Visitor numbers are having an impact on the quality of the salt marsh habitats which protect our coastline. We are pleased to see that the paragraph also references minimising water use. Water harvesting and grey water re-use should be encouraged for new developments. The last bullet point in section 6.2 could be enhanced to say “minimising water use, protecting water quality and minimising the impacts of air, land, light, and water pollution” in order to protect the environment. The paragraph could be 	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>further enhanced by making reference to Sustainable Drainage Systems (SuDS) within new developments. These will assist with ground water recharge and help protect river systems to name a few benefits. In addition, we would suggest an additional bullet point in this section which states "Ensuring adequate infrastructure and utilities are in place to accommodate new growth and development, and where necessary making improvements to existing infrastructure ahead of development.</p> <ul style="list-style-type: none"> • Paragraph 6.3 The paragraph could be further enhanced by placing a clear emphasis on habitat creation in order to result in biodiversity net gains. The Environment Agency fully supports the creation of green corridors and enhancement of green infrastructure. 	
Vision & Aims	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP572	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The overarching Vision for North Norfolk appropriately identifies key aspirations for 2036 that recognises the need to deliver a diverse and thriving economy, with towns acting as primary employment and service centres for their surrounding rural areas. It also recognises the need to deliver resource efficient residential development to meet local needs, along with the necessary infrastructure and community facilities and services to support long-term sustainability, whilst protecting and enhancing the quality of the natural and built environment. This Vision and the associated core aims and objectives set out within section 6 of the draft document are fully supported by Trinity College.</p>	Support noted.
Vision & Aims	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Effective co-operation The Council provide an overview in section 3 of the draft Local Plan of their approach to co-operation through the Norfolk wide strategic planning forum. This co-operation has resulted in a strategic planning framework for the County and a statement of common ground. We welcome the preparation of this statement, which is a requirement of national policy, and the broad overview of the key concerns facing the County in meeting development needs. However, we note that the current statement does not include evidence as to the delivery of development in each authority and whether there will be any unmet housing needs. The Council state in paragraph 9.18 of the draft local plan that neighbouring authorities have agreed that needs will be met though their local plans, however, it is acknowledged in sub section 6.6 of the statement of common ground that delivery has not kept pace with targets and we are concerned that there may be unmet needs within the County in future and that the Council should not dismiss the need to meet the needs of others at this stage. We would suggest that such details are included in the statement of common ground and that, in line with paragraph 27 of the NPPF this is regularly updated to reflect the current situation in each planning authorities covered by the statement of common ground.</p>	Welcome support . Consider comments in the development of future iteration of the Plan
Vision & Aims	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP609	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports the Vision. It rightly acknowledges that the District's main towns, including Cromer will have been the focus for a significant proportion of the district's development needs; and that the development needs of the district include ensuring</p>	Support noted.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>access to good quality homes, jobs and services and facilities. Pigeon agree that Cromer provides a range of services, facilities, a considerable range of job and leisure opportunities sufficient to meet the day to day needs of residents and visitors without the need to travel long distances, particularly by the private motor car. Walking, cycling and public transport are all viable options for travel for people to meet their day to day needs, with many of Cromer's services, facilities and opportunities within walking and cycling distance of all parts of the town; and for travel beyond the town, regular bus services are available to Holt, Sheringham, North Walsham and Norwich; and regular train Services to Sheringham, North Walsham and Norwich. We also agree that the town has the capacity to accommodate growth in certain locations such as land at Runton Road/Clifton Park, without impacting significantly on landscape character, in areas that are unaffected by flood risk and/or coastal erosion.</p>	
Vision & Aims	CPRE (Mr Michael Rayner) (1204056)	LP295	Object	<p>CPRE Norfolk wants to see a stronger and more ambitious statement on combating climate change than "The challenge for the Local Plan is to devise ways to ensure that the carbon footprint of existing and new development is reduced and to build new developments in a way that adapts to inevitable changes to the climate." We feel this needs to be far more ambitious through establishing a "North Norfolk Rule" for reducing the impacts of Climate Change. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy over the life of the Plan. The Committee on Climate Change effectively mandates this action. The emerging official position requires all of this to be stopped by 2030 and completely removed by 2050: there is an opportunity with the new Local Plan for North Norfolk that this District leads the way in reducing the impacts of Climate Change.</p>	<p>Noted, Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach through the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The Local Plan supports the transition to a low carbon future in accordance with the 2015 written ministerial statement and the Government's new net zero target moving toward net carbon by 2050. Meeting the</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					target by 2050 will require further significant increase in the use of renewable technologies and the switch to low carbon heating such as heat pumps. The Government is consulting (Oct -Dec 2019) on a future homes standard through building regulations that includes options to increase energy efficiency standards for new homes in 2020 and a requirement to ensure future homes to be future proofed with low carbon heating by 2025. Changes in national policy will also need to be considered in the finalisation of this policy

Statutory & Organisations	Number Received	Combined Summary of Responses (Vision, Aims & Objectives)
Objection	12	Many comments welcomed the references to the character of the area, but thought it would be helpful to draw out specific references to the natural and historic environment further and provided some useful suggestions. Specifically Historic England, while supportive of the document wish to see references to more substantial evidence base such as heritage impact assessments and conservation area appraisals, where they advocated a topic paper covering the approach to the historic environment. Other organisations while supportive wished to see further context and stronger statements around climate change, habitat loss & fragmentation and specific references to the protection of European sites, such as Special areas of protection, conservation and Ramsar sites, and other protected areas along with the strengthening of text around coastal change , cliff erosion /stability and adaptation to climate change. References to biodiversity net gain were strongly supported and references to habitat creation to achieve this encouraged, in green corridors and enhanced green infrastructure. Others were keen to ensure the contextual information acknowledged the links between economic growth , tourism and management of the environment and how development needs should be met
Support	13	
General Comments	8	

First Draft Local Plan (Part 1) Comments

Comments on Proposed Sites

(Submitted by Statutory Consultees & Other Organisations)

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Town & Village Proposals

DS1: Proposed Allocations

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS1	N/A	Innova Property Ltd (1217373)	LP364	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: In the assessment of site ownership, the amber colouring is set out as applying to two different scenarios. This should be clarified. We consider that a site put forward where there is more than one owner and there are legal agreements in place such that the site is available as an entity, should be rated green. To do otherwise is unjustified Furthermore, the HELAA confirms our approach: we note that the methodology used in the HELAA (as set out in Central Norfolk Strategic Housing and Economic Land Availability Assessment: Methodology Final, July 2016) confirms that sites in multiple ownerships will not be considered available only where there are no agreements. This methodology was agreed by each of the commissioning LPAs including North Norfolk District Council.	Noted. Consider clarification in future iteration of the Plan
DS1	N/A	Environment Agency (1217223)	LP477 LP478	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. You should be aware of constraints at Ludham, Horning and Gresham WRCs as these are either over or very near to current permitted capacities. Development within these areas needs to be planned with caution and early consultation with the sewerage company will be vital. No development should commence until clear plans are agreed for the necessary sewerage infrastructure improvements. Where possible, development should be limited and shared across other sites. It should also be noted that during the life of this plan other WRCs could reach capacity and appropriate remediation measures might be necessary.	Support noted: Consider comments in the development of future iteration of the Plan
DS1	N/A	Natural England (1215824)	LP725	General Comments	All sites in the boundary of, or within 500m of a protected landscape should undertake a comprehensive Landscape and Visual Impact Assessment to ensure that the development will not detract from the special qualities of the AONB. All proposals should support the objectives set out in the AONB Management as in line with emerging Policy ENV 1. Where a scheme constitutes a major development it should pass the exceptional circumstances text of the NPPF (para 172).	Comments Noted: Landscape and settlement considerations including the potential impact of development on landscape and views, along with a site specific SA have all informed site selections. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
						site assessment. A separate SA has also been published
DS1	N/A	Norfolk County Council (931093)	LP739	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The County Council has been unable to provide the level of technical response on highway, flood risk and surface water management matters at this stage and is therefore having to raise holding objection to the Local Plan as a whole. Further time and full discussion with the District Council is required to identify further evidence required by both the Highway Authority and Lead Local Flood Authority . The County Council looks forward to further working with the District Council on the above matters ahead of any final submission of the Local Plan and hopes that these technical issues can be satisfactorily resolved</p>	Comments noted. The Council has liaised with NCC Highways and LLFA throughout the production of this Plan and evidence base . Updated detailed LLFA comments across 4 sites were received on 16.10.19 and summarised in this schedule. The Council liaised with Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion and access arrangements on all sites as part of the HELAA process and in relation to further technical submissions by land promoters on an ongoing basis throughout the production of this consultation document. Where necessary mitigation measures will be a requirement to offset any potential adverse impact. The Council continues to work with Highways for detailed and technical comments - as agreed a deadline has been set for 11.12.19 for further technical site specific comments.
DS1	N/A	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP530	Object	<p>Policy DS1 – Development in or close to the AONB will need to prove that it’s not in conflict with para 172 NPPF, relevant studies undertaken and in line with our Management Plan. We request no major developments are planned to be sited within the AONB. There is concern about larger allocations around Cromer that we have objected to. We also have concerns over large modern executive style houses on the main coast road. We would prefer minor development of individual houses only in the small villages of the AONB, with larger numbers of houses sited in villages outside of the AONB boundary. No major development in AONB</p>	Comments noted. Consider comment in the finalisation of the Policy. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. Evidence contained within the Housing and Economic Land Availability Study and NNDC Landscape Character Assessment 2019 and background paper 2 detailing service provision have also been used to inform distribution of growth site

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
						assessment and the potential impact on landscape character. Mitigation measures will be a requirement to offset any potential adverse impact
DS1	N/A	Shell Ltd (Mr Daniel Olliffe, CBRE) (1216247 1216246)	LP211	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We support the assessment provided in paragraph 13.2 of the document that Fakenham could support relatively high levels of growth, but fundamentally disagree with the limited nature of the plan in only proposing to allocate three potential sites for additional growth, especially given that one of these sites (Land North of Rudham Stile Lane) is strategic in nature and dependent upon the delivery of an existing strategic allocation before development on the site can commence. It is considered that the Plan fails to adequately appropriately assess alternative sites and does not provide sound reasons as to why alternative sites are not considered appropriate. This is particularly relevant with respect to our client's site at Creake Road and further comments on this matter will be made in relation to the 'Alternatives Considered' consultation document.	Noted. Consider comments in the finalisation of the policy. The council is charged with providing sufficient sites to meet identified need. Policies H0U2, SD2 and SD3 set out the distribution and type of development required and Policy DS1 seeks to allocate sites required from these policies. The detailed methodology undertaken is set out in Background Paper 6.
DS1	N/A	Norfolk Land Ltd, Mr A Presslee (1216618 1216614)	LP378	Object	North Walsham is identified as a 'Large Growth Town' in the proposed settlement hierarchy, in which the plan proposes "a high level of growth". Other large growth towns are Cromer and Fakenham. The Draft Plan proposes two new residential allocations totalling some 2,150 dwellings split between site NW01/B (350 dwellings on land at Norwich Road/Nursery Drive) and site NW62 (1,800 dwellings and associated development known as the 'North Walsham Western Extension'). The Council's Annual Monitoring Report (December 2018) indicates that the North Walsham Ward has seen 333 housing completions between 2012/13 and 2017/18 (i.e. broadly since the adoption of the Site Allocations Plan), at an average of 55.5 dwelling completions per annum. What – therefore – are the Council's expectations for the delivery of substantial proposed allocation/s over the next decade? The draft plan notes that: "A large-scale allocation such as this will be complex, however, it is expected that it will be substantially completed during the Plan period". (paragraph 16.37). This is certainly over-optimistic. Experience suggests – including in the current Core Strategy's allocation of a single large site in Fakenham (which has yet to deliver any houses), and elsewhere in Norfolk – that an "all eggs in one basket" (large, complex, multi-use sites) approach almost inevitably leads to considerable delay in delivery (if delivery at all), especially in locations where viability, house prices and return to landowner/developer, and/or where demand by house buyers is less robust. Whilst acknowledging the ability of North Walsham to accommodate a significant proportion of new development, commensurate	Noted: The distribution of growth is informed by the guiding principles of the NPPF , including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing , jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					with its status as a Large Growth Town, the Draft Plan looks to allocate what we consider to be a disproportionately high number (including those late, additional extensions arising from amendments to Government methodology and guidance). It would be more sustainable to provide some of this additional housing elsewhere. We have indicated in these representations that this should include the additional site available at Horning Road, Hoveton.	
DS1	N/A	Norfolk Land Ltd, Mr A Presslee (1216618 1216614)	LP378	Object	The impression one gains is that the NW62 site's proposed allocation is led by a desire to secure a link road rather than to meet substantial un-met or predicted housing demand in North Walsham. The site's distance from the bulk of existing services/facilities (although it is acknowledged that others are planned) means that there will a high probability of reliance upon the car for everyday movements. It is notable that the NW01B site was latterly expanded (by 7 hectares to 18.6 hectares to increase the allocation from 160 to 350 dwellings), and the NW62 site's density increased to accommodate 1800 houses in lieu of 1500 in the draft Plan, arising from amendments to Government methodology and guidance and the necessity to increase planned housing numbers (ref. North Norfolk Council's Planning Policy and Built Heritage Working Party papers of 02 November 2018). Whilst acknowledging the ability of North Walsham to accommodate a significant proportion of new development, commensurate with its status as a Large Growth Town, the Draft Plan looks to allocate what we consider to be a disproportionately high number (including those late, additional extensions arising from amendments to Government methodology and guidance). It would be more sustainable to provide some of this additional housing elsewhere. We have indicated in these representations that this should include the additional site available at Horning Road, Hoveton.	North Walsham is the largest town and a sustainable location with good transport links to Norwich and offers a wide range of local employment. A number of infrastructure improvements are required in North Walsham and this quantum of growth provides the opportunity to address these through plan made growth.
DS1	N/A	Norfolk Land Ltd, Mr A Presslee (1216618 1216614)	LP377	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Holt is identified as a 'Small Growth Town' in the proposed settlement Hierarchy, in which the Plan proposes what it terms "relatively modest scale growth over the Plan period (the others being Stalham, Wells, Hoveton and Sheringham)." The Draft Plan proposes three new residential allocations totalling some 330 houses. However, some 300 of these (proposed site allocations refs. H04 and H20) are located on what might be described as the 'wrong' side of the A148 bypass: living here would necessitate longer journeys (most likely by car as there is no safe means to cross the A148 by foot/cycle) to access the Town's principal services and facilities.	Noted. Comprehensive site assessment has been undertaken on all sites, covering but not limited to environmental and highways impacts. Further details are set out in published Background Paper 6. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement to provide enhanced pedestrian access improvements.

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS1)
Objection	6	NCC Highways and NCC Lead Local Flood Authority (LLFA) initially raised a holding objection requesting further time to consider the plan. LLFA have subsequently removed their objection (LP739) and NNDC have agreed with NCC Highways for an extension of time to allow Highways further time to work through the detailed site specific technical comments. Anglian Water, EA, LLFA, Minerals and Waste all recommended consideration be given to the use of additional phrases in the policy wording to address their concerns on appropriate sites. Concern from Norfolk Coast Partnership over major development in AONB, and Natural England suggested that all proposals should support objectives in AONB Management plan. Alternative site promoters suggested that Fakenham could accommodate more growth through additional site allocations. But others are concerned that too much proposed in North Walsham and Holt.
Support	2	
General Comments	1	

Proposals for Cromer

DS2: Land at Cromer High Station

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS2	C07/2	Anglian Water (1217129)	LP380	Support	Policy DS2 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water. However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. To be effective it is suggested that wording be amended as follows: 'details of any required enhancement to the foul sewerage network'.	Support noted: Consider comments in the development of the policy.
DS2	C07/2	Environment Agency (1217223)	LP478	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • Paragraph 12.9 We have no concerns for West Runton Water Recycling Centre (WRC). We welcome that the plan acknowledges the need for upgrades to waste water infrastructure where required.	Support noted.
DS2	C07/2	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – 'safeguarding', in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply	Noted:- Consider comments in the finalisation of the policy
DS2	C07/2	Norfolk County Council: Norfolk Property Services (931093)	LP739	Support	Land at Cromer High Station. NPS support the inclusion of the land at Cromer High Station, which is owned by Norfolk County Council. As the site is well suited for residential development, NPS Property Consultants as agents for Norfolk County Council has recently submitted an outline planning application for residential development on this land, which is currently being processed by NNDC. The proposal has been carefully designed to be broadly consistent with the requirements of policy DS 2 of the 'emerging' Local Plan	Supported noted
DS2	C07/2	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly</p>	<p>approach across all proposed allocations within the plan.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					conveys the key policy intentions. By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS2)
Objection	1	General support expressed. Support received from the landowner. Historic England sought consistency in approach to heritage assets. Anglian Water, Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording.
Support	3	
General Comments	1	

DS3: Land at Runton Road / Clifton Park

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS3	C10/1	Anglian Water (1217129)	LP383	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy DS3 refers to applicants being required to provide an appropriate site layout which minimises the odour and site disturbance from Cromer Water Recycling Centre. There is a risk that odour and amenity issues could arise leading to restrictions on the continued use of Anglian Water's existing water recycling infrastructure. From the information that we have relating to this site it appears that a significant part of the site is at risk from odour from the normal operation of Cromer Water Recycling Centre. As such we would recommend a detailed odour risk assessment be undertaken for this site before it is allocated for housing as proposed. Policy DS3 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. To be effective it is suggested that wording be amended as follows: 'details of any required enhancement to the foul sewerage network'</p>	Support noted: Consider comments in the development of the policy.
DS3	C10/1	Environment Agency (1217223)	LP478	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • Paragraph 12.9 We have no concerns for West Runton Water Recycling Centre (WRC). We welcome that the plan acknowledges the need for upgrades to waste water infrastructure where required.</p>	Support noted
DS3	C10/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	<p>The following wording should be included in the allocation policy - 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</p>	Noted:- Consider comments in the finalisation of the policy

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS3	C10/1	Norfolk County Council: Children's Services (931093)	LP739	Support	<p>In order to accommodate expected children from new proposed housing in Cromer of around 900 dwellings (total growth 2016 – 2036), Children's Services using its pupil multiplier have calculated that up to an additional 1 form of entry may be required within the primary sector of the Town over the Plan period (up to 2036). The proposed development at Clifton Park/Runton Road with the "offer" of a 2ha site gives Children's Services the opportunity to consider its policy preference of all-through primary school provision for the Town of Cromer. The serviced site will need to have provision for pre-school facilities if required for the local area. A future strategy for Cromer could be 2 x 2FE primary schools to enable families in Cromer to have a choice either to the north or south of the Town. At this stage it is beneficial to secure a site early in the Local Plan process to enable Children's Services to assess/review primary education delivery in Cromer. Notwithstanding the above comments, there are uncertainties as to how in practice the offer of a primary school could be delivered both in terms of:</p> <p>a. Securing adequate finance through developer contributions for the school site and its build; and</p> <p>b. Planned in a timely i.e. site is available / could be released at the appropriate time.</p> <p>These issues will need to be resolved ahead of the County Council being able to fully commit to supporting the above site. County Council Officers will be progressing these issues with North Norfolk DC through the Local Plan process. Therefore while the County Council can support the safeguarding of a potential school site they cannot as yet commit to building a new school for the above reasons.</p>	Noted. Clarification welcomed. The Council has used current evidence base and engaged with relevant bodies including Children's services to identify where additional supporting infrastructure may be required as a result of new development and it is recognised that there is a requirement for further ongoing dialogue to support any final policy position. Consider comments in the finalisation of this policy
DS3	C10/1	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS3	C10/1	Norfolk Wildlife Trust (1217447)	LP694	Object	We object to the inclusion of this allocation due to the wildlife value of this site, which anecdotal records indicate supports important bird and plant assemblages. We note other consultees' concerns that this would effectively join Cromer and East Runton, and in addition to the loss of habitats it would effectively create a barrier for wildlife movement from the coast to the countryside inland for some distance in both directions. Proposed changes: We strongly recommend that this potential allocation is not pursued further, as it would be contrary to the draft environment policies set out in the plan.	Noted- consider the status of the site within the emerging local plan in regard biodiversity.
DS3	C10/1	Innova Property Ltd (1217373)	LP364	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: 1. Selection of this site goes against the long held desire to maintain an undeveloped gap between Cromer and E. & W. Runton – this is ignored in the Conclusion.2. A school in this location would confirm and compound the joining of Cromer with East Runton 3. The site is currently a valued space for informal recreation 4. The conclusion suggests The site scores positively in the Sustainability Appraisal. This statement applies to many other Cromer sites, including those not identified as Preferred Options, for example: C11; C18; C19; C19/1; C34; C44. Furthermore, the summary assessment in the SA is inconsistent – see detailed comments on SA. 5. The conclusion suggests “This is considered to be one of the most sustainable and suitable of the Cromer alternatives”. There is no evidence for this conclusion, particularly as it is noted as not being in walking distance of schools and has risk of flooding.	Concerns Noted. Consider feedback in the finalisation of proposals. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10 of the emerging LP and detailed in Background Paper 6 - Development Site Selection methodology. The site is proposed to be allocated for mixed used development including the provision of 2 hectares of serviced for a two-form entry primary school with a potential reserve site for future expansion.
DS3	C10/1	Norfolk & Norwich Naturalists' Society Chapman, Mr Carl (1217974)	LP672	Object	The site occupies an area of rising ground on the Holt-Cromer ridge. We consider that the site is likely to be of high importance to landfalling migratory bird species, including a number of BOCC Amber and Red List breeding species and also BAP (Sch41) Priority Species and the scrub habitats offered by the site create one of only a handful of such 'safe havens' on the north-east Norfolk coastal hinterland; other than the area around Beeston Bump and Common, this is the only significant undisturbed and undeveloped stretch of coast between Cromer and Sheringham. The site also supports breeding populations of species of local interest such as Lesser Whitethroat and Garden Warbler along with more 'common' bird species such as Dunnock (a BOCC4 Amber Listed species). The areas of dense scrub in the north of the site, and the mosaic of patchy scrub and grass being of particular	Noted. Concern is noted about the impact on biodiversity/wildlife. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and geodiversity and continue to work with site promoters to take into account biodiversity and geodiversity features.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>important in this regard as these habitats offer both safe nesting habitat and foraging opportunity in the open areas of grassland. Although until around 20 years ago the site was under arable cultivation, the very light sandy soils leach nutrients rapidly, and the site now supports areas of the Acid Grassland BAP (Sch41) Priority Habitat, supporting species such as sheeps sorrel <i>Rumex acetosella</i>, wavy hair-grass <i>Aira caryophyllea</i> (an axiophyte of local conservation interest) and lesser hawkbit <i>Leontodon saxatilis</i>, along with areas of more circumneutral grassland supporting yellow oat-grass <i>Trisetum flavescens</i> and rest-harrow <i>Ononis repens</i>. The more open and disturbed areas of grassland, particularly in the southern part of the site support a plethora of 'rare' and declining species of annual clovers including hare's-foot clover <i>Trifolium arvense</i>, knotted clover <i>Trifolium striatum</i> and clustered clover <i>Trifolium glomeratum</i> (a nationally scarce species), with the population of these numbering in the thousands rather than hundreds. The more open grassland habitats are also notable for supporting hundreds of plants of common cudweed, <i>Filago vulgaris</i>, a species which is considered Near-Threatened nationally and which is a species of conservation concern in Norfolk. There is also potential for plant species such as <i>Ornithopus purpusillus</i>, <i>Cerastium arvense</i>, and <i>Cerastium semidecandrum</i> to be present, these having been recorded in similar habitats in the immediate local area. As with loss of habitat used by breeding and landfalling bird species, it would not be possible to mitigate for development impacts upon the grassland habitats nor upon the uncommon species they support. We consider that Mill Lane, that bisects the site E-W is likely to be an important bat flyway and may be used by local bat populations seeking to access sheltered foraging in the lee of the coastal cliffs. The railway line to the south should be regarded as a key wildlife corridor. We consider that the site is also very likely to support common species of reptiles. It would not be possible to mitigate for the loss of the important habitats and loss of species interest should the site be formally allocated for development. Should NNDC wish to see site notes, species lists etc. then these could be provided on request.</p>	Mitigation measures will be a requirement to offset any potential adverse impact.
DS3	C10/1	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP607	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: This site allocation incorporates the provision of serviced land for a new two form-entry primary school which has been identified by the Education Authority and justification is set out in the IFS. The policy rightly does not specify the location of the proposed school within the allocation. However, the delivery of the school site has been the subject of</p>	Support Noted. Welcomes further information in Delivery Statement and Environmental Report. Consider comments in the development of the policy.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>extensive discussions with the Education Authority and the position of the school site as shown on the Concept Masterplan, which accompanies these representations, has been agreed with NCC(Education). The site fronts onto Runton Road to the north with good vehicular access options. The site is located adjacent to existing built form at Clifton Park to the east and therefore forms a natural extension to Cromer forming an important gateway into the town. It is therefore appropriate that its development is carried out sensitively to ensure the creation of a high quality gateway to the west of Cromer and this will be achieved through the provision of public open space along the site frontage which will include SUDS ponds and landscaping to create a green gateway to the site with buildings set-back from the A149. On this basis we support Part 1 of the site-specific requirements (i.e. careful attention to site layout, building heights and materials in order to minimise visual impact), which is reflected in the Concept Masterplan, which forms part of this submission. The site is allocated for a mix of uses comprising approximately 90 new homes as well as land for significant community infrastructure in the form of the primary school land and public open space. The requirement for the primary school land is accommodated within the accompanying Concept Masterplan, which includes a 2.2 ha site for a two form-entry primary school, with space for a pre-school should this be required in the future, and a further 0.4 ha of land for possible future expansion of the primary school in order to future proof the school site (further details are provided in the accompanying Delivery Statement). As stated above, the scheme will provide public open space (incorporating SUDS features and landscaping) along the site frontage to create a high quality green gateway to the town, with buildings set-back from the A149 thereby addressing the requirement under Part 2 of the draft policy to retain an open frontage to the site. As such we support Part 2 of the policy, provided there is adequate flexibility in the requirements of the policy to ensure that all aspects of the scheme can be delivered without compromising the quality and form of development. As such the Council may wish to consider a minor amendment to the draft policy to clarify this. The requirement set out in Part 3 relates to setting out the development in the most appropriate manner to mitigate impacts from the adjacent railway line and water recycling centre. These features have been considered as part of the preparation of the Concept Masterplan and do not represent a constraint to delivery of the scheme. Further information is provided in the</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>accompanying Delivery Statement and Phase 1 Desk Study Environmental Report, which is appended to the Statement. Part 4 of the policy refers to the need to provide a 'landscape buffer' between new development and the public footpaths running though the site. This requirement has been incorporated within the scheme design by providing public open space around bridleway BR22 to create a green corridor. The Council may wish to consider amending the wording of part 4 of the policy to specifically include the publicly maintainable rights of way, notably bridleway BR22 and footpath FP16 for the sake of clarity. It is accepted, based on the information in the IPS, that improvements to the foul sewerage network may be required. This is reflected in Part 5 of the policy and any associated costs will be secured by the scheme under Anglian Water's standard charging regime. The Council may wish to consider clarifying this and updating the policy to state that improvements to the foul sewerage network will be secured under Anglian Water's standard charging regime. Based on the assessment above, we support the identification of land at Runton Road / Clifton Park for the mix of uses set out in policy DS 3 and confirm that site can be delivered in accordance with the emerging policy. We would also highlight that the site includes sufficient space within the school site to accommodate a pre-school, should this be required in the future. The Council may wish to consider the following minor changes set out in bold below: "Land amounting to approximately 8 hectares is proposed to be allocated for mixed use development comprising approximately 90 dwellings inclusive of affordable homes and self-build plots, public open space, the provision of 2 hectares of serviced land for a two-form entry primary school with a potential reserve site for future expansion, and associated on and off site infrastructure. Development proposals would need to comply with a number of policies elsewhere in this Plan and the following site-specific requirements: 1. Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development; 2. Retention of an open frontage to the site (which may include SUDS ponds and landscaping); 3. A layout of development which minimises the potential for noise and odour nuisance originating from the adjacent railway line and Water Recycling Centre; 4. A layout that provides a landscaped buffer between the development and the public bridleway BR22 running through the site and between the development and public footpath FP16 and a landscaped buffer along the southern boundary; and, 5. Enhancements to the foul sewerage network</p>	

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					capacity may be required. Any such enhancements will be secured in accordance with Anglian Water's standard charging regime. "	
DS3	C10/1	Suffield Park Infant & Nursery School, Mrs Nichola Stewart (1218488)	LP792	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Concerns over the planned school on Runton Rd are follows: • Previous housing development has not led to increased numbers of primary school children as most of these houses have not been affordable for families. For example there are currently no children attending school from the Roughton Rd development. Some are used as holiday homes. • The school's current capacity is for three form entry with a pupil admission number in each year of 90. This is mirrored in Cromer Junior School. • At present there are only 60 children in each year group and this is the projected figure for the next three years, therefore building another school would potentially make all three schools unsustainable. • It appears part of the reason for families not residing in these new developments is the lack of well-paid employment opportunities locally • The cost of transport to employment elsewhere is prohibitive therefore making it unaffordable to reside in Cromer</p>	Noted. Consider comments in the development of the policy. The Council has used current evidence base and engaged with relevant bodies including Children's services to identify where additional supporting infrastructure may be required as a result of new development and it is recognised that there is a requirement for further ongoing dialogue to support any final policy position.

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS3)
Objection	5	Feedback focused on concerns over development on land considered to be an important gap between Cromer and East Runton and the potential adverse impact on important biodiversity. Objection from Norfolk Wildlife Trust and Norfolk & Norwich Naturalists' Society. NCC Children Services have advised that provision for an additional primary school on this site is welcomed but comment that there are uncertainties as to how in practice the offer of a primary school could be delivered, and will need to work with North Norfolk DC going forward. Suffield Park Infant & Nursery School concerned that a new school is not required and would impact on the existing schools in Cromer. Support received from the landowner who has submitted further information including a Delivery Statement and Environment Report. Anglian Water raised concerns over odour and recommended that an odour risk assessment should be undertaken. However EA have raised no concerns. NCC Minerals and Waste provided supporting comments to add appropriate site policies. Historic Environment sought consistency in approach to heritage assets.
Support	3	
General Comments	2	

DS4: Former Golf Practice Ground

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS4	C16	Anglian Water (1217129)	LP386	Support	Policy DS4 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage should be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Noted: Consider comments in the development of the policy.
DS4	C16	Environment Agency (1217223)	LP478	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • Paragraph 12.9 We have no concerns for West Runton Water Recycling Centre (WRC). We welcome that the plan acknowledges the need for upgrades to waste water infrastructure where required.	Support noted
DS4	C16	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS4	C16	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions. a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity,</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					provide greater protection to the historic environment and the policies will be more robust.	
DS4	C16	Innova Property Ltd (1217373)	LP364	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: 1. The walk to Roughton Rd train station appears outside what would be considered an easy walking distance. A measurement “as the crow flies” shows the site is c. 1.3 km distant and the actual walking route appears much greater than this. 2. Local knowledge describes this site as having unstable ground due to the presence of below ground water channels.</p> <p>3. The Proximity to SAC and SSSI is “less than 400m”. Other sites are less than this. 4. The site is within both the AONB and the undeveloped coast: other sites not within undeveloped coast. 5. The conclusion suggests The site scores positively in the Sustainability Appraisal. This statement applies to many other Cromer sites, including those not identified as Preferred Options, for example: C11; C18; C19; C19/1; C34; C44. Furthermore, the summary assessment in the SA is inconsistent – see detailed comments on SA. 6. The conclusion suggests “This is considered to be one of the most sustainable and suitable of the Cromer alternatives”. There is no evidence for this conclusion, particularly due to distances to train station and from SAC, risks of flooding and contamination.</p>	Noted. Consider comments in the development of the policy. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10 of the emerging LP and detailed in Background Paper 6 - Development Site Selection methodology.
DS4	C16	Norfolk Land Ltd, Mr A Presslee (1216618 1216614)	LP375	Object	<p>Cromer is identified as a ‘Large Growth Town’ in the proposed settlement hierarchy, in which the plan proposes “relatively large scale growth” together with North Walsham and Fakenham. The Draft Plan proposes four new residential allocations totalling some 590 dwellings. Whilst acknowledging the appropriateness for Cromer – as a Large Growth Town - to accommodate significant additional housing growth to meet identified need – including a proportion of specialist elderly/care provision in the case of site C16 (Former Golf Practice Ground on Overstrand Road) - there is a question mark about the suitability of this site. It is notable that the site was a late addition to the draft Plan, arising from amendments to Government methodology and guidance and the necessity to increase planned housing numbers (ref. North Norfolk Council’s Planning Policy and Built Heritage Working Party papers of 02 November 2018). It is a large site (contributing – at approximately 180 houses – nearly a third of Cromer’s overall provision), and its sustainability appraisal (environmental score) was ‘mixed’. It is our contention than rather than look to allocate a site that is evidently unsustainable in the terms of its</p>	Comprehensive site assessment has been undertaken on all sites, covering but not limited to environmental impacts. Further details are set out in published Background Paper 6. Assessment has been informed by site specific sustainability appraisal. The proposed allocation would need to comply with all relevant policies in the Local Plan in order to secure planning permission including but not limited to those on the natural environment.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					certain impacts upon the character and appearance of the AONB (simply to 'make up the numbers' and in a last-minute attempt to secure enough new houses in one of the Large Growth Towns), and in the absence of other suitable and available sites here, it would be more sustainable to provide this level of additional housing elsewhere. We have indicated in these representations that this should include the additional site available at Horning Road, Hoveton	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS4)
Objection	3	Limited response received. Some objections were based around the preference for an alternative site. They raised concerns over the potential impact on the natural environment, the AONB, and the close proximity of the site to the SAC and SSSI. Presence of unstable ground and the distance of the site to train station, and suggest that other alternative sites would be more appropriate. Historic England sought consistency in approach to heritage assets. Anglian Water, Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording.
Support	2	
General Comments	1	

DS5: Land West of Pine Tree Farm

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS5	C22/1	Anglian Water (1217129)	LP429	Support	Policy DS5 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS5	C22/1	Environment Agency (1217223)	LP478	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • Paragraph 12.9 We have no concerns for West Runton Water Recycling Centre (WRC). We welcome that the plan acknowledges the need for upgrades to waste water infrastructure where required.	Support noted
DS5	C22/1	Natural England (1215824)	LP726	General Comments	NE is very concerned about allocation C22/1 and recently objected to this proposal (note site is subject to a separate planning application, NNDC added) (our ref: 279055, dated 22nd May 2019) on the following grounds: · The proposed development will significantly impact the special qualities of the Norfolk Coast Area of Outstanding Natural Beauty (AONB) · The proposal is contrary to local Plan policy, fails to pass the exceptional circumstances text of the NPPF (para 172) and does not support the objectives set out in the AONB Management Plan Natural England have strong reservations about the sustainability of the proposal and creeping urbanisation into a protected landscape.	Comments noted: The site is subject to a separate planning application ahead of any allocation. Landscape and settlement considerations including the potential impact of development on landscape and views, along with a site specific SA have all informed site selections. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. A separate SA has also been published
DS5	C22/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	
DS5	C22/1	Historic England (1215813)	LP705	Object	<p>Whilst there are no designated heritage assets on site, this site surrounds 3 sides of the grade II listed Pine Tree Farmhouse. Part of the house probably dates from the 17th century, with the roof having been raised and additions made in the late C18. The house is of painted flint and brick with a Belgian tile roof. Broadly rectangular in plan, the farmhouse has extensions to rear under catslide roofs.</p> <p>Any development of the site therefore has the potential to impact the setting of the grade II listed building.</p> <p>We would suggest that built development is confined to the northern half of the site with the southern portion of land being used for sports facilities, allotments and public open space to retain a sense of openness and connection between the farm and the wider agricultural landscape beyond. We welcome the reference to the listed building at paragraph 12.36 and in criterion 1 of policy DS5. However, we suggest that the wording of policy DS5 is strengthened to read,</p> <p>'Preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping. The southern half of the site should be left open and used for allotments, public open space and sports facilities and the eastern boundary of the site, adjoining the farmhouse should be carefully landscaped.'</p> <p>We also recommend the inclusion of a diagram within the Plan to indicate these (and any other) broad principles for the site.</p>	Noted - consider confining development to the northern half of the site with the southern portion of land being used for sports facilities, allotments and public open space and consider strengthening the wording of Policy DS 5 to read 'Preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping. The southern half of the site should be left open and used for allotments, public open space and sports facilities and the eastern boundary of the site, adjoining the farmhouse should be carefully landscaped.' Consider the inclusion of a diagram within the Plan to indicate these broad principles of the site.
DS5	C22/1	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS5	C22/1	Norfolk Wildlife Trust (1217447)	LP695	General Comments	We support the proposed stand-off distance between any new development and existing woodland and hedgerow habitats, which if designed with appropriate new habitats (such as new scrub or woodland) will buffer the existing habitats from noise and light pollution from the new dwellings. Sufficient on-site green infrastructure should also be provided to reduce impacts from visitor pressure on the woodland. Woodland and hedgerow habitats within the site boundary need preserving and safeguarding from any impacts of development.	Noted- consider the inclusion of a key development consideration in regard to the provision of green infrastructure to further buffer the proposed allocation from the existing woodland and hedgerow habitats.
DS5	C22/1	Innova Property Ltd (1217373)	LP364	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Town proposals We note from para. 11.7 that the Council has done “some initial work”, but para 11.9 suggests “a detailed site assessment of each of the options has been completed”. The two statements do not seem consistent. Para. 11.10 notes that “Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal,” and refers to the methodology set out in the “Background Paper 6 - Site Selection Methodology and results.” Paragraphs 11.11 and 11.12 of the Draft Local Plan confirm that the decision on whether a site should be proposed as a draft allocation was made on the basis of the Background Paper 6 and that “as a result the Council is satisfied that the types of development proposed are likely to be deliverable”. However, in relation to para. 11.12 of the Draft Local Plan, we see no evidence in the Background Paper 6 or elsewhere that a site proposed only for housing (C22/1) has been either assessed or been demonstrated to be able to deliver sports facilities. If there is a need for such facilities, other sites too should have been assessed for such potential, but this does not appear to have been the case. Similarly, Paragraph 12.11 suggests the four sites proposed in Cromer are intended to deliver “...two residential care homes...” but it does not appear that any sites were specifically assessed for suitability or delivery of this use, and none of the proposed town policies specify a residential care home. We find inconsistencies in approach in relation to the three Large Growth Towns which are not adequately explained by the location being in or outside of AONB. For example Para 12.8 of the Draft Local Plan suggests, in relation to Cromer, that one of the main considerations influencing the suggested location of development sites is the need to “ensure a choice of medium sized sites are available to improve the prospects of delivery” This statement does not appear borne out. There is no evidence for why this suggested approach is only used for Cromer and not the other Large Growth Towns. In fact, the proposed allocations in North Walsham rely on only two	Noted. Consider comments in the development of the policy.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>large allocations. Both of these are identified in the Draft Local Plan as having complexities to deliverability, including the need for preparation and adoption of a comprehensive development brief before the site can be brought forward. Indeed, the Draft Local Plan notes (~in para 16.37) that in regard to deliverability of the largest of the two North Walsham sites, “the deliverability of the site will be complex and may take a number of years to come to fruition”. The proposals at North Walsham represent a comprehensive mixed development including residences; link road; primary school; employment and Green Infrastructure. A similar comprehensive approach is evident for Fakenham. No such comprehensive approach to development is evident for Cromer. The Draft Local Plan proposals for Cromer appear piecemeal rather than representing good place making. We note that the sites submitted to the Authority include an opportunity through site C41 for a masterplan approach to the town development, including provision of homes, GI, link road, school and other necessary infrastructure in a cohesive way. Furthermore, in our recent discussions with the Highway Authority, the Authority has confirmed that realisation of such a link road is a high priority. In addition to the apparent inconsistencies identified above, our analysis of the Site Background Paper 6 also raises doubt about the sites proposed for Cromer to deliver appropriate growth for this Large Growth Town. We do not consider the proposed approach or Site Allocations for Cromer to be sound due to the many issues and inconsistencies identified above and in our comments attached and below on: the Background Paper 6; Sustainability Appraisal ; and Draft Local Plan: Alternatives considered. The evidence presented does not justify the approach.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS5)
Objection	3	<p>Key issues raised including concerns over the potential impact on the AONB (contrary to Paragraph 172 of NPPF) from Natural England and the potential impact on the setting of the adjacent Grade II Listed Building from Historic England. Historic England suggested confining development to the northern half of the site with the southern portion of land being used for sports facilities, allotments and public open space. And strengthening the policy wording and the inclusion of diagram to indicate broad principles of site. General Support expressed for biodiversity net gain, creation of habitats and GI corridors. One objection was based around the preference for an alternative site and raised concerns that site hadn't been assessed for its suitability to provide sports facilities or a Care Home. Anglian Water, Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording.</p>
Support	2	
General Comments	3	

Proposals for Fakenham

DS6: Land North of Rudham Stile Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS6	F01/B	Anglian Water (1217129)	LP389	Support	<p>Policy DS6 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. Query reference to sewage treatment for this site only as would apply more generally to sites within catchment. To be effective it is suggested that wording be amended as follows: 'details of any required enhancement to the foul sewerage network' Also reference is made to demonstrating that there is capacity at the receiving Water Recycling Centre (formerly sewage treatment works). This requirement is not specific to this allocation site and would apply to all sites which come forward within a specific catchment.</p>	Noted: Consider comments in the development of the policy.
DS6	F01/B	Historic England (1215813)	LP705	Object	<p>General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions. a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list. b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS6	F01/B	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP628	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: This site includes a proportion of land controlled by Trinity College suitable for the provision of up to circa 400 dwellings (incorporating other complementary uses as appropriate), as indicated in their response to the Call for Sites in 2016. Vehicular, pedestrian and cycle access to this land is proposed via a link road from the adjacent site (Site F01/A) that forms part of the current outline application for that development. The area of land within Trinity College's control is contained</p>	Noted. Welcomes clarification on availability. Consider comments in the development of the policy.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>between the A148 to the north, Rudham Stile Lane to the south, and the existing Leisure Centre to the west. As such, it can be delivered without the need for the relocation of any existing recreation areas or, indeed, could provide some potential for expansion or enhancement of those recreation areas as appropriate to the future development proposed, as provided for under item 10 of the site specific requirements listed within the current draft policy. It is noted that the total site is proposed to deliver 560 dwellings including specialist elderly provision. However, this total area is also subject to third party land interests. As such, it is essential that the policy enables a flexible approach to facilitate the development of land within the control of Trinity College that would enable it to come forward in a timely manner on the basis that this has been specifically identified as both suitable and immediately available for development. In order to support the wider role that Fakenham plays within the District as a key service centre, and recognising the parameters proposed under draft policies ECN 1 and ECN 4, the potential provision of complementary employment and/or retail uses alongside residential development is considered appropriate and could also assist in supporting the new population. As would be expected, the policy appropriately states that proposals for the site must comply with policies elsewhere in the Plan. It then goes on to state a number of specific additional requirements. Whilst a number of these refer to infrastructure and the need to address potential site constraints, which is considered further below, the first requirement proposes the prior approval of a Development Brief to address various practical and technical matters. This is entirely unnecessary for a site of this size and for the scale of development proposed, the principles for which can readily be addressed through the normal process of a planning application and the associated documents that are required to support that as standard. It also ignores the principles that have already been established through the approved Development Brief that supported Core Strategy Policy F01 that relates in detail to site F01/A, but also references this in context to F01/B (both of which formed the original allocation site for Policy F01). In this regard, Trinity College do not support the policy and propose that this requirement be removed. With regard to the associated infrastructure necessary to support the development of Site F01/B, the other specific requirements are supported in principle on the basis that they highlight the core infrastructure matters that will affect its delivery. However, the specific infrastructure needs must be relevant to the specific</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					scale and type of development proposed for consideration through the planning application process, in order to ensure that it reflects the relevant development context and in order to maximise the long-term development prospects for the site and, therefore, the prospect of meeting the needs of the town overall. On this basis, Trinity College proposes that further detailed consideration needs to be given to the potential scope of development across the site, and that this should inform the final wording of the policy to secure development of allocated land in the most effective and efficient manner.	
DS6	F01/B	Shell Ltd (Mr Daniel Olliffe, CBRE) (1216247 1216246)	LP212	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Land North of Rudham Stile Lane is an extension to an existing strategic allocation, which as acknowledged at Paragraph 13.16 of the Plan has been allocated but not developed. Given the site is subject to a number of constraints (Utilities, archaeology, infrastructure) and development is dependent upon firstly the development of the existing strategic allocation and secondly a number of significant and key infrastructure improvements, the deliverability of the site within the Plan period is questioned. Whilst suitable and available, it is not considered that the plan has appropriately assessed the deliverability of the site and potential timescales for this delivery. In simple terms, the need for the existing strategic development to come forward in advance of this site and given the need for significant infrastructure to facilitate development, it is not considered that the full 560 dwellings, as allocated, will come forward over the Plan period.	Noted. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10 of the emerging LP and detailed in Background Paper 6 - Development Site Selection methodology. Comments noted on deliverability and will be addressed in the next iterations of the plan.
DS6	F01/B	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP627	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Trinity College is progressing proposals for the development of land north of Rudham Stile Lane (Site Allocation F01/A) through an outline planning application. It is anticipated that this will be determined later this year and will bring forward the comprehensive development of the site to provide residential and employment development, alongside a new primary school and local retail and community facilities. Those proposals have been prepared to reflect the parameters set out within the approved Development Brief for the site. As such, planning permission is anticipated in 2019, rather than 2020 as noted in the draft supporting text. Given the approach to developer contributions and viability in order to secure site specific contributions to manage and mitigate the	Noted. Consider comments in the development of the policy.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>impact of development (reinforced in the draft Local Plan under Policy SD 5), alongside the standard mechanisms of the development control process, all applications for development must demonstrate how they will deliver the infrastructure to support the scale of development proposed. As such, paragraph 3.19 inappropriately refers to the potential delaying of development associated with Site F01/A if key infrastructure and facilities are not available. As securing the delivery of the necessary infrastructure is a fundamental prerequisite of the decision making process, this reference is unnecessary and it is proposed that the final sentence of paragraph 3.19 should be removed.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS6)
Objection	3	<p>Feedback was supportive of the proposal. Support received from one landowner, but suggested that the policy wording should be more flexible to allow development to come forward in timely manner, to remove requirement for a Development Brief and to remove reference to the delay of development if key infrastructure are not available. Confirms that planning permission for F01A is anticipated in 2019. One objection was based around the preference for an alternative site and raised concerns over the deliverability of this site. Historic England sought consistency in approach to heritage assets. Anglian Water and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording and Anglian Water advised that the requirement to demonstrate capacity at water recycling centre would apply to all sites which come forward within a specific catchment.</p>
Support	2	
General Comments	0	

DS7: Land at Junction of A148 & B1146

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS7	F03	Anglian Water (1217129)	LP391	Support	Policy DS7 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS7	F03	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	Many of the draft allocations for housing and employment contained within the Plan are underlain to a greater or less degree by safeguarded mineral resources, namely sand and gravel. A small number of the draft allocations for housing or employment are within the consultation areas of existing mineral extraction sites, existing waste management facilities, existing Wastewater Recycling Centres, and/or Mineral Site-Specific Allocations within the adopted mineral Local Plan. Many of the draft allocations for housing and employment contained within the Plan are underlain to a greater or less degree by safeguarded mineral resources, namely sand and gravel. A small number of the draft allocations for housing or employment are within the consultation areas of existing mineral extraction sites, existing waste management facilities, existing Wastewater Recycling Centres, and/or Mineral Site-Specific Allocations within the adopted mineral Local Plan. The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS7	F03	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions.	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					conveys the key policy intentions. By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.	
DS7	F03	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: An overarching position of support for the proposed allocation, landowner confirms that the site is in single ownership, is available and deliverable in five years. It is a sustainable location, in walking distance to the town centre and bus stops. There are minimal constraints to development, all of which can be addressed in the consultation and design process. Providing market and affordable housing to meet some of the District's needs. Only scores poorly on one indicator of the SA, relating to minimising development of undeveloped land, however this should be put in context: There are insufficient sites to accommodate all local need on brownfield sites; so choosing the most sustainable un-developed site is necessary and a well-designed development that respects local character and distinctiveness, enhances biodiversity, and does not impact the landscape could be a positive addition to Fakenham's townscape. SA1 and SA8 scores are not a reason to seek an alternative plan strategy or site. For example, landscaping buffers stated in point 1 might not be the most appropriate solution; the solution should flow from the comprehensive design consultation process and the policy wording should allow for this. It is suggested that the wording of this point is re-considered to ensure the policy is justified and effective in delivering sustainable development. The requirement for improvements to Rudham Stile Lane is questioned as it does not appear to relate to this site. It is suggested this requirement is removed from the policy wording. If it is a requirement, it should be fairly and reasonably related to this site, in accordance with the CIL regulations (which also apply to S106). In addition, reference to roundabout works should be omitted from the policy wording, as transportation matters will be evaluated at pre-application stage with appropriate traffic modelling. The requirement for works to the roundabout cannot be stipulated at this stage, as modal shift and sustainable transport opportunities have not yet been accounted for therefore the requirement for works and their extent is not yet known. With reference to Point 5, Anglian Water should be aware of capacity in respect of foul water and sewer requisitioning and accommodation of future development should</p>	Support noted. Welcomes clarification on availability. Consider comments in the finalisation of the policy.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>be included in their programme of works. The landowner understands there is currently sewer capacity to accommodate development of the site. Also, the inclusion of this point is therefore questioned as a result of the Barratt Homes vs Welsh Water Court Supreme Judgement which confirmed that developers have the right to connect into the existing sewer system at the point of their choice, without liability for costs beyond the cost of the physical connection. This should not be listed as a constraint but a note to Anglian Water. Ecological/biodiversity constraints are not mentioned in the supporting text to Policy DS7. However, appropriate landscaping would be part of the scheme to enhance the biodiversity credentials of the development.</p> <p>The following wording is suggested for consideration "Land amounting to approximately 2.2 hectares will be allocated for development comprising approximately 65 dwellings inclusive of affordable homes, public open space, and associated on and off-site infrastructure set out below. Development proposals would need to comply with a number of policies elsewhere in this Plan and the following site specific requirements: - An appropriate design solution should be provided to address the boundaries between the development and the A148; - Provision of highway access on to Toll Bar; and</p>	
DS7	F03	Shell Ltd (Mr Daniel Olliffe, CBRE) (1216247 1216246)	LP213	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The principle of the allocation of Land at Junction of A148 and B1146 is supported and the growth to the west of Fakenham is considered to be an appropriate location for future development within the village. However, it is noted that site specific requirements for development included the need to provided highway access on to Toll Bar. This allocation, caveated on the ability to provide a suitable access, calls into question the soundness of the Plan and the appropriateness of assessment of alternative sites, specifically Land at Creake Road (Ref F02) which is dismissed as not being appropriate due to unsatisfactory access. This is simply not true. Land at Creake Road can be safely and appropriately accessed. The soundness of the Plan and allocations within Fakenham is therefore questioned as there is no differentiation between this allocation and Land at Creake Road, which can be appropriately accessed and could be conditioned in the same way with respect to access. It is considered that the assessment of alternative sites should be revisited and appropriate amendments to the allocations</p>	Support for this proposal noted. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					within the Plan made, namely the inclusion of Land Rear of the Shell Garage, Creake Road.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS7)
Objection	2	Limited response received. Support received from the landowner, but suggested that policy requirements relating to infrastructure improvements should be removed. One objection was based around the preference for an alternative site and questioned why the site access had been caveated to Toll Bar but alternative site FO2 have been dismissed due to unsatisfactory access. Historic England sought consistency in approach to heritage assets. Anglian Water and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording.
Support	2	
General Comments	1	

DS8: Land South of Barons Close

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS8	F10	Anglian Water (1217129)	LP394	Support	Policy DS8 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS8	F10	Environment Agency (1217223)	LP480	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • Paragraph 13.35 It is imperative that SuDS are designed into developments around Fakenham to protect the River Wensum from poor water quality. A buffer between the proposed development and river is essential to keep ecological connectivity, minimise disturbance to sensitive habitats and avoid potential adverse impacts. This appears to be considered as the part closest to the river is proposed to be green space.	Noted: Consider comments in the development the policy and future iteration of the Plan
DS8	F10	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – 'safeguarding', in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply	Noted:- Consider comments in the finalisation of the policy
DS8	F10	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>(both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS8	F10	Fakenham Area Conservation Team, Mrs Tracey White (1216122)	LP175	Object	<p>The Fakenham Area Conservation Team are concerned over the proposals to develop this area of land for the following reasons; The site is an important part of the wider Wensum Valley semi-natural landscape and habitat feature. The valley is one of the most important wildlife areas in the County and this is recognised by the designation of the River Wensum as a Special Area of Conservation. This is supported by a network of other areas of semi-natural habitat along the valley which are essential to maintain the special qualities of this feature and to provide the scale and connectivity of this mosaic of habitats. The value of the Valley as an ecological feature is its extent and length which provide migratory and residential / forage habitat for birds, mammals and other species. The scale and integrity of this mosaic is its most vital element. Previous developments have tended to erode this value and restrict the movement and forage / habitat extent for species which rely on the Valley for their survival. This is particularly noticeable in the Fakenham area where developments into the Valley have erected barriers to species and reduced the value of the remaining habitats both ecologically and visually. Further erosion of the habitats in the valley by the development of this site will therefore place an unsustainable feature into the Wensum Valley and have significant adverse impacts on the River Wensum SAC, nearby SSSI and County Wildlife sites and the associated biodiversity of the Valley. This is contrary to Policy ENV 4 of the Local Plan The inclusion of the areas of currently wet grazing / close to wet woodland (the latter a biodiversity action plan target habitat) adjacent to the proposed housing development for a proposed 'open space' would further damage and erode the special qualities of the habitats and ecological connectivity of the valley and SAC if any significant changes (as would almost certainly be necessary to manage the sites if they were to have public access as an open space) take place. These areas rely on limited or no public access, low intensity grazing and minimal management of the woodlands to maintain their value to wildlife. To alter or 'improve' this would increase the damage to the wildlife that use these areas as part of the much larger connective habitat along the valley. The impact of housing in this location would not be limited to its</p>	<p>Noted. Consider comments in the finalisation of the policy. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and continue to work with site promoters in the identification in relation to biodiversity. Mitigation measures will be a requirement to offset any potential adverse impact.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>damaging impact on wildlife. Fakenham attracts an increasing number of tourists to the Town and area on the basis of its association with the Wensum Valley. The Town is close to the Hawk and Owl Trust reserve at Sculthorpe which is a large, and now nationally important wildlife reserve, together with the equally important reserve and attraction of Pensthorpe Natural Park to the south of the Town. Large numbers of persons stay in the area - notably on the Racecourse and in other accommodation in the Town - and are attracted by these two reserves and the habitats and landscapes that are on the doorstep of where they are staying - with public footway access along the Wensum Valley to birdwatch etc. from just a few metres away which will be directly impacted by views of and biodiversity impacts from the proposed development. The damaging effects of the proposed development of area F10 will have an impact on the conservation biodiversity interest of the valley and will impact on these two major reserves together with the wider habitats and landscapes that people visiting the area come to see and experience. The development will therefore adversely impact on the tourism value of the Town and area. The erosion of the semi-natural habitat of the valley will also significantly adversely impact on the landscape character of the Town and Valley. The site is within a key accessible area of the Town and Valley by public right of way - there is a PRoW which runs the full length of the northern boundary of the site and which gives views over the pasture and woodlands to the south. The current character of this area is one of peaceful semi-natural habitats - a rare character type in Norfolk and also rare for the public to be able to access these easily from public rights of way. The development as proposed will effectively remove this value from the footpath on the northern side of the site and also impact significantly into views and the experience of the character of the valley from the well used bridleway alongside the River Wensum adjacent to the 'open space' element to the site. Landscaping as suggested in the text would not compensate for or significantly mitigate the impact of this experience for the persons using the Rights of Way and the impact on damaging the Character of the Town and area would be significant and contrary to policy ENV 2 within the Local Plan Overall, FACT believe that the site does not represent a sustainable or appropriate location for development. We are deeply concerned about the potential harm to the special features of biodiversity value within the Wensum Valley and impacts on the River Wensum SAC and nearby sites of the Hawk and Owl Trust reserve and Pensthorpe. We consider that there will</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					be significant detrimental impacts to the Character of the area and that these impacts will have substantial adverse impacts on the way in which Fakenham is perceived and used by tourists. FACT would support other more sustainable locations for housing development elsewhere around the boundaries of Fakenham which will not impact on these special features.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS8)
Objection	2	The Fakenham Area Conservation Team raised concerns over the environmental impact of development; the importance of the site for wildlife and biodiversity acting as an important environmental corridor and likely adverse effect on SAC, county wildlife site and SSSI adjacent to site. Would support more sustainable locations for housing elsewhere. Anglian Water advised that SUDS would need to be designed into the development to protect the River Wensum from poor water quality and a buffer provided to minimise impact on biodiversity. Anglian Water, Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording. Historic England sought consistency in approach to heritage assets.
Support	1	
General Comments	2	

Proposals for Holt

DS9: Land South of Beresford Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS9	H04	Environment Agency (1217223)	LP481	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • We understand that Holt WRC is close to capacity so an upgrade will be needed soon. This will ensure sufficient treatment to protect shellfish and bathing waters. We have been working with the Norfolk Rivers Trust to investigate the feasibility of installing an integrated wetland to improve the quality of discharged water from Holt Water Recycling Centre (WRC).	Support noted
DS9	H04	Natural England (1215824)	LP727	General Comments	Policy DS 9 We agree with policy wording amendments in section 9.7 of the HRA for allocations H04, H27/1.	Support noted. The HRA will inform further development of the proposal
DS9	H04	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS9	H04	Gladman Developments, Mr Craig Barnes (1217131)	LP287	Support	Gladman welcome and wholly support the proposed allocation of Land South of Beresford Road, Holt for housing through the Local Plan. Holt is a sustainable settlement, as illustrated by its inclusion as a Small Growth Town in the settlement hierarchy (see Policy SD3). It is therefore a suitable location for development over the plan period. The limited constraints to development within the town (in comparison to other settlements in this tier), together with the important role played to a wider rural hinterland, provides justification for a higher level of development to be accommodated at the town over the plan period. Land South of Beresford Road provides a sustainable and suitable option at which to meet some of this housing need. The Site is located to the south of the settlement, sandwiched between the	Support noted

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>existing built form and the Holt Country Park. The Site therefore serves a minor role within the countryside and the impact of developing the site on the wider landscape is very limited. The location of the Site reflects well and respects the built form of Holt and is responsive to the constraints of the settlement. To the north of the town is the Norfolk Coast AONB and as a result, applying the requirements of the NPPF, major development is restricted unless to have demonstrated public interest. The location of the Site avoids this constraint and is not located within the setting of the AONB. The Site has been selected by the Council as a draft allocation for housing following a vigorous and well-balanced selection exercise as summarised in the Site Selection Methodology background paper. The Site is assessed as reference H04. The assessment indicates that the Site is capable of accommodating 100 to 120 dwellings (as well as a 2FE school), is evaluated to be well located to the town centre and services, experiences no significant environmental constraints, and is not subject no contamination or flood risk. The Site scores positively in the Sustainability Appraisal and considered by the Council to represent one of the most sustainable and suitable locations of the sites examined in Holt. As well as responding to the housing needs of Holt and the wider local area, the allocation of the Site provides the Council with several additional opportunities. The Site will (and Gladman is committed to the delivery of) provide a serviced site for a new 2FE primary school (on the LEA's preferred site) which will in part address pre-existing education capacity problems within the town, as well as accommodate the schooling needs of the local population for the plan period. The Site provides the opportunity to better connect the settlement with the Holt Country Park to the south encouraging its use and enhancing access to recreation for existing residents. As Site promotor, Gladman can confirm the availability and deliverability of the Site for housing. Gladman promotes land on a nationwide basis, with a strong record of delivering new homes on the sites it promotes. Gladman has submitted an outline planning application for the development of the Site for housing, as well as land for a new 2FE primary school, public open space, landscaping, drainage and access (see Planning Application PO/18/1857). The application confirms Gladman's commitment to secure the development of the Site. Determination of the planning application by the LPA is likely to be in July 2019. Gladman consider that the Site can be developed in the short term. Submission of the application now, together with limited constraints means that the is no reason why the site</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					could not contribute towards years 4 and 5 of the five-year supply, with the potential to deliver in full in this period. The development of this Site could therefore make an important contribution to the housing land supply, with timely infrastructure provision to meet existing needs and allow for further sites to come forward unhindered. The serviced school site would be provided early in the development programme meaning that primary school provision required to support the wider growth of the town could come on stream early. Gladman would welcome the opportunity to engage in a Statement of Common Ground with the Council in relation to the Site.	
DS9	H04	Gladman Developments, Mr Craig Barnes (1217131)	LP288	General Comments	<p>The latest Development Framework Plan prepared and submitted as part of the ongoing planning application (see document reference 5664-I-02 rev K), confirms the commitment of Gladman to respond to the following requirements of Policy DS9:</p> <ul style="list-style-type: none"> • Provision of serviced land of a sufficient scale to accommodate a two-form entry primary school; • Promotion of traffic circulation through the proposed layout, including school drop off area; • Vehicular access via Beresford Road, with pedestrian/cycle access and emergency access via Lodge Close; • Provision of open space and a landscape buffer to Holt Country Park; • Improvement of pedestrian and cycle links to the Country Park from existing residential areas located to the north of the Site; and • Retention and management of existing trees and hedgerows. <p>For information and ease of reference Gladman include this Development Framework Plan in Appendix 1 to this representation. Gladman however object to the identified range of 70-100 dwellings. Gladman is unclear on what basis this range has been defined. Gladman considers that its inclusion within the policy provides for an unnecessary limitation on the development potential of the Site. The range identified is not consistent with the characteristics of the site and its surroundings, it is also at odds with the capacity applied to the Site applied by the Council through its own assessments (at 100 to 120 dwellings). Having undertaken a thorough appraisal of the constraints and opportunities of the Site through the planning application process, Gladman consider that the Site is suitable to accommodate up to 110 dwellings. Gladman also query the requirements in points 7 and 8 of the Policy for off-site mains water reinforcement, and enhancement to sewerage network capacity. Neither issue has thus far been raised during the determination of the current planning application. The evidence illustrating this as an issue is not clear within the evidence basis. Discussions with Anglian Water appear to only identify that this might be</p>	Comments noted. Disagree : It has not been demonstrated that the site can accommodate more than the number of dwellings proposed in the draft Plan and satisfactorily provide the required attention not high quality design, layout, access open space provision. Any application should be in line with the Local Plan Not withstanding this the number sin the plan are expressed as an approximation and do not preclude higher number provided there is appropriate and adequate justification.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					required, rather than being definitive. Gladman do not therefore consider that at this time, this policy requirement is sufficiently justified. Proposed changes: To reflect the evidence produced in support of the planning application, as well as the amount of development promoted through the planning application by Gladman, Gladman request that the policy is amended to read "around 110 dwellings". To provide flexibility, should the LEA determine that an alternative site is better suited to accommodate a new primary school, the Policy should acknowledge that the Site is suitable to accommodate housing in its entirety, where this is accepted and acknowledged by the Council. Should further discussions with Anglian Water confirm the need for these works, Gladman request clarification through the Infrastructure Delivery Plan, of the extent, cost and timescales required for this infrastructure. This information would provide clarity for decision makers, applicants and the community alike. It would also alleviate the potential for delay during the application process.	
DS9	H04	Historic England (1215813)	LP705	Object	<p>Whilst there are no designated heritage assets on site, this site lies immediately to the north of the Glaven Valley Conservation Area and Holt Country Park. Any development of this site therefore has the potential to affect the setting of the Conservation Area.</p> <p>We welcome the reference to the Conservation Area in paragraph 14.20. However, no mention is made of the Conservation Area in policy DS9.</p> <p>We note that criterion 3 of policy DS9 does make provision for 1.4 ha of public open space including a landscape buffer to Holt Country Park. We suggest that this criterion is amended to make reference to preserving and enhancing the setting of the Glaven Valley Conservation Area.</p>	Consider amendment to criterion 3 to read: Provision of 1.4 hectares of public open space to include a landscape buffer to preserve and, where opportunities arise, enhance the setting of the Glaven Valley Conservation Area and Holt Country Park.
DS9	H04	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity,</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					provide greater protection to the historic environment and the policies will be more robust.	
DS9	H04	Norfolk Wildlife Trust (1217447)	LP696	General Comments	We have previously commented on the recent planning application here. We repeat our request made during the planning consultation that due to the potential for hydrological impacts on the nearby Norfolk Valley Fens SAC, that any development in this location maintains open green space on the eastern boundary to avoid any potential indirect impacts from run-off towards the SAC. We refer to and repeat comments made to the recent planning application on this site.	Noted - consider the comments raised by the Norfolk Wildlife Trust on a recent planning application made on this site.

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS9)
Objection	2	General comments in support of site allocation, the site is subject to a live application. Support from landowner who confirms availability and deliverability of site, but suggested some changes to the policy requirement to allow for flexibility. Historic England sought consistency in approach to heritage assets and requested consistent wording. Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording.
Support	2	
General Comments	4	

DS10: Land North of Valley Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS10	H17	Environment Agency (1217223)	LP481	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • We understand that Holt WRC is close to capacity so an upgrade will be needed soon. This will ensure sufficient treatment to protect shellfish and bathing waters. We have been working with the Norfolk Rivers Trust to investigate the feasibility of installing an integrated wetland to improve the quality of discharged water from Holt Water Recycling Centre (WRC).	Support noted
DS10	H17	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – 'safeguarding', in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply	Noted:- Consider comments in the finalisation of the policy
DS10	H17	Historic England (1215813)	LP705	Object	This site lies within the Holt Conservation Area and adjacent to the Glaven Valley Conservation Area. Two grade II listed buildings lie immediately to the north of the site. Hill House has an eighteenth century facade with earlier double pile core and is constructed from Brick and pantiles. The Methodist church was built in 1862 by Thomas Jekyll of Norwich. It is constructed of yellow brick and flint with red brick dressings and has a steeply-pitched plain-tile roof. Any development of the site therefore has the potential to affect these heritage assets and their settings. We welcome the reference to the Conservation Areas in paragraph 14.26 and Policy DS10 (2). However, no mention is made of the listed buildings in either the supporting text or the policy. Whilst there may be scope for some development at this site, the development will need to be carefully and sensitively designed to preserve and where opportunities arise enhance the conservation area and the settings of the listed buildings.	Noted- consider the following changes to the policy wording: Add additional bullet point to paragraph 14.26 to read: 'Proximity to two grade II listed buildings (Hill House and the Methodist Church)' Amend criterion 2 to read: 'And landscape led design approach taking into account the need to preserve and where opportunities arise enhance the Holt and Glaven Valley Conservation Areas and wider landscape impacts.' Add additional criterion to read: 'Preserve the listed buildings and their settings through careful design and landscaping'

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					The supporting text and policy wording need to be amended to reference the listed buildings and to provide greater protection for the conservation areas in line with the statutory wording.	
DS10	H17	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS10)
Objection	2	Limited response received. Historic England sought consistency in approach to heritage assets and requested consistent wording. Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording.
Support	1	
General Comments	1	

DS11: Land at Heath Farm

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS11	H20	Anglian Water (1217129)	LP397	Support	Existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure 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. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is suggested that the following wording be added to Policy DS11: That suitable access is safeguarded for the maintenance of water supply infrastructure.	Support noted: Consider comments in the development of the policy.
DS11	H20	Environment Agency (1217223)	LP481	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • We understand that Holt WRC is close to capacity so an upgrade will be needed soon. This will ensure sufficient treatment to protect shellfish and bathing waters. We have been working with the Norfolk Rivers Trust to investigate the feasibility of installing an integrated wetland to improve the quality of discharged water from Holt Water Recycling Centre (WRC).	Support noted
DS11	H20	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS11	H20	North Norfolk Tomatoes (Mr David Fletcher, Strutt & Parker) (1217432)	LP537	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Norfolk Tomatoes support the allocation of Site H20: Land at Heath Farm, as set out in policy DS11 for residential development of approximately 200 dwellings. Norfolk Tomatoes supports the inclusion of Holt as a Small Growth Town and considers it is the most sustainable of the	Support noted.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					five settlements designated as 'Small Growth Towns'. It attracts employment, having higher employment within the area, and a strong retail offering, which complements Sheringham and Cromer.	
DS11	H20	Historic England (1215813)	LP705	Object	<p>Whilst there are no designated heritage assets within the site, there are two grade II listed buildings to the south east of the site. Development has the potential to impact upon the setting of these listed buildings.</p> <p>We welcome the reference to these listed buildings in paragraph 14.32 and policy DS11 although the text should be amended to read south east rather than north east.</p> <p>The policy should be re-worded for greater consistency with the legislation and to make the policy more robust.</p>	<p>Noted- consider amendment to Paragraph 14.32 and Policy DS11 to read 'listed buildings to the south east of the site'.</p> <p>Consider re-wording policy DS11 to read: A site layout and landscaping scheme to preserve the significance of the listed building to the south east of the site.</p>
DS11	H20	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the</p>	<p>Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS11	H20	Norfolk Land Ltd, Mr A Presslee (1216618 1216614)	LP377	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: It is notable that the H20 (Land at Heath Farm) site was a late addition to the draft Plan, arising from amendments to Government methodology and guidance and the necessity to increase planned housing numbers (ref. North Norfolk Council's Planning Policy and Built Heritage Working Party papers of 02 November 2018). It is a large site (an extension to an allocation in the current Core Strategy, and contributing to contributing – at approximately 200 houses – nearly two thirds of Holt's provision), and its sustainability appraisal (environmental score) was 'negative'. It is some distance from, and not readily accessible to, the town centre, and there will a high probability of reliance upon the car for everyday movements. It is our contention than rather than look to allocate a site that is evidently unsustainable in the terms of its certain environmental impacts, and its</p>	<p>Noted. Comprehensive site assessment has been undertaken on all sites, covering but not limited to environmental and highways impacts. Further details are set out in published Background Paper 6.</p> <p>The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement to provide enhanced pedestrian access improvements and a site layout and landscaping scheme which considers the</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					distance from the rest of the town and its facilities/services (simply to 'make up the numbers' and in a last-minute attempt to secure enough new houses in one of the Small Growth Towns), and in the absence of other suitable and available sites here, it would be more sustainable to provide this level of additional housing elsewhere within the Small Growth Towns category. We have indicated in these representations that this should include the additional site available at Horning Road, Hoveton. Whilst acknowledging the ability of Holt to accommodate additional housing growth in broad sustainability terms, the Draft Plan looks to allocate what we consider to be a disproportionately high number (principally as an extension to the Heath Farm development) compared to the other Small Growth Towns, particularly Hoveton.	proximity of Listed Buildings to the north east of the site.

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS11)
Objection	3	General support for site allocation, Anglian Water advised that policy wording should be amended to safeguard access to existing water mains located on the site. Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording. Historic England sought consistency in approach to heritage assets and requested consistent wording.
Support	3	
General Comments	1	

DS12: Land at Heath Farm (Employment)

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS12	H27/1	Environment Agency (1217223)	LP481	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • We understand that Holt WRC is close to capacity so an upgrade will be needed soon. This will ensure sufficient treatment to protect shellfish and bathing waters. We have been working with the Norfolk Rivers Trust to investigate the feasibility of installing an integrated wetland to improve the quality of discharged water from Holt Water Recycling Centre (WRC).	Support noted
DS12	H27/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is with the consultation area for a safeguarded mineral or waste site or adopted allocation, defined by the adopted Norfolk Mineral and Waste safeguarding policy. 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 the safeguarding of such sites, to the satisfaction of the Mineral Planning Authority.	Noted:- Consider comments in the finalisation of the policy
DS12	H27/1	North Norfolk Tomatoes (Mr David Fletcher, Strutt & Parker) (1217432)	LP540	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Norfolk Tomatoes support the allocation of Site H27/1: Land at Heath Farm, as set out in policy DS12 for employment development. Norfolk Tomatoes supports the inclusion of Holt as a Small Growth Town and considers it is the most sustainable of the five settlements designated as 'Small Growth Towns'. It attracts employment, having higher employment within the area, and a strong retail offering, which complements Sheringham and Cromer.	Support noted.
DS12	H27/1	Historic England (1215813)	LP705	Object	Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the boundary of the Glaven Valley Conservation Area. There are two grade II listed buildings to the north of the site at Heath Farm. Development of the site has the potential to impact on the settings of these heritage assets. As an employment site, the potential impact is	Noted - Consider amending the policy to make reference to the listed buildings and the Conservation Area in order to conserve and where appropriate enhance the listed buildings at Heath Farm and the Glaven

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>arguably greater than for a residential site.</p> <p>We note there is no reference to the historic environment in the site assessment on p60, Appendix B of Background Paper 6 – Development Site Selection Methodology, which is surprising given the nearby heritage assets and potential impact on settings.</p> <p>Given the proximity of the Conservation Area, Historic England has concerns regarding this site. Any development would need to be sensitively designed with appropriate landscaping.</p> <p>We welcome the reference to the listed buildings in paragraph 14.39. However there is no mention of the listed building in the policy. The policy should be amended to include reference to the listed buildings.</p> <p>The only mention of the Conservation Area is at paragraph 14.35 and whilst it is true that the site is not within the Conservation Area, no mention is made of the fact that it is immediately adjacent to the Conservation Area, which is an important omission. Paragraph 14.35 should be amended to more accurately reflect the relationship of the site to the Conservation Area. The policy should also be amended to include reference to the Conservation area.</p>	<p>Valley Conservation Area and their settings. Consider amending paragraph 14.35 to state that the conservation Area lies immediately adjacent to the site.</p>
DS12	H27/1	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word ‘including’ this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p>	<p>Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS12	H27/1	Norfolk Wildlife Trust (1217447)	LP697	Object	<p>We regard this as an inappropriate site for employment development, due to its proximity to the Norfolk Valley Fens SAC and the presence of alternative potential employment land in Holt in the draft plan . We believe there is a likelihood of an adverse effect on the SAC due to the proximity and land use, and so object to the proposal in this location. We recommend that if further employment land is required in Holt, that it is situated instead as part of proposed site H20, which would also benefit from existing transport links. Should the Council wish to proceed with an employment land allocation</p>	<p>Noted- The HRA recommends additional policy wording for proposed Allocation DS 12. This would seek to ensure that there would be no likely significant effect upon the Norfolk Valley Fens SAC.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					here, then it would need to be considered carefully as part of the plan HRA process before being progressed further in order to demonstrate that this allocation is deliverable. Proposed changes: Removal of this site from the plan.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS12)
Objection	3	General support for site allocation. Historic England sought consistency in approach to heritage assets and requested consistent wording. Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording.
Support	2	
General Comments	1	

Proposals for Hoveton

DS13: Land East of Tunstead Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS13	HV01/B	Anglian Water (1217129)	LP439	Support	Policy DS13 states that a wider water catchment strategy and foul water drainage strategy are required for this allocation site. However the supporting text refers to the water catchment strategy being aligned with the overall catchment strategy. Any site specific strategy would need to be aligned with any wider catchment strategy. Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. To be effective there is a need to clarify what is the requirement for the applicant in relation to foul drainage and how this relates to any further technical work or investigation(s) undertaken by Anglian Water rather than the developer.	Support noted: Consider comments in the development of the policy.
DS13	HV01/B	Broadland District Council (1216187)	LP170	Support	Broadland District Council welcomes the consultation and supports the acknowledgement that regard will be had to cross border issues including the relationship between Hoveton and Wroxham.	Support noted and welcomed.
DS13	HV01/B	Broads Authority (321326)	LP806	General Comments	Figure 10 – I cannot see the public car park on there – this is mentioned in the key	Noted: Consider comments in the development the policy.
DS13	HV01/B	Environment Agency (1217223)	LP482	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. Paragraph 15.10 Provision of SuDS within development is key. There is a history of mis-connections of foul water to the fresh water drainage system in this area. Opportunities for marginal aquatic plants should be included in any development along the edge of the river.	Noted

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS13	HV01/B	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS13	HV01/B	Persimmon Homes Anglia (Mr John Long, John Long Planning Ltd) (1216065 & 1216066)	LP159	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) support the Plan's identification of Hoveton as a settlement capable of accommodating growth. Persimmon Homes (Anglia) are promoting land for development in Hoveton. The land is proposed to be allocated for residential development in the dlp ref: HV01/B Land East of Tunstead, Policy DS13.	Support noted.
DS13	HV01/B	Persimmon Homes Anglia (Mr John Long, John Long Planning Ltd) (1216065 & 1216066)	LP160	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) are promoting land for development in Hoveton. The land is allocated for residential development in the DLP ref: HV01/B Land East of Tunstead, Policy DS13. The site allocation suggests that it is capable of accommodating approximately 150 homes, including affordable dwellings, elderly accommodation and infrastructure. Persimmon Homes (Anglia) have some comments on the wording of Policy DS 13. They are not considered fundamental to the Policy's soundness, which is not questioned, rather they are intended as adding clarity and certainty to the policy. 1. Suggest that the policy should be worded to require 'at least' 150 dwellings rather than 'approximately' 150 dwellings as it has carried out some technical work for the site in the form of a draft Planning Layout (submitted) that demonstrates delivery of 150 dwellings, including affordable housing, and a 1ha serviced site for the development of accommodation for the elderly to provide up to 75 beds of accommodation. In light of this technical work it can be demonstrated with evidence that there are no technical constraints to the site's development that cannot be overcome through careful design and/or with appropriate mitigation, if necessary; 2. Suggest that the policy acknowledges that not all hedgerows can be retained on site, as some will need to be removed to provide the access and visibility splays onto Tunstead Road;	Support noted for Policy DS13. 1. Disagree. It is considered that the wording of 'approximately 150 dwellings' gives the appropriate flexibility in terms of the residential allocation. 2. Disagree, the retention of trees and hedgerows should be a consideration from the outset. 3. Affordable housing needs to be provided across all types and tenure of accommodation.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					3. Suggest that the policy should clarify whether any of the elderly care accommodation would qualify as affordable housing.	
DS13	HV01/B	Historic England (1215813)	LP705	Object	There are no designated heritage assets on the site. The grade II* listed Church of St Peter and grade II listed ice house are located to the north east of the site but these are at sufficient distance from the site, and in the case of the ice house, in a well wooded location.	Noted - consider making reference to these within the supporting text
DS13	HV01/B	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS13)
Objection	2	General support for site allocation. Environment Agency and NCC Minerals and Waste recommended consideration be given to the use of additional phrases in policy wording. Historic England sought consistency in approach to heritage assets and requested consistent wording.
Support	4	
General Comments	3	

Proposals for North Walsham

DS14: Land at Norwich Road & Nursery Drive

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS14	NW01/B	Anglian Water (1217129)	LP398	Support	There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure 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. If this is not possible a formal application to divert Anglian Water's existing assets may be required. Amend policy DS14 to include reference to existing water main located on site and that this is a consideration for the applicant. Suggested that the following wording be added to Policy DS14: '9. That suitable access is safeguarded for the maintenance of water supply infrastructure.'	Support noted: Consider comments in the development of the policy.
DS14	NW01/B	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS14	NW01/B	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP545	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) supports the allocation of the Mixed Use: Land at Norwich Road and Nursery Drive (Site Reference NW01/B (including NW05, NW06/1 (part), NW07, NW30) Policy DS14, but suggests the following minor amendments to the wording of the policy for clarification and flexibility in applying the policy when drawing up more detailed proposals for the Development Brief: 1. Wording of Proposal on page 229 to be amended to remove "and enhancement" and to add the word "approximately" in two places. The wording (as amended) should read as follows: "Proposal - Mixed-use allocation including residential development of approximately 350 dwellings, the retention of approximately 2 hectares of existing employment land and provision of approximately 3 hectares of public open space." 2. Wording of Policy DS 14 on page 230 to be amended to remove "and	Noted: Consider comments in the development the policy. Proposals for North Walsham will be informed through the development of the Development Brief

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>enhancement” and to add the word “approximately” in two places. The wording (as amended) should read as follows: “Land amounting to approximately 18.6 hectares is proposed to be allocated for a mixed-use allocation including residential development of approximately 350 dwellings, the retention of approximately 2 hectares of existing employment land and provision of approximately 3 hectares of public open space.”</p> <p>3. Wording of Policy DS 14 on page 231 to be amended to add “prior to the occupation of the 2nd phase”. The wording (as amended) should read as follows: Development Brief, Point 2: “the 1st phase of development is limited to approximately 150 dwellings which must also deliver the estate link road and access to service all parcels prior to the occupation of the 2nd phase”.</p>	
DS14	NW01/B	Historic England (1215813)	LP705	General Comments	<p>Whilst there are no designated heritage assets within the site, Stump Cross/Wayside Cross which lies to the west of the site is a scheduled monument and grade II listed. However, development of the site is likely to have limited impact on this heritage asset, owing to the nature of the asset itself.</p>	Noted - consider making reference to these within the supporting text
DS14	NW01/B	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word ‘including’ this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS14)
Objection	1	General support for site allocation, Anglian Water advised that policy wording should be amended to safeguard access to existing water mains located on the site. Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies.
Support	2	
General Comments	2	

DS15: North Walsham Western Extension

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS15	NW62	Anglian Water (1217129)	LP356	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: existing borehole located within the proposed North Walsham Western extension which is connected to North Walsham Water Treatment Works (NVALWW) which supplies potable (clean) water to a wider area including North Walsham. The Water Treatment Works is located at Stump Cross, Norwich Road, North Walsham adjacent to the site boundary. It is important to ensure that adequate safeguards are put in place to ensure that the proposed mixed use development does not adversely affect the continued operation of Anglian Water's existing borehole, associated infrastructure and the North Walsham Water Treatment Works for our customers. This existing infrastructure is critical to enable us to carry out Anglian Water's duty as a water undertaker. Policy DS 15 as drafted does not make reference to the existing boreholes, how this be protected from potential polluting activities or how access to this will be maintained both during and after construction. Anglian Water would require the applicant(s) for this site prepare an appropriate risk assessment which considers the risk and protection of the source, both during construction and once developed. The risk assessment should identify any risk to source and mitigation. As such we would ask that the policy make specific reference to this requirement. The borehole is currently located in an agricultural field it is therefore important to ensure this land is not developed in such a way that would prevent being able to access and maintain the borehole. Consideration should be given to the extent of the proposed allocation site, the distribution of the proposed uses within the allocated site and how to ensure that the area in and around the borehole will remain undeveloped. The area in and around the borehole site should remain undeveloped to allow continued access by Anglian Water. The following wording is suggested for consideration in Policy DS15: 'A detailed groundwater risk assessment will be required to demonstrate no adverse impact from polluting activities on the groundwater source. Proposals will be supported where it can be demonstrated to the Council in consultation with the water undertaker that pollution to existing groundwater sources can be avoided or suitably mitigated. There is an existing borehole, horizontal audit and water mains within the boundary of the site and the site layout should be designed to take this into account. Proposals should</p>	Support noted: Consider feedback in finalisation of Policy approach to DS15

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					demonstrate how access to the existing boreholes will be safeguarded for operational and maintenance purposes by the water undertaker.	
DS15	NW62	Natural England (1215824)	LP728	General Comments	Policy DS 15 Site allocation NW62 is of significant size and within 1km of Bryants Heath SSSI which is linked directly via a public footpath. Due to the lack of alternative green space in the area we would anticipate an increase recreational use of the designated site. To mitigate disturbance impacts, the proposal will require suitable onsite open space that is proportionate to the scale of the development and sufficient to absorb the routine recreational requirements for the anticipated number of residents (a country park or equivalent). In addition, this allocation should provide significant contributions to net gain and opportunities for habitat creation as in line with emerging Policy ENV 4. Historically, the land parcels adjacent to the site were heathland and recreation of this habitat could provide an extension and buffer to the SSSI, potentially supporting wildlife whilst integrating recreation. Natural England would welcome a conversation about net gain and GI opportunities.	Comments noted & further engagement welcomed : The policy approach includes a requirements for enhancement to public rights of way, mitigation and enhancements to Bryant's Heath SSS1 as well as a requirement for significant levels of Open space. Any final allocation will be informed by the production of a Delivery Brief / Masterplan
DS15	NW62	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS15	NW62	Norfolk County Council: Children's Services (931093)	LP739	Support	While the emerging Local Plan does not raise any immediate issues for the County Council as education provider the following point need to be made: North Walsham (Western Extension) – The County Council supports the provision of a new primary sector school as part of the proposal for 1,800 new homes to the west of North Walsham (Policy DS15).	Comments and support noted

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS15	NW62	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP678	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet Homes support site allocation NW62 - Policy DS15 for a large scale mixed use development. Larkfleet has produced a deliverability statement to demonstrate the deliverability of the North Walsham Sustainable Urban Extension (NWSUE). The statement focuses on the NWSUE's potential to deliver housing for the housing needs of the district, but additional complimentary land uses will also be included within the proposals. Larkfleet Homes have commissioned reports in respect of infrastructure, planning and technical issues associated with deliverability. . The statement's conclusion draws upon a growing evidence base and confirms that the NWSUE is a suitable, sustainable, available and deliverable site.</p>	Support noted
DS15	NW62	Richborough Estates (Mr Tom Collins, Nineteen 47) (1217387 & 1217389)	LP663	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We consider that the LPA have significantly over-relied upon delivery of the key strategic site allocation of North Walsham Western Extension (NWE - NW62) and related supportive text of Policy DS15, during the Plan period. A robust strategy would be to allocate a wider range of sites, particularly those with fewer constraints that can make a meaningful contribution to the District's 5 year housing land supply, with flexibility and variety in the sites, which can be relied upon to meet the District's requirements.</p> <ul style="list-style-type: none"> • Contend that from experience of other LPAs, e.g.. Bedford, Rushcliffe and Amber Valley, the delivery of strategic sites of the scale of the NWE are often difficult to achieve, due to the amount and cost of infrastructure required to support the development. • Confirmation is required that all parties are in agreement and committed to bringing the site forward collaboratively within the timescales anticipated, particularly those parcels necessary for the delivery of the infrastructure needed to serve the development. • Reference to Lichfields report 'Start to Finish' (2016) and update (2018), which demonstrates that sites of 1,500-1,999 units take an average of 7 years between validation of first outline application through to first approval of an application for dwellings, excluding the period of promoting the site for an allocation and the discharge of conditions needed to implement the consent. Where applications have been determined more quickly than the average, this is as a result of matters being substantially 	<p>Disagree. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates that the majority of housing growth be concentrated in those settlements that have a range of services, are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environmental constraints. Further detail is published in background paper 2.</p> <p>The Council is aware that the NWE development will be towards the back-end of the Plan. Plan making is iterative -</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>addressed prior to submission which, when combined with the determination period, adds up to the same amount of time.</p> <ul style="list-style-type: none"> • Similar conclusions were reached by a separate report by Hourigan Connolly in 2014, which demonstrates that the delivery of homes from urban extensions of 500+ units takes about 9 years from first submission of reserved matters, with over 5 years required for securing an implementable consent. • The Lichfields report demonstrates an average annual rate of 102.5 dwellings per annum for sites of 1,500-1,999 units, but this is an average across all sites considered in the report. We would contend that this average figure would be at the very upper end of what could be delivered from a single site within North Norfolk, even with multiple outlets, since the Council's Interim Statement: Five-Year Supply of Housing Land & Housing Trajectory 2018 – 2023 (published June 2018) shows no sites delivering more than 60 dwellings per annum. This indicates that any one site is unlikely to sustain more than two operating sales outlets at a given period. • Clarification is required as to the extent and rate of housing the Council are relying upon being delivered from this site within the plan period. Further evidence is required which addresses the level of infrastructure and enabling works required before any houses can be delivered, in respect of both their deliverability and viability of the scheme to deliver such works alongside the range of other policy requirements. Reference is made, for comparison, to LPP1 site at Rudham Stile Lane, Fakenham (Policy F01). The 2018 Housing Land Supply and Trajectory Interim Statement identified the first delivery of housing from this application being in 2021/22, 10 years since the allocation became part of the DP and that even from such a large site, the trajectory shows a maximum of 60 dwellings per annum being delivered. Propose alternative site - The site at Paston Gateway represents an excellent opportunity for the Council to diversify the range of sites being allocated at the District's largest town, and to de-risk its current over-reliance on a single strategic site. The deliverability of Paston Gateway is discussed in more detail below, and in the Vision Document which accompanies these representations. 	<p>Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS15	NW62	Save Our Streets North Walsham, Mr Berni Marfleet (1217329)	LP336	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We object to the Plan as it does not properly address the Climate Emergency which both the Government and NNDC have declared. The Plan is not considered fit for the purpose it sets out to achieve and there are significant risks to delivering its objectives and targets. We believe it needs to be radically re drafted and for it to be subject to further consultation with the public before proceeding to the next Deposit stage. In particular, the proposals for North Walsham are totally inadequate to deliver a sustainable and environmentally and community enhancing development of this Growth Town. Given that the Western Extension forms such a large part of the whole District wide strategy for delivery of the housing targets, the serious concerns expressed below pose a very significant risk to the viability of the whole Plan.</p> <ul style="list-style-type: none"> • A North Walsham link/relief road connecting the Western Extension to the major extension of the Industrial Estate extending across the railway on Bradfield Road must be shown in the Plan together with a Policy supporting it. The Plan acknowledges that traffic access issues are already a major problem in attracting business to the Town. Without this Policy the delivery of the Industrial expansion is at risk and so is any funding bid to the Highway Authority or Government Agencies, which would be undermined and carry less weight. • The current proposal to provide the Link only between Norwich and Cromer Roads and extending up to, but not over the Railway is totally unacceptable. Without the Link across the railway, the existing heavy vehicle movements through unsafe and unsuitable residential roads, such as Aylsham Road and the Town Centre, will not only continue for the whole Plan period but significantly worsen, causing major deterioration in congestion, safety to road users and serious loss of amenity. • Other risks include potentially over optimistic annual housing completions to deliver the targets amounting to an almost doubling of the rate compared to the last three years. • The Council must, before proceeding further with the Plan, provide anticipated future traffic forecasts and this should be available for public scrutiny. • We have serious concerns that the Development Brief for the North Walsham Western Extension (NWE Policy DS15) will be Developer led. There needs to be community involvement in the whole process, not just 	<p>Noted, Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. North Walsham NWE response,</p> <ul style="list-style-type: none"> • Infrastructure: The Council has used the current evidence base and engaged with relevant bodies including Highways and infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan. A development brief will inform the finalisation of this policy and which will be led by council officers

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>consultation once it has been prepared by the Developer Consortium. This needs to be a fuller and more detailed Policy setting out what needs to be included in the Brief, including, inter alia, traffic management to restrict vehicular traffic along Aylsham Road to make it safe for pedestrians and cyclists , along with other pedestrian and cycle friendly "Green Routes" into the Town, a linear Greenway along Weavers Way together with public space and sporting/ recreational facilities, including a Country Park which should be located and designed, possibly in woodland to the south west to take visitor pressure off the Bryants Heath SSSI</p> <p>A Park and Ride should be included in the Policy to encourage commuter, leisure and educational movements into Norwich, as well as Hoveton/Wroxham, by train with a facility at the station.</p>	
DS15	NW62	The Battlefields Trust, Mr Michael Rayner (1210880)	LP093	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Battlefields Trust is concerned that no mention of the significant battle of North Walsham (1381) is made when considering the constraints, opportunities and description for North Walsham, particularly regarding the proposed Western Extension. Whilst the Battlefields Trust is pleased that some of the additional sites for housing further to the south than those recommended have not been included in the DLP, it should be recognised that the southern part of the proposed Western Expansion could encroach upon the battlefield. Therefore, any work in that area should include the need for archaeological survey specifically targeting the battlefield and any battle-related artefacts, to be carried out by an experienced battlefield archaeologist(s) to standards for metal-detecting as explained at www.battlefieldstrust.com Moreover, there is an opportunity for better interpretation and presentation of the battlefield if the proposed development goes ahead, in terms of interpretation panels and signed walks/rights of way.</p>	Noted. Consideration given to review Policy DS15 in light of the comments and in particular, the contents of the Development Brief.
DS15	NW62	Historic England (1215813)	LP705	Object	<p>This site is a large mixed use extension to the west of North Walsham. Whilst there are no designated heritage assets within the site, there are two grade II listed buildings to the west of the site at Bradmoor Farm and Stump Cross/Wayside Cross which lies to the east of the site and is a scheduled monument and grade II listed. Development of this site has the potential to impact upon the setting of these designated heritage assets. There is currently no mention of these designated heritage assets in</p>	Noted- consider making reference to the heritage assets in paragraph 16.36. Consider amending the policy to make reference to heritage assets. Consider the suggestion for an area of open space/ landscaping and set back would be appropriate to help protect the listed

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					paragraph 16.36. There is also no mention of the heritage assets in the policy. This should be amended to make reference to the heritage assets.	buildings at Bradmoor Farm. This should be included in the policy and could also be illustrated on a concept diagram for the site.
DS15	NW62	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS15	NW62	Norfolk Wildlife Trust (1217447)	LP698	General Comments	<p>We are concerned at the large scale of proposed allocation in the western extension proposal. This would result in potential impacts on county wildlife sites and a loss of a large area of open countryside with potentially significant losses of farmland birds. Therefore any proposal would need to be accompanied by a detailed ecological impact assessment, as well as a significant commitment to new green infrastructure. Proposed changes: If allocated the need for green infrastructure delivery should be specifically expressed in the allocation policy.</p>	Noted - Consider the inclusion of a key development consideration within the policy in regard to the need for green infrastructure provision and a detailed ecological impact assessment.

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS15)
Objection	4	<p>General support for site allocation. Anglian Water advised that policy wording should be amended to safeguard operation of Anglian Water's existing borehole and associated infrastructure. Natural England expressed support for suitable on-site open space and, along with the National Wildlife Trust, sought specific reference within the policy to biodiversity net gain and the creation of habitats and GI corridors. NCC (Children Services) support the provision of a new primary sector school and NCC (M & W) provided supporting comments to add to appropriate site policies. The Battlefields Trust sought specific reference within the policy to the need for archaeological surveys. Some objections were based around the preference for an alternative site and concerned that there was over reliance on the site allocation to deliver development and that significant infrastructure improvements would be</p>
Support	3	
General Comments	4	

		required to accommodate growth. Concerns also raised about the local planning approach to climate change and the need for the policy to enable a community led development approach.
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DS16: Land at Cornish Way

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS16	E10	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is with the consultation area for a safeguarded mineral or waste site or adopted allocation, defined by the adopted Norfolk Mineral and Waste safeguarding policy. 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 the safeguarding of such sites, to the satisfaction of the Mineral Planning Authority.	Noted:- Consider comments in the finalisation of the policy
DS16	E10	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS16)
Objection	1	Limited response received. Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies.
Support	0	
General Comments	1	

Proposals for Sheringham

DS17: Land Adjoining Seaview Crescent

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS17	SH04	Anglian Water (1217129)	LP403	Support	Policy DS17 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS17	SH04	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP831	Support	As agreed at our meeting in September please find attached additional policy wording from the LLFA for the sites discussed and suggested text for brownfield development: The ground conditions could be favourable for shallow infiltration, however if this is not the case the applicant will need agreement to connect to a nearby watercourse or surface water sewer. It is not recommended that any buildings or SUDs features are to be constructed in the flow path (west of the site). Consideration needs to be taken on the proposed access to this site ensuring that there is safe access and egress (no flooding above 100mm) while ensuring no increase in flood risk to and from the site.	Noted:-Additional commentary updating previous holding objection (Lp739) from LLFA 16.10.19 . Consider comments in the finalisation of the policy
DS17	SH04	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS17)
Objection	1	Limited response received. General support expressed. Anglian Water, LLFA recommended consideration be given to the use of additional phrases in the policy wording. Historic England sought consistency in approach to heritage assets
Support	2	
General Comments	0	

DS18: Former Allotments, Weybourne Road, Adjacent to Splash

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS18	SH07	Anglian Water (1217129)	LP406	Support	<p>Policy DS18 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water. However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure 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. If this is not possible a formal application to divert Anglian Water's existing assets may be required. Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. Amend policy DS18 to include reference to existing water main located on site and that this is a consideration for the applicant. Suggested that wording be amended as follows: 'details of any required enhancement to the foul sewerage network' It is therefore suggested that the following wording be added to Policy DS18: '7. That suitable access is safeguarded for the maintenance of water supply infrastructure.'</p>	Support noted: Consider comments in the development of the policy.
DS18	SH07	Historic England (1215813)	LP705	Object	<p>General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions. a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list. b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS18	SH07	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP831	Support	As agreed at our meeting in September please find attached additional policy wording from the LLFA for the sites discussed and suggested text for brownfield development: The ground conditions could be favourable for shallow infiltration, however if this is not the case the applicant will need agreement to connect to a nearby watercourse or surface water sewer. It is not recommended that any buildings or SUDs features are to be constructed in the flow path (North and East of the site). Consideration needs to be taken on the proposed access to this site ensuring that there is safe access and egress (no flooding above 100mm) while ensuring no increase in flood risk to and from the site.	Noted:-Additional commentary updating previous holding objection (Lp739) from LLFA 16.10.19 . Consider comments in the finalisation of the policy

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS18)
Objection	1	Limited response received. General support expressed. Anglian Water advised that policy wording should be amended to safeguard access to existing water mains located on the site. Anglian Water, LLFA, Minerals and Waste all recommended consideration be given to the use of additional phrases in the policy wording. Historic England sought consistency in approach to heritage assets.
Support	2	
General Comments	0	

DS19: Land South of Butts Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS19	SH18/1B	Anglian Water (1217129)	LP410	Support	There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure 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. If this is not possible a formal application to divert Anglian Water's existing assets may be required. Amend policy DS19 to include reference to existing water main located on site and that this is a consideration for the applicant. Suggested that the following wording be added to Policy DS19: '9. That suitable access is safeguarded for the maintenance of water supply infrastructure.'	Support noted: Consider comments in the development of the policy.
DS19	SH18/1B	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – 'safeguarding', in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply	Noted:- Consider comments in the finalisation of the policy
DS19	SH18/1B	Norfolk County Council: Norfolk Property Services (931093)	LP739	Object	NCC object to site allocation Land South of Butts Lane SH18/1B (DS19) and request land off Nelson Road SH16/1 be reconsidered for development. NPS consider that the alternative site owned by NNC is referable. Such a site is located in a sustainable location in close proximity to the town centre. The provision of residential development would allow a logical extension of the settlement boundary to allow growth in the town. There is also potential to provide a housing development with a notable care focus in this location. Although the site was identified in the Housing and Economic Land Availability Assessment (HELAA) June 2017 as a less constrained site for residential use with no significant site constraints, the First Draft Local Plan (Part 1) Alternatives Considered did not consider the site suitable for development as the site is in an; • Elevated position which is visible in the landscape; • Development would extend into the countryside and have a negative effect upon the quality of the landscape; • It could have an impact on the heritage assets to the south of the site. Having reviewed the site appraisal, NPS do not believe the site context has been fully considered in relation to landscape impact. Although the site is in	Noted: Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>an elevated position with a moderate fall in height from north to south, the land has residential development to the west and north boundary and a railway line to the south. Therefore, any new housing development would not result in a significant break out into the open countryside or have a negative impact upon the landscape, as there would be more elevated development to the north of the site. The proposal would allow a logical extension of the settlement boundary and could provide much-needed housing development with a care focus. With regard to heritage assets to the south of the site, these are located on the opposite side of the railway line and would not be affected by residential development. The land off Nelson Road SH16/1 is also considered more suitable for development than NNDC proposed site, on land South of Butts Lane SH18/1B. Land South of Butts Lane SH18/1B is located within an Area of Outstanding Natural Beauty and forms part of the setting of Sheringham Park and Conservation Area (see Core Strategy Proposals Map). The development of this land would have a greater impact upon an important landscape area in comparison to land off Nelson Road, which has no environmental or landscape designations. It would also result in a significant break out into the open countryside with existing development on only one boundary. The land South of Butts Lane also appears to have a constrained access and is likely to result in more ecological impacts as it would remove an agricultural land buffer between residential development and a large woodland area. Although land south of Butts Lane is considered to be well located to services and schools, the site is on the edge of Sheringham and a considerable distance from services and facilities in the town centre. Land off Nelson Road is much closer to the town centre and more sustainable. NCC would, therefore, object to site allocation Land South of Butts Lane SH18/1B and request land off Nelson Road SH16/1 be reconsidered for development</p>	
DS19	SH18/1B	Historic England (1215813)	LP705	Object	<p>This sensitive site is located within the Upper Sheringham Conservation Area. Any development therefore has the potential to impact upon the Conservation Area. The site is also located within the defined setting of Sheringham Park.</p> <p>To that end we have some concerns about the site. We do however note the wooded setting to the south and residential development to the north. With careful design, layout and landscaping some development may be acceptable of this site.</p>	Noted- Consider amending criterion 1 to read, Layout, design and landscaping that has regard to the site's location within the Norfolk Coast AONB and that preserves and where opportunities arise enhances the Upper Sheringham Conservation Area and its setting.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					We note the reference to the Conservation Area in paragraph 17.30 and the Sheringham Park setting in paragraph 13.31 as well as reference to the Conservation Area and landscaping in policy DS19 1-4 which is welcomed. The policy could be further strengthened with reference to the Conservation Area in accordance with the wording in legislation.	
DS19	SH18/1B	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS19	SH18/1B	Norfolk Wildlife Trust (1217447)	LP699	General Comments	<p>This proposed allocation is immediately adjacent to mature woodland on its southern edge. Building housing directly adjacent to woodland can have negative effects on the quality of the adjacent woodland habitat and therefore we recommend that any allocation here includes a stand-off distance, maintained as green infrastructure such as new woodland or scrub planting, to buffer the existing woodland from impacts such as noise and light pollution from the new dwellings.</p>	Noted - Consider the inclusion of a key development consideration within the policy in regard to the need for green infrastructure provision on site to form a buffer between the proposed allocation and the existing woodland.

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS19)
Objection	3	<p>Key issue raised by Historic England over the potential impact on the Conservation Area and setting of Sheringham Park. Suggest strengthening of policy wording to ensure careful design, layout and landscaping. Historic England also sought consistency in approach to heritage assets. One objection was based around the preference for an alternative site and also raised concerns over the impact on the AONB, the ecological impact and the constrained access to the site. Suggest that an alternative site would be more appropriate. General support expressed for new GI corridor. Anglian Water advised that policy wording should be amended to safeguard access to existing water mains located on the site. NCC Minerals and Waste provided supporting comments to add appropriate site policies.</p>
Support	1	
General Comments	2	

Proposals for Stalham

DS20: Land Adjacent Ingham Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS20	ST19/A	Anglian Water (1217129)	LP412	Support	There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure 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. If this is not possible a formal application to divert Anglian Water's existing assets may be required. Amend policy DS14 to include reference to existing water main located on site and that this is a consideration for the applicant. Suggested that the following wording be added to Policy DS14: '9. That suitable access is safeguarded for the maintenance of water supply infrastructure. 'Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. suggested that wording be amended as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS20	ST19/A	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS20	ST19/A	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions. a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list. b) The policy should use the appropriate wording from the list below	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS20)
Objection	1	Limited response received. Anglian Water advised that policy wording should be amended to safeguard access to existing water mains located on the site. NCC Minerals and Waste provided supporting comments to add appropriate site policies. Historic England sought consistency in approach to heritage assets.
Support	1	
General Comments	1	

DS21: Land North of Yarmouth Road, East of Broadbeach Gardens

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS21	ST23/2	Anglian Water (1217129)	LP414	Support	Policy DS21 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS21	ST23/2	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS21	ST23/2	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP831	Support	As agreed at our meeting in September please find attached additional policy wording from the LLFA for the sites discussed and suggested text for brownfield development: Ground investigations will need to prove if site is favourable for shallow infiltration as a method of discharging surface water. If infiltration is not showing to be favourable the applicant will need explore options to drain to the North East corner of the site where the makeup of the parcel of land is sandy gravels and/or whether the pond to the West could cope with the additional surface water from the development. It is not recommended that any buildings or SUDs features are to be constructed in the area of ponding in the South East corner of the site.	Noted:- Additional commentary updating previous holding objection (Lp739) from LLFA 16.10.19 . Consider comments in the finalisation of the policy
DS21	ST23/2	Historic England (1215813)	LP705	Object	Whilst there are no designated heritage assets within this site, the site lies adjacent to Stalham Conservation Area. There are two grade II listed buildings, Church Farmhouse and stable block to the west of the site as well as the grade II* listed Stalham Hall and two associated grade II listed buildings (barn and Stewards House) to the east of the site. Development of the proposed allocation would mean that Church Farm is severed from the surrounding rural landscape and the historical connection between the buildings and land would be lost. Development would also impact upon the setting of the Conservation Area, Stalham Hall and other listed buildings in the area. The relationship between some parts of the historic village core	Noted- Consider deleting the site or amending paragraph 18.18 to read 'listed buildings' and bullet 5 to read 'conserve and where appropriate enhance the nearby listed buildings including Stalham Hall (grade II*) and Church Farm and the Conservation Area and their settings.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>and the fields around it have already been affected by modern development but the allocation site is important because it maintains that link and is a positive element of the setting of the conservation area. To develop it would therefore harm the historic significance of the area.</p> <p>We note there is no reference to the historic environment in the site assessment on p108, Appendix B of Background Paper 6 – Development Site Selection Methodology, which is surprising given the nearby heritage assets and potential impact on settings.</p> <p>We note that paragraph 18.18 references to the listed building and conservation Area – surely listed building should be amended to plural. To that end we would suggest that this site should not be allocated.</p>	
DS21	ST23/2	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>Conservation Areas) Act 1990. registered park and garden - 'Development should protect the registered park and garden and its setting.' scheduled monument 'Development should protect the scheduled monument and its setting.' combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014 Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible. There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc. Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions. By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS21)
Objection	2	Historic England raised concerns over potential harm on historic significance of the area including the Conservation Area and nearby listed buildings. Historic England sought consistency in approach to heritage assets. Anglian Water, LLFA, Minerals and Waste recommended consideration be given to the use of additional phrases in the policy wording.
Support	2	
General Comments	1	

Proposals for Wells-next-the-Sea

DS22: Land at Market Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS22	W01/1	Anglian Water (1217129)	LP418	Support	Policy DS22 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS22	W01/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – 'safeguarding', in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply	Noted:- Consider comments in the finalisation of the policy
DS22	W01/1	Homes for Wells, Mr David Fennell (1217420)	LP547	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Homes for Wells notes that Market Lane south was originally an Exceptions Site, meaning that its development was restricted to affordable housing. Homes for Wells strongly supports the development of the red area at Market Lane south, subject to the limitation to affordable housing for rent to local people.	Comments noted: Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community.
DS22	W01/1	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP563	Support	The Holkham Estate fully supports the identification of Land at Market Lane, Wells for proposed allocation of 20 dwellings. This land is well related to recent development to the north of the site and is considered to be suitable, available, and achievable. In addition it is noted that development of 20 dwellings at the site would be required to provide 35% onsite provision in accordance with Draft Policy HOU 2 (i.e. 7 affordable dwellings, of which 1 to be 'low cost home ownership'). This requirement is acknowledged and can be fulfilled.	Support noted

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS22	W01/1	Wells Neighbourhood Plan, Questionnaire. (Mr Peter Rainsford) (1216818)	LP300	Support	The survey (clarification added, Wells NP survey) received 302 responses representing 15% of the 2000 distributed in the community magazine, May 2019. 154 (51%) gave this site their first preference, 46 second preference and 17 third preference In answer to the question "what kind of use should any new land for housing be for", 125 gave their first preference to be for affordable housing for rent by local people, 89 gave this as their second preference and 24 their third preference. By contrast, housing for sale on the open market received 14 first preferences, 9 second and 5 third	Support for site DS22 noted
DS22	W01/1	Historic England (1215813)	LP705	General Comments	There are no designated heritage assets on the site. Holkham Hall Registered Park and Garden (grade I) lies to the south and west of the site. Careful landscaping should ensure that the site is well screened from the registered park and garden. To that end we welcome bullet point 2.	Noted- consider reference to the heritage assets and consideration of bullet 2 and the strength to which this provides careful screening.
DS22	W01/1	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS22)
Objection	1	General support for site allocation, considered suitable site for housing but expressed a preference for affordable housing. Historic England sought consistency in approach to heritage assets and requested consistent wording. Anglian Water and Minerals and Waste recommended consideration be given to the use of additional phrases in the policy wording.
Support	4	
General Comments	2	

DS23: Land Adjacent Holkham Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS23	W07/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS23	W07/1	Homes for Wells, Mr David Fennell (1217420)	LP547	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Homes for Wells agrees with representations that housing development on the ridge of land between Mill Road and Holkham Road would be intrusive on the landscape. Homes for Wells supports the development of the red area between Mill Road and Holkham Road, subject to its limitation to affordable housing for rent to local people, but suggests that a better alternative close by would be the abandoned allotments south of Mill Road adjoining the former railway line at the east side of Heritage House. Such a development would be on land of poor value, is no longer wanted for allotments, would be inconspicuous and is within easy reach of the town centre. Given that any greenfield site is going to attract ferocious opposition to development, Homes for Wells submits that this would in fact be one of the least contentious sites.	Comments noted: Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community. Consider alternative site proposed in the finalisation of preferred sites in Wells
DS23	W07/1	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP564	Support	The Holkham Estates fully supports the identification of Land adjacent to Holkham Road, Wells for proposed allocation of 60 dwellings. This site is considered to be suitable, available, and achievable. In addition it is noted that development of 60 dwellings at the site would be required to provide 35% onsite provision in accordance with Draft Policy HOU 2 (i.e. 21 affordable dwellings, of which 2 to be 'low cost home ownership'). This requirement is acknowledged and can be fulfilled	Support noted
DS23	W07/1	Wells Neighbourhood Plan, Questionnaire. (Mr Peter	LP687	General Comments	The survey (clarification added - in the wells NP survey), results showed 42 (16%) of first preferences in favour of this site and 91 (38%) of second preferences	Comments noted

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
		Rainsford) (1216818)				
DS23	W07/1	Historic England (1215813)	LP705	Object	There are no designated heritage assets within this site. However the Wells Conservation Area lies to the north east of the site and Holkham Hall grade I registered park and garden lies to the south west of the site. The site is reasonably prominent in the landscape. There is currently no mention of the proximity of the Conservation Area and Registered Park and Garden Paragraph 19.24 should be amended to reflect this. The policy should also make reference to these assets. However, with careful design, some limited development should be possible on this site. We welcome bullet point 1 of the policy that addresses design issues. Suggested Change: Amend policy to reference the Conservation Area and Holkham Hall Registered Park and Garden.	Noted - consider amending the policy to reference the Conservation Area and Holkham Hall Registered Park and Garden.
DS23	W07/1	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions. a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list. b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS23)
Objection	2	General support for site allocation, but though some raised a preference for alternative sites and the need to address high levels of affordable housing . Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies.
Support	2	

General Comments	2	
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Proposals for Blakeney

DS24: Land East of Langham Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS24	BLA04/A	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – ‘safeguarding’, in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply	Noted:- Consider comments in the finalisation of the policy
DS24	BLA04/A	The Oddfellows, Ms Paula Griggstone (Mr Will Nichols, Strutt & Parker) (1219331 & 1219332)	LP826	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Oddfellows oppose the proposed site allocation referred to as BLA04/A Residential : Land East of Langham Road for the following reasons:</p> <ul style="list-style-type: none"> • From assessing the supporting information, the Council considers the preferred site to have a less sensitive landscape setting than other sites in the village. The assessment also states that the location is ‘reasonably well contained within the landscape’ (para 88 DLP stated in response but appears to refer to Preferred Site Option BLA04/A description within the DLP Alternatives Considered Document). • Para 20.13 of the DLP states that ‘BLA04 mirrors the recent Avocet View development [Harbour Way] and has a less sensitive landscape setting than other sites in the village’. However, para 20.15 contradicts this by stating that BLA04/A ‘is part of an agricultural field which is located on the south western fringe of the village off the Langham Road. It is directly adjacent to the existing residential area at Kingsway and Harbour Way and is within the AONB and the site, and surrounding area, are reasonably prominent in the local landscape particularly when viewed from higher ground to the south’. • In addition, Appendix B of Background Paper 6: Development Site Selection Methodology states that: ‘The site is a large arable field with a farm access onto the Langham Road.....The site is sensitive in environmental terms and any development will need to consider the relationship and impact on the SSSI.’ • It is evident that site allocation BLA04/A is not ‘reasonably well contained in the landscape’ (as stated on page 88 of the Local Plan but 	Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10 of the emerging LP and detailed in Background Paper 6 - Development Site Selection methodology. It is noted that para 20.13 of DLP refers to ‘BLA04 mirroring the recent development at Avocet View,’ rather than the preferred reduced site BLA04/A. Update reference to BLA04/A in text of para 20.13.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>rather, as the supporting Landscape Statement confirms, is very prominent in the landscape.</p> <ul style="list-style-type: none"> The proposed allocated site BLA04A is extremely open and given the relatively well established settlement edge the proposed allocation of the site would have significant localised landscape and visual impact in views from Langham Road and Saxlingham Road, and public rights of way including Footpath 6 (FP6) to the rear of Kingsway, the end of Bridleway 5 (BW5) along Wiveton Down to the south, and Footpath 7 (FP7) along the drive to the south west. This includes views to St Nicholas' Church from Langham Road, a view specifically recognized in the draft Blakeney Conservation Area Appraisal. Such impacts would be difficult to mitigate and/or would substantially limit the extent of development in this location. 	
DS24	BLA04/A	The Oddfellows, Ms Paula Grigglesstone (Mr Will Nichols, Strutt & Parker) (1219331 & 1219332)	LP826	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: (linked to the above) Instead, The Oddfellows support the alternative sites BLA01 (Land south of Morston Road) and BLA09 (Land west of Langham Road), which form a continuous land parcel. Despite being available, deliverable and achievable these sites (which can be considered individually or as combined whole site were rejected by NNDC. The Council should reconsider as these alternative sites would form a more appropriate location at which to focus Blakeney's future growth. • Site ref BLA01 and ref BLA09 covers an area of approximately 2.9 hectares and is currently used for agricultural purposes. It is immediately adjacent to the recently completed Harbour Way development. The aggregated site BLA01/BLA09 is locally very well enclosed between the existing built form to the north and Wiveton Down (forming a ridge to the south and west).</p> <ul style="list-style-type: none"> The site has very few constraints and is flat with slightly raised land to the south and west shielding the site from long-range views (and helping to contain the site). There are no stability or contamination issues on the site and the site is entirely located within flood zone 1 and therefore at very low risk from flooding. The site is not located within a Conservation Area, nor within or close to the setting of any listed buildings. There are also no scheduled monuments on the site or in its vicinity. The principal views are from Langham Road and FP7 along the drive to the south, and to a lesser extent from Saxlingham Road, FP6 and the A19/Morston Road. FP7 is elevated above the level of the site, and 	Noted: Consider comments in the finalisation of the preferred sites for Blakeney. Regard has also been had to Policy HOU1, which sets the housing target for each settlement. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10, and as set out in background paper no 6 .

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>subsequently there are views over and between the boundary vegetation to the north towards the North Sea and the east to St Nicholas' Church.</p> <ul style="list-style-type: none"> • The development of Harbour Way provides an indication of the change to these views and the extent of development would be increased but would be partially softened by the intervening hedge. The site could be delivered for a combination of market and affordable housing together with open space and the creation of new footpaths/cycleways enhancing permeability into the village. It is estimated that the site could deliver between 60-85 residential units. • There are no access issues and full vehicular/cycle access can be achieved directly from Langham Road. In addition, and subject to the adjacent site. • There are no legal issues relating to the site, which is, in combination with the land to the north (ref BLA01) all within a single ownership, and could come forward either at one time or as part of a phased development. • The site is well-related to the existing settlement with residential development on its northern boundary and should be reconsidered. 	
DS24	BLA04/A	Historic England (1215813)	LP705	General Comments	<p>There are no designated heritage assets on this site. The Glaven Valley Conservation Area lies to the east of the site but is a considerable distance away from the site and so development in this location should have limited impact upon the Conservation Area and its setting.</p>	Noted- Consider reference to the conservation area and its setting.
DS24	BLA04/A	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS24)
Objection	2	Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies. Some objections were based around the preference for an alternative site and raised concerns regarding the potential impact on the landscape and environment. Support expressed from promoter for an alternative site.
Support	1	
General Comments	2	

Proposals for Briston

DS25: Land East of Astley Primary School

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS25	BRI01	Historic England (1215813)	LP705	Object	Whilst there are no designated heritage assets on this site, development of this site (and BRI01) would remove an important gap and separation between the villages of Melton Constable and Briston. Coalescence of settlements is to be avoided. It is important to maintain the character and distinctiveness of settlements. Suggested change: Consider issue of coalescence.	Noted- Consider the issue of coalescence
DS25	BRI01	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS25	BRI01	Norfolk Wildlife Trust (1217447)	LP700	General Comments	<p>There is a high density of ponds in the surrounding landscape, therefore maintenance of ecological connectivity is important in order to prevent the wildlife populations on either side of the village from becoming isolated. We therefore strongly recommend that both allocations include maintained green corridors suitable for the movement of amphibians (and other wildlife) as part of any green infrastructure requirements. Proposed changes:</p> <p>Inclusion of policy requirements for green infrastructure corridors in each allocation suitable for wildlife movement north/south.</p>	Noted - consider the inclusion of policy requirements for green infrastructure corridors to ensure movement of amphibians (and other wildlife) north and south within the key development considerations of the proposed allocation.

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS25)
Objection	2	Historic England concerned that development would lead to coalescence of Briston and Melton Constable and sought consistency in approach to heritage assets and requested consistent wording. General support expressed for biodiversity net gain, creation of habitats and GI corridors.
Support	0	
General Comments	1	

DS26: Land West of Astley Primary School

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS26	BRI02	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – 'safeguarding', in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply	Noted:- Consider comments in the finalisation of the policy
DS26	BRI02	Historic England (1215813)	LP705	Object	<p>Whilst there are no designated heritage assets within the site, the Grade II listed Manor Farmhouse lies to the north east of the site. Any development of this site has the potential to impact upon the setting of the listed building. There is no reference to this listed building at paragraph 21.14 or in the policy. The policy and paragraph should be amended accordingly. Suggested Amendments: Amend paragraph 21.14 to make reference to the grade II listed Manor Farmhouse.</p> <p>The policy should be amended to read, Development should preserve the grade II listed Manor Farmhouse and its setting.</p> <p>Consider issue of coalescence.</p>	Noted - consider amendment to paragraph 21.14 to make reference to the grade II listed Manor Farmhouse: 'Development should preserve the grade II listed Manor Farmhouse and its setting.' Consider the issue of coalescence.
DS26	BRI02	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS26	BRI02	Norfolk Wildlife Trust (1217447)	LP700	General Comments	<p>There is a high density of ponds in the surrounding landscape, therefore maintenance of ecological connectivity is important in order to prevent the wildlife populations on either side of the village from becoming isolated. We therefore strongly recommend that both allocations include maintained green corridors suitable for the movement of amphibians (and other wildlife) as part of any green infrastructure requirements. Proposed changes:</p>	Noted - consider the inclusion of policy requirements for green infrastructure corridors to ensure movement of amphibians (and other wildlife) north and

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					Inclusion of policy requirements for green infrastructure corridors in each allocation suitable for wildlife movement north/south.	south within the key development considerations of the proposed allocation.

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS26)
Objection	2	Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies. General support expressed for biodiversity net gain, creation of habitats and GI corridors.
Support	0	
General Comments	2	

Proposals for Ludham

DS27: Land South of School Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS27	LUD01/A	Anglian Water (1217129)	LP416	Support	Policy DS27 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water. Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective to "details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS27	LUD01/A	Broads Authority (321326)	LP806	General Comments	Figure 17 – needs to show the Broads, like Stalham and Hoveton maps do. •	Noted: Consider comments in the development the policy.
DS27	LUD01/A	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS27)
Objection	1	Limited response received. General support expressed. Anglian Water recommended consideration be given to the use of additional phrases in the policy wording. Figure 17 should show the Broads. Historic England sought consistency in approach to heritage assets.
Support	1	
General Comments	1	

DS28: Land at Eastern End of Grange Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS28	LUD06/A	Anglian Water (1217129)	LP419	Support	Policy DS28 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water. However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS28	LUD06/A	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS28)
Objection	1	Limited response received. General support expressed. Anglian Water recommended consideration be given to the use of additional phrases in the policy wording. Historic England sought consistency in approach to heritage assets.
Support	1	
General Comments	0	

Proposals for Mundesley

DS29: Land off Cromer Road & Church Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS29	MUN03/A	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - 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	Noted:- Consider comments in the finalisation of the policy
DS29	MUN03/A	Scarlett Homes, Mr Sean Ohara (Miss Maureen Darrie, Building Partnership Ltd) (1217451 & 1217482)	LP642	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Scarlett Homes is the prospective developer and supports the allocation of site MUN03, which relates to Parcel 1 of the allocation MUN03/A (Figure 18) Mixed Use: Land off Cromer Road & Church Lane, Mundesley.</p> <ul style="list-style-type: none"> Mundesley is a large growth village, identified in the Settlement Hierarchy in the plan. The proposal for 50 residential units is a modest development and consistent with low growth aspirations for the area through the Plan period. There are limited alternative sites with capacity for planned growth in the village. MUN03 is well located in the village with access to available services. The proposed approach to planning site development is landscape led, with provision for a large new area of open space (parcel 3). This respects the local environmental considerations including the setting of the Church and Conservation Area. Any future planning application would be robust and accompanied by a full review of the site and its context, including the value of the village's location on the coast and a landscape and visual impact assessment to ensure that any potential impacts are properly addressed and mitigated. Critical to the success of any Plan is the ability to deliver site allocations. Scarlett Homes is committed to working with the local community to deliver this allocation. The site is under one land ownership which also assists in securing timely delivery The allocation is wholly compliant with NPPF objectives for housing delivery. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area. We are 	Support Noted.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					confident that the site could be built -out relatively quickly in accordance with policy, maintaining supply and delivery in the plan area.	
DS29	MUN03/A	Historic England (1215813)	LP705	Object	Whilst there are no designated heritage assets on this site, the site is adjacent to the Mundesley Conservation Area and opposite the Grade II listed All Saints Church. Any development therefore has the potential to impact upon these heritage assets and their settings. We welcome reference to the heritage assets in paragraph 23.16. However there is currently no mention of the assets within the policy. The policy should be amended to included reference to them.	Noted- consider amending the wording of the policy to state: 'Development should conserve and where appropriate enhance the Mundesley Conservation Area and Grade II listed All Saints Church.
DS29	MUN03/A	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy: listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
DS29	MUN03/A	Norfolk Wildlife Trust (1217447)	LP701	General Comments	<p>We note that Parcel 2 of this proposed allocation currently appears to have wood or scrub cover and is linked to other areas of former railway line now as green space. If this proposal is allocated, then we recommend that this parcel is retained as wildlife rich open space as part of Mundesley's green infrastructure. Proposed changes: Parcel 2 to be retained and managed as green infrastructure primarily for its wildlife value and contribution to ecological networks.</p>	Noted - consider amending the wording of parcel 2 to make reference to the site as being part of the wider Green Infrastructure network.

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS29)
Objection	2	Limited response received. Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies. General support expressed for biodiversity net gain, creation of habitats and GI corridors.
Support	1	
General Comments	2	

Proposals for Other Areas

DS30: Tattersett Business Park

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS30	E7	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is with the consultation area for a safeguarded mineral or waste site or adopted allocation, defined by the adopted Norfolk Mineral and Waste safeguarding policy. 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 the safeguarding of such sites, to the satisfaction of the Mineral Planning Authority.	Noted:- Consider comments in the finalisation of the policy
DS30	E7	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP831	Support	As agreed at our meeting in September please find attached additional policy wording from the LLFA for the sites discussed and suggested text for brownfield development: The ground conditions may be favourable for shallow infiltration in the West of the site. The East of the site may not be favourable for shallow infiltration and if this is the case the applicant will need to explore options to drain the whole proposed development to the West of the site as this is made up of sandy gravels or seek agreement to connect to a nearby watercourse. There is a flow path running through the site from the East side to the West. The applicant will need to demonstrate that this flow path can be managed avoiding property and SUDs features and without increasing flood risk to and from the site	Noted:-Additional commentary updating previous holding objection (Lp739) from LLFA 16.10.19. Consider comments in the finalisation of the policy
DS30	E7	Historic England (1215813)	LP705	Object	Whilst there are no designated heritage assets within the site boundary, there are two scheduled monuments (a bowl barrow and a saucer barrow) to the south west of the site. Any development has the potential to impact upon the setting of these heritage assets. However, dependent upon the precise nature and scale of development and with careful landscaping along the south western edge of the site some development should be possible on this site. Suggested change: Development should preserve and enhance the scheduled monuments to the south west of the site and their settings.	Noted- consider the potential impact upon the setting of the scheduled monuments to the south west of the site and their setting.
DS30	E7	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p>	<p>approach across all proposed allocations within the plan.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS30)
Objection	2	Limited response received. Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies and NCC (LLFA) sought additional policy wording in relation to brownfield development.
Support	1	
General Comments	1	

