

North Norfolk Local Plan

2016 - 2036



NORTH
NORFOLK
DISTRICT
COUNCIL



CONSULTATION STATEMENT

SUBMISSION VERSION
May 2023

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Planning Policy Team**

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1 Introduction

- 1.1 This Consultation Statement has been prepared to support the submission of the North Norfolk Local Plan, (LP). The statement sets out how the Council have involved communities and stakeholders in the preparing the Local Plan, and how this meets national regulations and the requirements set out in the Councils' Statements of Community Involvement.
- 1.2 The Statement of Consultation is a statutory requirement for Local Planning Authorities in the process of submitting a Local Plan to the Secretary of State and describes how the Council have complied with government requirements in line with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 This is the third iteration of the Consultation Statement. Each version has been produced and published to coincide with earlier stages of the Plan process. The earlier Interim Consultation statement, which accompanied the First Draft Local Plan (Part1), May 2019, sets out in detail the requirements of how the Council met Regulation 22 (1) (c) (i-iv) at that stage in relation to the 2015 consultation conducted under Regulation 18 on the subjects of the Local Plan [Examination Library Reference B14]. The previous iteration of the Consultation Statement published at the Regulation 19, Publication Stage, January 2022 [Examination Library Reference B1], accompanied the Consultation on the Proposed submission consultation Document and informed on how the Council have met the requirements under Regulation 22 (1) (c) (i-iv) in relation to how the issues raised by the representations at the previous Regulation 18 stage had been taken into account from the First Draft Local Plan (Part 1) consultation, May 2019. The document covered the engagement undertaken at Regulation 18 stage on the first Draft Local Plan (Part1) undertaken between 7th May 2019 and 28th June 2019 up to the publication of the Proposed Submission Version Under regulation 19 and summarised the main responses to the First Draft Local Plan (Part1) in relation to preferred options and the alternatives considered, the Interim Sustainability Appraisal and Interim Habitats Assessment and supporting evidence and background papers.
- 1.4 This statement is the final submission version and updates the previous Consultation Statement that was published to support the Proposed Submission Version of the Local Plan at Publication Stage (Regulation 19), January 2022. Most notably this version incorporates additional content:
 - Setting out how the Council has complied with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 part (v) and (vi).
 - An additional section has been added along with supporting appendices, Appendices H-L.
 - Throughout the document relevant text has been updated. Appendices F & G have been updated with engagement statistics and updated consultation information.
- 1.5 This document provides:
 - An overview of the engagement activities undertaken, including which bodies and persons were invited to make representations under Regulation 18,
 - Summaries of the main issues raised through the engagement activities at Regulations 18 stage on the First Draft Local Plan (Part1) undertaken between

7th May 2019 and 28th June 2019 up to the publication of the Proposed Submission version, at Publication Stage under Regulation, (Regulation 22 (1) (C) i-iv),

- outlines the further detail in relation to Regulation 22 (1) (C) (v-vi).
- Outlines the Councils response to the Regulation 19 consultation including additional proposed modifications for consideration at the examination.

Legislation

1.6 The Planning and Compulsory Purchase Act (2004) sets out the approach to plan preparation, including a strong emphasis on community engagement. Under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Local Planning Authority has a requirement to prepare a statement to submit to the Secretary of State alongside the Local Plan which provides detail on:

- which bodies and persons the Local Planning Authority invited to make representations under regulation 18,
- how those bodies and persons were invited to make representations under regulation 18,
- a summary of the main issues raised by the representations made pursuant to regulation 18,
- how any representations made pursuant to regulation 18 have been taken into account,
- if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations, and,
- if no representations were made in regulation 20, that no such representations were made.

1.7 Extensive early engagement was undertaken with stakeholders throughout the production of the Local Plan as detailed in the table below.

Table 1: Key stages of the Local Plan Preparation

Consultation Stage	Substage	Consultation Dates	Consultation Statement
Plan preparation	Stage1a: Subjects of the Local Plan- Regulation 18 Notification and Statement of Community Involvement	17 August - 9 October 2015	First Draft Local Plan (part1) Interim Consultation statement Examination Library Reference B11]
	Call for sites	18 th January – 31 st May 2016	
	Stage 1b: Housing & Economic Land Availability Assessment (HELAA) Methodology	21 March - 3 May 2016	
	Stage 1c: Regulation 18: Town Strategies, Issues, Opportunities and Town Visions	10 May - 30 June 2016	
	Stage1d: Draft Sustainability Appraisal (SA) Scoping Report	10 October - 21 November 2016	

	Stage 1e: Habitats Regulations Assessment (HRA) Scope	April 2017	
	Stage 1f: Local Plan Workshop (update and viability)	29 th August 2018	
Plan Development	First Local Draft Local Plan (Part1)- Preferred Options (Regulation 18)	7 th May – 19 th June 2019	First Draft Plan Interim Consultation Statement [Examination Library Reference B11]
	First Local Draft Local Plan (Part1)- Alternatives considered	extended to 28 th June 2019	
	Interim Sustainability Appraisal		
	Interim Sustainability Appraisal Scoping report		
	Interim Habitats Regulation Assessment		
	Further call for sites		
	Regulation 18 Background papers		
	Supporting evidence		Tables 3.3 Examination Library
Plan publication	Local Plan Proposed Submission Version (Regulation 19)	17 th January – 28 th February 2022	Consultation Statement [Examination Library Reference A1]
	Polices map		
	Sustainability Appraisal, SA		
	Habitat Regulation Assessment		
Submission	Local Plan Proposed submission Regulation (Regulation 22)	May 2023	Consultation Statement final. This Document. [Examination Library Reference A5 + Appendices A.1 – A5.12]
	Submission Policies map		
	Sustainability Appraisal		
	Habitat Regulation Assessment Consultation Statement		

2 Public & Stakeholder Engagement (Regulation 18)

Statement of Community Involvement (SCI)

- 2.1 Throughout the key plan-making and consultation stages the Council has liaised with relevant stakeholders and individuals to assist with the preparation of the plan and to seek to resolve issues.
- 2.2 The Councils' adopted Statement of Community Involvement (SCI) sets out how the Council intended to engage with members of the public and stakeholders in relation to planning, including the preparation of the Local Plan. The SCI requires a range of different engagement methods to be used across the community, to try to ensure that everyone has the opportunity to comment. The Council has made every effort to ensure that the Local Plan engagement process was in line with the adopted SCI. At each stage a communication strategy was signed off through the Council's [Planning Policy and Build Heritage Working Party](#), and [then Cabinet](#). The SCI can be found in the Examination Document Library reference A9.
- 2.3 Extensive engagement was undertaken with stakeholders during the earlier stages of the production of the Local Plan. The detail of this is included in the First Draft Local Plan (Part1) Interim Consultation Statement, May 2019, and which accompanied the Regulation 18 consultation undertaken in the spring of 2019.

Duty to Co-operate

- 2.4 The Council has a good track record of working together to achieve shared objectives. Officer and stakeholder level engagement on cross-boundary matters takes place through the **Norfolk Strategic Planning Group (NSPG)** which meets monthly. In early 2015 the authorities agreed to co-operate formally on a range of strategic cross-boundary planning issues through the preparation of the **Norfolk Strategic Planning Framework (NSPF)**. The Norfolk Strategic Planning Member Forum oversees the production of the NSPF on behalf of all the local planning authorities, and meets quarterly.
- 2.5 Throughout the development of the Local Plan, there has been regular and ongoing co-operation and discussion with adjoining local authorities and other relevant stakeholders to identify cross-boundary strategic issues. The resulting Norfolk Strategic Planning Framework provides a shared evidence base and a structure for tackling identified planning issues across the county (especially those which have a strategic impact across local authority boundaries), through a series of 31 agreements. Signatories include:
- Breckland District Council • Broadland District Council • Broads Authority • Great Yarmouth Borough Council • Borough Council of King's Lynn and West Norfolk • North Norfolk District Council • Norwich City Council • South Norfolk Council • Norfolk County Council • Natural England • Environment Agency • Anglian Water • Marine Management Organisation • New Anglia Local Enterprise Partnership • Active Norfolk • Water Resources East.
- 2.6 Work to inform the NSPF has also involved wider stakeholders including;
- Wild Anglia • Norfolk and Waveney CCG • Norfolk and Waveney Integrated Care System

(ICS) • Suffolk County Council • Suffolk County Council • Babergh & Mid Suffolk District Councils • East Suffolk Council • West Suffolk Council • Fenland District Council • East Cambridgeshire District Council • South Holland District Council • Cambridgeshire and Peterborough Combined Authority • Mobile UK • UK Power Networks.

- 2.7 Further detail on this is contained in the Council's Duty to Co-operate Statement, [Examination Library Reference A8]. The NSPF document is also available via Norfolk County Council's Norfolk Strategic Planning Member Forum web page¹.

Planning Policy & Built Heritage Working Party

- 2.8 The production of the Local Plan is overseen by The Planning Policy & Built Heritage Working Party. Meetings are held on a monthly basis and the Party makes recommendations to Cabinet on matters of planning policy and built heritage. Meetings are open to the public and the agendas and minutes are available at [Home | Browse meetings - Planning Policy & Built Heritage Working Party \(north-norfolk.gov.uk\)](#). Decisions and Working Party papers are subsequently approved by the Council's Cabinet when required. In respect of the Local Plan, the purpose of the Working Party is to scrutinise and, where appropriate, to make recommendations on work relating to the Local Plan.

Additional Partnership Working

- 2.9 **Local Plan Meetings between North Norfolk District Council and Norfolk County Council:** Senior Officer Group with a core member of the NNDC Policy Manager and Team Leader and NCC department leads for infrastructure/spatial planning, Highways, Children's services (education), Public Health, Minerals and Waste, Natural Environment, Lead Local Flood Authority, (LLFA) and Norfolk Property Services, (NPS) held approximately every six months.
- 2.10 **Development Management Officers Group (DMO Group):** Senior DM officer group with a core membership of Officers including Norfolk County Council, South Norfolk Council, Broadland District Council, Norwich City Council, King's Lynn and West Norfolk Borough Council, Great Yarmouth Borough Council, the Broads Authority, Breckland District Council, the Lead Local Flood Authority and Norfolk County Highways. Meetings are held on a quarterly basis. The main aim of the group is to provide a strategic level update on issues affecting each District in attendance in relation to Development management practices.
- 2.11 **Norfolk Coast Partnership (AONB):** Officer and Councillor representation on the Core Management Group, with other key stakeholders being Kings Lynn and West Norfolk Borough Council, Great Yarmouth Borough Council, Natural England, Norfolk County Council, Broads Authority and Community representatives. Meetings are held approximately four times a year. The main aim of The Partnership is to deliver statutory duties required from Section 85 of the Countryside and Rights of Way Act 2000, which places a duty on relevant local authorities and public bodies, in exercising or performing any functions in relation to, or which affect, land in an AONB to have regard to the purpose of conserving and enhancing the natural beauty of an AONB. An updated 5-year Management Plan, 2019-2024 has recently been endorsed by the

¹ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>

Council. A Partnership Forum meets twice yearly and is made up of representatives from all of the partners and five community representatives elected by parishes in the area.

Coastal Partnership East

- 2.12 Coastal Partnership East brings together the coastal management expertise from three coastal local authorities into a single team; North Norfolk District Council, Great Yarmouth Borough Council, and East Suffolk Council. Coastal Partnership East is responsible for 92km of the 173km of coastline in Norfolk and Suffolk, from Holkham in North Norfolk to Landguard Point in Felixstowe. The three Councils covering most of the Norfolk and Suffolk coast, agreed to a partnership model to address these jointly shared issues. The partnership authorities operate through an integrated Coastal Zone Management, (ICZM) approach as evidenced by the Norfolk and Suffolk Coastal Authorities Statement of Common Ground for Coastal Zone Planning 2018. As coastal erosion risk management authorities, East Suffolk Council, Great Yarmouth Borough Council, and North Norfolk District Council are signatories to the Coastal Concordat for England².
- 2.13 Local Plan policies in coastal locations along with wider approaches to Coastal change management have been informed and evidenced through the joint approach and the utilisation of shared evidence bases such as Shore Line Management Plans, (SMPs). As key sources of evidence SMPs are integral to the formulation of Local Plan policy in respect of the coast, in particular the identification of the Coastal Change Management Area, (CCMA).
- 2.14 An emerging Coastal Adaptation Supplementary Planning Document, SPD has been prepared through the partnership with The Broads Authority (The Broads). An initial consultation was held between 4 September 2020 and 16 October 2020 and the responses received have helped to prepare a final draft document which was consulted on between January 25th 2023 and March 8th 2023.
- 2.15 The Coastal Adaptation SPD provides guidance to the implementation of the four authorities Local Plans and emerging Local policy approaches along the coastline and supports the implementation of the polices, providing case study examples of coastal adaptation best practice and will:
- Ensure Coastal Communities continue to prosper and can adapt to coastal change; and
 - Provide detailed guidance for developers, landowners, development management teams, and elected members on the interpretation of policies with a whole coast approach.

Further information can be obtained from: <https://www.coasteast.org.uk/about-us>

- 2.16 Further information on the emerging SPD and associated documents can be found <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/planning-policy-consultations>

Public Engagement

² <https://www.gov.uk/government/publications/a-coastal-concordat-for-england>

2.17 Members of the public, as well as developers, landowners and agents were encouraged to sign up to the Local Plan Database. Subscribers were kept up to date on progress and opportunities to get involved via newsletters and other notifications were sent where appropriate. Registration was through the following web link:
www.north-norfolk.gov.uk/tasks/planning-policy/register-for-updates-on-the-local-plan

3 Who We Engaged With (Regulation 18)

3.1 This section covers the engagement undertaken at Regulation 18 stage on the First Draft Local Plan (Part1), which included the alternatives considered, the Interim Consultation Statement, interim Sustainability Appraisal & interim Habitats Regulation Assessment. Consultation was undertaken between 7th May 2019 and 28th June 2019 up to the publication of the Proposed Submission version, at Publication Stage under Regulation 19. Included within chapter 3, 4 & 5 is a summary of:

- Who we have engaged with,
- How we have engaged,
- A summary main issues raised,

Chapter 6 details how these issues have been taken into account in forming the Proposed Submission Version of the Plan.

3.2 Supporting the consultation, a range of background papers and supporting evidence were also published at the same time to enable informed feedback and debate. These included:

- Paper 1 - Approach to setting the Draft Housing Target
- Paper 2 - Distribution of Growth
- Paper 3 - Approach to Employment
- Paper 4 - Infrastructure Position Statement
- Paper 5 - Green Infrastructure Position Statement
- Paper 6 - Development Site Selection Methodology
- Paper 7 - Housing Construction Standards

3.3 Evidence was published on the Council's online [Document Library](#)³ and included:

- Strategic Housing Market Assessment 2017, and 2019 Updates
- Norfolk Caravans & Houseboats Accommodation Needs Assessment, 2017
- Housing & Economic Land Availability Assessment methodology, 2016
- Housing & Economic Land Availability Assessment Part 1 Housing, 2017
- Housing & Economic Land Availability Assessment Part 2 Employment Land, 2018
- Settlement Profiles - Economic (*and facilities*) statistics, 2018
- Economic Impact of Tourism North Norfolk, 2017
- Business Growth and Investment Opportunities Study, 2015
- Indoor Leisure Facilities Strategy, 2015
- North Norfolk Power Study, 2019
- Planning In Health (Health Protocol), 2019
- Interim Plan-Wide Viability Assessment, 2018
- Norfolk Strategic Planning Framework (*Duty to Cooperate*) 2018 (now superseded)
- Amenity Green Space Study, 2019
- Norfolk Green Infrastructure Mapping Project Report, 2018
- Strategic Flood Risk Assessment, 2017
- Visitor Impact Assessment on European Protected sites, 2017
- Various monitoring reports including Five Year Housing Land Statements and

³ <https://www.north-norfolk.gov.uk/document-library>

Annual Monitoring Reports.

3.4 This chapter outlines who we engaged with as part of the preparation of the North Norfolk Local Plan Proposed Submission Version.

3.5 Table below sets out in broad terms who the Council consulted with during the preparation of the First Draft Local Plan (Part 1) and associated documents. These comprise the specific consultation bodies and general consultation bodies as set out in legislation, as well as individual members of the public and organisations who had indicated to us, when asked, that they wanted to be consulted on these documents.

Table 2: Consultation Bodies

Specific consultation bodies	General consultation bodies
<ul style="list-style-type: none"> • Coal Authority • The Environment Agency • Historic England • The Marine Management Organisation • Natural England • Network Rail • Highways Authority (NNC) • Norfolk Constabulary • Policy and Crime Commissionaire • Norfolk County Council • Borough Council of Kings Lynn & West Norfolk • Breckland District Council • Broadland District Council • Broads Authority • Great Yarmouth Borough Council • Norwich City Council • South Norfolk Council • Town and Parish Councils • NHS Norfolk • North Norfolk Clinical Commissioning Group (CCG) • Norfolk & Waveney Sustainable & Transformation Partnership • UK Power Networks & National Grid • Anglian Water • Telecommunication organisations • Sport England • Duty to Cooperate Bodies • New Anglia, Local enterprise Partnership for Norfolk & Suffolk 	<ul style="list-style-type: none"> • Members of the Public (including but not limited to those that expressed an interest) • District Council and Local County Council Members (Councillors) • Norfolk Coast Partnership • Local Businesses (who expressed an interest) • Developers / Agents • Landowners • Community Groups • Groups representing voluntary, young, racial/ethnic, national, religious, disability and business interests

3.6 The Council agreed to formally co-operate on a range of strategic cross-boundary planning issues through the preparation of the Norfolk Strategic Planning Framework (NSPF). A number of working groups were tasked with the production of evidence and a document demonstrating Shared Spatial Objectives for a Growing County and Statement of Common Ground. These groups consist of Local Authority staff assisted by other organisations including the Environment Agency, Natural England NHS Sustainability and Transformation Partnership (STP) now known as the Norfolk and Waveney Integrated Care System (N&WICS), Anglian Water, UK Power Networks, Active Norfolk and the New

Anglia Local Enterprise Partnership. For further information see the Norfolk Strategic Planning Member Forum website: www.norfolk.gov.uk/nsf

3.7 The table below sets out those organisations the Council formally engaged with through the Duty to Cooperate.

Table 3: Norfolk Strategic Framework

Signatories	Acknowledgements (of support in the production of the document)
<ul style="list-style-type: none"> • Breckland District Council • Broadland District Council • Broads Authority • Great Yarmouth Borough Council • Borough Council of King’s Lynn & West Norfolk • North Norfolk District Council • Norwich City Council • South Norfolk Council • Norfolk County Council • Natural England • Environment Agency • Anglian Water • Marine Management Organisation • New Anglia Local Enterprise Partnership • Active Norfolk • Water Resources East 	<ul style="list-style-type: none"> • Breckland District Council • Broadland District Council • Broads Authority • Great Yarmouth Borough Council • Borough Council of King’s Lynn and West Norfolk • North Norfolk District Council • Norwich City Council • South Norfolk Council • Norfolk County Council • Suffolk County Council • Babergh & Mid Suffolk District Councils • East Suffolk Council • West Suffolk Council • Fenland District Council • East Cambridgeshire District Council • South Holland District Council • Natural England • Environment Agency • Wild Anglia • Anglian Water • New Anglia Local Enterprise Partnership • UK Power Networks • Cambridgeshire and Peterborough Combined Authority • Norfolk and Waveney CCG • NHS Sustainability and Transformation Partnership Estates for Norfolk and Waveney • Mobile UK

3.8 A total of 1,891 General and Specific Consultees were directly consulted of which 296 were Specific Consultees and 1,595 were General consultees. A full list of the General and Specific Bodies consulted by group is contained in Appendix F.

4 How We Engaged (Regulation 18)

- 4.1 The Council engaged directly with those statutory and general bodies and a range of consultation methods in order to ensure the involvement of a wide audience as part of the plan making process. Fig 4 in the Statement of Community Involvement details the method of engagement available in order to involve the wider public.
- 4.2 A 6-week consultation period was held between 7th May 2019 and 19th June 2019 2 on the First Draft Local Plan (part1) and the range of supporting documentation and evidence. This was subsequently extended by a further two weeks period until the 28th June 2019.
- 4.3 12 public drop-in events were held between 2.30 pm and 7.30pm where officers from the Planning Policy Team were available to discuss the draft policies accompanying documents and supporting material:

Table 4: Public Drop-in Consultation Events

Settlement	Date (2019)
Sheringham	Tuesday 7 May
Cromer	Wednesday 8 May
Briston & Melton Constable	Thursday 9 May
Holt	Wednesday 15 May
North Walsham	Thursday 16 May
Mundesley	Friday 17 May
Ludham	Monday 20 May
Stalham	Tuesday 21 May
Hoveton	Thursday 23 May
Fakenham	Friday 24 May
Blakeney	Wednesday 29 May
Wells-next-the-Sea	Friday 31 May

- 4.4 The table below sets out the communication methods utilised:

Table 5: Communication Methods

Communication Method	
Consultation Documents	Relevant documents were made available for inspection at Council offices in Cromer and Fakenham and local Libraries in North Norfolk.
Exhibitions, leaflets and posters	Display boards were created for use at the public drop in sessions, along with easy read summaries and power point presentation. Events were advertised through direct mail out, Press and local poster distribution.
Website and Email	Relevant documents were made available on the North Norfolk District Council Local Plan web site for viewing and downloading. News articles and links were posted on the NNDC new page and Intranet news pages.
Member - Town & Parish Council Local Plan Update Events	Town and parish council events were held to provide advance notice of the forthcoming LP Regulation18 consultation

	and to advise attendees of the emerging content of the Local Plan. Held on 30 th October 6-8 pm, 1 st November 6-8pm 2018
Local Plan Newsletter	Details of the consultation, how and when to get involved were included in the Spring 2019 newsletter published to all those registered on the Local Plan consultee database, town and parish councils and all Members.
Council Tax letter mail out	A letter regarding the forth coming Local Plan consultation was distributed to all residences and commercial properties in North Norfolk in with the annual council tax notice.
Targeted letters & statutory notices and emails	Targeted letters / statutory notices with relevant information were sent advising of the start, duration and how to be involved in the consultation to all those statutory, and general consultees registered on the Council's Local Plan consultee database. A separate letter asked Town and Parish councils to display the formal consultation notices and consultation poster detailing the public events and how to get involved.
Press / media	News releases were issued to: <ul style="list-style-type: none"> • EDP, North Norfolk News, Fakenham & Wells Times, Fakenham Sun. • Radio Norfolk, Heart, North Norfolk Radio, KLFM. • Look East, Anglia News, That's TV Norfolk. • Local papers and magazines: Just Cromer, Just Holt, Just North Walsham, Just Sheringham, Just Wroxham & Coltishall, North Norfolk Post, Cromer Times, NW Times, Holt Chronicle, Sheringham Independent, Norfolk On My Mind.
Social media	Updates posted before and during on the Council's Facebook and Twitter accounts signposting to notifications, and relevant news feeds.
Meeting with Communities	Attendance at specific town & parish council meetings upon request included: Roughton PC 7.01.19, Swafeld PC 22.01.19, Northrepps PC 5.02.19, Cromer TC 14.02.19, Colby & Banningham PC 20.03.19, Little Snoring PC 15.4.19.

4.5 Accompanying the consultation, the Council undertook a **call for sites** in order to deliver small scale growth in the villages identified as small growth villages in policy SD3 at Regulation 18 stage. Alternative site suggestions, which had not already been put forward were also sought. More information on this feedback is contained in Para 5.7/5.8. Examples of the consultation notices, response form (written) and media releases are contained in Appendix G.

Equalities

- 4.6 We directly consulted a range of community groups and organisations by contacting them by letter or email through our consultation database. This included organisations representing particular social groups including faith groups, people from minority backgrounds, including Gypsies, Travellers and Travelling Showpeople, organisations and other ethnic groups, people with disabilities and particular age groups, including the young and elderly. A breakdown of statutory and general consultee by category of interest is included in Appendix F. A range of engagement techniques were used in order to enable all groups to make their views known.
- 4.7 Methods of engagement used to help broaden the accessibility of the consultation included:
- Translation / other formats available for all documents on request e.g. Braille, audio, large print or other language,
 - Venues for drop-in events used were accessible to those with disabilities and open into the evenings - 19.30 Hrs,
 - Ensuring the consultations were advertised through as many means as possible and involved dissemination through community representative groups such as town and parish councils and district council members.

Responses

- 4.8 Consultees could use a range of different methods to respond to the consultation. These were:
- **Online** (preferred) - using the Council's online consultation portal by visiting <https://northnorfolk-consult.objective.co.uk/portal>. This allowed respondent to draft, amend, and submit responses directly related to the section of the Plan with which they wished to comment,
 - **Response form** - paper forms were available at consultation events, local Libraries, council offices and upon request. Forms could be returned by hand and by post to the planning policy team; (Appendix G),
 - **Email** - people could email the Planning Policy team with their comments using a dedicated email address,
 - **Letter** - people could send hand-written or typed letters to the Planning Policy Team by post.

5 Summary of the Main Issues Raised (Regulation 18)

5.1 This section provides a summary of:

- the level and nature of response to the First Draft Local Plan (Part1)- quantity, types of respondent, method of response,
- an account of the main issues raised in relation to the draft Strategic Policies, site proposals and accompanying documents.

Level and Nature of Responses

5.2 Local Plan Update Events for Parish & Town Councils delivered over two evenings 30.10.21 and 1.11.21 to a full Committee Room. Events included a Local Plan progress update including explanation of key topics such as housing target & distribution, affordability, viability, optional housing standards along with Drop-in Session and Q&A Session Approximately 90 representatives of 60 Parish & Town Councils attended. Feedback indicated the events were informative, honest and well received. **Key issues covered** including setting of the housing target, distribution of growth, dwelling affordability, better quality homes and public consultation arrangements.

5.3 **Key discussion items included:** Optional technical standards, the component parts of the housing target and the underlying trends of household projections, infrastructure provision, potential for policy approaches around carbon reduction, dwelling affordability.

5.4 Comments received online were automatically recorded on the Council's online consultation database Consultation Portal <http://consult.north-norfolk.gov.uk/portal>. All responses received by email, letter or on paper copies of the response form (approximately 11% of responses) were recorded on the Consultation Portal manually and made available to view through the Portal for public viewing. All responses are summarised in the Schedule of Representations reports which are appended to this document.

Overall Quantity

5.5 951 representations were received from 404 consultees across the consultation documents. These are broken down as:

Document	No. of Representations	No. of Consultees	Late Responses
First Draft Plan	831	337	14
Alternatives Considered	83	30	
SA	9	9	
SA Scoping Report	2	2	
HRA	5	5	
LCA	7	7	
LSS	6	6	
Totals	951	404	(14)

5.6 Collectively the schedules contain 1347 individual comments when broken down into policy and proposal areas.

Types of Respondents

- 5.7 A Broad range of respondents submitted responses to the consultation documents:
- 595 individual comments,
 - 86 town and parish council comments from 15 Councils,
 - 508 statutory consultees and organisational comments.
- 5.8 In addition 148 comments on the alternative options document and 14 comments on the Interim Sustainability Appraisal & interim Habitats regulation Assessment.
- 5.9 Ninety one (91) sites were proposed through the further Call for Sites process covering small growth villages:
- 84 were associated with the small growth small growth villages as proposed, 7 related to alternative settlements outside the proposed hierarchy,⁴
 - 39 were new alternative proposals (completely new sites previously not promoted),
 - 12 were existing sites with no change in site area,
 - 40 were existing sites with a change to the site area proposed.
- 5.10 In addition, 26 sites were proposed through the First Draft Local Plan & Alternatives Considered consultation documents. Of these:
- 4 were wholly new sites in the identified growth locations / proposed hierarchy,
 - The other 2 were existing sites comprising of either the same site area (8) or a revised site area (16).
- 5.11 Fourteen (14) representations were received after the closing date and a further one representation was anonymous and were considered an inadmissible. One response (containing 7 separate representations on different policy areas was subsequently withdrawn. Details are in Appendix F.

Method of Response

- 5.12 The vast majority of responses were submitted directly through the Council's consultation portal. Forty-two (42) letters and a further 55 emails were received. Some of these duplicated the electronic submissions uploaded through the Portal.

Overview of Key Policy Issues Raised

- 5.13 Vision and Aims: 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.

⁴ Holkham, Northrepps, Tattersett, Warham, Wighton

- 5.14 There was a recurring theme throughout the responses from the general public that the Draft Plan was prepared prior to the declaration of a climate change emergency and as such the plan did not go far enough and or emphasis the issue sufficiently. Statutory bodies however recognised the input and content throughout the document around climate change mitigation and adaptation. 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.
- 5.15 **Sustainable Development Policies:** The majority of comments that raised substantive issues focused around key policies such as the settlement hierarchy SD3, Development in the Countryside SD4, Developer Contributions & Viability SD5, and Flood Risk & surface water Drainage SD10.
- 5.16 **Settlement Hierarchy - Distribution of Growth & Countryside Development:** There was no universal agreement in relation to the Distribution of Growth. Concerns were raised around the requirements to locate town-based growth in the AONB with statutory bodies advising of strong supporting evidence to justify choices in the SA and HRA. The principle of broadly focusing growth in and close to the larger settlements was generally supported, however the challenge was to ensure the Plan facilitates appropriate levels of growth in the correct locations and provide appropriate infrastructure. Some developers commented that focusing large scale development in North Walsham and Fakenham could lead to pressures on land supply in the short term and further allocations with a preference in the higher valued areas, instead of reliance on windfall should be made.
- 5.17 Proposals for growth in villages are particularly controversial with arguments both for and against development. The majority of public comments objected to growth in villages and countryside due to inappropriate infrastructure and highlighting climate change. The following PC/TC's objected to being identified as small growth villages: Bacton, High Kelling, Roughton, Southrepps and Weybourne. Reasons given varied but included preference for exception site development, impacts on existing character & infrastructure and as such small-scale allocations run the risk of disproportionate and unsustainable growth. There was general support for the opportunities rural exception polices brought from both public and development industry.
- 5.18 Proposals for growth in villages are particularly controversial with arguments both for and against development. The majority of public comments objected to growth in villages and countryside due to inappropriate infrastructure and highlighting climate change. The following PC/TC's objected to being identified as small growth villages: Bacton, High Kelling, Roughton, Southrepps and Weybourne. Reasons given varied but included preference for exception site development, impacts on existing character & infrastructure and as such small-scale allocations run the risk of disproportionate and unsustainable growth. There was general support for the opportunities rural exception polices brought from both public and development industry.
- 5.19 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.

- 5.20 **Developer Contributions:** Other issues raised included concerns around viability in relation to the Councils increased requirement for progressive infrastructure such as electric charging points and the requirement to ensure adequate full fibre to premises was in place prior to occupation. Many developers and land promoters requested clear requirements around obligations at the same time as wanting the Council to incorporate more flexibility in the policies application. Statutory bodies generally welcomed many of the policies and provided some useful suggestions on how to strengthen the policies and add clarity.
- 5.21 **Environment Policies:** Many of the policies were largely supported across the board and were seen as giving strength to the protection and enhancement of the landscape and settlement character. Natural England reiterated their position around requiring an enhanced policy approach around the protection of European sites while others also sought greater provision and incorporation of Green infrastructure, habitat creation and biodiversity net gain into development proposals.
- 5.22 **Housing Policies:** The majority of comments focused on the setting of the Housing target, HOU1 and the Housing Mix HOU2. Many individual commentaries indicated that the general public thought the housing target was too high and raised delivery concerns, lack of infrastructure and impacts on the landscape. Mixed commentary was received from statutory and organisations, with comments ranging from the target should be set as a minimum to comply with the NPPF. Some thought that the target should include a further uplift to address employment growth. 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.
- 5.23 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/number of adequate sites, particularly in higher valued and rural areas and or a buffer of sites should also be considered. The high reliance on windfall, rather than allocations was raised as a concern by some.
- 5.24 In relation the housing mix, HOU2. 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). The disproportionate requirement for self-built was questioned. Many developers wanted greater flexibility in housing mix and more certainty in the type and tenure of affordable housing. For the Public the main concern raised was around supplying housing at a price and tenure that addresses local need with the provision for Low Cost Home Ownership reflecting actual levels of income within North Norfolk rather than levels of average income for England as a whole.
- 5.25 **Employment Policies:** Overall broad support was offered for the Economic Policies within the Plan. Town and Parish Councils identified potential modifications to the primary shopping areas in Cromer, North Walsham and Sheringham. Statutory Consultees provided the most substantive responses offering minor modifications to ensure further clarity to the direction of the policies. Individual responses argued for

more flexibility in regard to the approach to tourism arguing for more rural and coastal development.

Overview of Key Site Issues Raised

- 5.26 In general, Statutory Consultees did not raise any substantive site concerns and provided more general comments around the principle of allocation. Statutory and organisations provided helpful comments around their aims and priorities and provided examples of where policy wording could be strengthened and or help address a specific site issue. Historic England requested that the Council undertake heritage impact assessments in relation to site assessments. NCC Highways and Lead Local Flood Authority (LLFA) initially raised a holding objection based on resource limitations to respond to the technical requirements of site access and highway network during the consultation period. The LLFA subsequently removed their objection and an extension of time was agreed with NCC Highways and officers of both councils worked together to ensure detailed site specific technical comments were received that have fed into the site assessments.
- 5.27 Although limited feedback there was general support received from the Town and Parish councils around the allocations with one or two exceptions including DS3, **Clifton Park, Cromer** which received significant number of objections.
- 5.28 A large number of objections were received from members of the public and nearly half were objections to the proposed site allocation at Clifton Park, Cromer. Comments raised a number of issues, including concerns over development on land which is considered to be a critical gap, a wish to retain the town and village boundaries, biodiversity and capacity concern at WRC.
- 5.29 There was general support for the proposed sites **in North Walsham** and acknowledgment for the need for a link road. Underlying many objections to individual sites, especially in North Walsham, are concerns about whether development is actually needed and how supporting infrastructure would be provided in a timely fashion.
- 5.30 Some developers raised concern over the reliance on large growth in the lower values areas such as North Walsham and this could hamper the Council in the short term through restrictions on land supply. Respondents in Wells – next –the - Sea were concerned about the level of market housing which could be built on the sites in Wells-next-the-Sea, and that it would not reflect their needs.
- 5.31 General comments were raised by members of the public around over the potential impact of development on the character of the countryside and on the character of settlements, especially in the coastal towns and villages. A number of comments mentioned concerns about how large-scale housing growth might undermine the character of the District. Concern over major development within the AONB and some comments raised potential environmental issues for site DS8 Barons Close, Fakenham.
- 5.32 Further general concerns were included in site commentary over the lack of employment opportunities available and the additional pressure development could have on services including doctors and schools. Inadequate vehicular access, flooding and drainage, amenity impacts on adjacent homeowners and impacts on wildlife and the tourism are recurring themes.

- 5.33 Anglian water provided feedback on a number of policies supporting the approaches around demonstrating water efficiency through BREEAM and optional building regulation standards. In relation to SuDs they supported the general approach making it clear this was their preferred method of discharge. In relation to a number of sites they supported the allocations with conditions and suggested alternative wording in relation to foul sewage, on site water infrastructure and surface water management for reasons of clarity and policy effectiveness.
- 5.34 An Interim Habitat Regulations Assessment was prepared and accompanied the consultation documents. At this stage it was concluded that *“Whilst a conclusion of no adverse effects on European site integrity cannot currently be made. It is concluded that there are measures recommended or in progress that are capable of providing the necessary certainty to enable a conclusion of no adverse effects at the next iteration of the HRA”*. The process of Habitat Assessment is iterative, and the findings have been incorporated into the Plan and a final HRA commissioned to update the report and to take account of any changes.

Overview of Alternative Options Considered

- 5.35 In regard to policies, representations took the opportunity to re-affirm support for the Council’s preferred policy options and or to raise objection to specific alternatives. A limited number of responses against alternative policies suggests broad overall support for the direction of the preferred policies within the First Draft Local Plan.
- 5.36 In regard to sites, representations took the opportunity to provide additional information, requested that sites be re-assessed for alternative uses or be re-assessed as smaller sites. The only alternative site to raise substantive support was W11, a mixed-use site put forward in Wells – next - the Sea. These comments were not directly objecting to the Council’s assessment but largely requesting that the site size is reduced, and the site is re-assessed on this basis.

Overview of Sustainability Reports & Habitats Regulations Assessment

- 5.37 Where comments were received on the interim SA and HRA reports they were supportive of the approach and assessments to date. Comments focused on the need for further work to inform the HRA in relation to the potential for adverse effects and mitigation, with some advising that a separate policy is needed in relation to recreational pressures. Three specific representations sought further clarity and or changes to specific policy and site sustainability appraisals. Natural England were supportive of the methodology and approach taken in providing a robust assessment at regulation 18 stage.

Overview of Landscape Character Assessment & Landscape Sensitivity Assessment

- 5.38 These documents were consulted on at the same time as the Local Plan but separately under Regulation 12 and 13 The Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended). The number of responses are reported here for consistency however the development of the documents as supplementary planning guidance is outside the scope of this consultation statement and no further analysis is reported. Both documents have since been finalised and adopted by the Council.

6 How the Main Issues Have Been Addressed (Regulation 18)

- 6.1 This section provides a summary of how the responses received have been taken into account in preparing the Proposed Submission Version at Publication stage of the Development Plan Document, (DPD) for Regulation 19 consultation and proposed submission to the Secretary of State for independent examination.
- 6.2 The feedback received was reported to Members of the Built Heritage and Planning Policy Working Party through a series of schedules in December 2020 as detailed in Appendix A-E Detailed analysis, policy and site proposal recommendations were then presented and discussed at working parties between March 2020 and November 2021 in order to finalise individual policy and site proposal content.

General Comments: How the Main Issues Have Been Addressed

- 6.3 In response to the wide ranging comments relating to the need to address climate resilience through sustainable development, and Members feedback through the Planning Policy & Build Heritage Working Party to ensure the principles of climate change, environmental considerations and the inclusion of revised corporate priorities, the Plan has been amended to enable upfront considerations of climate change principles, rather than the previous layout which embedded the approach throughout the document. Consequently, the document has been restructured with policies from across the Plan being consolidated in a new section focusing on delivering climate resilient sustainable growth. However, action and consideration of matters relating to climate change remain integral parts of many policies and as such, the Plan needs to be taken as a whole. The guiding principles of delivering climate resilient sustainable growth is now set out through Policy CC1. A number of policies or aspects of policies have been merged in order to provide clarity and reduce repetition and in some cases, additional policies have been added where necessary.
- 6.4 The front end of the plan which, includes the Spatial Portrait, Vision and the Aims & Objectives, has been updated with a more focused purpose of identifying and substantiating the key challenges facing the District in enabling growth, providing housing and jobs, whilst conserving and enhancing the landscape and natural environment – all in the context of moving towards net zero and increasing our resilience to climate change. New sections have been added into the Spatial Portrait around carbon emissions, the key challenges around the Plan’s role in facilitating and managing the mitigation and adaptation to climate change through land use policies, in order to seek a step change across the district to a more sustainable future through a shared responsibility and model shift in practices.
- 6.5 The Proposed Submission Version at Publication Stage now sets out the strategic policies across six specific strategic and interrelated policy sections including: **The Delivery of Climate Resilient Sustainable Growth, The Spatial Strategy, Delivering Well Connected, Healthy Communities, The Environment, Housing and The Economy**. The previous sustainable development section has been replaced with a focused section, which provides a consolidation of policies and that puts emphasis on the delivery of climate resilient sustainable growth. The section consolidates the key policies and considerations that were previously incorporated throughout the Plan into one upfront chapter and sets out the guiding principles that development proposals should address in order to ensure that new development positively contributes to mitigating and adapting to

climate change and addresses the challenges most relevant to North Norfolk.

- 6.6 The section incorporates policies that were previously detailed throughout the document and also new policies, such as the requirement for biodiversity net gain. As a result, a new section covering the distribution of development has been created, which clearly focuses on the delivery of the sufficient housing of the right type that addresses the needs identified through national evidence and reflects local priorities. The settlement hierarchy has been updated and detail added bringing clarity to the approach around growth in small growth villages and “countryside” development and allows for the setting of any housing target through neighbourhood planning in such villages. A third new section; Delivering well connected, healthy places, consolidates policies and approaches around community facilities, health, services, and infrastructure requirements, which were previously in the sustainable development section. As such, it allows the Plan to place emphasis on key policy requirements highlighted by Members and responses around the delivery of and support for services, open space, broadband, and the timely delivery of necessary infrastructure through specific developer contributions and which link back specifically to a number of the key strategic aims and objectives that were set for the Local Plan.
- 6.7 Section 6 then focuses on the built and natural environment, setting out policies that cover the strategic approach to the Norfolk Coast Area of Outstanding Beauty and the Broads, how development proposals are to reflect the defining and distinctive qualities of the landscape character areas, protect and enhance biodiversity geodiversity and the historic environment. Remaining policies in the section set out the principles of high quality design, amending considerations and a specific approach to addressing the effects of growth through individual or in-combination effects on the integrity of international and European sites from recreational disturbance.
- 6.8 Section 7, covering Housing, is repurposed to complement the housing distribution policies and collectively they enable the delivery of a wide range of both market and affordable homes in sizes, tenures and types to match the identified existing and future needs. The minimum space standards and requirement for accessible and adaptable homes remains in this section. These policies incorporate the aim to increase the overall percentage of appropriate housing across the District that allows people to remain in their own homes and communities through all the stages of life in a cost effective way, complementing the wider health strategy.
- 6.9 The final strategic policy section covers the economy and sets out the guiding principles around employment opportunities required to deliver sustainable growth. Policies in this section cover employment allocations, the approach to employment in designated and undesignated areas and include specific policies on retail and main town centres and the tourist economy. The section, although updated for reasons of clarity and conformity, remains largely in the same order as at Regulation 18 and is updated and informed by further employment studies and background papers in relation to existing and future provision.

Sites

6.10 Site allocations and new sites submitted in locations in line with the spatial strategy have been reviewed and sections updated with individual site proposals. All proposals have been reviewed in relation to feedback, additional evidence and detail from statutory bodies where necessary such as Anglian Water and Highways, sustainability report and Habitat Regulation Assessment. Site allocation policies have been refined so as to set out specifically policy requirements that need to be addressed through future planning applications. Each settlement review is brought together through a site assessment booklet which consolidates the feedback received at regulation 18, the sustainability assessment and other relevant information. The booklets provided the detailed site assessments and policy requirements necessary to ensure sites are suitable, available and deliverable to meet the identified needs and spatial strategy of the District.

Evidence

- 6.11 A number of evidence-based studies have been commissioned or undertaken in house to further inform and support policy and site work, in response to feedback and changes in national policy. In particular a detailed Heritage Impact Assessment has been undertaken with guidance and review from Historic England, an updated viability assessment, a quantitative and qualitative review of open space provision and local standards, and an assessment around the supply and demand of employment land in the District. Statutory documents such as the Sustainability Appraisal report has evolved and informed policy development along with the final iteration of the Habitat Regulation Assessment, HRA.
- 6.12 Further background work reflecting on feedback has been undertaken to inform and review the housing target and the policy ask around type and tenure of housing has been undertaken. A study of retirement housing needs, has been done undertaken with Local Planning Authorities across Norfolk to help substantiate the growth need for specialist adult accommodation.
- 6.13 Further highway studies have informed various site appraisals and the more detailed work around the large urban extension North Walsham West.

Strategic Policies: How the Main Issues Have Been Addressed

6.14 This section sets out how the responses received in relation to the strategic policies have been addressed in preparing the Proposed Submission Version at Publication stage of the Development Plan Document, (DPD) for Regulation 19 consultation and proposed submission to the Secretary of State for independent examination.

Policy SD 1: Presumption in Favour of Sustainable Development

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> The majority supported the approach and priority given to the principle of sustainable development. Statutory Bodies & Organisations gave a mix of responses, with some commenting that the policy and supporting text could usefully include further references to wider plans, such as master plans and that it should be made clearer that the presumption does not negate environmental objectives, including the assessment of impacts to designated sites and the possible need for mitigation. 	<ul style="list-style-type: none"> The Policy has been moved to the Climate Change Section of the Plan and updated as Policy CC1: Delivering Climate Resilient Sustainable Growth. In response to the wide-ranging comments relating to the need to address climate change and resilience through sustainable development, the expectation to ensure that wider climate change principles are up front and integrated throughout the Plan, and that development makes a positive contribution the policy has been revised. Through integrating sustainable development and climate change principles the approach now sets out the key guiding principles that new development should address in order to ensure that new development positively contributes to mitigating and adapting to climate change and sustainable development, addressing the key challenges most relevant for North Norfolk.

Policy SD 2: Community-Led Development

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> A number of comments of support endorsing the policy approach for community led development (through neighbourhood plans). Consideration in favour of these developments would be appropriate and inclusive of the local community but should not be at the expense of quality, compliance, sustainability or policy. Some Statutory Bodies & Organisations asked for clarification as to the extent of community support required, with some organisations seeking amendments to the approach around the inclusion of estate masterplans, greater recognition and endorsement of market housing in 	<ul style="list-style-type: none"> The policy has been moved into the Spatial Strategy section and is known as Policy SS3: Community-Led Development. In response to the limited consultation feedback, some amendments to the policy wording have been made to add clarity. In particular, detail has been added to explain the types of schemes that would be supported and what is meant by demonstrable community support, as a footnote in the policy. A further criteria (point d) was added as a result of the Councilor’s resolution at Planning Policy & Built Heritage Working Party, to ensure that

<p>rural areas, recognising the contribution to sustainable development and the use of Housing needs assessments in demonstrating need, and hence support in rural areas.</p>	<p>proposals incorporated ‘substantial’ community benefits and amendments relating to affordable housing to ensure continuity and consistency with other policies, such as Policy HOU3: Affordable Homes in the Countryside (Rural Exceptions Housing).</p>
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Policy SD 3: Settlement Hierarchy

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • A significant number of the objections to the Policy related to the provision of growth in the Small Growth Villages and the Countryside. Objectors commented that housing development should be focused where there is appropriate infrastructure, public transport, healthcare, employment and other services. They considered that the approach fails to integrate the problems of the climate crisis. Many suggested that rather than allocating in these villages, development should be allowed on infill and brownfield sites. • Collectively, many commented that the overall policy approach would provide an appropriate strategy in meeting environmental objectives to direct growth to those settlements that have services, employment, and public transport and where there is a specific housing need. Overall support for focusing development in Large Growth Towns, which are the largest most sustainable locations and also able to accommodate growth. • In relation to Small Growth Villages, feedback suggested that the identified small villages are unsuitable locations for growth as there is no local demand, limited employment and services and would development would have unacceptable impacts on the existing character and infrastructure and could run the risk of disproportionate and unsustainable growth. • Feedback identified that the village of Langham does not contain the required level of services/ facilities, as set out in the methodology, to be considered as a Small Growth Village and consequently • There was, however, strong support for the provision of affordable housing in 	<ul style="list-style-type: none"> • The policy has been moved into the Spatial Strategy section and is broadened out clearly shoe the indented spatial strategy Policy SS1: Spatial Strategy. • The Policy accords with the NPPF requirement that ‘planning policies and decisions should actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.’ Taking this requirement and the feedback into account, the settlement hierarchy policy, together with site allocations being included in the Plan for settlements in the top three parts of the hierarchy, provide a specific focus and degree of certainty, where sites will be developed during the plan period. The policy goes on to identify suitable small growth villages based on the provision of a limited amount of services. The qualifying villages were reviewed in line with updated information on service provision and the list amended where the level of service provision no longer met the qualifying criteria. (Langham was removed). • Although 209 small sites were put forward through the call for sites, a revised criteria led approach is put forward for the delivery of growth in the small growth villages based on a more flexible approach, equitable distribution and criteria approach delivered through market forces. The policy approach is changed to provide an indicative target In line with the historical delivery of 6% growth for those villages identified as Smaller Growth Villages in line to deliver the

<p>such villages. Many considered that allocating development in Small Growth Villages would have a knock-on impact on the delivery of rural exception affordable housing schemes. Development on small suitable infill plots was, however, generally supported.</p> <ul style="list-style-type: none"> • Conversely, some considered that growth in the Countryside is overly restrictive and small-scale development should be allowed on greenfield sites and on derelict/neglected sites and that other settlements should also be promoted. • A number of statutory bodies and organisations commented that the requirement for site selection should be informed by the Sustainability Appraisal and Habitat Regulations Assessment and have high regard to the landscape. • That the small village requirement of approximately 400 dwellings be increased and an allowance for residential growth to come forward for sites adjoining or close to the existing confines of a settlement, in order to be more flexible • Provide more certainty through less reliance on windfall, concern regarding the impact of estate housing. • Those representing the larger agricultural estate management sought greater flexibility that could allow for the facilitation of estate growth such as key worker accommodation. 	<p>required numbers in line with Policy HOU1</p> <ul style="list-style-type: none"> • With such an approach, Small Growth Villages will not receive specific allocations, but each location will see development in line with revised settlement boundaries. A number of criteria were added clarifying the qualifying conditions and quantities for development in small villages clarifying the types of development that would be permitted as a function of the development boundary to help direct all development rather than just residential, small-scale developments will be permitted both within and in locations immediately abutting to the defined boundaries in each of the village. A settlement boundary review has been undertaken for each of the selected Small Growth Villages to ensure the boundaries are up to date. • The revised policy approach would not lead to the number of dwellings in any of the selected Small Growth Villages increasing by more than 6% from the date of adoption of the Plan, unless it was through exception development, additional growth identified through neighbourhood planning or through other rural policies and permitted development that accords with the broader policies in the Local Plan. The approach is also amended to align with other policies and clarify that AH use should first be a consideration in line with wider Council aspirations and need
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Policy SD 4: Development in the Countryside

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • The policy approach was largely supported, but a number of responses commented that appropriate development should be allowed to ensure that the rural economy is preserved and one questioning the effectiveness of the policy given the number of exceptions. • The view that growth should only be promoted in the countryside in order to meet identified need was promoted by 	<ul style="list-style-type: none"> • The policy has been moved into the Spatial Strategy section and is known as Policy SS2: Development in the Countryside. • No substantial issues were raised from the consultation feedback, with the prevailing view being that growth should only be supported in the countryside in order to meet identified need and that the approach taken was the right approach with regard to

<p>some, whilst others sought policy wording to support estate management and the contribution they bring to sustainable development.</p> <ul style="list-style-type: none"> • The development industry sought greater flexibility and a more positive approach to growth in this designation • There was limited concern around the potential impact of business extensions and a request for the requirement of a Landscape Visual Impact Assessment in the policy. • Norfolk County Council, Minerals and Waste team, requested that bullet point 2 be removed in its entirety. 	<p>sustainable development in North Norfolk.</p> <ul style="list-style-type: none"> • Norfolk County Council Minerals and Waste team’s request to remove bullet point 2 has been carried out and, for clarity, bullet point 3 has been linked to Policy HOU4, adding certainty around the application of key workers to functionally link them to the land and also allowing a more flexible approach with regard to agricultural worker’s accommodation needs on the larger estates.
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Policy SD 5: Developer Contributions & Viability

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • General support for the principle of the use of developer contributions, being considered vital for the success of larger development schemes, where further enhancements and clarifications around specific developer responsibilities i.e. around the creation of new habitat (EA) and specific reference to Norfolk County Council's Planning Obligation Standards. • Some comments stated that the Policy doesn’t provide enough detail on how contributions will be calculated and doesn’t refer to future SPDs, which could determine contribution levels. • A number of respondents comment that Developers must adhere to their promises with regard to contributions to infrastructure and medical provision, particularly as improvements are needed to the road infrastructure and given the concerns over the impact on NHS Health Service, Primary Care and Mental Health Services. Therefore, suggest that policies are explicit that contributions towards healthcare will be obtained and should be supported by a Health Impact Assessment for larger scale development. • A small number of comments requested consideration of a further Community Infrastructure Levy and more contributions to adult social care. • The Development industry sought variations to enable the submission of a 	<ul style="list-style-type: none"> • In response to the feedback it is considered that there was scope to undertake some minor changes and clarifications in order to strengthen the policy wording and reasoned justification so that there is a clear purpose and further clarity. • The Policy has been moved to the Delivering Well Connected & Healthy Communities section of the Plan and renamed, Policy HC4: Infrastructure Provision, Developer Contributions & Viability, in order to emphasise its purpose is to deliver infrastructure to support growth. • An indicative list of infrastructure is added to the supporting text along with text around biodiversity, emphasising that it is the developer’s responsibility to mitigate and enhance existing habitats and if this cannot be achieved on site it remains the developer’s responsibility to ensure suitable off-site enhancement. • In addition, the requirement for biodiversity net gain has been strengthened in the specific environmental policy and a further new policy CC10 Biodiversity Net Gain has been added. The policy itself has been amended to specify that contributions are required that meet the NPPF tests and will be sought on the specific policy requirements as set out in the wider

viability appraisal 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.

Development Plan and Supplementary Planning Documents.

- In relation to viability the policy is amended to ensure it is clear that a viability appraisal is required where a proposal is seeking a departure from policy on viability grounds.
- Further references have been added to the supporting text in relation to the considerations of national policy and the requirement for the Council to introduce Infrastructure Funding Statements, setting out the Council's infrastructure priorities and delivery as well as monitoring information around how monies have been received and spent. Norfolk County Councils Planning Obligation Standards (which are reviewed annually) are expressly referenced. (para 5.4.5)
- In relation to the comments regarding the requirement for appropriate contributions for health provision as a result of growth the approach is clarified through the addition of a separate and specific policy.
- For clarity and in order to draw together the wider health and wellbeing comments a separate additional **policy HC1 Health and Well Being** is added around the considerations of health and well-being through development with particular reference to the requirements of the health protocol. The support for the provision of necessary health infrastructure and services is an important consideration across North Norfolk. The Council is a signatory to the Joint Norfolk Health Protocol through the Norfolk Strategic Framework 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.

Policy SD 6: Provision & Retention of Local Facilities and Services

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Overall support for protecting community facilities, where some amendments were suggested to the policy with regard to change of use and making it tougher to change pubs and shops. A few commenting that health and social care campuses should be considered. • The Broads Authority suggested the approach may be too permissive. 	<ul style="list-style-type: none"> • The Policy has been moved to the Healthy Communities section and is now known as Policy HC3: Provision & Retention of Local Facilities and Services. • Limited consultation feedback was received in relation to this policy. Further clarity was sought as to the identification of the sites the policy relates i.e. health and social care campuses - these will be identified on the policies map. • Although pubs are identified as important local facilities, for which the policy applies, one comment requested amending the policy in order to make it more difficult to change between use classes, specifically in relation to Public Houses and shops. Legislation already exists through the Localism Act that allows communities to identify Assets of Community Value, which allows a community the right to bid if such an asset becomes available. Minor amendments to the policy are proposed for reasons of clarity.

Policy SD 7: Renewable Energy

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Mixture of responses, with one stating that onshore wind turbines should be discouraged due to their inherent impact on the appearance and character of the countryside and that solar farms should be limited and should be screened by hedging. • Another states that Norfolk is extremely suitable for onshore wind power, which is an obvious way to cut carbon emissions. • Some considered the policy wording is unnecessarily negative, whilst others commented that it was too general, offering little specific protection against future inappropriate onshore wind turbine development. • Some commented that the policy wording does not seem to accord with the Landscape Sensitivity Assessment, 	<ul style="list-style-type: none"> • The Policy has been moved to the Climate Change Section of the Plan and is now known as Policy CC2: Renewable & Low Carbon Energy. • The general content of the consultation feedback expressed an overall desire to have a clear and more positively worded policy that would still provide the necessary strong protection to the most valued areas of the natural and built environment, to the amenity of local communities and to the biodiversity of the district. • Since the Regulation 18 version of the Policy was drafted the government has committed to a legally binding target requiring the country to be net carbon zero by 2050 and the Council has declared a Climate Emergency coupled with the positive implementation of a

<p>which found that there are no landscapes that score 'low' or even 'low-moderate' sensitivity to commercial wind energy developments. Therefore, the policy should offer more prescribed protection, in consideration of the valued landscape and local community.</p> <ul style="list-style-type: none"> • Comments from a housing developer and Norfolk Wildlife Trust (NWT) include that the policy wording needs to better accord with the Vision and Aims and Objectives statements in the Plan and take more account of the declared climate change emergency, in order to provide more positive support for renewable energy provision. • NWT also recommended that the policy should provide support for other renewable energy opportunities in new development, such as solar panels on new build roofs. This is also reiterated by the Environment Agency who refer to encouraging alternative heating systems as well. • Natural England include recommendations that renewable energy projects are considered strategically in terms of timings of works, particularly for cable lines and grid connections, in order to minimise disturbance and highlighting that Policy ENV4: Biodiversity & Geology should be referenced in this Policy to ensure delivery of green infrastructure. 	<p>Green Agenda including the commitment to the production of an Environmental Charter.</p> <ul style="list-style-type: none"> • In response to the above, the policy has been more positively worded to encourage the principle of all types of renewable energy development, including any brought forward through community-led initiatives. The wording now references proposals including landward infrastructure covering for cable routes for offshore wind energy development, as well. The wording has also been amended to support all proposals where the site is located in an area that does not exceed 'moderate-high' sensitivity within the Landscape Sensitivity Assessment SPD (2021). • The policy wording retains a criteria based element which has been merged, so that all proposals would need to demonstrate its suitability against a list of 6 requirements. In response to feedback the list now includes the special qualities of nationally and internationally designated conservation sites, habitats and biodiversity. Support for offshore ring main and concerns around piecemeal development of underground cable routes is added to the supporting text. • For further clarity, the last paragraph of the policy has been amended to direct the location of wind energy proposals to be informed by a Wind Energy Map, which will identify the broad areas of the district where such proposals would be acceptable, in principle. • The requests to include other renewable energy in new development, such as solar panels and alternative heating systems, within the Policy, is now referred to in the policy justification text where a link is provided to Policy CC3: Sustainable Construction, Energy Efficiency & Carbon, which addresses these matters.
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Policy SD 8: Fibre to the Premises

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Overall support, stating that the introduction of broadband and improved fibre internet connections is important and should be available to every property, allowing employees to work remotely, limiting travel and reducing traffic and congestion. • Also suggestion that the policy should prioritise businesses/ commercial uses for better upload speeds and that a technological hub is required to provide a facility for businesses and that planning advice should be better and more flexibly linked to economic development needs. • Developers were concerned that the approach is too onerous on them, stating that Broadband installation is the responsibility of the 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. 	<ul style="list-style-type: none"> • The Policy has been moved to the Healthy Communities section and is now known as Policy HC5: Fibre to Premises. • The policy wording has been amended to add further clarity in response to feedback and national guidance. A threshold has been added around commercial proposals and the policy clarified that all new dwellings shall be constructed with industry standard FTTP connections and within the dwelling and to allow connection to the public highway. • In response to developer comments, it is clear that national policy and the direction of travel from the government demonstrates that high speed digital infrastructure provision is a national priority and that new digital infrastructure should be delivered in all urban and rural areas as part of development proposals. • The government’s policy approach on digital infrastructure is supported by the statutory requirements placed on infrastructure providers such as OpenReach, by increased funding, and by roll out initiatives delivered nationally and locally through ‘Better Broadband for Norfolk’. • The policy approach has been amended from a demonstration of not practicable to one that is not cost effective and allows for the submission of evidence from the developers to support why particular infrastructure may not be able to be provided, but will require them to make all reasonable efforts to provide full connectivity to the new development and the use of alternative technologies.

Policy SD 9: Telecommunications Infrastructure

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Limited feedback with one stating concern over the safety of 5G and one comment in support of controlling the 	<ul style="list-style-type: none"> • The Policy has been moved to the Healthy Communities section and is now known as Policy HC6: Telecommunications Infrastructure.

<p>siting of masts and infrastructure and to mitigate/disguise where possible.</p> <ul style="list-style-type: none"> • The key issue raised by statutory bodies & organisations 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, but that the approach placed unnecessary burdens on the residential developers. 	<ul style="list-style-type: none"> • In response to developer comments, it is clear that national policy and the direction of travel from the government demonstrates that the demand for telecommunications infrastructure is important and integral to the success of business operations and individual lifestyles. • The policy has been amended to ensure the facilitation of this growth, whilst at the same time, encouraging mast sharing and the use a least visibly intrusive option. The aspects that required a demonstration of the wider least environmentally intrusive option has been removed. • The scope of the policy has been reduced to ensure it clearly focuses on infrastructure provision rather than Previous duplication on SD8 and clarification brought in ensuring the onus is on developers to demonstrate compliance with the policy •
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Policy SD 10: Flood Risk & Surface Water Drainage

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • General support for this policy. Comments included that housing should not be built in flood risk areas and concern over the impact of new housing on drainage. Suggest that fully paved developments without green areas and hardstanding over gardens are discouraged to limit potential for run off and flooding. Introduce a maximum hardstanding percentage. • Statutory bodies generally welcomed the policy and supporting text. Some suggestions around clarity, such as a reference to sewer flooding and 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. • 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. 	<ul style="list-style-type: none"> • The Policy has been moved to the Climate Change Section of the Plan and is now known as Policy CC7: Flood Risk & Surface Water Drainage. • In response to the feedback it is considered that there was scope to add further clarity to the policy wording and accompanying text so that the purpose and explanations aided interpretation. • Specific text was added to the policy at the request of Anglian Water, making clear that the preferred method of discharge was through SuDs 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. • Three further bullet points were added to the first part of the policy, ensuring that foul water disposal and treatment is provided in time to serve the development, service water connections are not made to the foul system and that access to water supply

- 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.
- The LLFA suggested 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.
- The Environment Agency (EA) sought further text detailing the requirements of development within flood zones and how any such development could be made more resilient, along with clarifications when Flood Risk Assessments would be required and the expected content. Whilst the general principles were supported by the development industry, some responses sought changes around requirements to consider and supply a drainage strategy at pre application stage, as this was considered to be onerous.

and drainage infrastructure is safeguarded.

- The policy was also been strengthened in clarifying that developers need to evidence how the drainage hierarchy has been followed and demonstrate consideration of all other solutions if a drainage option is not feasible.
- At the request of the Environment Agency additional wording was added to the supporting text around the requirement for resilient design in areas of flood risk and for clarity advising that the EA would object to any new development in Functional floodplain (Flood Zone 3b) as this would be against policy. The policy and supporting text were also updated emphasising the importance of drainage strategies/ flood-risk plans and the detail required in order to make development more resilient in flood risk areas.
- Reference to the sources of flood risk and wider District context was added to the supporting text which was also expanded emphasising that SuDS should form an integral part of any green infrastructure framework of a site and provide wider amenity and recreational benefits and opportunities for biodiversity improvements.
- The consideration and opportunities for biodiversity enhancement through SuDs was added to the policy. Further detail on climate change and the need to consider future projected flood extents and their illustration in the Council's updated SFRA was also added.
- The policy and supporting text has been updated in relation to run –off rates, the consistency of the policy with the LLFA advice and the rates expected from Brownfield development.
- Clarity has been brought around the requirement for SuDs and the perceived major development threshold. The approach is one where all new built development should be informed by sustainable drainage principles unless it can be demonstrated as not feasible. Additional policy wording is added clarifying that Development proposals should prioritise the use of sustainable

	<p>drainage systems. On the advice of Anglian Water it is emphasised that alternatives will only be permitted where sustainable drainage is shown to be impractical or where it is clearly demonstrated to compromise the viability of the scheme. Any alternative scheme must be consistent with both national and local planning policy.</p> <ul style="list-style-type: none">• Reference to the drainage hierarchy is simplified with the policy referring to it and further explanation added to the supporting text. References to guidance from the LLFA are updated from 2017 to 2019 and emerging 2021 guidance additional references added to supporting documents such as the SFRA and further guidance from Anglian Water and the Environment Agency.• Text has been added to both the supporting text and policy in order to clarify the requirements for and the content of Flood Risk Assessments. A further policy reference to the level of information required and at what stage of a planning application it is required has been added to the policy, with a further table added as an appendix to the Plan for reasons of clarity. The table is linked to LLFA guidance. The requirements of the proportionate information to be supplied at pre application stage is clarified so as not to make the process too onerous on developers, but also to emphasise that drainage solutions need to be considered early on in the process• In response to comments by Natural England around the importance to demonstrate that the method of surface water disposal will not have any adverse effect on European and nationally designated sites, further text has been added to the supporting text around the importance of water quality and the appropriate consideration given to all four pillars of Water Quantity, Water Quality, Amenity and Biodiversity.
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Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Individuals mainly commented that villages and towns on the coast should be protected from the risk of coastal erosion and flooding in order to maintain existing communities, encourage tourism and protect agricultural land and wildlife and that new homes should not be built in areas at risk of coastal erosion. • A company that operates a caravan park within the CCMA is concerned that the policy would be overly restrictive and limit opportunities for the staged 'roll back' or possible relocation of existing tourist related businesses within the CCMA. It states that the relocation from the most vulnerable areas of the CCMA to the less vulnerable areas in the CCMA would be more feasible, viable and deliverable than a complete move outside of the CCMA. They comment about the difficulties of finding alternative sites and that most attractive sites are likely to be within the AONB/Undeveloped Coast where other restrictive policies would apply. • Natural England commented that 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. • The RSPB commented that any assessments regarding coastal change must consider wider issues, such as, changes to sediment inputs offshore, especially with a changing climate and weather patterns. The Norfolk Coast Partnership requested that geology be mentioned in the policy and that there is a need to involve the Norfolk Geodiversity Partnership in applications and projects. 	<ul style="list-style-type: none"> • The Policy has been moved to the Climate Change Section of the Plan and is now known as Policy CC5: Coastal Erosion. • The Policy has not been amended in relation to Individuals comments regarding coastal protection, because the policy for coastal management and defense is contained in the relevant Shoreline Management Plans. North Norfolk DC is the 'Coast Protection Authority' with the power to undertake coast protection works and to determine third party applications for such works. North Norfolk DC also has a broader responsibility for ensuring that the interests of the public and of our coastal communities is safeguarded in the face of coastal change. • The policy wording has been amended to add further clarity as to what proposals will be granted planning permission within the defined CCMA. In response to the Holiday Park Company, the matter of roll-back/ relocation is largely dealt with in Policy CC6: Coastal Adaptation. Further guidance, including details regarding the types of development that are likely to be acceptable within the CCMA and the requirements of a Coastal Erosion Vulnerability Assessment, will be set out in a joint authority coastal Supplementary Planning Document that is currently being drafted.

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • An Individuals supported the policy, but suggests that coastal adaptation should be for local occupiers and shouldn't allow second homeowners to relocate. • An objection was concerned that the relocation of cliff-top caravan parks to sites within the undeveloped coast could be harmful to the landscape and that the provision for the safeguarding of the landscape is essential within the policies. Such development could encroach into the local countryside and conflict with Policy SD4 (Development in the Countryside). Bacton & Edingthorpe PC commented that the designation of Bacton as a Small Growth Village could potentially limit the future availability of suitable sites for relocation of facilities threatened by coastal erosion. • One objection on behalf of a caravan park operator within the CCMA, was concerned that the Policy is too restrictive in that it would only allow for the relocation of proposals from the CCMA that would be affected by coastal erosion in the next 20 years, from date of proposal, which may not be the most economically viable or feasible approach for certain uses It is suggested that this time limit requirement should be deleted, or extended. They comment that the Policy includes additional onerous requirements that will need to be met in order for a 'roll back' proposal to be supported and that the wording should refer to 'no net detrimental impact' and that the Policy's requirements should be balanced with the viability of relocation. • Natural England welcomes the policy, commenting that shoreline adaptation should be considered on a strategic scale where possible. • The Norfolk Coast Partnership supports the policy, as it would not be detrimental to the landscape. • The Environment Agency (EA) have some concerns that the policy is impracticable and unfeasible for a number of commercial and business 	<ul style="list-style-type: none"> • The Policy has been moved to the Climate Change Section of the Plan and is now known as Policy CC6: Coastal Adaptation. • The key issues identified from the consultation feedback largely relate to the specific details of the rollback being too restrictive. • The Individual comment regarding second homeowners is addressed within the second part of the policy, as part of the residential rollback criteria requires that the property is a primary residence. • Some of the respondents comment that the requirements of the draft policy would make relocation unviable and undeliverable, for a number of reasons. In response, The overarching aim of the draft policy is to achieve the well planned roll-back of affected communities and businesses, in order that relocation can preferably be permitted on sites well-related to the settlement from which they are moving (to retain the cohesiveness of the community), but the policy would also allow for the eventuality of a wider search for sites adjacent to Selected Settlements (as defined in Policy SD3, now Policy SS3). Going forward, the efficacy of the draft policy would be to add value to the at-risk properties, for example, by not requiring the replacement to be on a like for like basis. Also, the proposed timeframes in which properties and business premises can be considered for relocation and rollback have both been lengthened from at risk of erosion of 20 years to 50 years from the date of the proposal. The main implication of this change is that it will allow forward planning by more properties and businesses, which also reflects the unpredictable and accelerating climate changes. • For clarity, the policy wording has been amended to refer to there being 'no net detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special

<p>uses. Commenting that some Local Authorities (LA) are considering offering 2 for 1 property rollback opportunities to try to offset the high cost of relocation and encourage uptake of rollback opportunities. They also recommend inclusion of 'or, that the relocated dwelling should be in a location which exhibits a similar or improved level of sustainability', or similar, 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 areas.</p>	<p>designations' for all development types' within the policy wording.</p> <ul style="list-style-type: none"> The policy justification has been added to, referring to the joint Coastal Supplementary Planning Document (SPD), which will include more detail about coastal adaptation and the roll-back process.
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Policy SD 13: Pollution & Hazard Prevention and Minimisation

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> Individuals commented that it was important to minimise noise and light pollution. Suggesting that noise and light control zones should be introduced in rural areas and that all development proposals should provide an Environmental Impact Assessment (EIA). A comment from Cley PC requested a more robust and enforceable policy relating to the reduction in light pollution and requesting more areas to be designated as dark sky discovery sites. The feedback statutory bodies and organisations was generally supportive of the approach. However, comments sought that more emphasis should be given to air quality, dark skies and further details provided around the Water Framework Directive and that the Habitats Directive is referred to, particularly given the close proximity to the Broads. One response suggested that more prescription and guidance should be provided about how the policy would be implemented and quantified. 	<ul style="list-style-type: none"> The Policy has been moved to the Climate Change Section of the Plan and is now known as Policy CC13: Protecting Environmental Quality. Feedback comments were generally focused around the need for more emphasis on water quality, noise pollution and light pollution. For further clarity, the policy justification has been expanded to provide more information on the topics that the policy covers. In addition, the information has been updated in line with the requirements of the 2021 NPPF (in particular, paragraphs 185 and 186) and guidance within the PPG. The policy wording 'where possible' has been removed and the top of the policy makes it clear that the fundamental aim is to protect the environment, by avoiding, minimising and taking every opportunity to reduce through mitigation measures, of all forms of pollution. The matters that the policy covers have been extended to specifically refer to noise and light pollution. These matters are also included in other emerging policies, such as Policy ENV10: Protection of Amenity (now Policy ENV6). In order to reinforce the issue of light pollution, this policy also incorporates specific wording regarding the

	<p>importance of dark skies and tranquility as intrinsic characteristics of the North Norfolk Coast AONB and wider rural areas. Design matters relating to light pollution will be covered in the next version of the North Norfolk Design Guide Supplementary Planning Document.</p> <ul style="list-style-type: none"> • In response to the comment requesting EIAs for every development, the EIA screening provisions include thresholds are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The policy has not been altered in relation to this comment.
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Policy SD 14: Transport Impact of New Development

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Some Individuals state concerns over the adequacy of the road infrastructure to deal with cars resulting from new development and the impact of increased traffic, specifically around Southrepps and also more widely across the District. • Some suggest that Travel Plans should be required for large residential schemes, and one comments that restricting direct access onto a Principal Route is in contradiction with Paragraph 109 of the NPPF and cannot be justified. • One comments that the Policy does not mention County Council transport policies or park and ride schemes to minimise car use in town centres. • One comment suggests the provision of new green cycling paths away from roads. • Another comments of the need to assess levels of commuting to ensure that the wider road infrastructure is not overloaded and minimises greenhouse gases. Suggested changes to the policy include that all development with significant transport implications should require a transport assessment. • Sheringham TC comments that the A149 'Coast Road' should be included as a Principal Route on the Policies Maps, because funding for buses only covers Principal Routes. 	<ul style="list-style-type: none"> • The Policy has been moved to the Climate Change Section of the Plan and is now known as Policy CC9: Transport Impact of New Development. • In response to the feedback and in order to align the policy with the NPPF and PPG, the introduction and policy justification text has been expanded to highlight the need to maximise sustainable transport opportunities, particularly with regard to the wider need to reduce emissions and improve air quality and public health. Specific reference is also made to Norfolk County Council's 3rd Local Transport Plan, Connecting Norfolk, which sets out the strategic policy for transport in the County. In addition, further clarity has been added with regards to the need for Travel Plans, Travel Assessments and Travel Statements. • Some feedback conveys concerns over the adequacy of the road infrastructure to deal with cars resulting from new development, particularly in relation to villages and also the cumulative impact of increased traffic across the District. This concern reaffirms the Local Plan's strategic aim to direct the majority of new development in the district close to towns and larger villages, as set out in Policy SD3: Settlement Hierarchy (now SS1). It is useful to be reminded that the wording to this policy was

- Wells TC expressed concern about the dwindling level of public transport, which has an impact on the ability of people to access work and education. In addition, there has been an increase in visitor parking in the town, which highlights the need to implement parking restrictions and other traffic management.
- Feedback from statutory bodies and organisations was supportive of the approach and general principles, however, comments suggested more emphasis 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 Paragraph 104 of the NPPF which promotes high quality walking and cycle parking and the recognition of other forms of transport network was promoted.
- Natural England has suggested that the policy should include wording concerning the traffic impacts associated with new development in relation to the natural environment, particularly with regard to impacts on European sites and SSSIs.

amended through the Working Party, to include requiring proposals for small villages to incorporate service/ infrastructure improvements to address existing constraints and also bring about additional improvements.

- In response to the query regarding the status of the A149 'Coast Road' being included as a Principal Route, the road hierarchy comes under the jurisdiction of the County Council and it is those routes identified as primary and principal roads that make up the roads referred to as Principal Routes in the policy. These roads have a strategic role to play in carrying traffic, usually at speed. Development in the vicinity of these roads or their junctions can compromise the ability for people to travel more sustainably whilst also prejudicing the ability of strategic routes to carry traffic freely and safely. For these reasons the Principal Routes are also designated as 'Corridors of Movement' (CoM), where development is normally resisted. Although the Coast Road (between Cromer and Hunstanton) is classified as an 'A' road, it is identified as a Special Access Route in the hierarchy, as the road travels through residential and other built up areas, which have 20 or 30 mph speed limits and often high levels of pedestrian activity with some crossing facilities including zebra crossings. As such, the Principal Routes terminology is considered to correctly reflect the County's road hierarchy and the need to safeguard highway safety on these particular roads.
- In response to the comment that criteria 4 of the draft policy would be in conflict with paragraph 109 of the then NPPF, it is confirmed that this element of the criteria relates to the need for a proposal to be able to successfully accommodate the expected nature and volume of traffic without being detrimental to the amenity or character of an area. Firstly, the policy is worded in a flexible way as each criteria is set out as a consideration. In addition, any assessment against this part of criteria 4, would not be a highway based assessment, but an amenity based one

	<p>and therefore, it is not considered to be in conflict with paragraph 109 of the NPPF.</p> <ul style="list-style-type: none"> • With regard to Natural England’s regarding the traffic impacts from new development and in particular, in relation to European sites and SSSIs, this matter will be picked up through the final iteration of the Habitats Regulations Assessment and if necessary, the Policy will be updated accordingly.
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Policy SD 15: Parking Provision

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Individual representations called for increased levels of car and cycle parking within residential developments and that the policy should ensure that public parking is adequate, well designed and includes blue badge parking. Concern highlights safety issues relating to cars parking on narrow roads and access roads and reflect the different reliance on cars between urban and rural areas. • Sheringham TC supports the retention of designated public car parks and refers to a particular site in Sheringham, where this would be particularly poignant. • Statutory bodies and organisations were supportive, where one mentioned the need to mitigate against any potential impacts from external lighting and signage in car parks. • The other supported the flexibility of the policy, stating that each development site has individual characteristics regarding connectivity and local sustainable transport opportunities. 	<ul style="list-style-type: none"> • The Policy has been moved to the Healthy Communities Section of the Plan and is now known as Policy HC7: Parking Provision. • The limited consultation feedback generally supports the policy, in favour of its flexibility and stating that each development site has individual characteristics regarding connectivity and local sustainable transport opportunities. • In response to the feedback, minor amendments have been made to the policy wording to clarify the need for on-site vehicle and cycle parking. • Reference is made to the County Council’s latest parking standards, where the current version dates from 2007, which has been revised to take account of changes to more recent changes to the Use Classes Order. The policy is worded to allow for the parking standards to be used as a starting point and for the individual site circumstances to steer the final level of parking provision.

Policy SD 16: Electric Vehicle Charging

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • There is overall support for the provision of electric vehicle (EV) charging points, but some concerns with how this will be delivered. It is suggested that the wording is changed to remove the phrase ‘where practical’ from the first line of the policy. 	<ul style="list-style-type: none"> • The Policy has been moved to the Climate Change Section of the Plan and is now known as Policy CC8: Electric Vehicle Charging. • The consultation feedback was generally supportive of the inclusion of EV charging points as part of new

<ul style="list-style-type: none"> • North Walsham TC supported the provision of EV charging points in domestic driveways but commented that this should be extended to communal parking areas as well, with active, rather than passive, charging points. • Overall, the responses from statutory bodies and organisations were generally supportive of the inclusion of EV charging points as part of new residential development proposals, where the policy lends itself to levels of EV parking provision that is proportionate and practical in respect of both delivery, technically and practical and management. • Some responses raised concerns about 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. • Housing developers confirmed willingness to support the approach, 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). 	<p>development proposals, highlighting that the policy must be flexible in determining levels of EV parking provision that are both proportionate and practical in respect of their delivery, technical feasibility, as well as their management.</p> <ul style="list-style-type: none"> • In response, the provision for new communal parking in residential development has been changed to provide a minimum of 50% of the car parking spaces with active charge points, as suggested by North Walsham TC, with the remainder of the spaces needing passive provision. • There is the potential that the next version of the County Council Parking Standards will incorporate required levels of EV charging points for different types of development. Any such future standards are likely to be a material consideration and consequently, any relevant development schemes will need to accord with either these standards or the details set out in this policy, whichever provides the greater level of EV charge point provision. • Given the above, it is considered important to provide this policy in order to take a proactive approach to the development with regards to positively meeting local, national and international climate change challenges. The policy wording has, therefore, been strengthened to ensure that EV charging point provision is delivered. Given the rapid change in technology and variations in provision, it is likely that Supplementary Planning Guidance will be needed to offer further information on this matter.
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Policy SD 17: Safeguarding Land for Sustainable Development

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • An objection would like to see the rail link to Fakenham and Holt included and Hoveton added to the policy list where land will be safeguarded for Sustainable Transport use. • Statutory bodies and organisations: Two comments of support received. The safeguarding of sustainable 	<ul style="list-style-type: none"> • The Policy has been moved to the Healthy Communities Section of the Plan and is now known as Policy HC8: Safeguarding Land for Sustainable Transport. • This strategic policy directly relates to the requirement within the 2021 NPPF (part (e) of para. 106) to identify and

<p>transport routes was supported highlighting the potential for footpaths and Green infrastructure.</p> <ul style="list-style-type: none"> • 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. 	<p>protect sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.</p> <ul style="list-style-type: none"> • Limited feedback was received and was generally, supportive of safeguarding sustainable transport routes 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. In addition, a request was put forward for the inclusion of land associated with a rail link project between Fakenham and Holt and also land at Hoveton. • In response, the identification of safeguarded land for sustainable transport falls under the jurisdiction of Norfolk County Council Highways Authority, which have confirmed that the locations put forward do not meet the criteria for being acceptable rail freight opportunities. • The rail freight locations in the existing Core Strategy Policy CT 7 have been reviewed with the County Council and have been maintained on the list, but the County’s Norfolk Rail Freight Strategy is not being updated or replaced. • The County Council is developing a ‘recycling the railways’ project, which looks to create longer distance cycle paths along some of the closed rail lines. The former railway lines to be protected for pedestrian and cycleways have been updated within the Policy, based on the County Council information.
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Policy ENV 1: Norfolk Coast Area of Outstanding Natural Beauty & The Broads National Park

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Objections focused around the broad approach the Council should be taking in relation to development in the AONB. One objection stated that suitable development necessary to meet identified local housing need that does make a contribution to the natural 	<ul style="list-style-type: none"> • In response to the feedback it is considered that there is scope to provide further clarity strength to the policy and provide guidance in order to ensure proposals consider the special qualities of the landscape and add clarity to the interpretation of national

beauty and character of the area should be allowed in the AONB.

- Remaining objections focused on the principle of development in the AONB, due to the impact on affordability of house prices and disagreed with the premise of allocation in the AONB throughout the plan.
- The definition of major development within the AONB was questioned in relation to the promotion of specific proposals.
- Support was received around the positive attitude that the policy promotes, suggesting that it should go further and allow local needs housing in principle.
- Statutory bodies and organisations offered broad support for this policy, but references to ‘opportunities to enhance’ biodiversity were sought.
- The Broads Authority and Norfolk Coast Partnership thought greater emphasis could be placed on developers to consider the special qualities of the landscape in any proposals and sought the policy approach to be strengthened. The BA sought clarifications to its own reference.
- The Environment Agency (EA) provided general comments covering the whole environment section and welcomed the approach set out in ENV1.

policy and align with ENV2, which focuses on the overarching approach for the protection and enhancement of landscape and settlement Character. The introductory and justification text to the policy section has been amended to reflect this and the policy is amended.

- The policy is updated to correctly reference the Broads and to ensure clarity around the considerations necessary around the determination of the appropriateness of development in line with the requirements of the NPPF and local considerations, including the landscape character SPD and objectives of the AONB Management Plan.
- Clarity has been brought by removing the words ‘where possible’ and the greater use of specific criteria.
- The considerations around Major development and exceptional circumstances are now also explained in the supporting text but also within the policy. Clarity is brought to the policy by ensuring all development proposals whether considered major or are of a smaller nature must demonstrate how they meet a range of criteria which are informed by national policy and additional local considerations which provide the robust evidence.
- The policy is one that considered landscape primarily so the specific reference to need is removed, however, a proposal still must demonstrate its relevance to the economic, social and environmental wellbeing of the area, and how it relates to sustainability, including being appropriately located. Such demonstration would include need.
- The wording is also aligned to policy SD 2 – Community-Led Development, where the policy approach supports community led development proposals as long as they meet a number of criteria including evidence of need.

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Detailed support and general advice was received from Natural England, the Broads Authority, Norfolk Coast Partnership, Duchy of Cornwall and RSPB. Many acknowledged the importance of protecting landscape and settlement character. • Concerns raised included those around being too vague in the policy wording, specifically in relation to the use of ‘where possible’, ‘must strive’ and bullet point 2, which referred to gaps between settlements. It was suggested that these need to be clearly defined and justified. It was noted that in order to align with national policy the approach should also be formulated in such a way that development would not be limited where landscape constraints can be addressed by appropriate mitigation. • Historic England broadly supported the policy and the production of the updated LCA. Their objection sought clarification on the terminology used suggesting updating the reference to Historic Parks and Gardens to Registered Parks and Gardens. They also cautioned against the continuation of using bullet point 8, commenting that the setting of a heritage asset is more than just visual links and which can change over time and encompasses other factors, such as noise, odour, light and how an asset is experienced and as such is covered in updated reference to Registered Parks and Gardens. 	<ul style="list-style-type: none"> • In response to the feedback it is considered that there is scope to undertake some minor changes and clarifications in order to ensure ambiguity is removed, strengthen the policy wording so that there is a clear purpose for consideration and enhancement and acknowledge that development is not limited where landscape constraints can be addressed through appropriate mitigation. • National policy places an emphasis on protecting but also enhancement to the valued features of the landscape. The introduction and policy justification text has been amended to reflect this and provide clarity and align with the Council’s Landscape Character and Landscape Sensitivity SPD’s which provide the evidence base and basis for proposals and decision making. • Criterion 2 is removed as it is not substantiated across the District. That is not to say settlement gaps and coalescence should not be and will not be respected. Various Landscape Characters identify the importance of gaps as a defining feature and the amended policy provides appropriate guidelines and considerations of such gaps in line with the appropriate Landscape character, for example, coastal shelf and historic estates. • Criterion 8 is removed as suggested and agreed with Historic England. The setting of Sheringham Park remains a wider consideration, and it is not necessarily limited or defined on the basis of a particular line or the visual area set out in the Zone of Visual Influence identified by the National Trust in 2005/6. The setting is encapsulated in the broader scope of registered parks and gardens in the policy and the approach set out in ENV11-Protecting and enhancing the Historic Environment. The panoramic views, wider parklands and semi natural habitats of both Sheringham Park and Felbrigg Hall are also included in the key characteristics and valued

	<p>features of the Woodland Glacial Ridge landscape character type.</p> <ul style="list-style-type: none"> • Various minor amendments are also made to the criteria of the policy in order to link with and align to other policies in the Plan. A positive element is introduced through the requirement for proposals to demonstrate how they enable a scheme to integrate into the landscape and where they are considered to have potential for adverse impacts defined Landscape Character to be informed by a Visual impact assessment undertaken to current best practice.
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Policy ENV 3: Heritage & Undeveloped Coast

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Overall, the policy was considered to be much-needed for North Norfolk, as protection should be given to important areas of wildlife habitat and biodiversity. • The comments requested that the Undeveloped Coast area needed updating on the policies map going forward, to exclude existing settlements and suggested further consideration of the policy wording. • Bacton & Edingthorpe Parish Council strongly supported the policy, referring to the area's links to the nearby Norfolk Coast AONB and to the Bacton Gas Terminal. • Statutory Bodies and Organisations broadly supported the policy, but one respondent commented that the approach was unduly restrictive given the overlap with the AONB, which is a national statutory designation reinforced by Local Plan policy that provides an adequate safeguard. 	<ul style="list-style-type: none"> • The consultation comments were broadly supportive, with one comment referring to the overlap of the two designated areas with that of the AONB, which provides a nationally designated approach to protection. • In response, no amendments to the policy have been made. It is acknowledged that the Heritage Coast falls within the AONB, but it considered that it requires separate mention, as it is not a statutory designation, but was established to conserve the best stretches of undeveloped coast in England. A heritage coast is defined by agreement between the relevant maritime local authorities and Natural England. The Undeveloped Coast designation stretches further east around the district's coastline than the AONB designation and again, seeks to protect undeveloped coast that falls outside the statutory designated AONB.

Policy ENV 4: Biodiversity & Geology

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • There was general support for the policy approach from Individuals where a number of the comments focus on how the policy could go further to protect biodiversity; that Environmental Impact Assessments (EIAs) should be required on all 	<ul style="list-style-type: none"> • The consultation feedback was generally supportive of the aims of the Policy. As a result of the feedback and that national policy and guidance has continued to evolve since the Policy was first written, the wording has been strengthened around the requirement

development and that suitable information should be submitted during the pre-application stage to ensure mitigation is achieved.

- One comments that no development should be permitted on sites that currently provide biodiversity and where development would have an adverse impact on a designated site, while another recommends that a wildlife conservation or preservation authority should advise on the layout of major sites and become a delivery and maintenance partner.
- The Policy approach was largely supported with some statutory bodies requesting clarifications around background documents and seeking stronger wording around the requirement to provide enhanced biodiversity and habitat creation on and off site, to better link the policy to the Plans Vision.
- The term 'measurable net gain' should be referred to in order that a monitoring strategy can be developed to measure biodiversity net gain over the Plan period. 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.
- 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 in 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 contributions to be site specific.
- The Norfolk Geodiversity Partnership request the inclusion of further geological details within the policy justification, including mention of two County Geodiversity Sites (CGS) and forty-two candidate CGS.

to provide enhanced biodiversity and habitat creation and the term 'measurable' has been added in order that a monitoring strategy can be developed to measure biodiversity net gain over the Plan period. For legibility, the Policy has been re-organised to separate out the varying levels of nature conservation designations and functional links to new policy specifically covering Biodiversity net gain. The supporting text has been enhanced adding sections on biodiversity and recreational impacts added in the policy and supporting text.

- In response to the comment requesting EIAs for every development, the EIA screening provisions include thresholds are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The policy has not been altered in relation to this comment.
- Geodiversity details have been added to the policy justification, as requested by the Norfolk Geodiversity Partnership and the policy header updated.
- Two separate policies have also been created in order to provide further clarity. One relating to Recreational Avoidance Mitigation Strategy (RAMS), Policy ENV5 and a second new policy CC10: Biodiversity Net Gain.

Policy ENV 5: Green Infrastructure

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • There is general support for the aims of this policy, with an overall desire to increase the provision of sustainable, active and GI travel opportunities as part of new developments. One objection raises concerns over inconsistencies with this policy and the GI Background Paper. • Respondents also noted the need for a holistic approach to GI in terms of connectivity of wildlife corridors, green/POS, and [sub] urban/non-built areas. The need for testing capacity for onsite provision and clearly defining GI is also noted. • Some comments suggested that the policy wording could be strengthened with regard to improving connectivity between areas of green and Public Open Space provision and how the movement of people and vehicles might be improved in relation to public transport and easing existing levels of congestion. • Statutory bodies and organisations gave overall support for this policy, with all respondents welcoming and recognising the need for GI as a central tenet for new developments. • Consultees noted that PROW might be included as a location for offsite enhancement in the policy's last paragraph. It was also noted that the aims of this policy should be measurable and consistent to allow the development of a monitoring framework. • Some developers pointed out that too heavy a reliance on GI might raise issues of viability in line with NPPF Paragraph 34, with one noting the potential difference in implications for Outline/Reserved Matters and Full applications. 	<ul style="list-style-type: none"> • This policy has been merged with Policy ENV8: Public Rights of Way and has been moved to the Climate Change section as Policy CC11: Green Infrastructure. • Consultation feedback showed broad support for the aims of Policy in establishing a strategic approach for the conservation and provision of Green Infrastructure across the district. • As a result of feedback and the fact that Public Rights of Way form part of Green Infrastructure, the policy justification and wording of draft Policy ENV 8: Public Rights of Way, has been incorporated into Policy ENV5/CC11. • In addition, the policy has been updated to also reflect the requirements for the provision of enhanced green infrastructure as part of the Norfolk Green Infrastructure and Recreational Avoidance Strategy (RAMS) and will link to new Policy ENV5: Impacts on International and European sites, Recreational Impact Avoidance and Mitigation Strategy. • No change to the policy is made with regards viability concerns. The approach and incorporation/enhancement of the GI into developments is in line with government expectations and a strong theme/objective of the Local Plan. The plan seeks incorporation in many ways, through multifunctional uses. In line with national policy, policy costs should be taken into account in the price paid for land.

Policy ENV 6: Trees & Hedgerows

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Individual respondents generally supported this policy and highlight the importance of trees and hedgerows to 	<ul style="list-style-type: none"> • The policy has been moved into the Climate Change section and is known as

<p>enhance biodiversity and provide continuous habitat areas across the County. No substantive issues were identified.</p> <ul style="list-style-type: none"> • There was good support for this policy from all Statutory Bodies and Organisations, who recognised the importance of trees and hedgerows. • Some respondents noted areas for strengthening this policy, particularly in relation to offering protection to trees & hedgerows which are not currently protected but are considered important landscape and biodiversity features. • The EA also promoted the protection and planting of trees alongside rivers to keep water temperatures cool and provide habitat for a range of species. 	<p>Policy CC12: Trees, Hedgerows & Development.</p> <ul style="list-style-type: none"> • The feedback shows that there is generally good support for this Policy. • Given the NPPF’s advice on protecting valued landscapes, the presumption of this policy has been strengthened to include the need to take account of the harm or loss of unprotected, but nevertheless, important natural landscape features. This approach will also complement the overall suite of Environmental Policies and climate change resilience. • A key theme of the NPPF relates to conserving and enhancing the natural environment and given that in 2019 the Council declared a Climate Emergency and launched a Tree Planting Scheme with the aim of planting 110,000 trees in 4 years, it is considered that the Policy should reflect this proactive approach by incorporating a positive statement at the start of the Policy to encourage and support new tree planting across the district to mitigate against the impacts of climate change and to enhance the character and appearance of the locality, enhance biodiversity and ecology
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Policy ENV 7: Open Space & Local Green Spaces

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Some representations contested specific open space designations and the use of an out-of-date methodology, stating as many of these designations were “carried” forward from the existing Core Strategy, and that this should be updated. Concern was also raised in regard to Local Green Space designations and the criteria around potential to develop on open space specifically for education. Parish Councils (2) expressed General support expressed but further strengthening of the policy around play equipment, sports strategy and the requirement to provide better linkages between existing open spaces. • Some of those in support appreciated the inclusion of allotments, while some general comments sought reference to 	<ul style="list-style-type: none"> • This Policy has been moved to the Healthy Communities section and is now known as Policy HC2: Open Spaces & Local Green Spaces. • At Regulation 18 stage, the policy set out that schemes of 11 or more dwellings with a combined gross floorspace of more than 1,000 square metres (gross internal area) must provide or contribute towards the provision of open space in line with the standards set out in Table 6. The detail in Table 6 was carried forward from the existing Core Strategy as the updated Open Space Assessment was still in the process of being produced along with a commitment to update on its findings through the commissioned evidence. • The updated 2019 Open Space Assessment has since been completed

<p>‘health and wellbeing’ and that developments should provide open space on site to meet specific varying needs. A wider point was raised regarding developments of under 10 dwellings and that they should also contribute towards infrastructure.</p> <ul style="list-style-type: none"> • Comments from Statutory bodies and organisations (8) were largely supportive of the policy approach. 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. Flexibility regarding on and off-site provision was supported. Clarity was sought on Table 6. Objections (2) were largely around specific designations of open spaces rather than the policy itself. • A small number of Individual objections raised that there should be a more joined up approach with the Broads Authority, particularly in regard to Hoveton. 	<p>and it provides a detailed analysis of the current open space quality and quantity within the District leading to recommendations of new evidenced based local standards on quality, accessibility and quality of open space.</p> <ul style="list-style-type: none"> • In line with the study and consultation feedback policy ENV7 is revised. The main changes are summarised as follows: • The setting of and incorporation into the policy and supporting text requirements for adherence to the new local open space standards, further detailed added into an appendix to the policies. The addition of the thresholds for on-site open space provision and off-site open space contributions as set out within the Open Space Assessment (2019). • The addition of Provision of new Recreation Space where it is in line with the Playing Pitch Strategy and Open Space Study. • Clarity is brought to the policy around the criteria where development on formal education & recreational facilities would be supported. • References linking open space provision to wider strategies including climate change and biodiversity mitigation and policies are included in the text along with further references highlighting the links to the provision of the GIRAMS through a new policy ENV5.
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Policy ENV 8: Public Rights of Way

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • General support for principle of the policy, with some concerns raised over the potential impact on certain areas of wildlife from disturbance by inappropriate behaviour, noise and dogs, some suggesting that consultation with the Norfolk Wildlife Trust and other experienced organisations is essential in developing policy. • One objection relates to the promotion of a site in Roughton that could provide 	<ul style="list-style-type: none"> • In response to the consultation feedback and the consideration that Public Rights of Way form part of the wider Green Infrastructure, the wording of draft Policy ENV 8: Public Rights of Way, has been incorporated into Policy ENV5, which has been moved into the Climate Change section and is now known as Policy CC11: Green Infrastructure. • In response to the consultation feedback, it is considered that the inclusion of Public Rights of Way within

<p>links from the site to a footpath (Roughton FP15).</p> <ul style="list-style-type: none"> • Cley Parish Council would like to see better connectivity for Public Rights of Way, using permissive paths, footways and new PROWs wherever possible, to connect and link to adjoining parishes, National Trails and local services. All new development should enhance the current PROW network whilst creating new off-road opportunities for walkers, cyclists and horse riders. • Statutory Bodies and Organisations suggested that, in finalising the policy, further commentary could be added regarding the inclusion of PROWs in new development or contributions made for improvements to existing PROWs. 	<p>the wider Green Infrastructure policy provides an integrated and stronger policy approach to this issue. It should also be noted that other policies within the plan reinforce the importance of sustainable movement and connectivity. These include Policy HC8 Safeguarding Land for Sustainable Transport and Policy ENV8 High Quality Design.</p>
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Policy ENV 9: High Quality Design

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Some raised concerns that the design standards would increase development costs, whilst others did not think it had gone far enough. • Statutory bodies and organisations were generally supportive of the policy. One housing developer commented that the policy should be more flexible to ensure that small scale developments do not need to comply with all of the requirements set out in the policy. Another objected to giving the draft Design SPD Development Plan status, as it has not been subject to examination. • Historic England requested more detail in the supporting text in regard to local materials and vernacular. • Norfolk Police requested specific reference be made to Secure by Design. • The general consensus was in support of the policy and that it should not be weakened 	<ul style="list-style-type: none"> • This Policy has been renumbered as Policy ENV8: High Quality Design. • A number of additional references have been made within the policy to further align the wording to guidance that has been updated since the Regulation 18 Consultation, mainly in relation to the National Design Guide and additional supporting guidance, such as the 'Building for a Healthy Life' guidance. • Amendments have been made to the policy justification to reflect this updated guidance, making reference to the 'National Design Guide', 'Secured by Design' and 'Building for a Healthy Life'. • In response to the housing developer, text was amended within the policy justification to clarify acknowledgement that minor developments, including extensions and alterations may not, by their nature, be able to address all of these principles. • In response to developers' comments, it should be noted that the Policy wording refers to the current North Norfolk Design Guide SPD (December 2008), which has been through a formal adoption process. The policy wording

	<p>allows for the updating of such guidance, alongside national design guidance.</p> <ul style="list-style-type: none"> • The criteria bullet points have been reviewed and clarity and consistency throughout brought through slight wording changes • Supporting text in relation to Important approach route has been clarified that these cover vehicular approaches into and out of all settlements, clarifying that edge of settlement development should pay particular attention to its setting.
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Policy ENV 10: Protection of Amenity

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • The issue of buffers between new residential developments and highway impacts is noted as a means of increasing residential amenity and reducing noise pollution. • Sheringham Town Council suggests that lighting in new developments should be limited to that necessary for security and that consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas and sky-lights, in recognition of Dark Skies. • The policy is generally supported by statutory bodies and organisations. Additional areas of policy development were highlighted as being; cross-referencing with Broads Authority policies, considering the impact of light pollution and Dark Skies on amenity and biodiversity and the inclusion of water pollution and maintenance of water quality being included in bullet point 8 of the policy. • Respondents also noted the need for clarification and consistency between the policy and the North Norfolk Design Guide and PPG. • The EA suggested more emphasis on addressing and protecting against odour pollution from new developments at the design stage rather than resolving at the decision stage. 	<ul style="list-style-type: none"> • This Policy has been renumbered as Policy ENV6: Protection of Amenity. • There is general support for this Policy. Particular concern was raised regarding the use of large areas of glazing, sky-lights and artificial light. The first two points are detailed design matters, but along with the latter issue, they are specifically referred to in the policy justification, highlighting these particular design issues, as requested. • Artificial lighting is referred to specifically in this policy wording and also, in Policy SD 13: Pollution & Hazard Prevention & Minimisation. In addition, this other policy also refers to water quality, which is raised by the EA. • In line with PPG guidance, the Policy wording has been extended to encompass working conditions, as well as living conditions and additional wording has been added to clarify that a high standard of amenity ‘should be achieved and maintained without preventing or unreasonably restricting the continued operation of established authorised uses and activities on adjacent sites.’

<ul style="list-style-type: none"> • The redevelopment of farm buildings for second homes/holiday lets adjacent to people’s homes was also raised as an issue of residential amenity by an objector 	
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Policy ENV 11: Protecting and Enhancing the Historic Environment

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • There is general support for the policy, with no substantive issues raised. General comments support the use of Conservation Area appraisals and suggest an increased emphasis/protection of existing historic buildings, including heritage assets such as flint walls. • Statutory Bodies and Organisations generally supported the policy approach, but some suggest changes including reference to a ‘shared Conservation Area’ with the Broads Authority and more clarity/accuracy in implementing the policy by restructuring the layout of the wording through the use of sub-headings. • One respondent noted the cumulative design impact of more modern buildings/materials on heritage assets and whether this should be considered in the policy. • Historic England confirm that the policy is broadly consistent with the tests for harm in the NPPF. However, they strongly advise that differentiation should be made between the different Listed Building grades as to the acceptable levels of harm associated with them as laid out in the NPPF (Grade II – exceptional, Grade II*/Grade I – wholly exceptional). They suggest the creation and implementation of a policy framework for addressing heritage at risk. They would also like to see more detail in relation to archaeology. • Reference to the Council’s Local List was also suggested 	<ul style="list-style-type: none"> • This Policy has been renumbered as Policy ENV7: Protecting and Enhancing the Historic Environment. • As a result of the consultation feedback and further consultation with Historic England, the policy wording has been amended, where a number of additional references have been made specifically covering Archaeology and Heritage at Risk, as well as the creation of separate subheadings for designated and non-designated heritage assets which then detail policy considerations which should be taken into account • A Historic Impact Assessment has also been undertaken in conjunction with HE, the policy justification and the policy wording, through further liaison with Historic England, which addresses their consultation comments at Regulation 18. • The initial paragraph describing the full range of designated and non-designated heritage assets has been moved to the policy justification, as it does not form an operative part of the policy. • An additional ref in the policy to the encouragement around the re use of buildings on the Local list is added

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • There was a significant number of responses. Many respondents raised concerns that the housing target is too high and that the District cannot accommodate the proposed level of development due to constraints, lack of infrastructure capacity, road network, service provision and the need to only address locally derived need. • Conversely, a number of representations suggest that the housing target should be considered 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 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 • There was widespread views that the number of second homes has an adverse impact on the local housing market and in particular prices out local people and limits the type and tenure of properties that are available for local occupation and being built. • Some comments consider there is an over-concentration of growth in North 	<ul style="list-style-type: none"> • The NPPF aims to boost significantly the supply of homes. To deliver this increase in supply it requires that Plans should ensure that all of the likely future needs for homes is planned for. The policy is renamed: Delivering Sufficient Homes and sets a minimum requirement over the Plan period. In doing so the policy is updated and the supporting text updated with the methodology used describing and justifying the setting of the Housing target through the use of the 2016 ONS projections. • The policy is amended to link with SS1 (formally SD3 Reg 18) which sets the settlement hierarchy and distribution. Percentage distribution figures at set out across each settlement hierarchy where the majority of growth is focused in the higher order settlements. • Policy tables are updated with up to date planning permissions and completions while new allocation numbers are updated to accord with the numbers being brought forward through the final site specific policies. • The policy does not focus on type and tenure. • Text is updated clarifying that the Council expects all of the sites to be immediately available for development, and that some may have secured permission prior to adoption. • The reliance on windfall is reduced with revision.

<p>Walsham, which impacts on the ability of other more remote areas to improve infrastructure and that brownfield sites should be used first.</p> <ul style="list-style-type: none"> • A number of respondents do not support the proposed growth in Cromer. • The allocated numbers in Wells are supported. • Related 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 • The high reliance on windfall development over allocation was also raised as an issue. • 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 	
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Policy HOU 2: Housing Mix

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Comments largely related to the detailed application of specific policy requirements rather than raising fundamental objections to the general policy approach. • Most comments raised concern about the shortage of affordable housing within the District and the need to 	<ul style="list-style-type: none"> • As well as delivering sufficient homes it is important to ensure those homes that are provided match the identified needs in terms of type, tenure and affordability. For clarity the policy is renamed: Delivering the right mix of Homes.

encourage more, at a price and tenure that addresses local need with the provision for Low-Cost Home Ownership reflecting actual levels of income within North Norfolk, rather than levels of average income for England as a whole. Generally, there was support for a higher affordable percentage being required.

- Support was also implied for more elderly accommodation and adaptable homes, however, there were others that said the approach was too restrictive and not reflective enough to local circumstances and challenged the evidence base on viability zones and the lowering of the affordability threshold outside the AONB.
- Comments from the development industry tended to argue for more flexibility and less prescription so that local circumstances, need, and viability can be considered at planning application stage.
- Concerns around the perceived impacts of second homes on the price of homes was a common theme.
- Individuals and Town and Parish Councils generally sought greater control over future house types particularly in relation to affordability and local lettings, controls over second home ownership, and a desire generally to see housing policies giving more priority towards addressing local needs first.

- The policy is designed to deliver the identified strategic needs of the District while other policies in the plan 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 brought about through community planning powers.
- Affordable housing need is identified in the Strategic Housing Market Assessment and evidence shows a clear need for rented properties and two /three bedroomed properties, which the policy advocates in order to meet this need. The Council considers that affordable homes should be genuinely affordable reflecting the local economy and support for price controls in accordance with local income is however also welcomed.
- Affordable housing rates are supported and informed by the Council's viability evidence and depicted in this policy in line with the latest evidence.
- Clarity is brought to the policy and an additional map inserted identifying the Designated Rural Area where a lower threshold will be used for the delivery of affordable housing. Affordable Housing thresholds reflect the rural area designation of North Norfolk under s.157 Housing Act 1985.
- Clarity is brought to the policy through the requirements for specialist elderly accommodation. Supporting text is modified with further detail and the policy requirement for 80 bed schemes reduced to 60 on larger sites.
- The Local Plan explains that second home controls could only be applied to new dwellings and that the number of new dwellings in those parts of the district with high proportions of second homes would be very small in relation to the existing housing stock. Furthermore, a high proportion of new homes built in these areas would be affordable homes and hence would not be available for second home occupation.
- Given the above, it is considered that the imposition of principle residence restrictions on new properties, would

	<p>be an ineffective measure, as it is likely to simply move the demand for second homes from the new to the existing housing stock where no planning controls are possible, thus defeating the objective of such a policy. Neither is there any evidence that restricting the occupation of a small percentage of properties in this way is likely to have any appreciable impact on local property prices which is often cited as a reason for imposing such restrictions.</p> <p>No change is undertaken to the approach in this regard.</p> <ul style="list-style-type: none"> •
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Policy HOU 3: Affordable Homes in the Countryside

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • The policy received limited feedback with the majority supporting the approach and raising no substantial issues. One individual objection requested a bespoke rural exception policy for Wells -next -the Sea and others commented that development should be well related to settlements with facilities where there is support from the local community. • Some Statutory Bodies & Organisations suggested that the policy should be more prescriptive in relation to the tenure of homes allowed, while others sought clarification that growth would not exceed identified local need. 	<ul style="list-style-type: none"> • The policy actively supports the provision of affordable housing as an exception to policies in the Local Plan in order to address and provide for a local identified housing need. The policy provides a consistent approach across the District. • Bullet point 4 has been amended removing reference to a 5% growth ceiling and replacing with that of a scale and design appropriate to its immediate surroundings. • In order to align better with the Council’s Housing strategy, the word ‘adjacent’ is changed to ‘adjoining in the policy in the last paragraph when referencing need. • Clarity is added regarding the approach to market housing in the supporting text. • The parish of Wells –next –the-sea are a designated Neighbourhood Planning Area and are seeking to bring forward housing related policies through their Np – no change

Policy HOU 4: Agricultural & Other Key Worker Accommodation

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • The policy received limited feedback from the consultation, which overall, was in general support of the policy. • A general comment was made suggesting that restrictions should be in 	<ul style="list-style-type: none"> • One comment expressed a desire to extend the policy to cover other types of key workers within towns. In response it should be highlighted that the aim of policy HOU4 is to assist with providing residential accommodation

<p>place to prevent any such houses being sold for other purposes/ second homes.</p> <ul style="list-style-type: none"> • Another comment of support suggested that the approach could be expanded to cover key workers in towns and not just focus on those connected to the land. • Statutory Bodies & Organisations: requested consideration of some amended wording with regard to landscape and designated sites. 	<p>to those in essential need due to their land-based roles in rural areas that are likely to otherwise be unsustainable.</p> <ul style="list-style-type: none"> • In order to align the terminology of the policy with the NPPF and PPG, the title of the policy is changed to 'Essential Rural Worker Accommodation'. • Bullet point 2 if further clarified to align the policy with policy HOU7 (re-use of rural buildings in the countryside) and will ensure that the conversion of an existing building is considered before new build. • Specific reference to environmental impact is not considered to be required as any proposal would need to satisfy other relevant policies, such as Policy ENV2 – Protection & Enhancement of Landscape & Settlement Character.
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Policy HOU 5: Gypsy, Traveller & Travelling Showpeople’s Accommodation

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Limited feedback was provided. One individual comment in support of the policy. 	<ul style="list-style-type: none"> • It is considered that the approach through a criteria led policy remains the most appropriate given the low level of need. • Minor amendments for reasons of clarity and to align the policy approach to the wider sustainable development approach and needs by the Local Plan.

Policy HOU 6: Replacement Dwellings. Extensions & Annexed Accommodation

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Comments included allowing extensions to properties makes it harder for first time buyers to purchase a property. More value should be placed on the environmental impacts. Another objected that the policy should be more prescriptive and ensure extension and infill development are of appropriate (small scale) footprint restrictions, height. Specifically replacement dwellings should be restricted to one on a plot to avoid over intensification. One individual objection received, concerned that the policy would result in an increase of second homes and suggesting that occupancy restrictions should be in place. 	<ul style="list-style-type: none"> • The approach aims to allow moderate change to properties in the rural area but also to retain a range of housing types in the countryside to ensure choice and variety. • It should be noted that not all extensions require an application for planning permission due to permitted development rights laid down by national policy. • No substantive changes are made to the policy approach. The policy is amended slightly: • The tile is changed to include Domestic outbuildings. Consideration of the size of the existing property is added to as a material consideration to be taken into account in determination of impact.

<ul style="list-style-type: none"> Statutory Bodies & Organisations suggest consideration of some amended wording with regard to landscape, designated sites and flood risk mitigation. 	<p>Further text is added in relation to annexed accommodation for reasons of clarity around the circumstances of support.</p> <ul style="list-style-type: none"> Supporting text is updated highlighting the need to comply with other policies such as amenity and Sustainable Construction Energy Efficiency & Carbon Reduction policies including the requirement for proposals to demonstrate how existing materials will be reused on site or recycled?
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Policy HOU 7: Re-use of Rural Buildings in the Countryside

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> Some individuals advocated a presumption against the conversion of isolated farm buildings into dwellings, especially in the AONB or Undeveloped Coast and the linkage of the policy to HOU4. Concern expressed that buildings converted into holiday lets are generally not in character with local buildings and result in increased traffic and parking needs which harm the quality of life for local residents. High Kelling Parish Council stated that the policy needs to be made more explicit in terms of, for example, design, footprint, height, scale, volume and materials in order to ensure that extended, replacement or re-used dwellings do not overwhelm neighbouring properties or the countryside. A housing developer requested consideration of wording within the supporting text to distinguish between Class Q permitted development rights and the application of the policy was suggested. 	<ul style="list-style-type: none"> The policy is only intended to allow for the conversion of buildings that do not require extensive rebuilding or alteration in order to make them suitable for the use purpose. The policy adds clarity to the requirements of the NPPF. No substantive changes are made to the policy approach but some contextual wording was added to the supporting text updating the purpose of the policy. No substantive changes are made to the policy approach

Policy HOU 8: Accessible & Adaptable Homes

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> Comments were generally supportive, some individuals sought higher construction and energy efficient standards as the substantive part of their comments, which are the subject of a different policy. 	<ul style="list-style-type: none"> In response to housing developers feedback it is advised that Background paper no 7, published at regulation 18 stage provides detailed and comprehensive evidence, set out the required justification and made the compelling case for this policy in North

- Some support for the principle of the policy was evident across the development industry, but caution and objections were raised on the reliance of an aging population to justify the approach and application across all development, as well as in relation to the requirement to provide evidence of compliance at application stage.
- Although the age structure of the District 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 outside building regulations and in particular, in relation to market housing responding that policy requirement to apply to all homes - the M4(2) standard, was disproportionate and as such should be reduced to apply to only a proportion of properties.
- Norfolk Homes specifically thought the approach was "an unwelcome approach to addressing an existing shortfall" and an interference with issues that sit with Building Control. Extending the approach to all market housing would utilise extra space, unwelcomed costs and require the redesign of many of their existing house types. They inferred that the requirements would lead to fewer smaller market homes being built, resulting in more expensive housing and that further consideration of viability and unintended consequences should be looked at in the finalisation of the policy. However, Norfolk Homes confirmed that their affordable homes already comply to M4(2) and previous developments in Cromer complied with the M4(3) requirement, which the policy is seeking to apply.
- Pigeon Development also confirmed that the site they were promoting in the Local Plan at Cromer could accommodate the policy approach.
- The Duchy of Cornwall supported the approach recognising the importance of providing accessible and adaptable homes and the requirement to meet the necessary Building Regulations to

Norfolk, especially when combined with Policy HOU9: Minimum Space standards.

- The viability of requiring enhanced accessibility or adaptability standards over and above building regulations has been tested as part of the iterative viability process. The 2018 study demonstrated that the impact of requiring 100% of homes to be built to Category 2 standard for accessibility and adaptability. For the majority of housing development this is estimated to add £10sqm over National Housing Standards equivalent build cost allowance for houses and £15 sqm for apartments. This is over and above the Government's assessment of cost of £9.31 per sqm for a 2 story 3 bed dwelling and £7.32 per sqm for a 2 bed dwelling as derived from the accompanying cost impact study.
- More detail is contained in Background paper no 7 Housing Constructions Standards paragraph 7.6, and the Council's Plan Wide Viability study. The study concludes that there is sufficient headroom across all areas and development typologies for new development to meet optional technical standards. Affordable housing is confirmed to be able to meet the costs in the regulation 18 feedback from developers and the government's own cost impact study shows that significant proportions of additional costs can be recovered through sales value increases especially when there are perceived extra values in relation to space.
- Addressing the remaining feedback, the regulation 18 version of the Plan included clear text around exceptions to the approach in the Plan text and the policy. These could be due to specific challenges due to topography, flood risk and /or the relationship to design. Where such material considerations exist it will be up to the promoters to demonstrate the M4(2) or M4(3) requirements are not feasible to be delivered and exemption will be made on a case for case basis based on clear evidence submitted as part of the planning application.

<p>ensure homes can be lived in by all members of the community.</p> <ul style="list-style-type: none"> • Other comments focused on the Council providing more clarity of the requirements and exceptions. • Persimmon Homes (Anglia) sought clarity on the need to provide documentation detailing accordance with the standards for all developments at application stage, so as not to be an onerous exercise and circumstances around exceptions. • Norfolk Homes objected to this requirement stating that it was entirely at odds with the Government’s intention of reducing the burden on house builders and ensuring the planning system is quicker, efficient and more responsive in delivering houses and that the policy is an example of planning seeking to interfere with issues squarely in the remit of the Building Regulations, and for which a planning policy is entirely superfluous. 	<ul style="list-style-type: none"> • No substantive changes are made to the policy approach. Clarity is added to the policy around the process of exemptions on practicality and viability grounds and around the requirement to include details of how the scheme complies through the existing Design and access statement requirements. The supportive text is updated with contextual information and adds clarity to the information that is required in order to support proposals. The policy is also amended to clarify that the standards should be seen as a minimum.
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Policy HOU 9: Minimum Space Standards

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Individuals generally supported the policy approach, with their focus on the benefits of providing healthy spaces to improve wellbeing. One sought an exception to new build tourist accommodation so that new development could mirror historical delivery. • Feedback from the development industry offered mixed views 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 House Builders Federation (HBF) point to high levels of satisfaction in internal design of new homes as justification to their general comment 	<ul style="list-style-type: none"> • 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 Plans viability assessment. • Background paper no 7, published to support the policy approach at Regulation 18, included detailed analysis of new homes being built on housing estates across North Norfolk, and revealed that approximately 58% of dwellings being built do not meet one or more of the minimum national space standards. For Flats this falls to 50%. Sixty-nine percent of the development in North Norfolk meets the space standards for gross Internal space, dropping to 61% for the 1-2 & 3 bed properties i.e. 39% do not meet the minimum space standard. In the larger 4+ bedroom dwellings the figure

<p>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.</p> <ul style="list-style-type: none"> • 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 livable homes. 	<p>is much higher at 95.3% meeting the standard. The internal configuration of some dwellings with smaller bedrooms, is leading to developments with dwellings that are below the specific requirements of the national standard.</p> <ul style="list-style-type: none"> • The timeline of local plan production is considered to be appropriate for any transition period for the introduction of such a policy requirement. By invoking these changes through the Local Plan it is considered that the national space standards will help to ensure that new homes provide a flexible and high quality environment in line with the NPPF, capable of responding to occupants needs throughout their lifetime and changing circumstances and is aligned to the wider Council's ambitions. • No substantive changes are made to the policy approach. Clarification is added to the supporting text and policy around the use of the existing Access & Design Statement to include details of how any proposal would meet or exceed these standards or successor document. The technical requirements are moved to the appendix of the study.
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Policy HOU 10: Water Efficiency

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Limited comments were received on this policy, with no substantial issues raised. • A small number of Parish & Town Councils were in support of the prescriptive water efficiency targets. • Anglian Water fully support and endorse the optional water efficiency standard being applied within the Local Plan area. • Recognising the Area is one of water stress classification by The Environment Agency (EA) Anglian water advised that the policy should encourage development to go to improve and go beyond this standard, which has wider benefits and provided some amended wording for consideration. 	<ul style="list-style-type: none"> • The policy has been moved into the Climate Change section and is known as Policy CC4: Water Efficiency. • Support for the policy approach was received from Anglian Water, who also advised that they would like to see developers to go beyond the national standard. The policy wording has been amended to encourage developers to comply and exceed the national standard. • The Environment Agency identify the whole region at the highest level of serious stress and the introduction of the optional demand management is supported in the Anglian River Basin District River Basin Management Plan and the Revised Draft Water Resource Management Plan 2019.

	<ul style="list-style-type: none"> • The Norfolk Authorities in conjunction with Natural England, Environment Agency and Anglian Water through the Norfolk Strategic Framework and Duty to co-operate process recognises that Local Plans should contribute to long term water resilience through a joint agreement. • Clarity is added to the wording, so that it is clear the principle of water efficiency applies to all development and not just residential. In line with local ambition and the drive for good water management the policy is amended to include non-residential properties and the requirement to achieve BEEAM very good standard. The wording is updated to ensure the requirement is aligned to building regulations rather than the specific optional standard currently quoted so as to future proof the policy. Clarity is added to the policy and supporting text around the information required to support a proposal in this matter.
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Policy HOU 11: Sustainable Construction, Energy Efficiency & Carbon Reduction

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Most Individuals generally supported the principle of the policy, but many concluded that the policy does not go far enough in its prescriptive nature of ambition in relation to the Council's subsequent declaration of climate change. • Town Council's supported more prescription in setting around energy efficiency and carbon reduction, with one suggesting that the policy should give careful attention to roof orientation and give priority to grey water recycling over other measures such as water storage and green roofs • All respondents from statutory bodies and the development industry were supportive of the policy and the designing out of emissions followed by the use of low carbon technologies. • Three of the major house builders and site promoters that are active in the region responded, with one pointing out that the approach would not assist 	<ul style="list-style-type: none"> • The policy has been moved into the Climate Change section and is known as Policy CC3: Sustainable Construction, Energy Efficiency & Carbon Reduction. • The Government's response to the Future Homes Standard consultation published January 2021, confirmed that the government believe local Council's have a role in helping to meet the net zero target and tackle climate change and it was clarified that the Government will not bring in the previous amendments to the Planning and Energy Act 2008, which restricted Local Planning Authorities ability to set local standards that exceeded the energy efficiency standards set out in level 4 Code for Sustainable homes (19% reduction). This renewed clarification means that the government expects Local Plans to help create a greener built environment and assist with the move towards higher carbon reduction standards through

the Council in achieving its wider ambition to improve the existing housing stock, while others, (Norfolk Homes and Persimmon) were concerned around the impacts on development viability.

- 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 will achieve carbon neutrality.
- Anglian Water supported the use of BREEAM standards as they helped to demonstrate greater water efficiency and reduce demand

building regulation. Given North Norfolk's wider environmental ambitions to tackle climate change, it is considered appropriate to continue to set a localised target, aid development through transition and that the approach should be more progressive by setting a higher minimum target, but one that aligns with the government's direction of travel. **The policy requirement is amended** to allow for progressive change in advance of the governments intended building regulation review and future legislation through the Future Homes Standards. The target is amended to accord with the government aim of achieving net zero by 2050 and developers are encouraged to exceed. The requirement for non-residential development is also strengthened to that of BREEAM very good, removing any ambiguity and aligning the requirement with other policy requirements across the Local Plan.

- In response to the consultation feedback for those that wanted greater prescription, no changes are made. It is not for policy to pre determine how developers will achieve the carbon reduction and energy efficiencies through prescriptive measures. Each development and development site is different, technology is advancing at a fast pace, supply and costs vary and how this will be achieved is dependent on the type, scale and design of a proposal. The approach allows flexibility and discretion to the developers in line with the overall ambition and is not intended to be prescriptive in measures.
- In response to feedback, the policy requirement that all proposals should be accompanied by a separate compliance statement covering energy efficiency and carbon reduction is not considered to be onerous, indeed some applications do so already, though it is accepted that this could be part of the Design and Access Statement (where required), or a separate energy statement. Text is amended so that it is clear that a Compliance Statement is required and what it should include.

Policy ECN 1: Employment Land

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • A mixture of responses was received from Individuals: Objections focused around the broad approach the Council should be taking i.e. supporting the green energy sector and the lack of need for employment land given the changing economic landscape. • One general comment set out that the quantum proposed should be a minimum to allow for flexible future growth across the District. • Wells Town Council supported the retention of existing sites in Wells. While Sheringham Town Council supported the retention of current employment land. • Statutory Bodies & Organisations were largely supportive of the Policy approach. Trinity College (as a landowner in the district) stated that there should be more employment land in Fakenham given this area has had the highest take up rate. • The Wells Neighbourhood Plan Group also suggested more employment land should be designated in Wells-next-the-sea. 	<ul style="list-style-type: none"> • The policy is renamed Policy E1: Employment Land. • The Council consider it important to retain a supply of land for employment uses. The policy sets out the required quantum available and the requirement of new allocations / designations in order to ensure that a sufficient supply of land is reserved for employment generating uses across the district. • The policy table and supporting text has have been updated reflecting recent permissions and completions and the publication of the detailed assessment of employment land and requirements undertaken through the 2020 Growth Sites Delivery Strategy study and employment site review. • It is considered that the updated quantum of land proposed within each location is sufficient to meet the needs in a flexible way across the district in accordance with the spatial hierarchy and strategy of the requirement for employment land across the District. • The neighbourhood Plan for Wells has the potential to consider including policies on more localised employment opportunities in the parish where justified.

Policy ECN 2: Employment Areas, Enterprise Zones & Former Airbases

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Limited feedback was received with one general comment about the Great Eastern Way Industrial Estate regarding greater flexibility of employment opportunities. • The Broads Authority comments that there may be cross-boundary issues regarding Neatishead. • The Environment Agency (EA) commented that the policy should ensure that there would be no risk of surface or groundwater flood risk. 	<ul style="list-style-type: none"> • Now Policy E2: Employment Areas, Enterprise Zones & Former Airbases. • In response to the EA, the policy does not include reference to flood risk as this is set out within emerging Strategic Policy SD 10: Flood Risk and Surface Water Drainage (now Policy CC7). • The policy is updated to reflect the introduction of Use class E and updates to the Use classes order. A further change is made to clarify that proposals on former airbases are restricted to <u>employment generating</u> proposals, for the avoidance of doubt.

	<ul style="list-style-type: none"> The policy is restructured for clarity and removal of repetition, but no substantial changes are made.
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Policy ECN 3: Employment Development Outside of Employment Areas

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> Limited feedback was received with one Individual comment in support of the policy with the proviso that this should not be at the expense of Policy HOU6: Replacement Dwellings, Extensions and Annexed Accommodation. The Environment Agency (EA) made a comment on the site regarding Bacton Gas Terminal and the need for an Environmental Impact Assessment (EIA). 	<ul style="list-style-type: none"> Now Policy E3: Employment Development Outside of Employment Areas. In response to the EA, the requirement for proposals at Bacton Gas Terminal to be subject to an EIA has been added. The policy is amended in order to clarify the approach to conversions, redevelopment and change of use of existing employment uses to non-employment uses , specifying an employment threshold above which any proposal seeking a change of use would need justify the change in relation to employment opportunities, viability and specifying an approach to marketing . This is to ensure that there is flexibility on a case-by-case basis, but for the avoidance of doubt seeks an agreement on marketing with the LPA in advice of any proposal A paragraph has been added to the supporting text to ensure that the policy is not confused with the policies for expansions of existing tourist accommodation and tourist attractions.

Policy ECN 4: Retail & Town Centres

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> A mixture of feedback was received in relation to this policy. No substantial land use issues were raised and comments acknowledged that the high street is changing and suggested that digital technologies should be embedded in town centres alongside places where people can work and live, potentially above shops. Sheringham TC suggested that the policy should limit the development of floorspace for food and beverage, while Cromer TC sought further encouragement for securing public 	<ul style="list-style-type: none"> Now Policy E4: Retail & Town Centres. The policy approach is considered to reflect local circumstances, align to national policy and be supported by appropriate evidence. Much of the feedback sought the policy to provide additional controls and or increased presumptions, which national policy does not allow and it is concluded that no major alterations to the draft policy are required. Some minor amendments to reflect comments and provide clarity have been incorporated within the amended

<p>works of art in order to improve the public realm.</p> <ul style="list-style-type: none"> • North Walsham TC objected to the policy and sought greater protection in the policy to restrict retail losses and residential development. Feedback from town Council’s including: North Walsham, Cromer, Sheringham and Stalham considered that the identified Primary Shopping Area, PSAs should include all existing shops and sought changes in order to seek greater protection. • The policy approach was largely endorsed by the Statutory Bodies and Organisations that responded. Norfolk County Council (NCC) commented that the policy complemented the aspiration of transport and public realm improvements in town centres. • Kelling Estate sought greater flexibility towards retail development in the countryside. • Trinity College as landowners of the existing allocation to the north of the Fakenham sought an uplift in the impact threshold for the town in order to lower the tests for further out of town provision. 	<p>policy which has also been slightly restructured for clarity.</p> <ul style="list-style-type: none"> • The Primary shopping Areas of all town centres were reviewed and policies map amended were appropriate in line the NPPF definition of where retail development is concentrated. The role of the PSA is not one of protection. • Cromer PSA is extended to include areas on Mount Street that provide a retail function. Other suggestions along Church Street and Overstrand Road are not taken forward. Extending the PSA into this area would also reclassify a significant amount of residential area as edge of centre and could lead to the potential erosion of the TC boundary • Stalham PSA is extended to St Johns Rd and Kingfisher close and to the east of the town centre to include units on Upper Saithe Rd. • No changes were undertaken to the remaining towns
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Policy ECN 5: Signage & Shopfronts

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • General comment stating that well-designed signage and shopfronts are important to the retail offer in towns and should follow the guidance contained in the Design Guide rather than ‘having regard’ to the guide. • The Norfolk Coast Partnership supported the policy, but requested further consideration of the impact of lighting on visual amenity. 	<ul style="list-style-type: none"> • Now Policy E5: Signage & Shop Fronts. • No substantive changes are made to the policy. The limited consultation feedback sought to give increased weight to the Council’s design guidance and as such, the policy has been amended to be in line with Policy ENV9: High Quality Design (now Policy ENV8), which seeks applicants to demonstrate conformity to the design principles set out in the Council’s Supplementary Planning Document and other design guidance endorsed by the Council in this regard. The design guidance includes consideration of lighting. • The policy is further amended to provide a reference to any locally produced best practice guidance e.g. through neighbourhood Planning

Policy ECN 6: New-Build Tourist Accommodation, Static Caravans & Holiday Lodges

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • A small number of objections were raised regarding the flexibility of the policy, with some arguing that it is too restrictive and others arguing that it is too permissive. • Some comments were made in support of the policy, whilst others commented that development of holiday accommodation should not override policies relating to the environment and design. This included one from Bacton & Edingthorpe Parish Council that stated that cliff top caravans would have a detrimental impact upon the landscape. • The Broads Authority raised the need to differentiate between residential caravans and holiday caravans. • The Environment Agency commented that if development was permitted in the CCMA adequate warning and evacuation measures must be in place. • Norfolk Coast Partnership requested that the AONB be mentioned in the policy more. • Other comments focused on the need to differentiate between all hotels and new hotels and setting out that the policy is too restrictive and not flexible enough. 	<ul style="list-style-type: none"> • Now Policy E6: New-Build Tourist Accommodation, Static Caravans & Holiday Lodges. • In response to the feedback, the word 'holiday' has been added to references to static caravans to ensure differentiation between holiday caravans and residential caravans. • The policy has also been split out to ensure there is a clear difference between a new build development and the approach to business extensions. • For clarity bullet 1 is amended to refer to 'proposals' rather than new build to ensure that this also captures conversions etc. Wording has been clarified in this regard to ensure greater conformity with national policy. • The reworded policy aims to direct new tourist accommodation, static caravans and holiday lodges within the boundaries of existing settlements, whilst also allowing for the expansion of existing businesses. The policy allows for new static caravan sites or holiday lodge accommodation where it would relocate existing sites from the cliff top or within the CCMA or Environment Agency Flood Risk Zone 3. • The policy is amended to include additional considerations of biodiversity net gains, and impact on amenity the AONB and highway network. In addition, the supporting text of the Policy would require the imposition of conditions, where appropriate, to ensure that the development was retained as tourist accommodation.

Policy ECN 7: Use of Land for Touring Caravan & Camping Sites

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Feedback received included one response commenting that new tourist development should not be at the expense of environmental policies, whilst another response stated that the policies should be more permissive. 	<ul style="list-style-type: none"> • Now Policy E7: Use of Land for Touring Caravan & Camping Sites. • In response to the feedback, the wording has been revised to ensure that the relevant consideration is given to flood risk and coastal erosion.

<ul style="list-style-type: none"> • Bacton & Edingtonthorpe Parish Council stated that caravan development on cliff tops are not supported due to impact on the landscape. • The Environment Agency (EA) set out that the exception test is also required for Flood Zone 2, as well as Flood Zone 3. Measures should be put in place to ensure that these do not become permanent. • Others commented that the policy should be more flexible. 	<ul style="list-style-type: none"> • No policy changes are made in relation to the permanent nature, but the supporting text is updated with reference to the use of the land as touring use and the expectation that occupancy would be seasonal. • A clause has been added to the policy to require the submission of a Coastal Erosion Vulnerability Assessment to ensure adequate evacuation and warning measures are in place if a proposal is in the Coastal Change management Area CCMA and as such provides consistency with other policies in the Plan
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Policy ECN 8: New-Build & Extensions to Tourist Attractions

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Feedback received included regarding one response commenting that the need for further tourist development should not be at the expense of environmental policies. • Norfolk Coast Partnership supported the policy. • The Kelling Estate commented that there is no need to impose blanket restrictions on development in the AONB, Heritage Coast or Undeveloped Coast, as it would be contrary to the NPPF. 	<ul style="list-style-type: none"> • Now Policy E8: New-Build & Extensions to Tourist Attractions. • No change is made in response to the comment that the policy should not be a blanket restriction in the AONB, Heritage Coast and Undeveloped Coast, it is considered that given the level of environmental protection and the importance of these areas, particularly the AONB, and the wider aim of broadening the employment and tourism opportunities across the district it is the correct approach that the presumption is against tourist attractions and extensions to existing attractions in these locations. The approach is in line with policy ENV 1: Norfolk Coast Area of Outstanding Natural Beauty & The Broads and ENV 3: Heritage & Undeveloped Coast. • No substantive changes are made to the policy. The policy however is re structured with minor wording changes for reasons of clarity

Policy ECN 9: Retaining an Adequate Supply & Mix of Tourist Accommodation

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> • Feedback received included one commenting that development should not be at the expense of environmental policies and should be subject to similar requirements as Policy HOU6: 	<ul style="list-style-type: none"> • Now Policy E9: Retaining Adequate Supply & Mix of Tourist Accommodation. • The policy and supporting text has been revised to ensure consistency in

<p>Replacement Dwellings. Extensions & Annexed Accommodation.</p> <ul style="list-style-type: none"> • The Kelling Estate commented that parts 1 and 2 of the policy are separate clauses and should use an ‘or’ and that the wording should be placed in the supporting text to encourage countryside development through large estate management. • Wells-next-the-Sea Neighbourhood Plan Group stated that development around Wells should be restricted, based on the survey data of residents. 	<p>approach across the Local Plan. A clause is added to ensure marketing is consistent with punished best practice in line with other policy approaches.</p> <ul style="list-style-type: none"> • The policy is amended for reasons of clarity so that it is clear the policy is applied to redevelopment of buildings currently, or last used, for tourist accommodation rather than sites. • Bullet point 2 in relation to loss of local services is removed and support for the change of use clarified to that of replacements and reasons of viability with additional clarifying text added to the supporting text linking the approach to HC3 for clarity and consistency.
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Additional Policies

6.15 In response to feedback, reasons of clarity and emerging legislation three new strategic policies have been included in the Local Plan:

Policy Ref	Name	Comments
HC1	Health & Wellbeing	For clarity and in order to draw together the wider health and wellbeing comments a separate additional policy HC1 Health & Wellbeing is added around the considerations of health and well-being through development with particular reference to the requirements of the health protocol. The support for the provision of necessary health infrastructure and services is an important consideration across North Norfolk. The Council is a signatory to the Joint Norfolk Health Protocol through the Norfolk Strategic Framework 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
CC10	Biodiversity Net Gain	The requirement for biodiversity net gain has been strengthened in the specific environmental policy ENV4 Biodiversity & Geodiversity and a further new policy CC10 Biodiversity Net Gain has been added. This policy sets a specific minimum target of 10% biodiversity net gain and outlines measures required to achieve it and demonstrate at planning application stage.
ENV5	Impacts on International & European Sites, Recreational Impact Avoidance & Mitigation Strategy	To ensure compliance with the Conservation of Habitats and Species Regulations 2017 as amended and enable growth in the District through the implementation of measures to avoid adverse effects on the integrity of habitat sites arising from recreational disturbance a specific policy ENV5 Impacts on International & European Sites, Recreational Impact Avoidance & Mitigation Strategy

Site Proposals: How the Main Issues have been addressed

6.16 This section sets out how the responses received in relation to the strategic site proposals and associated settlement wide issues have been addressed in preparing the Proposed Submission Version at Publication stage of the Development Plan Document, (DPD) for Regulation 19 consultation and proposed submission to the Secretary of State for independent examination. Summary details of the representations made are contained in the appendices to the Consultation Statement and further detail on each site assessment can be obtained from the site assessment booklets.

Policy DS1: Site Allocations

Summary of comments raised at Regulation 18	Changes made
<ul style="list-style-type: none"> The responses primarily focus on concerns over allocating Greenfield Land for new development and suggested that Brownfield land and the existing housing stock (Extending or bringing empty homes back into use) should be prioritised in order to limit the environmental impact. Housing should be phased and new sites should be on a reserve list until existing allocated sites have been developed. Development should be focused in central locations in order to help reinvigorate town centres and to scrutinise and reduce the amount of development on agricultural land. Feedback suggest that a more holistic approach is needed for proposals in towns and villages, not just focusing on housing and settlements in isolation. Concerns also raise that there is no comprehensive approach been taken to development in Cromer and sites haven't been assessed for their suitability to provide sports facilities or a Care Home. One respondent points out that a housing trajectory hasn't been included and suggests that smaller unconstrained sites (including site C16) come forward to boost supply in short term, to allow larger sites to come forward in longer term. Concern over the lack of evidence to demonstrate that sites rolled over from the previous plan are deliverable. One respondent supports the policy recognising the benefits of allocating land immediately adjacent to build up areas but without leading to the coalescence of settlements. Statutory bodies and Organisations requested that 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 	<ul style="list-style-type: none"> The Council is charged with providing sufficient sites to meet identified need. There is very limited brownfield land across the District, suitable sites are identified in the brownfield register. The Local Plan focuses the majority of development closely related to the defined large towns as set out in spatial strategy to ensure the delivery of sustainable development. The policy is a generic policy that allocates the preferred sites "on mass" subject to separate requirements of each individual site policy. The majority of the feedback was not related to the specific purpose of the policy and has been addressed through the specific section / site proposal of the Plan where necessary. The policy has been updated to reflect the final allocations and allocation details only Plan making is Iterative - Housing Trajectory and Phasing was beyond the scope of the Reg18 consultation document and will be addressed once more certainty over the overall housing target and allocations is known and will be included in future iterations. NCC Highways and NCC Lead Local Flood Authority (LLFA) initially raised a holding

<p>much proposed in North Walsham and Holt. 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. Natural England requested a comprehensive Landscape and Visual Impact Assessment to ensure development did not detract from the AONB. Environment Agency made reference to WRC constraints and capacities.</p> <ul style="list-style-type: none"> • 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. 	<p>objection requesting further time to consider the Plan. LLFA subsequently removed their objection and provided detailed commentary where required and officers agreed an extension of time with NCC Highways to allow Highways further time to work through the detailed site-specific technical comments. Where relevant the site appraisals and assessments have been updated with this commentary in the site assessment booklets and has been taken into account.</p> <ul style="list-style-type: none"> • The Council have ongoing liaison with infrastructure providers which has informed site selection and the emerging Infrastructure Delivery Plan.
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Large Growth Towns

CROMER

Ref	Location	Issues	How taken into account
C07/2	Land at Cromer High Station	Feedback focussed on access considerations while statutory bodies such as Anglian Water advised some additional policy wording.	<ul style="list-style-type: none"> The policy wording is clarified to ensure improved access to public transport and junction improvements are considered as part of any application. Full details of the site assessment are contained in the Cromer Regulation 19 site assessment booklet.
C10/1	Land at Runton road / Clifton park	<ul style="list-style-type: none"> Feedback focused on concerns over development on land which is considered locally to be a “green gap” between East Runton and Cromer with the loss of biodiversity and wildlife along with the loss of open space and the potential negative impact on amenity. Concerns over the smells and capacity of the nearby from Anglian Water plant and the WRC Capacity. Other objections raised concerns around highway access and safety, the need for a new school, increased perception of flood risk should there be heavy rainfall Anglian Water requested that an odour risk assessment be undertaken for this site to ensure that it is deliverable. Support was received from the landowner who submitted further information including a Delivery Statement and an Environment Report 	<ul style="list-style-type: none"> In response to the promoters Phase 1 (Desk Study) Environment Report dated June 2019 (Pigeon Investment Management LTD) Anglian water previous commentary and subsequently withdrew their objection in relation to the potential issues at the adjacent WRC 12.12.2019. Further dialogue with the education authority confirmed there is the potential need for a new primary school site in Cromer and the site is their preferred reserve school site for future expansion, however there is no certainty that the County Council could fund the delivery at this stage. The site assessment was reviewed in light of the commentary and further information and it was concluded that development of the site at a lower density and number as proposed in at the Regulation 18 stage could address many of the concerns raised at the time. The proposed policy was amended to reflect the additional requirements relevant to deliver appropriate development in that location. The site remains suitable for development - Full details of the site assessment are contained in the Cromer Regulation 19 site assessment booklet.

			<ul style="list-style-type: none"> The site was subsequently removed from the plan by Members at Planning Policy and Built Heritage working party in September 2021
C16	Former Golf Practice Ground, Overstrand road	<ul style="list-style-type: none"> Some concerns over the potential impact on the natural environment, water supply, air quality, road network and impacts on the AONB were raised. Landowner confirm he was committed to provide a range of housing types and tenure on site. 	<ul style="list-style-type: none"> The policy is amended to require a landscaping buffer between the site and adjacent business and residential properties. Clarification is brought to the policy with regard access and the requirements for suitable visibility displays.
C22/1	Land west of Pine Tree Farm	<ul style="list-style-type: none"> Feedback highlighted concerns on the potential impact on the natural environment, the AONB, air quality, dark skies, noise and wildlife, health and well-being, pedestrian access, potential impacts on Historic environment and impact on trade and business. Wider issues were raised regarding the potential for increased negative impacts on the road network and infrastructure provision such as impacts on schools, water, gas and healthcare. General comments expressed support for biodiversity net gain, creation of habitats and GI corridors. 	<ul style="list-style-type: none"> The site assessment was reviewed in light of the commentary and further information, and it was concluded that site would not be sufficient to accommodate the proposed 300 dwellings, elderly care and the sports / football club facilities as intended. The site and adjacent alternative sites (C18) at various stage of Plan preparation have been promoted individually. Following the Regulation 18 consultation and the Council's review of emerging planning applications the approach is amended to include a new site compiled from both C22/1 and C18. A new site allocation, C22/2 is proposed which would seek a comprehensive scheme on a combined smaller site area and could deliver approx. 400 dwellings, sports facilities (replacement Cromer Town Football Club), elderly care provision, open space and supporting infrastructure including comprehensive access strategy with vehicle access limited to Norwich Road and new pedestrian footbridge over the railway line. Taking on board feedback the revised approach delivers the scale of growth required over the plan period, is of a scale sufficient to deliver required access infrastructure including secondary points of access and

			has the potential to provide a well-designed extension to Cromer incorporating significant green infrastructure in the form of sports pitches and various types of open space. The policy wording includes the requirement to manage localised landscape impacts
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Settlement Wide Issues

- 6.17 Very few people supported the proposed allocation on Runton Rd/ Clifton Park. A significant number of people expressed concerns about current infrastructure capacity within the town and whether it could accommodate the amounts of development proposed. Many of these people believe major infrastructure investment would be needed but questioned how and if this could be satisfactorily delivered. Some challenged the need for an increase in education facilities. Many people believe development of the sites suggested would harm the landscape character of the town, worsen air quality, exacerbate current flooding problems, harm biodiversity, generate unacceptable levels of traffic congestion, and impact on wider health provision. Some people questioned the need for additional housing and the availability / need for employment development. Many people including Cromer Town Council, Runton Parish Council supported the concept of green gaps and opposed the expansion of the town into neighbouring Parishes. Cromer town Council sought the expansion of the Primary Shopping Area to cover greater parts of the town centre.
- 6.18 Further engagement with the Education Authority established that there was the potential need for a new primary school site as residential development in the Town is likely to put pressure on existing local schools. The Education Authority has expressed a preference for the proposed 2ha site Allocation at Runton Road / Clifton Park (C10/1) to include the potential for education provision as the catchment area could then serve East and West Runton and bring related benefits to the wider town. They have confirmed that currently there is no certainty that the County Council could fund the delivery of a 2-form entry primary school, and as such the ability to deliver a school is not at this stage established.
- 6.19 In response to comments made by the town Council the Primary Shopping Area (PS), identified on the policies map, is extended to include areas on Mount Street that provide a retail function, other areas suggested do not provide the retail function as envisaged in national policy.

FAKENHAM

Ref	Location	Issues	How taken into account
F01/B	Land North of Rudham Stile Lane	<ul style="list-style-type: none"> • Feedback was generally 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 is not available. One objection 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. • NCC Highways advised that further junction improvements would-be required at the “Shell roundabout) 	<ul style="list-style-type: none"> • The policy is updated to reflect the further highway considerations and the infrastructure secured through granting of planning permission for the adjacent site F01/A previously allocated in the Core strategy. Delivery remains linked to conditioned investment and phased delivery. • Full details of the site assessment are contained in the Regulation 19 site assessment booklet.
F10	Land South of Barons Close	<ul style="list-style-type: none"> • The responses primarily focused on concerns over the environmental impact of development; the importance of the site for wildlife and biodiversity acting as an important environmental corridor and the potential adverse effect on SAC, county wildlife site and SSSI adjacent to site. • 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 	<ul style="list-style-type: none"> • The policy wording is updated to include findings of the Appropriate Assessment and include the requirement for a project level HRA which is necessary to inform hydrological issues, site design, layout, drainage and habitat surveys; • Full details of the site assessment are contained in the Regulation 19 site assessment booklet.

		provided to minimise impact on biodiversity.	
F03	Land at Junction of A148 & B1146	<ul style="list-style-type: none"> Limited feedback, Landowner suggested that the policy requirements relating to infrastructure improvements should be removed. 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 	<ul style="list-style-type: none"> HIA concluded that site for a residential use would have no impact upon the significance (including any contribution made to that significance by setting) of local non-designated heritage assets and as such no change to the policy was carried out

Settlement Wide Issues

- 6.20 Very few people responded to the proposed site options in Fakenham compared to other Large Growth Towns. Of those that did, responses primarily raised concerns around environmental impact of development, in regard site reference F10. Land South of Baron close and the importance of the site for wildlife and biodiversity acting as an important environmental corridor and the potential adverse effect on River Wensum SAC.
- 6.21 Feedback for the larger site F01/B was generally supportive. Outline planning permission has since been granted for the adjacent site F01/A allocated in the adopted core strategy 11.10.2021, PO/17/0680. This permission links in the delivery of 950 dwellings, 1.2 ha employment land, community facilities small hotel and land for a 2-form entry primary school with landscaping/ public open space including 5.23 ha Park, 5.96 ha natural green space and 1.46 ha allotments and the phased delivery of significant infrastructure including on-site and off-site highway improvement works.
- 6.22 Development here will be guided by a masterplan, phasing plan and a detailed foul and surface water draining strategy which needs to be approved through reserved matters. Access will come into the site from a new roundabout on the A148 in the vicinity of Water Moor Lane, and the development will be served by a spine road connecting through to Clipbush Lane to the east. Offsite highway works include lane widening, junction improvements of the A148 / A1065 / Wells Lane (Shell Garage) and other pedestrian and footpath improvements. The provision of the infrastructure to serve F01/A is linked to the sequential developed anticipated in F01/B.
- 6.23 Through further dialogue and commitments conditioned with the planning permission for F01/A capacity at Fakenham WRC plant is expected to be increased through mitigation and investment. Anglian water have confirmed that based on the trajectory of the Local Plan they consider there is sufficient headroom at Fakenham WRC based upon the existing permit to accept foul flows until circ 2032 (AMP9). Through AMP7 2020-2025 AW proposed £0.568 million investment to increase WRC process capacity.
- 6.24 As such there is no change in the approach and the policy requirements of F01/B around

phased infrastructure delivery.

- 6.25 A limited number of comments raised on the alternative sites which mainly repeated objections to the preferred sites being within the Local Plan. Limited support is put forward for a number of the alternative sites, which were considered to be more suitable for development, primarily for reasons of deliverability. In some cases further information has been provided in order to seek to overcome the known constraints regarding the alternative sites.
- 6.26 The site appraisals have been updated with the final Habitat Regulation Assessment and policy requirements added in relation to site F10. An additional site, F02 is allocated following the submission and resolution of further access details.

NORTH WALSHAM

Ref	Location	Issues	How taken into account
NW01/B	Land at Norwich Road & Nursery Drive	<ul style="list-style-type: none"> Concerns raised included those associated with wider road network, traffic congestion, lack of pedestrian and cycle routes along with the impact on schools, healthcare capacity and that of electricity and telecommunications as well as wider issues with drainage. Feedback sought sensitive design and the adjoining neighbours at Nursery Drive would like to see a landscape buffer between the new housing and existing. 	<ul style="list-style-type: none"> Clarity is brought to the policy through the removal for the requirement of a future development brief and the policy is strengthened to ensure the delivery of the required infrastructure. The policy is amended to increase the amount of public open space and to maximise connectivity between the residential development and the open space. The requirement for a landscape buffer of no less than 6 metres between the development site and the existing properties at Norwich Road and Nursery Drive is added to the policy. Full details of the site assessment are contained in the Regulation 19 site assessment booklet.
NW62	North Walsham Western Extension	<ul style="list-style-type: none"> The town council expressed concerns and objected to the proposal due to the proposed link road not extending into the industrial site, which is required in order to improve the level of investment and employment in the town and result in the diversion of heavy good vehicles from the town centre. Expansion to the west of the town is supported in principle as long as the Local Plan takes a holistic approach to addressing a broad range of the infrastructure requirements of the town and they are delivered. The provision of land for convenience store, health centre and school was supported and sought clear commitment from providers and policy makers to ensure 	<ul style="list-style-type: none"> The site reference is updated to NW62/A and renamed North Walsham West. The site is enlarged to include land north of the Railway line and an additional parcel south of the original site added to ensure that the highway infrastructure can be delivered on land within the boundary of the allocation and also to provide the opportunity for the delivery of the significant area of green infrastructure to the west and south of the town bordering the 'battlefield site'. Further transport evidence has been undertaken and a development brief consultation undertaken since Reg 18. In light of the feedback, evidence and further dialogue with promoters the policy has been amended to include more

		<p>delivery. Environmental considerations such as the creation of green corridors, open public spaces, cycle routes, and pedestrian connections to the town centre and the development of recreation through a new country park were promoted.</p> <ul style="list-style-type: none"> • Statutory bodies and organisation generally supported the allocation. Anglian Water requested consideration of specific safeguarding wording. 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. • 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 required to accommodate growth. • Concerns were also raised about the local planning approach to climate change and the need for the policy to enable a community led development approach. • Objections focused around Existing traffic issues in the town and a lack of pedestrian and cycle routes. Concerns over parking, the impact on the town centre and impact on amenity of existing resident's. 	<p>detail and clarity on the specific allocation requirements.</p> <ul style="list-style-type: none"> • The policy is amended to include the requirement for a prior approval of a development brief, site wide Masterplan, Design code, drainage strategy and Green infrastructure strategy accommodating at least 17.47 Ha of new public space, sports pitches, and allotments as well as a substantial town park to the south west of the site and improved connectivity to the wider countryside and Weaver Way corridor. • The policy is amended to promote sustainable transport including the use of segregated pedestrian and cycle network, interconnected streets, appropriate public transport to the town centre and off-site improvements. • The revised policy wording required that the new link road will be delivered and designed as an attractive main residential street through the development with mixed-use frontage usages and segregated cycle paths and footways. The revised wording in the policy requires that the new link road will be suitable for HGV traffic (including high sided vehicles) and will connect Norwich Road to Cromer Road and provides a suitable route over the railway for access to the Lyngate/Folgate Rd industrial estate with appropriate junctions. Clarity is brought to the policy in order to ensure that the entire link road is delivered, in full, at the earliest opportunity. • Specific requirements around off-site improvements to the highway and transport network are also now included in the policy. • Full details of the site assessment are contained in
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		<p>Lack of employment opportunities. Concerns over the potential impact on the environment; loss of a large area of greenspace / agricultural land, adverse landscape impact, impact on wildlife and biodiversity and Weavers Way, impact on the site of the 1381 Battle of North Walsham.</p> <ul style="list-style-type: none"> • Suggestions that other sites should be prioritised first, including brownfield sites, and as part of existing development. • Improvements needed to the railway station and suggestions that the town centre should become a Conservation Redevelopment Zone and be pedestrianised. 	<p>the Regulation 19 site assessment booklet.</p>
E10	Land Off Cornish Way	<ul style="list-style-type: none"> • No substantive issues raised. Support for further employment land in North Walsham, concern that North Walsham lacks the infrastructure necessary to accommodate growth and improvements. 	<ul style="list-style-type: none"> • This site is not taken forward as an allocation following a boundary review the designated employment site boundary has been amended to include the site which was previously allocated in the Core Strategy. Further employment land is added through the allocation of adjacent land through NW52 which supports the requirement for access improvements from Bradfield Rd and connections over the railway to the Western extension.

Settlement Wide Issues

6.27 A number of the representations received across all sites were concerning town wide infrastructure, traffic congestion and service provision concerns. There were concerns with the existing road infrastructure, traffic congestion, lack of pedestrian and cycle routes. Further concerns were expressed regarding capacity at doctors and dentists, electricity and telecommunications and issues with drainage. Representations suggested that they would like to see improvements to the railway station and for the town centre to become a Conservation Redevelopment Zone and be pedestrianised.

6.28 In response to the representations on traffic and transport issues raised at Reg. 18 further highway evidence has been commissioned to look at the impact of traffic generated by the growth proposals on the highway network. This evidence suggests areas of intervention and mitigation on the network which could be targeted by more detailed

examination in Transport Assessments that would accompany future planning applications. Relative policy wording in the allocated sites has been amended to include direct reference to the required transport measures that need to be brought forward including measures to improve cycling and walking through the development and into the town centre and services such as the rail station.

6.29 There are no proposals in the Local Plan to make the town centre a 'conservation redevelopment zone' or to be pedestrianised. The plan continues to recognise the importance on the town centre in its retail and hospitality function with supportive policies on these matters. The Plan also re-enforces the importance of the town centre conservation area with a policy regarding protecting and enhancing the historic environment. However, unrelated to the Local Plan, the Council is taking forward other projects to address some of the town centre related issues such as the Heritage Action Zone project in partnership with Historic England seeking to deliver enhancements the historic character and heritage of North Walsham town centre.

6.30 Representations were made by landowners/promoters in relation to the suitability of alternative sites for residential allocation in the town, namely:

- Site promoters for NW16, Land at End of Mundesley Road, provided detailed information regarding a number of matters including: access and transport, landscape and an illustrative layout. This information was considered and taken into account in the updated site appraisal. Following, further comprehensive appraisal, the site was not considered suitable site for development as the preferred options offer more sustainable development options providing mixed use development and have the potential to deliver significant locally strategic benefits and the Plan is not changed.
- Site promoters for NW23, Land at Yarmouth Road & NW24 Land Adjacent Mushroom Farm submitted further details at Reg. 18 consultation with regard potential site layout, landscaping and access for a combined site. These sites have a number of constraints and development would adversely affect the setting of the settlement. Development of this large (combined) site would extend into the open countryside and have a negative effect on the quality of the landscape by reducing the rural character. There are concerns from the Highway Authority that the site cannot deliver suitable access and pedestrian connections. The site is not considered suitable site for development.
- Site NW52, North Walsham Industrial Estate Extension was not part of the Regulation 18 consultation. This site was added in order to provide extra employment land in the town and align with the policy ambition of the urban extension including the delivery of the link road through the site and connecting to Cornish Way.

Small Growth Towns

HOLT

Ref	Location	Issues	How taken into account
H04	Land South of Beresford Road	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • The site has subsequently been granted planning permission through appeal and removed from the Plan.
H17	Land North of Valley Lane	<ul style="list-style-type: none"> • One objection was received in relation to the environmental impact of development and the impact on the Conservation Areas, density, noise and the disruption to wildlife were put forward. • 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. 	<ul style="list-style-type: none"> • Clarity is brought to the policy around the incorporation of open space, landscaping and the pedestrian access improvements. Further refined policy wording is added to the policy around the requirements for foul drainage strategy and the submission of a surface water management Plan. • Full details of the site assessment are contained in the Regulation 19 site assessment booklet.
H20	Land at Heath Farm	<ul style="list-style-type: none"> • Feedback received from statutory bodies was in general in support of the 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 	<ul style="list-style-type: none"> • The policy wording is updated to include findings of the Appropriate Assessment and include the requirement for a project level HRA which is necessary to inform hydrological issues, site design, layout, and drainage and habitat surveys. • Clarity is brought through additional policy wording addressing historic England's and Anglian Waters concerns.

		<p>to heritage assets and requested consistent wording.</p> <ul style="list-style-type: none"> • One objection received - residential development was considered to increase commercial vehicles travelling through the residential area impacting on residential amenity, close to road traffic noise, be out of context and expand too far into the countryside. Suggested changes included amending the policy requirements to ensure site layout preserves residential amenity and requires a landscaping scheme. Suggest that this site would be more suitable for employment. 	<ul style="list-style-type: none"> • Policy wording is added to address comments made by NCC Minerals and Waste requirements. • On site provision of open space is quantified and the overall number of dwellings reduced to take account of infrastructure requirements, landscaping and surface water drainage requirements. • Full details of the site assessment are contained in the Regulation 19 site assessment booklet.
H27/1	Land at Heath Farm	<ul style="list-style-type: none"> • Norfolk Wildlife Trust objected to the employment use of the site due to its proximity to Norfolk Valley Fens SAC and potential for adverse effects. • 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. • A preference for residential development was put forward by a member of the public in order to limit the perceived impacts of employment use on residential amenity. 	<ul style="list-style-type: none"> • Policy wording is added to address comments made by NCC Minerals and Waste requirements and Historic England. • The policy wording is updated to include findings of the Appropriate Assessment and include the requirement for a project level HRA which is necessary to inform hydrological issues, site design, layout, and drainage and habitat surveys. • Full details of the site assessment are contained in the Regulation 19 site assessment booklet.

Settlement Wide Issues

6.31 Overall very little feedback was received on the proposals for Holt, no comments were provided by the town council and only few members of the public provided comments. General commentary from statutory bodies included the requirement to approach the historic environment in a consistent way and to reference NCC Minerals and waste considerations. NNC objected to the existing open land designation on H10, Land off Swann Grove and continued to promote the site for residential development. Land at Beresford Rd, HO4, Land at Beresford Rd has been subject to a planning application and subsequent granted permission through appeal. The issues raised at the time were considered through the planning application and appeal included highways issues, education and s106 contributions.

HOVETON

Ref	Location	Issues	How taken into account
HV01/B	Land East of Tunstead Road	<ul style="list-style-type: none"> • A few representations are in support of the allocation, highlighting the need to provide elderly care on the site for the area. • Objections identify concerns regarding potential impact from development of this site on the local road infrastructure and impact the development may have on the local character, In addition to environmental concerns such as pollution and impact to amenities. • Town Council expressed concerns over the implementation of one large site. NCC Highways Authority comment on the positive sustainability of the site's location. 	<ul style="list-style-type: none"> • The policy has been amended in order to promote active travel and make it easier to navigate from the site into the surrounding area. Policy also includes requirement to provide an access from Tunstead road that connects to new Stalham roundabout, east of the site. The Policy includes appropriate text designed to encourage careful design of the site to avoid any possible detrimental impact on the local character.

Settlement Wide Issues

6.32 Representations received identify the local road infrastructure and the perceived impact the site will have on it as a key concern. Specifically, Wroxham Bridge, Tunstead Road and Stalham Road, and Brook Park are all mentioned as areas of concern. Representations also raise concerns over the loss of agricultural land the impact this may have in the future, alongside concerns over the increasing pressure on local services and facilities.

SHERINGHAM

Ref	Location	Issues	How taken into account
SH04	Land Adjoining Seaview Crescent	<ul style="list-style-type: none"> • The town council supported the site allocation requesting improved access to the community centre direct from the site. • Overall statutory consultees expressed. General support 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 	<ul style="list-style-type: none"> • The policy was amended following feedback to include a requirement for the provision of a suitable access. • The policy wording has been updated in relation to SUD's features and the requirement for a surface water management plan. • In terms of heritage the HIA concluded that there would be limited impact on the historic environment, no change to policy is required. • Full details of the site assessment are contained in the Sheringham settlement

			Regulation 19 site assessment booklet.
SH07	Former Allotments, Weybourne Road, Adjacent to Reef Leisure centre	<ul style="list-style-type: none"> • Further information on drainage, sewage, surface water and 'landscape and Visual Appraisal' was submitted in relation to the site which has been used to inform the site assessment. • Both Upper Sheringham and Sheringham Town Councils' expressed support. Anglian Water advised that policy wording should be amended to safeguard access to existing water mains located on the site. Anglian Water, LLFA, NCC 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 	<ul style="list-style-type: none"> • Clarity is brought to the policy by reviewing the landscape requirements and layout. As a result the number of dwellings has been reduced from 45 to 40. The policy already includes drainage, sewage and surface water requirements and safeguarding of the existing water main, but some changes to the policy wording have been made in line with feedback for consistency and clarity. • In terms of heritage the HIA concluded that there would be limited impact on the historic environment, no change to policy is required. • Full details of the site assessment are contained in the Sheringham settlement Regulation 19 site assessment booklet.
SH18/1B		<ul style="list-style-type: none"> • Some concerns raised re encroachment into the AONB. Historic England raised some concerns over impact on Conservation Area and setting of Sheringham Park. Suggested strengthening of policy wording through careful design, layout and landscaping. Concerns also raised on ecological impact and constrained access to the site. Anglian Water advised that policy wording should be amended to safeguard access to existing water mains located on the site. Some support was expressed for a GI corridor on the site. NCC Minerals and Waste supporting comments to add appropriate site policies. 	<ul style="list-style-type: none"> • Consideration of design, layout and landscaping on the AONB and heritage assets has already been included in the policy, but some changes to the policy wording have been made in line with feedback. • In terms of ecology a landscape buffer along with biodiversity enhancement and mitigation measures is already a requirement included in the policy. The Local Plan also includes a specific policy requirement for Biodiversity net gain. • The number of dwellings has been reduced from 50 to 48 in line with vehicular access requirements from the Highway Authority off the A1082 (Holway Road). The policy wording has been amended accordingly. • Policy wording amended in relation to Anglian Water and safeguarding existing water main

			<ul style="list-style-type: none"> • Full details of the site assessment are contained in the Sheringham settlement Regulation 19 site assessment booklet.
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Settlement Wide Issues

- 6.33 Limited feedback was received on the sites and settlement wide issues with little substantive issues being raised. The town council expressed support for all three sites expressing a preference for rented affordable properties. The feedback and updated proposals were endorsed by Cabinet at a meeting on 6 July 2020.
- 6.34 The town council sought changes to the Primary Shopping Area to include the retail units in towards the north end of the High Street. In response to comments made by the town council around changes to the identified Primary Shopping Area, PSA no changes were made. It is considered that the area to the north of the existing PSA does not meet the definition of the PSA as where retail is concentrated
- 6.35 Site SH07 is subject to a restrictive covenant in favour of the town council. In further liaison the town council have reaffirmed their position around their support for residential development on SH07. They indicated that they are willing to revise the terms of the covenant from commercial development to that of residential in order to help address the residential needs of the Town.
- 6.36 A number of comments have been made in support of the assessment of alternative sites that have not been selected as proposed preferred sites in the Local Plan. The assessment of SH16/1 was disputed by County Council Property Services, who consider the site to be a sustainable location.
- 6.37 On respondent objected to site SH23 not being selected as it is a brownfield site that is well located to the town (within settlement boundary). Full site assessments are contained in the booklets.
- 6.38 The Highway Authority raised concerns in relation to the impact of the sites and overall settlement numbers on the highway network. In particular they have restricted the number of dwellings to be served by the vehicular access for SH18/1B. This is shared with an existing adjacent site. In total across the allocated site and adjacent sites, one of which is currently being built out), the Highway Authority specifies the access should serve a maximum of 100 dwellings. In this case no more than 48 dwellings on site SH18/1B.

STALHAM

Ref	Location	Issues	How taken into account
ST19/A	Land adjacent Ingham Rd	<ul style="list-style-type: none"> • Individual representations received are in objection to this site, they raise concerns over the congestion experiences along Ingham Road during certain times of the day, and raise issues with the site's location in regard to 	<ul style="list-style-type: none"> • The policy has been clarified to abide by the requirements set out by the NCC Highways Authority in their representation for a transport assessment to be undertaken. The policy has been amended to take into consideration of

		local services and facilities. NCC Highways Authority raise no objection to the site. Anglian water advised that there is existing water main in their ownership within the boundary of the site and the site layout should be designed to take this into account.	the onsite Anglian Water infrastructure.
ST23/2	Land North of Yarmouth Road, East of Broadbeach Gardens	<ul style="list-style-type: none"> Individual representations are in objection to this site, they raise concerns relating to the previously proposed employment opportunities that would be provided on site that will be changed to residential. Comments also raise concerns regarding traffic congestion on Yarmouth Road and the site's location in relation to nearby services and facilities. Historic England raise concerns regarding the impact the site has on nearby listed buildings and the Stalham Conservation Area. NCC Highways requested that the a Transport assessment be included in the policy requirements 	<ul style="list-style-type: none"> The policy is amended to include the requirement for a transport assessment. The HIA undertaken identified mitigation in form of landscape arrangements to be provided on-site that will help alleviate impacts on the nearby conservation area and listed buildings. The policy is amended accordingly.

Settlement Wide Issues

6.39 Representations received for both sites raise concerns over the increase in traffic and the issues this will raise in the settlement. Additionally, there are concerns relating to both sites over the cumulative impact on local services and facilities.

WELLS-NEXT-THE-SEA

Ref	Location	Issues	How taken into account
W01/1	Land to Rear of Market Lane	<ul style="list-style-type: none"> Feedback considered the site suitable for housing, but some including the Town Council expressed a preference for affordable housing. Historic England sought consideration of careful landscaping to site. Anglian Water and Minerals and Waste recommended consideration be given to the 	<ul style="list-style-type: none"> The feedback has been considered in line with wider policy and viability evidence the site is required to provide 35% affordable housing – as such no change to the policy is required. The HIA concluded that there would be limited impact on the historic environment. No key long range views from the site. The policy wording is updated in relation landscaping to ensure

		<p>use of additional phrases in the policy wording.</p>	<p>that the site is well screened from Holkham Hall Registered Park and Garden (Grade I).</p> <ul style="list-style-type: none"> • Policy wording clarified in relation to Anglian Water and Minerals and Waste requirements. • Full details of the site assessment are contained in the Wells next the Sea settlement Regulation 19 site assessment booklet.
W07/1	Land adjacent to Holkham Rd	<ul style="list-style-type: none"> • Concerns raised over the potential impact on the environment and AONB, the developments prominence, impact on views, the countryside and coastal paths, insufficient space for landscaping, potential adverse impact on designated sites, dark skies and wildlife. Other concerns regarding traffic and access, design, scale and number of dwellings. • Objection from the Town Council given the prominent position limited access and existing use. • General support from consultees, but raised a preference for alternative sites, addressing affordable housing. • Historic England sought reference to the Conservation Area and Holkham Hall Registered Park and Garden, and that with careful design limited development should be possible on the site. • Minerals and Waste provided supporting comments to add to appropriate site policies. 	<ul style="list-style-type: none"> • Taking into consideration the feedback given the policy has been amended and reduced the number of dwellings from 60 to 50 to reduce the impact of the site allocation on the surrounding area. • The Policy already contains the feedback issues in relation to design, building heights and materials and no policy change is considered necessary. • The Policy already included the need for satisfactory access (pedestrian and vehicular), but this wording has been amended to be specific in terms of where vehicular and pedestrian access is sought from. • HIA concluded no designated heritage assets within the site. However, the Wells Conservation Area lies to the northeast of the site and Holkham Hall Registered Park and Garden to the south west. Policy wording is amended to include reference to these designations, and that careful design and landscaping is sought. • Policy wording clarified in relation to Anglian Water and Minerals and Waste. • Full details of the site assessment are contained in the Wells next the Sea settlement Regulation 19 site assessment booklet.

Settlement Wide Issues

- 6.40 There was general support for the site allocation on Land to rear of Market Lane (W01/1). This site was carried forward from the previous Local Plan site allocations. Under the previous allocation the intention was it would be developed solely for affordable housing. However, the site to date has not come forward for development. Whilst the site is allocated for development there is a 35% affordable housing requirement in the Local Plan for this location in line with viability testing and Policy HOU2. Therefore, whilst not solely for affordable housing the site will deliver an element of affordable housing to support local need.
- 6.41 The majority of comments regarding sites in Wells are in favour of the assessment of alternatives that are not proposed as preferred sites in the Local Plan. One comment was made to support site W11 requesting that the Council consider a smaller parcel of land for mixed use development. There have been two further iterations of W11, which have been considered at Regulation 19. They are W11/A and W11/B. These were both for smaller sites but following Site Assessments the sites were discounted and no changes to the allocation have been made.
- 6.42 Two further site W12 and W13 were also put forward for consideration but not considered as suitable for development. Full details of the site assessment are contained in the Wells next the Sea settlement Regulation 19 site assessment booklet.
- 6.43 Following a review of planning permission PF/10/0484, the Policies map has been amended so that the settlement boundary accords with the site boundaries of the Holkham Freeman Street car park permission, to the north west of the town.
- 6.44 Alongside consultation on the draft Local Plan the Council also published and sought comments on its proposal for Open Land Area designations. A further three Open Space Designation sites were considered and reviewed at the Planning Policy & Built Heritage Working Party on 8 January 2021. One additional Open Land Area was designated for Wells (ref: AGS/WEL22 - Wells East Quay).
- 6.45 The Town Council are currently preparing a Neighbourhood Plan with the aim of identifying further affordable housing sites and appropriate housing policies in order to bring forward further housing provision including affordable housing in line with local identified needs.

Large Growth Villages

BLAKENEY

Ref	Location	Issues	How taken into account
BLA04/A	Land East of Langham Road	<ul style="list-style-type: none"> • Feedback raised generalised concerns on the potential impact on the environment, the AONB, that development would be prominent, detrimental impact on views on approach into Blakeney, the distinctive local, character of the village and Conservation Area, dark skies, light and noise pollution, impact on wildlife. Potential adverse impact on designated sites. Similar impact's on AONB to non-preferred sites. • Wider issues were raised regarding potential for increased impact on road network and infrastructure provision such as impact on schools, healthcare, water and foul drainage, limited employment opportunity, impacts on public footpaths, loss of green space/agricultural land. • General comments expressed that if developed adequate screening required, no street or outside lighting, houses should be lower than 1.5 storey in height. • Support for affordable homes for local people. • Support given in relation to access to primary school and other services within the village. • Historic England sought consistency in approach to heritage assets. • NCC Minerals and Waste recommended consideration be given to use of additional phrase in policy wording. • Support expressed from promoter for an alternative site. 	<ul style="list-style-type: none"> • The feedback has been considered and the policy already includes requirements to minimise the impact on the AONB, wider landscape views into Blakeney and the character of the village through the number of dwellings being proposed (30 dwellings), careful attention to site layout, scale, materials and landscaping. The Policy also already includes a requirement for a scheme of mitigation to minimise potential impacts on designated sites. No policy change is therefore required. • In terms of heritage impacts the HIA concluded that there will be limited impact on the historic environment. No policy change is therefore required. • The HRA has concluded that local significant effects are ruled out subject to the GIRAMS being in place. The policy already includes a requirement for appropriate contributions towards this. • NCC Education Authority advised that adequate primary school capacity is available to serve the needs of the proposed development- no change required. • Improvements to existing footways on the Langham Road and public footpaths, along with convenient and safe vehicular access requirements are already included as part of the policy. The policy has been amended to include an extension of the 30mph speed limit to the southern extent of the site. • Enhancements to the sewerage network capacity is already a policy requirement and no

			<p>change required in respect of this. However, a surface water management plan has been added.</p> <ul style="list-style-type: none"> • Policy wording clarified in relation to Minerals and Waste requirements. • Full details of the site assessment are contained in the Blakeney settlement Regulation 19 site assessment booklet.
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Settlement Wide Issues

- 6.46 Overall a number of objections were received in relation to the preferred site BLA04/A being included within the Local Plan. The primary issues raised were in regard to impacts upon the landscape, the historic environment and nearby residential amenity (Kingsway) and the promotion of an alternative site(s). A number of comments offer support for the alternative sites (BLA01/A /B and BLA09), in these it was contented that these sites would have less significant impacts upon those primary issues. The highway objections to these sites were disputed and it is stated that the alternative sites were available, deliverable and achievable. Additional site assessment information was subsequently provided by site promoters in support for both the alternative options. The sites appraisal were updated and considered through the Councils Planning Policy and Build Heritage Working Party, (July 2020 & December 2020) which included public representation in support of both sites.
- 6.47 While no representatives were received from the parish council it is recognised that the parish council is also developing its own neighbourhood plan which offers the community the opportunity to add a layer of local distinction though additional local policy considerations, subject to evidence and appropriate justification and examination, in order to address evidenced local needs and ensure any development respects community aspirations on local character.

BRISTON

Ref	Location	Issues	How taken into account
BRI01	Land East of Astley School	<ul style="list-style-type: none"> • Limited response received. No substantive issues raised. Concern that development will lead to coalescence of Briston and Melton Constable, and future development will be difficult to control. Concern with proximity of the potential site access to the school. • Assessment needed to ensure site can deliver required level of affordable housing and 	<ul style="list-style-type: none"> • An HIA was undertaken and concluded that there would be limited impact on the historic environment. Therefore, no change to the policy required. • Following feedback regarding the access the policy wording has been amended requiring the access to be provided from The Lane. • The Plan has undergone Plan wide viability appraisal at regulation 18 stage. Briston is

		<p>associated community benefits.</p> <ul style="list-style-type: none"> • 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 	<p>identified as settlement in viability Zone 1 where at least 15% affordable housing is deliverable</p> <ul style="list-style-type: none"> • In terms of biodiversity the policy already included the retention and enhancement of mature hedges and existing pond. The policy wording has been amended so that the existing pond is to be retained and incorporated into open space on the site. The Local Plan also includes a required for Biodiversity net gain. • Full details of the site assessment are contained in the Briston settlement Regulation 19 site assessment booklet.
BRI02	Land West of Astley school	<ul style="list-style-type: none"> • Limited response received. No substantive issues raised. Concern that development will lead to coalescence of Briston and Melton Constable, and future development will be difficult to control. Concern with the potential site access to the school. • Assessment needed to ensure site can deliver required level of affordable housing and associated community benefits. Questions raised over deliverability. • Support received from the landowner who confirms that the site is available, suitable and achievable. • 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. 	<ul style="list-style-type: none"> • An HIA was undertaken and concluded that there would be limited impact on the historic environment. Therefore, no change to the policy required. • Following feedback regarding the access the policy wording has been amended requiring the access to be provided from The Lane. • The Plan has undergone Plan wide viability appraisal and the viability evidence identifies Briston in Zone 1 where at least 15% affordable housing is deliverable • A requirement for green wildlife links has already been included in the policy. No change required. • Full details of the site assessment are contained in the Briston settlement Regulation 19 site assessment booklet.

		<ul style="list-style-type: none"> • General support expressed for biodiversity net gain, creation of habitats and GI corridors. 	
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Settlement Wide Issues

6.48 Some objections were received in relation to the preferred sites (BRI01 and BRI02) being included within the Local Plan. The primary issues raised were in regard to the constraints and issues on the sites, and the promotion of alternative sites where it was stated that the highway constraints identified could be overcome and in particular BRI10 and BRI11 were put forward as alternative preferred sites. Historic England raised general concerns in relation to coalescence between the settlements of Briston and Melton Constable. A number of respondents also had concerns over the approach taken, but few suggested any solutions. The HIA concluded that there would be limited impact on the historic environment.

LUDHAM

Ref	Location	Issues	How taken into account
LUD01/A	Land south of school Rd	<ul style="list-style-type: none"> • No individual or Parish Council representations received. NCC Highways Authority raise no objections or concerns. Anglian Water identify a possible need to enhance the public foul sewerage network to accommodate future development. EA also raise concerns regarding the Ludham WRC being a near capacity. 	<ul style="list-style-type: none"> • The policy has been amended to ensure the requirement for the submission of a Foul Drainage Strategy to help mitigate the impact the site will have.
LUD06/A	Land south of Grange Road	<ul style="list-style-type: none"> • No individual or Parish Council representations received. NCC Highways Authority raise no objections or concerns. Anglian Water identify a possible need to enhance the public foul sewerage network to accommodate future development. EA also raise concerns regarding the Ludham WRC being a near capacity. 	<ul style="list-style-type: none"> • The policy has been amended to ensure the requirement for the submission of a Foul Drainage Strategy to help mitigate the impact the site will have.

Settlement Wide Issues

6.49 Consultation raised limited feedback with little concern around the level of growth or the sites identified. Known constraints include the limited capacity at Ludham WRC and a schedule to provide investment is set out in the Anglian Waters Long term planning Framework.

MUNDESLEY

Ref	Location	Issues	How taken into account
MUN03/A	Land off Cromer Rd and Church Street	<ul style="list-style-type: none"> • The Majority of feedback from individuals was in objection to the allocation. Road safety is a significant concern, especially on Cromer Road with reference to a ‘blind’ bend being the key issue. Other concerns relate to the site being situated in the wrong place and suggest other areas of the settlement would be more suitable, comments highlight concerns regarding the site’s visibility in the wider landscape, overdevelopment of the settlement is referred to many times in the representation and the impacts this has on the local services and facilities. Representations also refer to the quantity of affordable housing and suggest not enough will be provided on site. • The Parish Council are in support of providing well designed housing but remain concerned regarding visibility of the site. Comments received from NCC Highways Authority suggest improvements are needed towards access and egress from the site onto Cromer Road. • Historic England identifies the presence of a Grade 2 listed building (church) adjacent to the site. 	<ul style="list-style-type: none"> • The scale of the site has been amended to reduce the overall size of the site from 50 to 30 dwellings. The site boundary has been reduced to reflect this change as well, therefore reducing the impact of the site on the surrounding area. • A HIA has been undertaken to fully assess the impacts of the site on nearby heritage assets and the outcome of this has been considered. • The site-specific policy has been amended to identify a need to mitigate impacts on the setting on the nearby church and also makes note of the need to create a well-designed site in light of the site’s elevated situation. • Full details of the site assessment are contained in the Mundesley Regulation 19 site assessment booklet.

**Sustainability Appraisal & Interim Habitats Regulation Assessment:
How the Main Issues have been addressed**

Summary of comments raised at Regulation 18	Changes made
<p>HRA: Statutory bodies supported the approach and assessment. Natural England advise that some further detail would be required and that the interim HRA recommendation would need to be assimilated into the Plan ahead of the next iteration of HRA.</p>	<ul style="list-style-type: none"> • The Council continue to work with Anglian Water and the Environment Agency over identifying and addressing limitations at WRC. The updated positions will feed into the final HRA • Officers are working through the Duty to Co-operate including with Natural England on the Norfolk wide Green Infrastructure Recreation impact avoidance and Mitigation Strategy which will identify the mitigation required in relation to recreational impacts on Es.
<p>SA: a number of general comments were received generally supporting the approach. Natural England were <i>satisfied that the methodology and baseline information used to inform the scoping report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance.</i> Some individual commentary sought changes to the individual objective scores in relation to a couple of sites, while the Broads Authority brought to attention a potential inconsistency with the interpretation of SA objectives SA3 and SA policy across three policies</p>	<ul style="list-style-type: none"> • The SA process is iterative. Comments made on the specific policies and sites were noted and considered in the finalisation of the SA.

6.50 The Local Plan sets out 20 Strategic objectives which have been appraised against the 16 SA objectives set out in the SA report. Each of the Strategic Objectives was reviewed against the SA Objectives in a matrix to determine their compatibility and to identify any potential areas where new Strategic Objectives need to be established or the existing ones clarified.

6.51 On the whole the Strategic Objectives and the SA Objectives complement each other - no conflicts were identified.

7 How the Main Issues Have Been Addressed (Regulation 19)

- 7.1 This section of the Consultation Statement sets out how the Council have complied with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012-part (v) and (vi).
- 7.2 Representations were sought around legal compliance and soundness on the proposed submission version under Regulation 19 for 7 weeks between January 17th 2022 and March 7th 2022. The consultation was originally scheduled to finish on 28th February 2022, but an additional week was added in response to allow more people more time to respond. In accordance with the regulations, comments were sought on the soundness and legal compliance of the Plan.
- 7.3 The Plan documents were supported by the Sustainability Appraisal, Habitats Regulations Assessment, Policies Map, and a range of evidence documents published on the Council’s web pages and Document Library. An earlier version of the Consultation Statement which detailed the feedback from the previous regulation 18 consultation and how it had been taken into account [First Draft Local Plan Interim Consultation Statement Examination Library Reference B11]. The Consultation documents, and all supporting documents were made available online through the Councils planning Document Library www.north-norfolk.gov.uk/documentlibrary. Paper copies of the Plan and main supporting documents were also available at the Council officers and district libraries.
- 7.4 Comments were encouraged to be submitted online in relation to each policy / section of the Plan. A downloadable response form was also made available and email / postal responses were also accepted. Those wishing to make paper representations were provided with response forms on request at Council offices, libraries and by post. These were subsequently uploaded onto the Council’s consultation portal which remains publicly accessible and where all the responses can be read: <https://northnorfolk-consult.objective.co.uk/kse>

Publicity

- 7.5 The Council engaged directly with those statutory and general bodies through a range of consultation methods in order to ensure the involvement of a wide audience as part of the plan making process. Fig 4 in the Statement of Community Involvement details the method of engagement available in order to involve the wider public.
- 7.6 The table below sets out the communication methods utilised

Table 6: Communication Methods

Promotion Task (Intended)	Involving	Implementation
Launch Events	<ul style="list-style-type: none"> • Members Briefing – All Members offered the opportunity of a briefing to explain the highlights of the Local Plan and the consultation arrangements. 	Late Dec/Early January - date TBC
Local Plan Newsletter (Task 1)	<ul style="list-style-type: none"> • All on Consultee Database (including all Parish & Town Councils and All Members) advising of consultation dates and arrangements. 	Mid Dec

Targeted Letters	The Consultation Database contains details of those individuals and interested parties that have registered to receive direct updates such as developers and agents (currently 1750 individuals and organisations). It also includes organisations representing a range of those considered harder to engage and all of the statutory bodies. Targeted letters / statutory notices with relevant information will be send advising of the start, duration and how to be involved in the consultation.	Start of consultation
News Release Comms Team to issue 2 x news releases prior to and during the consultation	<ul style="list-style-type: none"> • EDP, North Norfolk News, Fakenham & Wells Times, Fakenham Sun • Radio Norfolk, Heart, North Norfolk Radio, KLFM • Look East, Anglia News, That's TV Norfolk • Just Cromer, Just Holt, Just North Walsham, Just Sheringham, Just Wroxham & Coltishall, North Norfolk Post, Cromer Times, NW Times, Holt Chronicle, Sheringham Independent, Norfolk On My Mind • Town & Country News 	1) Mid Dec 2) 2 weeks prior to close of consultation
Paid Advertising Sponsored Ads Comms Team	<ul style="list-style-type: none"> • Facebook / Instagram (may be seen by a younger audience + local organisations) 	Mid Dec
Consultation Notice / Poster Distributed to P&TCs + Members for placement in the locality.	<ul style="list-style-type: none"> • Parish notice boards / parish meetings 	Mid Dec
Social Media NNDC posts throughout the consultation period	<ul style="list-style-type: none"> • Facebook / Instagram • Twitter 	Mid Dec
Other information outlets to be utilised	<ul style="list-style-type: none"> • NNDC Home Page • Staff Intranet • Members Bulletin • NNDC Local Plan Web Page • NNDC News Page • NNDC 'Council Consultations' web page 	Throughout consultation

Equalities

7.7 We directly consulted a range of community groups and organisations by contacting them by letter or email through our consultation database. This included organisations representing particular social groups including faith groups, people from minority backgrounds, including Gypsies, Travellers and Travelling Showpeople, organisations and other ethnic groups, people with disabilities and particular age groups, including the young and elderly. A breakdown of statutory and general consultee by category of interest is included in Appendix F. A range of engagement techniques were used in order to enable all groups to make their views known.

- 7.8 Methods of engagement used to help broaden the accessibility of the consultation included:
- Translation / other formats available for all documents on request e.g. Braille, audio, large print or other language.
 - Ensuring the consultations were advertised through as many means as possible and involved dissemination through community representative groups such as town and parish councils.

Number of Responses Received

- 7.9 The Council received a **total 697** representations from 190 respondents. A proportion of the responses received (106/ 27%) were not made using the prescribed consultation response form. A large number of responses related to multiple topic areas, policies or sites in the Plan, or to other supporting documents and or included additional uploaded PDF documents. In order to review and respond to the representations, the Council undertook an exercise to split such comments and upload them to the relevant section of the Plan on the consultation portal prior to review.
- 7.10 All the representations, remain publicly available through the Council's planning consultation portal. [Consultation Home - Keystone \(objective.co.uk\)](http://objective.co.uk). In addition, the representations have also been compiled into two specific PDF schedules which are appended to this statement. This Schedule of Representations, Schedule 1 [Appendix H of the Consultation Statement, Examination Library Reference A5.8], details all of the representations received during the proposed submission consultation period, in Local Plan section order. Schedule 2, [Appendix I of the Consultation Statement, Examination Library Reference A5.9], details all the representations received during the proposed submission consultation period in representor order. Summaries of the representations received and an initial response/ incorporating proposed changes to the Plan are contained in a further three schedules (3, 4 & 5) appended to this report. [Examination Library references: A5.10, A5.11 & A5.12]
- 7.11 Appendix F is updated to include details of the general and specific bodies consulted by group at each stage of Plan.

Late Representations

- 7.12 A further two late and inadmissible representations were received after the extended closing date of the 7th March.

Summary of Main Issues Raised at Regulation 19

- 7.13 In reviewing the representations and identifying the main issues it is recognised that the actual issues for the examination will be determined by the Inspector. Nevertheless, the regulations require the Council to identify and summarise the main issues raised in those representations received in response to the consultation on the proposed submission version.
- 7.14 It's anticipated that a number of the issues raised through representation will be addressed either prior to or subsequent to submission
- 7.15 No representation has been made, that in the view of officers would render the Plan unsound or give rise to sufficient cause at this stage to undertake a further consultation under regulation 18.

7.16 Schedule 3 [Appendix J of the Consultation Statement Examination Library Reference A5.10] summarises in detail each representation received and the Council’s response and should be read in conjunction with the below precis of the main issues identified.

Strategic Policies

A. Excessive (onerous) and/or inadequate approach to addressing climate change

- 7.17 Some representations seek to challenge the direction of travel and sought lower standards and alignment with the minimum requirements of Building Regulations in relation to carbon reduction, rather than the progressive requirement contained in the policy. This was not uniform, and others argue that the Plan should go further and quicker. Collectively it is considered that statutory bodies recognised the need to place increased emphasis on climate change and take a positive action to achieving net zero through supporting actions that address the causes of climate change and that reduce greenhouse gas emissions and the approach was seen to be compatible with their aims.
- 7.18 Some respondents seek to challenge the approach to onshore wind energy and argue that it is too restrictive given the climate emergency, while other respondents consider that the policy approach is not restrictive enough, requesting that such proposals are assessed on a case-by-case basis.
- 7.19 In relation to Biodiversity – some respondents sought further clarification about the threshold of development that would be required to provide Biodiversity Net Gain, with some requiring all development to be included over and above emerging national policy/guidance.
- 7.20 In relation to mitigation and adaptation to climate change, some respondents raised concerns that the policies, along with those that sought control over tourism development, were too restrictive and would limit opportunities, particularly for phased rollback within the Coastal Change Management Area (CCMA) and that extending rollback applications to the 50-year risk area may still not provide a viable or feasible approach to relocation for commercial/ tourist uses.

B. Whether the Plan provides for sufficient Growth.

- 7.21 Representations raised issues around the overall approach to setting the housing allowance, the deviation from the standard methodology, reliance on large strategic sites and the high proportion of windfall coupled with and the further need for additional allocations. Aligned with this some representation raised the concern that the Plan period is not consistent with national policy and should be extended to aid delivery to at least 2037/38.
- 7.22 Representations seek to challenge the approach to the housing requirement making the case that the requirement has either been set too high, or too low and as a result wish to see a more restrictive or a less restrictive approach. The development industry in particular objects to the Authorities departure from the standard approach that the NPPF requires Local Authorities to follow when establishing housing need and questions if the departure from the standard methodology is based on “exceptional” circumstances. The components of expected future supply are also challenged with arguments made that the Plan relies too heavily on windfall developments, more sites should be allocated, and the delivery and trajectory expectations are too optimistic. To address this, it is argued that the Plan should allocate more land, identify reserve sites and include a larger buffer or contingency to offset the risk should identified sites not deliver as expected. A case is made

to extend the Plan period to cover a longer period to ensure delivery and increase the number of allocations through the incorporation of additional sites that had previously been ruled out during the course of the Plan's development. Others argue the opposite and make the case for higher windfall allowances and fewer allocations and do not accept that there is a need to accommodate so much housing growth. Some respondents took the opportunity to raise the issue of building homes to meet the demand for second homes, sought further restrictions on the use of homes as holiday accommodation and challenged the Plan to put more emphasis on affordable housing provision in order to only address the needs arising from the existing local population.

C. The Distribution of growth and in particular the approach to the small growth settlements

- 7.23 There is broad support, or at least little substantive objection, for the focus of growth in towns although some argue that this could go further, not least to avoid the need to develop in the smaller growth villages but in order to meet the needs around affordable housing and thus avoid the need to develop in the smaller villages. The approach to growth in Small Growth Villages, identified through offering a limited number of services seeks a fair and equitable distribution through delivery of small scale growth of approximately 6% household growth in each settlement through a criteria based approach, is subject to multiple representations arguing either that it is not required, would be unsustainable and does not address local needs, or alternatively that the approach lacks certainty of delivery and should be replaced with specific small scale site allocations equivalent of 10% of the housing requirement. Other respondents sought additional development opportunities in these smaller rural settlements to allow infill and rounding off development. The practical implementation of the policy is also questioned. The lack of controls over second home ownership is cited as a reason not to build in villages as there is a concern that such developments would simply be purchased by second homeowners and not provide for a local need. It is conversely argued that the lack of supporting infrastructure makes small villages unsuitable and unsustainable locations for development.
- 7.24 Aligned with the above issues a small number of representations sought to challenge the principle for growth, housing type and tenure mix on the bases of local need and lack of infrastructure and promoted a distribution based on a preference that environmental first principles be the basis of the settlement hierarchy.
- 7.25 Several developers challenged the flexibility of the housing mix requirements and affordable housing percentages set out in policy HOU2 and sought flexibility on a case-by-case basis rather than a policy requirement which sets out to meet the strategic requirement based on the evidenced needs.

D. Unduly prescriptive and on the other hand, inadequate requirements for infrastructure and validation requirements.

- 7.26 The principle of the policy approach around Infrastructure provision, developer contributions and viability were not challenged however several objections were received from developers and agents who seek to challenge the perceived prescriptive nature of the infrastructure requirements and alleged open-ended nature around the requirements for financial contributions. The need to supply upfront information at the time of a planning application in order to support proposals, their determination and demonstrate policy compliance and or provide appropriate information to justify a departure from policy was also objected to by developers. This was particularly true in relation to minimum space standards, and the requirement for accessible and adaptable homes, where the need for

such standards was also challenged. This though was not universal, and some developers/housing associations confirmed that the standards were already being met while others sought higher targets. The cumulative impact of the policies on the viability of developed was questioned. Others seek to challenge the overall level of growth citing the lack of appropriate infrastructure as reasoned justification.

- 7.27 A common issue that was raised across representations highlighted concerns around the genuine need for improvements to infrastructure such as around the adequacy of the road network to accommodate growth and the need for onsite and off-site enhancements to alternative modes of transport such as public transport, and improved connectivity through the provision and linkage of footpaths and cycle ways. Specific policies which require consideration around the provision of infrastructure such as those seeking the consideration and inclusion of Health and wellbeing, retention and provision of open space, & local facilities as well as telecommunication infrastructure telecommunications, open space, health provision, parking provision and safeguarding land for sustainable transport where in the main not challenged and generally supported.

E. Restrictive / prescriptive nature of employment and tourism policies.

- 7.28 The main issues raised within the Economy section cover a number of matters around the adequacy of employment land and the flexibility of the overall approach to employment in order to deliver growth. There are concerns that the overall approach seeks to direct employment generating use first to the employment sites and does not provide enough flexibility in terms of location. It is suggested that additional land should be found by making further mixed residential and employment land allocations. Other responses welcomed the flexibility in the suit of policies covering economic growth but sought further clarity in the application of the approach to employment growth outside of employment areas. A related issue raised that the approach set out in association with employment growth is too restrictive in the types of development considered acceptable on designated areas, in particular by not supporting redevelopment of employment land through mixed-use proposals.
- 7.29 The approach to new tourist accommodation, static caravans & holiday lodges & extensions to existing sites attracted challenge from several representations, mainly those with an interest in the development of land and raising various concerns about its perceived restrictive nature. Some responses consider the approach to be unduly onerous in the limits it imposes on the type of development permitted and within which locations. Several of these are linked to issues around coastal change and adaptation and a more permissive approach in the CCMA which takes into account of the impacts from development. This however was not universal, and the proposed policy approach was supported by some consultee bodies such as Natural England and RSPB.
- 7.30 Similarly, the approach to new tourist attractions and extensions was also challenged due to the perception of being restrictive in nature in relation to the locations in which new tourist attractions and extensions will be supported. It is suggested that the policy should allow for consideration of the specific merits of any proposed and be reworded to facilitate development in the AONB and sensitive landscape areas. This however was not universal, and the proposed policy approach was supported by consultee bodies such as Natural England and RSPB. The approach put forward elsewhere in the Plan around ensuring the distinctive qualities of the varied landscape character areas, their key characteristic and valued features and the historic environment were supported by general and statutory consultees especially those that acknowledgement the special qualities of the AONB and wider landscape of North Norfolk.

F. Several policies received no representation, while others are considered to have raised no substantive objection with many representations providing general comment or corroborating support.

- 7.31 Many approaches to climate change, including the guiding principles of delivering climate resilient sustainable growth, the suit of policies detailing the authority's approach to environmental protection & enhancement and those that support the delivery of well-connected healthy communities, including those policies that sought provision of rural exception housing and essential rural workers were generally supported.
- 7.32 Consultee Bodies such as Anglian Water, Natural England and Historic England were generally supportive of the suit of policies covering environment and climate change matters. The Norfolk Coast Partnership provided supportive commentary around the updated policy stance (than the adopted Core Strategy) for the protection and enhancement of the Norfolk Coast AONB. Especially around the acknowledgement of its special qualities, nocturnal character, and the reference to siting, scale massing and design which is seen as an important element of the policy when considering the potential impact from large replacement homes and new development on the special qualities of the AONB.
- 7.33 Although issues were raised in relation to a number of specific matters as outlined above around the adequacy of providing appropriate infrastructure specific policies which require consideration around the provision of infrastructure such as those seeking the consideration and inclusion of Health and wellbeing, retention and provision of open space, & local facilities as well as telecommunication infrastructure telecommunications, open space, health provision, parking provision and safeguarding land for sustainable transport, retail and signage where in the main not challenged and generally supported.
- 7.34 Table 7 below provides a high level summary based on Regulation 19 representations and Paragraph 48 of NPPF.

Strategic Sites

G The availability of Sites and promotion of alternative sites and changes to site boundaries

- 7.35 The proposed employment Land allocation H27/1 was withdrawn from the Plan as the promoter confirmed it was no longer available. Throughout the representations site owners and promoters of sites which have been discounted at previous stages of plan preparation sought reinstatement of sites either on grounds that the Plan allocates insufficient growth or that a discounted alternative is preferable or more deliverable than one of the proposed allocations.
- 7.36 In particular further sites in North Walsham were sought with commentary linked to issues around the approach to housing requirements and the appropriateness of the Plan period.
- 7.37 A number of alternative sites were promoted through the Regulation 19 consultation, most notably, site C19 in Cromer was put forward for consideration by several members of the public in their representations but no representation from the site promoter or landowner was received. Alternative sites (previously discounted) were also proposed at Ludham, Wells-Next-the-Sea and Sheringham and were put forward by the relevant site promoters but there was no support from members of the public.
- 7.38 Some developers / promoters along with statutory bodies sought increases to site the proposed site allocation boundaries for a variety of reasons. These include but not limited

to:

- Site HOV1, Hoveton – A significant increase to the size of the site put forward by the site promoters in order to improve layout and site viability. The modification would ensure that drainage, highways, and landscaping issues could be addressed in a more comprehensive manner. It was not proposed to increase the quantum of development.
- Site C22, Norwich Road, Cromer – minor alterations to the site area to ensure that the likely full extent of highway access works are included within the allocated area.
- Site ST23, Yarmouth Road Stalham – enlargement of proposed allocation to include the garden area of an adjacent property. The garden is already within the development boundary of Stalham and hence development would be policy compliant but its inclusion within the allocated area may facilitate more comprehensive development by allowing for vehicular access to the garden via the wider allocation.
- Site W07/1 in Wells - updating to include an access point to Mill Road within the area allocated.
- Site LUD01/A & LUD06/A. In addition to the above, a representation from the site promoters for LUD01/A also suggest expanding the site to incorporate more dwellings and removing LUD06/A from the Local Plan, however the Council does not support these requests.

7.39 Conversely a number of allocations were objected to:

- Cromer C16 - Objections from members of the public regarding impacts on services and facilities in Cromer and the road network at peak tourist periods.
- Cromer C22 - A large number of objections from members of the public regarding impacts on services and facilities in Cromer, the impact on the road network during peak tourist periods, and the impact the site has on biodiversity.
- Fakenham F10 - Objection from the Wildlife Trust due to flooding concerns and from Fakenham Area Conservation Team (FACT) regarding impact on biodiversity.
- Holt H17 - Objections from members of the public regarding impact on biodiversity and the nearby County Wildlife Site, and landscape/views. Comments also refer to the impact on traffic in the centre of Holt.
- Hoveton HV01/B - Objections from members of the public regarding flooding concerns and impact from future climate change on the area. Also, objections relate to traffic concerns around Wroxham bridge.
- North Walsham NW01/B - Objections from members of the public and third-party land promoters regarding traffic impacts on the local network, especially on the minor road network around North Walsham.
- North Walsham NW62/A - Objections from members of the public and third-party land promoters regarding traffic impacts on the local network, especially on the minor road network around North Walsham. Also, comments relate to concerns regarding delivery timescales and the over reliance on this allocation to deliver a large proportion of the Plan's housing requirement.
- Sheringham SH18/B - Objection from Norfolk Property Services, NPS on behalf of Norfolk Country Council who promote an alternative site to this allocation that they believe to be more suitable, (SH16/1)

- Wells-Next-the-Sea W01/1 - Objections from members of the public regarding the site's use as a residential allocation for market homes, and impacts the site has on the AONB and the overall character of the settlement.
- Wells-Next-the-Sea W07/1 - Objects from members of the public regarding the site's impact on the AONB and the overall character of the area, and the site's impacts on the town's services and facilities in addition to the impact it will have during the holiday season on the road network.
- Blakeney BLA04/A - Objections from members of the public regarding the risk of the site being used for second homes and impact on the landscape and local services and facilities.
- Briston BLA01 - Objects from members of the public regarding traffic concerns and the risk of increased traffic accidents. Also object to the number of dwellings being proposed and question the necessity of the car park requirement being so close to the school.
- Briston BLA02 - Objects from members of the public regarding traffic concerns and the risk of increased traffic accidents. Also object to the number of dwellings being proposed and question the necessity of the car park requirement being so close to the school.
- Ludham LUD01/A - Objection from third party site promoter regarding the site's ability to be delivered during the Plan Period and believe the site should be extended whilst LUD06/A is removed entirely.
- Ludham LUD06/A - Objection from third party site promoter regarding the site's ability to be delivered during the Plan Period and believe the site should be extended whilst LUD06/A is removed entirely.

H. Seeking deferral of policy requirements for negotiation at later planning application stage.

7.40 Each of the proposed site allocations is subject to specific policy requirements which must be complied with in order to secure planning permission that is policy compliant and in line with the authority's priorities for development at each site (as informed through the preparation of the Plan). Some representations sought to argue for less prescription in some of the site allocation policies particularly in relation to amounts of open space, specialist elderly homes provision and other criteria on the basis that these can/should be considered at application stage when the specific nature of any development proposal is being considered and that site allocation policies should not seek to shape sustainable development in this way. This was not uniform, and others sought additional criteria in the site allocations policies.

7.41 The key sites where such proposals were suggested were:

- Cromer C22/2 – The site promoter for the site suggested several changes to the wording of the policy and requested an increased site area to accommodate highways mitigation and access requirements.
- Fakenham F01/B – the site promoter for the site suggested several changes to the wording of the policy's site requirements.
- NW62/A – the site promoter for the site suggested several changes to the wording of the policy's site requirements and wanted to amend what the site was intended to deliver.

- Hoveton HV01/B – the site promoter for the site suggested expanding the site to accommodate all policy requirements and an increase in dwelling capacity to improve the site’s viability.
- Ludham LUD01/A – the site promoter for site suggested expanding the site to accommodate more land instead of providing two separate allocations in the settlement.

I. Seeking additional policy criteria in the site allocations policies

- 7.42 These representations fall into three categories, the first making the case for the inclusion of ‘missing’ criteria which have been applied to some sites but not to others, those seeking to add new requirements to the site allocation policies which are largely already included in policies elsewhere in the Plan, and those which seek new or modified criteria within the policies to improve their effectiveness.
- 7.43 Several site allocations received no or little representations, while others are considered to have raised no substantive objection with many representations providing general comment or corroborating support.
- 7.44 Almost all sites received support from their relevant site promoter or landowner though not all of them provided representations during the Regulation 19 consultation. Some sites received support from members of the public or from statutory/non-statutory consultees. Most comments provided by statutory consultees, such as Natural England and Norfolk Country Council, were supportive or neutral as long as their proposed changes were implemented.
- 7.45 Most notable representations of support:
- Holt H17 and H20 - both received support from Holt Town Council.
 - North Walsham NW62/A - received support from Norfolk County Council Highways Authority.
 - Sheringham SH04 - received support from Sheringham Town Council.
- 7.46 Table below provides the Council’s high level summary of the level of objection to the individual policies contained in the proposed submission version of the Local Plan based on Regulation 19 representations and Paragraph 48 of the NPPF.

Table 7: Level of Objection

Policy	Level of Objection
CC1	No objection (principle)
CC2	Objections of some significance
CC3	Objections of some significance
CC4	No objection
CC5	Less significant comment/ objection
CC6	Less significant comment/ objection
CC7	No objection
CC8	Less significant comment/ objection
CC9	Less significant comment/ objection
CC10	Less significant comment/ objection
CC11	Less significant comment/ objection
CC12	Less significant comment/ objection
CC13	Less significant comment/ objection
SS1	Objections of some significance
SS2	Less significant comment/ objection
SS3	<i>Less significant comment / objection</i>
HC1	No objection
HC2	No objection (principle). Less significant comment/ objection in relation to a number of proposed designations
HC3	Less significant comment / objection
HC4	Less significant comment / objection
HC5	Less significant comment / objection
HC6	Less significant comment / objection
HC7	Less significant comment/ objection
HC8	Less significant comment
ENV1	Less significant comment / objection
ENV2	Less significant comment / objection
ENV3	No objection
ENV4	Less significant comment/ objection
ENV5	Less significant comment/ objection
ENV6	Less significant comment
ENV7	Less significant comment
ENV8	Less significant comment
HOU1	Objections of some significance
HOU2	Objections of some significance
HOU3	Less significant comment / objection
HOU4	No objection
HOU5	Less significant comment / objection

HOU6	Less significant comment / objection
HOU7	Less significant comment / objection
HOU8	Objections of some significance (justification)
HOU9	Objections of some significance (justification only)
E1	Objections of some significance
E2	Objections of some significance
E3	Less significant comment / objection
E4	No objection
E5	No objection
E6	Objections of some significance
E7	Less significant comment
E8	Objections of some significance
E9	Less significant objection / comment
BLA04/A	Objections of some significance
BRI01	Less significant comment/objection
BRI02	Less significant comment/objection
CO7/2	Objection of some significance
C16	Objection of some significance
C22/2	Objection of some significance
FO1/B	No objection
F02	No objection
FO3	No objection
F10	Less significant comment/objection
H17	Less significant comment/objection
H20	No objection
H27/1	Objection of some significance
HV01/B	Less significant comment/objection
LUD01/A	Less significant comment/objection
LUD06/A	Less significant comment/objection
NW01/B	Objection of some significance
NW62/A	Objection of some significance
NW52	Less significant comment/objection
MUN03/B	No objection
SH04	Less significant comment/objection
SH07	Less significant comment/objection
SH18/1B	Less significant comment/objection
ST19/A	No objection
ST23/2	No objection
E7 (TAT01)	Less significant comment
W01/1	Less significant comment/objection
W07/1	Less significant comment/objection

Sustainability Appraisal / Habitats Regulation Assessment

- 7.47 Two individual respondents questioned the conclusions of the SA report stating that it was not positively prepared nor appropriate to conclude that some effects remain uncertain, Natural England confirmed their general satisfaction with the methodology and baseline information used to inform the SA. Natural England also confirmed they are satisfied that the Habitats Regulations Assessment (HRA) (Footprint Ecology, 9th December 2021) stating it has provided a robust explanation assessment of the Regulation 19 stage of North Norfolk District Council's Draft Local Plan in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and having regard to relevant case law. Natural England agrees with the conclusions made in the HRA and supports the mitigation measures suggested. Although, they go on to say that although the Norfolk Wide Green Infrastructure & Recreational Impact Avoidance Strategy, GIRAMS is considered to be the main mitigation measure for recreational disturbance, NE would also draw attention to site specific green infrastructure that may also reduce any likely significant effects from development proposals, as detailed in Policy CC11 of the Local Plan.
- 7.48 Anglian Water, in its comments on the HRA, confirm that they are updating their Drainage and Wastewater Management Plan, DWMP, for 2025- 2030 and it will be subject to consultation over the next 18 months and finalised in 2023 ahead of agreement with regulators on investment in late 2023/early 2024. The planned investment by Anglian Water at Fakenham quoted at Para 6.12 of the HRA to provide for the level of growth in the Local Plan is confirmed to be dependent on the DWMP for 2025 to 2030 and beyond being confirmed by regulators through the Price Review (PR24) process. The trajectory of the Plan however reflects the later delivery of the larger allocations in Fakenham which are projected to commence from 2032.

Other Issues

- 7.49 **Nutrient Neutrality** – The requirement to address nutrient neutrality was identified after the Regulation 19 consultation process. Natural England, in its statutory role as an adviser on the natural environment, advised a total of 74 Local Planning Authorities (LPAs) in March 2022 on the nutrient impacts of new plans and projects on protected sites where those protected sites are already in unfavourable condition due to excess nutrients⁵.
- 7.50 This included advice to all Councils in Norfolk about the impact of phosphorus and nitrogen on water quality within the wider catchment of the River Wensum Special Area of Conservation (SAC) and The Broads SAC and Ramsar site. New development within the catchment of these habitats, comprising of overnight accommodation and any other development which may have non-sewerage water quality implications, can cause adverse impacts to nutrient levels.
- 7.51 Each of the Norfolk Councils, as the “Competent Authority” for each local planning authority area under The Conservation of Habitats and Species Regulations 2017 (the Regs), is required to consider the implications of these matters on the River Wensum SAC and the Broads SAC before permitting any further development which has the potential to result in additional nutrient loads entering the catchments.
- 7.52 Mitigating the impact of phosphorus and nitrogen on water quality within the wider catchment of the River Wensum and The Broads is complex. Ideally, each development should seek to achieve nutrient neutrality. Achieving nutrient neutrality often requires

⁵ [letter-from-ne-water-quality-and-nutrient-neutrality-advice.pdf \(north-norfolk.gov.uk\)](https://www.norfolk.gov.uk/letter-from-ne-water-quality-and-nutrient-neutrality-advice.pdf)

mitigation as part of development, either in the form of on-site treatment of wastewater and surface water runoff, or by offsetting any increase in nutrient loading by converting land on or off-site with woodlands or wetlands or through other means of mitigation designed to reduce phosphorus and nitrogen entering the watercourse.

- 7.53 The Norfolk Authorities in combination with Natural England are working together to ensure consistency of approach on nutrient neutrality. Work is being undertaken by a technical consultancy on behalf of the Norfolk Authorities to create a county wide Nitrate and Phosphate Mitigation Strategy which will establish short, medium, and long-term mitigation solutions. It is very likely that as mitigation options are identified and ways to deliver mitigation are secured, tariff schemes may be created, enabling developers to pay a tariff to be used towards off-site mitigation.
- 7.54 The Council has proposed main modifications (**PMAIN/3.13/01** and **PMAINCC13/01**) for consideration during the examination in order to address this requirement as detailed in Schedule 5 [Appendix L of the Consultation Statement, Examination Library Reference A5.12].

8 Council's Response & Proposed Additional Modifications

- 8.1 In response to the issues raised the Council have proposed a number of additional modifications for consideration throughout the examination based on the representations and are seeking Statement of Common Grounds, SOCG, with a number of statutory bodies, site promoters and agents.
- 8.2 The proposed additional modifications are considered helpful to aid the interpretation and implementation of the Plan by improving its effectiveness and addressing many of the concerns made in the representations. The majority of the proposed additional modifications are considered to be minor in nature and consist of typing corrections, punctuation and factual updates. A number of others bring suggested clarity to the policies and supporting text and help address issues raised in interpretation and the intent of the policies.
- 8.3 The detail is contained in Schedules 3, 4 & 5 appended to this Consultation Statement as Appendix J, K & L. [Examination Library Reference A5.10, A5.11 & A5.12]
- 8.4 Schedule 3 details how the Council has taken these representations into account, while Schedules 4 and 5 detail the proposed minor and main modifications in relation to issues that have been raised. The proposed additional modifications typically address matters of clarity and interpretation, and bring further consistency across the Plan where necessary and are considered helpful in seeking the incorporation of matters raised in order to address representations received. These schedules were agreed through the Planning Policy & Built Heritage Working Party along with the submission of the Plan and further delegation of minor amendments to officers and the Planning Portfolio Holder through the December 2022 and January 2023 meetings. The working party decisions to submit the Plan were ratified by cabinet on 6th February and 6th March 2023. Full Council resolved to submit the "Draft North Norfolk Local Plan to a government appointed Inspector for independent examination" along with the schedule of potential additional modifications that the Planning Policy and Built Heritage Working Party and Cabinet agreed in response to the Regulation 19 public consultation on 1st March, 2023.
- 8.5 It is anticipated that these proposed additional modifications will form areas of discussion at the examination, and, depending on the view of the inspector, be consulted on as necessary in accordance with the examination findings.
- 8.6 A number of Statements of Common Ground (SoCG) are being prepared with statutory bodies and site promoters which seek to address a number of the main issues raised through the representation along with matters around continued dialogue and the Duty to Co-Operate. It is anticipated that these will be prepared as part of the submission documentation, or shortly afterwards.