

Wells-next-the-Sea Neighbourhood Plan

Regulation 16 Stage Public Consultation

Report of Representations

Monday 2 October - Monday 13 November 2023

**North Norfolk District Council
Planning Policy Team**

01263 516318

planningpolicy@north-norfolk.gov.uk

North Norfolk District Council,
Holt Road, Cromer, NR27 9EN

www.north-norfolk.gov.uk/blakeneynp

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



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From: [Feavyour, Louise](#)
To: [Planning Policy](#)
Subject: RE: Wells-Next-the-Sea Neighbourhood Plan (Submission Version) Consultation
Date: 02 October 2023 12:48:03
Attachments: [image001.png](#)
[image002.png](#)
[Standard Consultation Response MMO.pdf](#)
[Wells-Next-the-Sea Consultation Response Oct 23.pdf](#)

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

Dear North Norfolk Planning Team,

MMO Marine Planning response to the consultation on Wells-Next-the-Sea Neighbourhood Plan

I hope you received our standard response to your initial email.

Please consider these further comments regarding the draft Neighbourhood Plan within our bespoke response attached. We advise that you take note of any relevant policies within the East Marine Plan documents in regard to areas within the consultation plan that may impact upon the marine environment. Some examples of policies that may be relevant include: employment, social and heritage. These are provided only as a recommendation and we suggest you make your own determination of which are relevant. Our policies can be referred to as a guide, demonstrating your regard to the marine plans, under the [Marine and Coastal Access Act, 2009](#). It is important to note that marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach.

You may consider mentioning the East Marine Plan when discussing coastal or marine themes - such as the discussion of Wells beach and harbour.

Should you require Marine Licences, please consider signposting to the Coastal Concordat. Each council should consider signing up to the Coastal Concordat by 2021, as per the [25-Year Environment Plan](#):

“The government’s 25 Year Environment Plan includes a commitment for all local authorities with a coastal interest in England to be signed up to the coastal concordat by 2021. The concordat will be periodically reviewed, as was done in 2018 and 2019 to monitor the progress of this commitment.”

Many thanks for the opportunity to comment,

Louise Feavyour (she/her) | **East Coastal Marine Planner** | **Marine Management Organisation**

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

📧 Louise.Feavyour@marinemanagement.org.uk | +442030250620

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

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



During the current health emergency, the Marine Management Organisation is continuing to provide vital services and support to our customers and stakeholders. We are in the main working remotely, in



Marine
Management
Organisation

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Our ref: 457

Planning Policy Team
North Norfolk District Council
Holt Road
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Monday 2nd October 2023

Dear Sir/Madam,

MMO Marine Planning and Marine Licensing response to Wells-Next-the-Sea Neighbourhood Plan Consultation

Thank you for giving us the opportunity to comment on the Neighbourhood Plan. The comments provided within this letter refer to the document entitled Wells-Next-the-Sea Neighbourhood Plan June 2023, Draft submission.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the [East Inshore and East Offshore Marine Plans](#) are of relevance. The East Marine Plans cover the area from Flamborough Head to Felixstowe, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the [East Inshore and East Offshore Marine Plans](#), or the [UK Marine Policy Statement](#) (MPS) unless relevant



INVESTORS
IN PEOPLE | Bronze

considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#), [Explore Marine Plans](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the [UK marine area](#).

The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes

Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to your Neighbourhood Plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the East Marine Plans is completed:

- **EC1:** Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported.
- **EC2:** Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.
- **SOC1:** Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.
- **SOC2:** Proposals that may affect heritage assets should demonstrate, in order of preference:
 - a) that they will not compromise or harm elements which contribute to the significance of the heritage asset
 - b) how, if there is compromise or harm to a heritage asset, this will be minimised
 - c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or
 - d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset
- **SOC3:** Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:
 - a) that they will not adversely impact the terrestrial and marine character of an area

- b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them
- c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against
- d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts.
- **BIO1:** Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial).
- **BIO2:** Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests.
- **CC1:** Proposals should take account of:
 - how they may be impacted upon by, and respond to, climate change over their lifetime and
 - how they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.
- **CC2:** Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal.
- **GOV1:** Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa.
- **FISH1:** Within areas of fishing activity, proposals should demonstrate in order of preference:
 - a) that they will not prevent fishing activities on, or access to, fishing grounds
 - b) how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them
 - c) how, if the adverse impacts cannot be minimised, they will be mitigated
 - d) the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts
- **FISH2:** Proposals should demonstrate, in order of preference:
 - a) that they will not have an adverse impact upon spawning and nursery areas and any associated habitat
 - b) how, if there are adverse impacts upon the spawning and nursery areas and any associated habitat, they will minimise them
 - c) how, if the adverse impacts cannot be minimised they will be mitigated
 - d) the case for proceeding with their proposals if it is not possible to minimise or mitigate the adverse impacts
- **AQ1:** Within sustainable aquaculture development sites (identified through research), proposals should demonstrate in order of preference:

- a) that they will avoid adverse impacts on future aquaculture development by altering the sea bed or water column in ways which would cause adverse impacts to aquaculture productivity or potential
 - b) how, if there are adverse impacts on aquaculture development, they can be minimised
 - c) how, if the adverse impacts cannot be minimised they will be mitigated
 - d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts
- **TR1:** Proposals for development should demonstrate that during construction and operation, in order of preference:
 - a) they will not adversely impact tourism and recreation activities
 - b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them
 - c) how, if the adverse impacts cannot be minimised, they will be mitigated
 - d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts
 - **TR2:** Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference:
 - a) that they will not adversely impact on recreational boating routes
 - b) how, if there are adverse impacts on recreational boating routes, they will minimise them
 - c) how, if the adverse impacts cannot be minimised, they will be mitigated
 - d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts
 - **TR3:** Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported.

As previously stated, these are recommendations and we suggest that your own interpretation of the East Marine Plans is completed. We would also recommend you consult the following references for further information:

[East Inshore and East Offshore Marine Plans](#) and [Explore Marine Plans](#).

Yours sincerely,



Louise Feavour
Marine Planner (East)

Telephone: 02030250620

E-mail: louise.feavour@marinemanagement.org.uk

Consultation response - PLEASE READ

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

Kind regards,

The Marine Management Organisation

Marine Management Organisation Functions

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

Marine Planning and Local Plan development

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

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#).

We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

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

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

Marine Licensing and consultation requests below MHWS

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

Consultation requests for development above MHWS

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

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

Minerals and Waste Local Plans and Local Aggregate Assessments

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

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

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

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



NORFOLK
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Our Priority is You

Planning Department
North Norfolk District Council
Holt Road
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NR27 9EN

Stephanie Fletcher
Designing Out Crime Officer
Community Safety
Norfolk Police

www.norfolk.police.uk
DesigningOutCrime@norfolk.police.uk
Stephanie.Fletcher@norfolk.police.uk

Secured by Design



Official Police Security Initiative

Date: Tuesday 3rd October 2023

Reference: Well next-the-sea Draft Local Neighbourhood Plan

Dear Mr. Brown,

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

Having reviewed the proposed Draft Neighbourhood Plan, I am pleased to see early indications of commitment to safety and security through Crime Prevention Through Environmental Design principles specified within the proposal document.

This is very reassuring when the existing crime demographic for Wells as detailed shows us that there are higher levels than usual for Norfolk in this area – more specifically this is seasonal and includes, violence and sexual offences, anti-social behaviour, criminal damage and arson, theft, vehicle crime, public order offences, drug related crimes, shop lifting, bicycle theft and burglary.

The Crime and Disorder Act (1998) Section 17 *'places a duty on the Police and local authorities, (including in their role as planning authorities), to do all they reasonably can to prevent crime and disorder in its area including anti-social and other behaviour adversely affecting the local environment'* and The National Planning Policy Framework July 2021 requires that; *'Planning Policies and decisions should aim to achieve healthy, inclusive and safe places which...are accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.'*

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

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

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

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

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

Conclusions

The Norfolk Constabulary DOCO team will be available throughout the subsequent planning processes to provide site specific consultation to each phase application to ensure that any final proposals will fulfill the Local Plan's commitment to Crime Prevention through the adoption of Secured by Design's crime reduction methodologies. Conditions can be imposed within the planning process to support this and this would be welcomed and supported by the Constabulary.

Yours sincerely,

S Fletcher

Stephanie Fletcher
Designing Out Crime Officer
Norfolk Constabulary

Wells-next -the-Sea Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)

Consultation Response Form

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

Responses to the consultation are invited between **Monday 2 October - Monday 13 November 2023**.

PART A and Part B MUST be completed in full.

Part A: Personal Details

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

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

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

Oral Examination

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

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

Yes, I wish to participate at an oral examination

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

I would be willing to contribute, but have no specific status or reason to be a chosen speaker, other than being a resident.

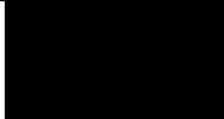
Future Notification & Next Stages

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

Please notify me

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

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. Representations must be received no later than Monday 13 November 2023. Late representations may not be accepted.

Signature:		Date: 10/10/23
Print Name:	Amanda C Howe	
For official use only		
Date received:	Ref No:	

Part B: Representation Details

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

Basic Conditions

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

The relevant basic conditions for Neighbourhood Plans are:

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

In the table below please complete each column to show:

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

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

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
Whole document		Support	Overall I think this is really important and all goals are correct.	
P64	WNS1	Support	Crucial that this shifts. The final suitability of the recommended site and access needs some further consideration, but the need is great.	
P73	WNS3	Support	Also great need to prioritise local and elders' needs.	
P85	WNS4	SUPPORT!	Essential shift.	
P87	WNS5	Support but there is an omission	This section is important, but nowhere in the document does it mention introducing planning needs for alteration of use – we are seeing many homes now going into multilets, AirB7Bs, etc. which is very different than being private residences. Surely there should be a need to apply for a change of use, even without making extensions etc.	
P106	WNS9	Support but much more is needed	The issue of visitor parking and its impacts on residents is a really big problem – although I note that the Neighbourhood plan says this goes beyond there scope, we MUST enact this via Project 3 (p.138) and other means.	

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

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

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

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

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

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

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

From: [REDACTED]
To: [Planning Policy](#)
Subject: Wells consultation
Date: 10 October 2023 02:09:15

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I believe class jealousy, NIMBYism, and political opportunism have got in the way of a sensible debate about second home ownership in our seaside communities.

I do not believe it is fair to penalise people for success. Both the Conservatives and Lib Dems speak of creating opportunity, but they pay lip service to it. If people have been sufficiently successful in life to be able to afford a second home in a place they like, they should not be treated like second class citizens because of it. The affluent contribute immeasurably to North Norfolk in terms of their spending power.

I know if I could afford a second home (or even a first home) I'd do it. And most normal people, being honest, would say the same. But here we seem to have an above average number of comfortably well off people with an insane hatred of anyone more well off than they are - and they're the people informing this debate.

So there is a role for second home owners within our local economy.

I believe it is wrong - for all the reasons above - to increase or double council tax for second home owners. If anything, these people use our local services less frequently by virtue of the fact they do not live here all year round, so it is antithetical to expect them to pay more than the rest of us and, again, penalises success.

I do believe it is right to set quotas for the percentage of properties in a town or village that can be owned by those who are not year round residents. By setting these limits and publishing them, this is a fair mechanism by which to signal to potential second home owners where they are and are not welcome; whilst still protecting the ability of local people to be able to buy a property of their own, and to remain resident in the place they grew up and where they have familial connections and roots.

In summary: I approve of a percentage quota. I do not approve of measures which aim to distance or alienate those who have already bought houses in our beautiful part of the world.

All the best

Jon

—

JON PAYNE

[REDACTED]

Wells-next -the-Sea Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

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PART A and Part B MUST be completed in full.

Part A: Personal Details

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

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

Oral Examination

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

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

Yes, I wish to participate at an oral examination

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

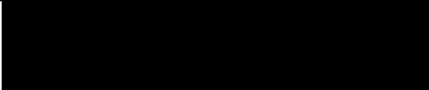
Future Notification & Next Stages

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

Please notify me

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

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. Representations must be received no later than Monday 13 November 2023. Late representations may not be accepted.

Signature:		Date: 14/10/2023
Print Name:	D Elliott	
For official use only		
Date received:	Ref No:	

Part B: Representation Details

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

Basic Conditions

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

The relevant basic conditions for Neighbourhood Plans are:

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

In the table below please complete each column to show:

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

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

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
P85	WNS4	OBJECT	<p>Whilst worthy in its intention as written this is unworkable. Realistically affordable/social housing [I will use the general term “social housing” from now] will no longer be built in any number by the public sector. Nor can housing associations be relied upon. The reality is that the only viable way significant numbers of such housing can be provided is by allowing developers to use open market sales to subsidise the building of social housing. The appropriate % of open market housing in any development can be controlled by planning permission. Developers must be able to maximise the value of the open market sales without any restriction on the use or type of such housing, either at the time of first ownership or subsequently. Maximising the value of open market sales to the developer in turn maximises the potential cross subsidy for social housing.</p> <p>This way you obtain a mix of ownership and use within a given development. You get the benefits from the vital support given to a range of local businesses from second home/holiday lets etc whilst ensuring social housing is provided.</p>	<p>WNS4 as written will not achieve its aims. The restrictions it wishes to place on open market properties in no way “ensure that there is a supply of new housing for occupation by local people”. The restrictions on open market sales need to be removed. Covenants on the sale of the land to developers and/or on planning permission need to state a higher % proportion of social housing than is typical elsewhere in the UK. 40 to 45% of social housing should be required in any significant (not infill) development in Wells. Covenants should be placed on any future sale of social housing on new developments which prevent them being “open market” sales. You cannot work against the high market price of open market properties in Wells but what you can do is to make those high prices work as much for the social sector as possible by cross subsidy. You have to create and maintain two separate markets for housing in Wells, broadly social and private. The housing must co-exist to create a social community. The Stathe Place development provides the model of what is needed.</p>

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

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

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

Wells-next-the-Sea Neighbourhood Plan Neighbourhood Development Plan 2023-20362 – Response to Regulation 16 Consultation

I refer to the consultation on the above plan.

NPS is commissioned by Norfolk Constabulary to prepare representations on infrastructure planning policy matters. Therefore, on behalf of the Constabulary, I would make the following comments, based on the role Norfolk Constabulary have for policing, making the county a safe place.

Central Government place great emphasis on the role of the Police and the National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 92 and 130 which state.

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

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

130. Planning policies and decisions should ensure that developments:

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their 'Secured By Design' initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live.

The Neighbourhood Plan identifies new housing development will take place in the main village. This will result in an increase in the population which will add strain to existing police resources in the area. To address this, further investment will be required to enhance police provision and infrastructure. If additional provision / infrastructure is not partially funded and delivered through the planning system (including through development plan policy provision), the consequence is that additional pressure will be placed on existing police resources.

In terms of creating and maintaining safer communities, it is disappointing that several provisions have been omitted from this Regulation 14 version. Therefore, it is requested that the following revision be made in the Regulation 16 version of the Neighbourhood Plan to ensure that it satisfactorily addresses NPPF provisions in the Neighbourhood Plan area.

- The Neighbourhood Plan should take the opportunity to include within its objectives (on pages 45 and 46) to *'create and maintain a safer community and reduce crime and disorder'*. This would be consistent with NPPF advice, and it is disappointing that this consideration is currently excluded.
- The Neighbourhood Plan highlights within its provisions the importance of good design. It is therefore surprising and regrettably that the Plan (notably policy WNS6: High Quality Design) is silent on crime and disorder issues and fails to offer support for the well-established principles of crime prevention through good design and the 'Secured by Design' approach (as the design and layout of the built environment plays an important role in designing out crime, reducing the opportunities for and risk of anti-social behaviour along with allaying residents fear of crime and disorder). It is considered that Neighbourhood Plan policy should include a requirement that *'All new developments should conform to the 'Secured by Design' principles and the Neighbourhood Plan will support development proposals aimed at improving community safety'*. This would be supported by an objective to *'create and maintain a safer community and reduce crime and disorder'*.
- The Neighbourhood Plan currently fails to recognise that police infrastructure will play an important role to support development and meet the needs of residents and enhance community safety. It is considered that this omission should be addressed in the Neighbourhood Plan and police services be specifically included within the 'community infrastructure' on page 103.

I trust that these matters can still be incorporated into the Plan objectives, policies, and provisions to support / maintain a safe community and reduce the opportunities for crime and disorder (and help reduce the fear of crime in the Neighbourhood Plan area) to ensure that the Plan is consistent with the emphasis that Government places on creating safer communities in NPPF advice.

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

Wells-next-the-Sea Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

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

Responses to the consultation are invited between **Monday 2 October - Monday 13 November, 2023.**

PART A and Part B MUST be completed in full.

Part A: Personal Details

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

Personal Details			
Title: Mr	Name: C A C Glaister		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish)	<input checked="" type="checkbox"/>	I am a Statutory Consultee	<input type="checkbox"/>
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No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

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Feel my objection to proposed plan and my suggested amendment could be applied by oral examination

Future Notification & Next Stages

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Please notify me

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Print Name: C A C Glaister

Date:

For official use only

Date received:

Ref No:

Part B: Representation Details

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Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
WNS\$	Principal Private Residence Dwellings	Object	<p>The Principal Private Residence restriction will fail in its intention to ensure that there is a supply of new housing for local people for the following reasons:</p> <p>1) Such a restriction would have a very limited impact on the market value of the house; thus, they would still not be affordable for local people.</p> <p>2) As the restriction would only apply to future new houses, excluding WO1/1 & WO/7/1, it will be very limited in the numbers eligible in the future, given the limited housing development opportunities identified in the Plan.</p> <p>3) As the restriction would be implemented by way of a planning condition, it is extremely unlikely that NNDC would have the resources or the will to carry out frequent assessments to ensure the restriction is being complied with, especially when short term holiday</p>	<p>The advantages of charging Second Homes a penal multiplier of rateable value are:</p> <p>1) Such a levy would be more effective in reducing the value of a property thus making it more affordable for occupation by local people.</p> <p>2) The excess charged is levied every year and thus an indefinite annual enhanced income for NNDC. Whereas a restriction via a planning condition is a one-off negative event.</p> <p>3) So long as NNDC ring fence the extra revenue it can be utilised in the provision of affordable homes for key workers in Wells, via the financing of such an organisation as Homes for Wells.</p> <p>4).It would be much simpler for NNDC to implement penal rates as it already has systems set up to levy rates and would not have</p>
			<p>lettings are the cause of the breach.</p> <p>4) NNDC have already conceded that the Principal Private Residence restriction is an inferior proposal in that they have accepted that the alternative principal put forward by the developer for WO1/1 & WO7/1 is superior and have thus been exempted from the Policy in WSN4</p> <p>5. Such a restriction could easily be circumvented by owners supplying bogus documentation.</p> <p>6) Such is the futility of the Principal Private Residence restriction, it has already been acknowledged and accepted by numerous authorities throughout the UK, in that they are pursuing an alternative effective achievable policy - charging 2 to 3 times rateable value</p>	<p>to continually chase to check a Principal Private Residence planning restrictions are being complied with.</p> <p>5) Such a policy could not just be restricted to new housing, but if every time that NNDC are notified of a new rate payer of any house in Wells they could assume it is a Second Home and levy the enhanced charge, until, the owner provides relevant proof the property is a principal residence.</p> <p>6) Second Home owners have the benefit of contributing to the main economy of Wells, tourism, via owners using local hospital, cleaners and maintenance facilities. They also subsidise local services by being charged for them but not use them for 52 weeks a year e.g, refuse collection.</p>

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

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

Date: 09 November 2023
Our ref: 452642
Your ref: Wells-next-the-Sea Neighbourhood Plan



Mr Chris Brown
North Norfolk District Council

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

T 0300 060 3900

BY EMAIL ONLY
planningpolicy@north-norfolk.gov.uk

Dear Mr Brown

Wells-next-the-Sea Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 12 October 2023.

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

Further information on when to consult Natural England on planning proposals is here- [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](#)

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

Impact Risk Zones:

Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.

Standing Advice:

Natural England has published Standing Advice. Links to standing advice are in Annex A

If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.

Further information on LPA duties relating to protected sites and areas is here- [Protected sites and areas: how to review planning applications - GOV.UK \(www.gov.uk\)](#)

Further guidance is also set out in Planning Practice Guidance on the natural environment [Natural environment - GOV.UK \(www.gov.uk\)](#) and on Habitats Regulations Assessment [Appropriate assessment - GOV.UK \(www.gov.uk\)](#)

Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Should the proposal change, please consult us again.

Yours sincerely

Sally Wintle
Consultations Team

Annex A – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](#) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the [Magic](#) website or as Local Wildlife Sites. List of priority habitats and species can be found on [Gov.uk](#). Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Annex A – Additional advice

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 4.0](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 4.0](#) and is designed for use where certain criteria are met.

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 4.0](#) and is available as a beta test version.

Green Infrastructure

Natural England's [Green Infrastructure Framework](#) provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the [15 Green Infrastructure Principles](#). The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Annex A – Additional advice

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

Wells-next -the-Sea Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

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Responses to the consultation are invited between **Monday 2 October - Monday 13 November 2023**.

PART A and Part B MUST be completed in full.

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Personal Details			
Title:	Name: Tessa Saunders		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish) <input type="checkbox"/>		I am a Statutory Consultee <input checked="" type="checkbox"/>	
I work in the Neighbourhood Area (the parish) <input type="checkbox"/>		Other (please specify) <input type="checkbox"/>	
I represent a Resident's Association <input type="checkbox"/>		
Organisation Name (if responding on behalf of your organisation) Anglian Water Services Ltd			
Address: Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambs.			
Postcode: PE29 6XU			
Telephone: 07816202878		Email: tSaunders3@anglianwater.co.uk	

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

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

Yes, I wish to participate at an oral examination

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

Future Notification & Next Stages

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

Please notify me

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

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. Representations must be received no later than Monday 13 November 2023. Late representations may not be accepted.

Signature:	<i>Tessa Saunders</i>	Date: 13.11.23
Print Name:	Tessa Saunders	
For official use only		
Date received:	Ref No:	

Part B: Representation Details

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

Basic Conditions

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

The relevant basic conditions for Neighbourhood Plans are:

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

In the table below please complete each column to show:

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

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Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
67	Note 1	Support	Anglian Water welcomes the explanatory note with regard to our role in helping support surface water management on the allocation site, particularly with regard to using sustainable drainage systems and nature based solutions to manage surface water effectively, with multi-functional benefits for amenity and biodiversity.	n/a
98	Para 6.6 Note	Support	Anglian Water supports the introduction of text to explain the presence of underground assets within sites identified in policy WSN7. This will assist developers and promote the need to seek early engagement with Anglian Water when considering redevelopment proposals on these sites.	n/a
104-105	7.7	Support	Anglian Water supports reference to the Drainage and Wastewater Management Plan 2025-2050 (DWMP). However, we would advise that the DWMP has now been finalised and published since the Reg14 consultation, and an update to the Neighbourhood Plan should be considered to ensure that it reflects the finalised version as appropriate. The summary outlining the strategies for the Wells-Freeman-Street Water Recycling Centre remain the same.	The Drainage and Wastewater Management Plan 2025-2050 has been published and is no longer in draft form. Text in 7.7 to be amended to reflect this.
128	WNS15 Sea Level Rise and Flood Risk	Support	Anglian Water supports the amendments to policy to include reference to using sustainable drainage systems to manage flood risk. This follows the drainage hierarchy to managing surface water run-off utilising SuDS in the first instance, before other measures are considered.	n/a

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
131-132	WNS17: Wells Beach Figure 40 Beach policy area	Object	<p>Anglian Water's consultation response at Regulation 14, raised concerns regarding the inclusion of our Water Recycling Centre within the Beach policy area (Policy WNS17). Whilst it is in proximity to the beach, the WRC is not part of the wider tourism offer the policy aims to address in relation to recreational and visitor assets.</p> <p>Anglian Water welcomes the response in the Consultation Statement (331) that states that the Neighbourhood Plan would not wish to restrict improvements to the WRC for the benefit of the town, and this has been included as a Note in the supporting text under paragraph 10.3.</p> <p>However, given the intention of the policy and the inclusion of the note under 10.3, it would therefore seem otiose to continue to include the WRC within the Beach Policy Designation as identified in Figure 40 and the Policies Map. We would therefore request that the WRC is removed from this designation. As it is located on the edge of the Beach Policy area, it would be straightforward to achieve, and not result in any ambiguities should we seek planning consent for any future works at the WRC.</p>	Remove the area occupied by the Wells-Freeman-Street WRC from the Beach Policy Designation in Figure 40 and the Policies Map (Figure 25).

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

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

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

Ref: GA/DJ/03922/L0008

13th November 2023

Sent by email to planningpolicy@north-norfolk.gov.uk

Planning Policy Team
North Norfolk District Council
Council Offices
Holt Road
Cromer
Norfolk
NR27 9EN

Dear Sir / Madam,

**Wells-next-the-Sea Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)
On behalf of The Holkham Estate**

On behalf of our client, The Holkham Estate, we are pleased to submit representations to the Wells-next-the-Sea Draft Neighbourhood Plan Submission Version Consultation (Regulation 16). These representations follow our client's detailed comments submitted to the Regulation 14 consultation in September 2022.

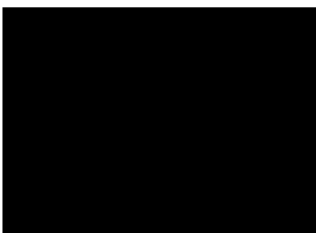
Please see the required consultation response form enclosed.

Holkham welcomes the positive discussions that have been had with the Town Council since Regulation 14 stage which have resolved and reduced many of the Estate's objections. There are still a few points outstanding which we would be pleased to discuss further going forwards.

We trust that these representations will be given due consideration in the examination of the Neighbourhood Plan and we look forward to participating further in discussions where there is an opportunity to do so.

If you have any questions in respect of this submission, please do not hesitate to contact me.

Yours sincerely



The Exchange | Colworth Science Park
Sharnbrook | Bedford | MK44 1LZ
t 01234 867135 | e info@arplanning.co.uk | w www.arplanning.co.uk

Armstrong Rigg Planning Ltd
Registered in England & Wales No 08137553. Registered Address:
The Exchange, Colworth Science Park, Sharnbrook, Bedford, MK44 1LQ.

Geoff Armstrong (geoff.armstrong@arplanning.co.uk)

Director

Armstrong Rigg Planning

Direct Line: 01234 867130

Mobile No: 07710 883907

Encs.

1. Consultation Response Form

Wells-next -the-Sea Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

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

Responses to the consultation are invited between **Monday 2 October - Monday 13 November 2023**.

PART A and Part B MUST be completed in full.

Part A: Personal Details

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

Personal Details			
Title: MR	Name: GEOFF ARMSTRONG		
Please tell us the capacity in which you are commenting on the Plan:			
I am a resident in the Neighbourhood Area (the parish) <input type="checkbox"/>		I am a Statutory Consultee <input type="checkbox"/>	
I work in the Neighbourhood Area (the parish) <input type="checkbox"/>		Other (please specify) <input checked="" type="checkbox"/>	
I represent a Resident's Association <input type="checkbox"/>		AGENT.....	
Organisation Name (if responding on behalf of your organisation) ARMSTRONG RIGG PLANNING ON BEHALF OF THE HOLKHAM ESTATE			
Address: ARMSTRONG RIGG PLANNING, THE EXCHANGE, COLWORTH SCIENCE PARK, SHARNBROOK, BEDFORD			
Postcode: MK44 1LZ			
Telephone: 01234 867135		Email: geoff.armstrong@arplanning.co.uk	

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

Oral Examination

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

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

Yes, I wish to participate at an oral examination

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

The Holkham Estate is a key stakeholder for the emerging Neighbourhood Plan as a major landowner in the area. Holkham has an ambition to be a force for good in helping local communities to thrive, by providing employment, homes, and support for local businesses and charities. They are the landowner of emerging Local Plan allocations at Site W01/1 - Ashburton Close and Site W07/1 – Holkham Road and they also hold a restrictive covenant as the previous owner of the proposed site allocation at Policy WNS2 – Two Furlong Hill. They are an important partner in delivering the Neighbourhood Plan and they should be represented in any hearing discussions.

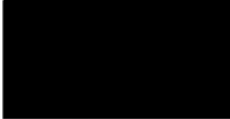
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Signature:		Date: 13/11/2023
Print Name:	GEOFF ARMSTRONG	
For official use only		
Date received:	Ref No:	

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Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
4. Vision and objectives Pages 49-50	WNS0: Sustainable Development and Protected Nature Conservation Sites	Support	The policy largely repeats requirements of national legislation, but it is appropriate in setting out these requirements at a local level.	N/A
5. Housing and design Page 64	WNS1: Community Led Housing	Support	The policy essentially allows for affordable housing exception sites to come forwards, but with additional criteria relating to key workers, local connections, an allocation policy and community participation/support. These criteria are considered appropriate with respect to the specific housing needs of the Wells-next-the-Sea.	N/A
5. Housing and design Pages 68-69	WNS2: Housing allocation at Two Furlong Hill (Allocation WELLS1)	Support	<p>The Holkham Estate supports the allocation of this site.</p> <p>We would also comment that it may be difficult to achieve 45 dwellings on the site whilst fulfilling the other site criteria. The site is only 1.89 ha in size and is required by the policy to accommodate 45 dwellings, 0.12ha of open space, substantial landscaping to the north and east of the site and on-site Biodiversity Net Gain to the south of the site. Further, the policy does not allow apartments and requires bungalows that are less space efficient. We have suggested several amendments to enable greater flexibility to ensure the deliverability of the site.</p>	<p>First paragraph: <i>"This Neighbourhood Plan provides for a minimum of an additional approximately 45 new dwellings ..."</i></p> <p>Second paragraph: <i>"... for a minimum of approximately 45 dwellings ..."</i></p> <p>Criteria a. <i>"... a. A minimum of Approximately 45 Affordable dwellings..."</i></p> <p>Criteria b. <i>"... b. Dwelling type to be predominantly a mix of houses and bungalows ..."</i></p> <p>Criteria l. <i>"... l. Delivery of Biodiversity Net Gain on site unless off-site mitigation is the only feasible solution. On-site habitat improvements should be targeted to the south of the site and the area connecting with the deciduous woodland Priority Habitat. ..."</i></p>

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
5. Housing and design Page 73	WNS3: Housing Mix	Object	<p>In so far as this policy would apply to emerging Local Plan allocations at Site W01/1 - Ashburton Close and Site W07/1 – Holkham Road, our client objects to the requirement for self/custom build plots on sites of 10 dwellings or more and the proposed tenure split of 60% rent and 40% affordable home ownership.</p> <p>Holkham are the landowners of the emerging Local Plan allocations and as set out at paragraph 5.77 a specific housing mix has been agreed for these sites that would deliver a greater proportion of affordable housing than required by emerging policy (see comments to WNS4 below) in addition to homes for private rent and market sale. Holkham’s site at Ashburton Close has a planning application pending with a housing mix that accords with paragraph 5.77 (but would not accord with the mix set out at WNS3) and their site at Holkham Road is subject to a pre-application advice request that similarly proposes a housing mix that accords with paragraph 5.77 but not WNS3.</p> <p>The requirements of Policy WNS3 would be inappropriate on Holkham’s two sites as they have been designed to meet very specific local needs that won’t meet these policy criteria. The proposed tenure split for affordable at WNS3 is contrary to the specific mix for Holkham’s sites set out at paragraph 5.77 of the supporting text. In this context, in order for the policy to meet the basic condition of contributing to the achievement of sustainable development, we consider that the policy text should be amended to exclude these sites in a similar way to how they are excluded from Policy WNS4.</p> <p>In all other respects, Holkham are pleased to support this policy.</p>	<p>Additional text:</p> <p><u>“Note: The requirements for self-build or custom build and for a specific tenure split of affordable housing do not apply to the strategic allocations W01/1 at Ashburton Close and W07/1 at Holkham Road as identified in the emerging Local Plan as submitted in May 2023, subject to the provision of the proposed intermediate rented housing outlined in paragraph 5.77 above.”</u></p>

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
5. Housing and design Page 85	WNS4: Principal Residence	Object	<p>The policy sets out a principal residence requirement for new market housing, but excludes Holkham’s land at Site W01/1 - Ashburton Close and Site W07/1 – Holkham Road from this requirement, subject to them meeting the agreed mix set out a paragraph 5.76 of the supporting text (n.b. this is a typo and should read 5.77).</p> <p>The Holkham Estate supports the exclusion of their two sites from this policy. There is significant justification for this exclusion with respect to maximising the opportunity to leverage market housing delivery to increase the supply of affordable housing and in particular intermediate rent housing for local people. The agreed mix for these sites set out at paragraph 5.77 would deliver c.45% affordable housing against an emerging policy requirement for 35% and the tenure split of the affordable housing has been designed to meet specific local needs identified in the Housing Needs Assessment.</p> <p>Our client’s support for the exclusion of their sites from this policy should not be read as support for the policy as a whole. In this respect Holkham’s position on principle residence restrictions is set out in their regulation 14 consultation comments objecting in principle to this policy.</p> <p>In summary, Holkham support the revisions to the policy to exclude the two emerging Local Plan allocations, but on the whole they consider that the policy would not meet the basic condition of contributing to the achievement of sustainable development.</p>	<p>Delete the policy.</p> <p>If the policy is retained a typo needs correcting so that the final paragraph refers to the correct section of supporting text: “paragraph 5.76 <u>5.77</u>”</p>
5. Housing and design Pages 87-88	WNS5: Infill development and extensions	Support	No comments.	N/A
5. Housing and design	WNS6: High quality design	Support	The various design criteria set out in the policy are reasonable and would encourage good design.	N/A

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
Pages 92-95			Our only comment is regarding the Design Guidance and Codes referred to in the policy which whilst generally appropriate seek to set out a lot of detail on matters such as highways and drainage design where the Town Council are not the relevant authority for setting such standards. We note that the policy simply requires proposals to have 'regard to the guidance'. As such as long as the guidance is interpreted flexibly then we have no objection to this policy.	
6. Employment and retail Page 99	WNS7: Redevelopment opportunities	Support	No comments.	N/A
6. Employment and retail Page 102	WNS8: Retail and the town centre	Support	No comments.	N/A
7. Infrastructure and access Page 106	WNS9: Visitor parking	Support	The former pitch and putt course has been used for several years for seasonal car parking, over-flow parking when the Beach Road car park and the town car park at Freeman Street are both full. Holkham would certainly support the flexible use of the former pitch and putt course for such parking not least because of the significant implications and a negative impact on the town should seasonal parking not be permitted.	N/A
7. Infrastructure and access Page 109	WNS10: Opportunities for sustainable transport	Support	No comments.	N/A
8. Environment Page 115	WNS11: Protecting the historic environment	Support	The policy is broadly consistent with the NPPF and is therefore considered to be appropriate.	N/A

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
8. Environment Page 117	WNS12: Non-designated Heritage Assets	Object	<p>Holkham has significant concerns regarding the robustness of the assessment process undertaken to identify the proposed non-designated heritage assets. In this respect the estate agrees with the comments to the Regulation 14 consultation made by North Norfolk District Council. The stated methodology used appears to be sound, but the way it has been applied is clearly flawed. Put simply there are clear problems with the addition of some of the proposed assets (e.g. the addition of 3. Town Sign outside Arch House which is only 20 years old and the far from unique 1. Water Tower which is more of an eyesore than an asset) and the absence of other buildings such as the F&G Smith maltings building on the Quay.</p> <p>The Planning Practice Guidance states that it is important that the decisions to identify non-designated heritage assets are based on sound evidence. Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets. (Paragraph: 040 Reference ID: 18a-040-20190723). We consider that sufficient information on the criteria used is lacking.</p> <p>Our client is particularly concerned regarding the identification of 4. Mill Farm due to its proximity to the emerging site allocation Policy W07/1 – Holkham Road. The Neighbourhood Plan should not seek to negatively impact upon strategic policies of the emerging Local Plan, unless there is considerable justification which is clearly lacking from the paucity of information contained in the assessment of Mill Farm. Policy WSN12 also identifies 11. New Farm and 12. Manor Farm as proposed non-designated heritage assets simply because they (and Mill Farm) are farmhouses located on the edge of the town. This is not sufficient justification.</p>	Delete the policy.

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
			<p>The NPPF states at paragraph 203 that <i>“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”</i> By contract Policy WSN12 is much more restrictive in stating that proposals should conserve these assets. Given the failure to provide sound evidence to justify the proposed non-designated assets and this conflict with NPPF paragraph 203, we consider that the policy is not in accordance with the basic condition to have regard to national policy. It should therefore be deleted.</p>	
8. Environment Page 120	<p>WNS12: Non-designated Heritage Assets WNS13: Local Green Spaces</p>	Object	<p>The policy proposes to designate g. Mill Road Meadow (north of Mill Road) as Local Green Space. Holkham strongly objects to this proposal as it would conflict with emerging site allocation Policy W07/1 – Holkham Road. The site allocation policy requires vehicle access from Mill Road which is shown on the site allocation plan as running through the middle of the proposed Local Green Space.</p> <p>The proposed LGS plan at Figure 35 of the Neighbourhood Plan excludes a sliver of land to the east of the meadow which has presumably been excluded to allow access into the main part of Policy W07/1. This sliver of land is insufficient for the required access and in a location where suitable visibility splays cannot be achieved. The access into the allocation will need to be designed in detail in consultation with NCC Highways and at this stage we cannot therefore advise on the exact area of land required for the access. It is not therefore appropriate to designate the site (or part of the site) as LGS at this stage.</p> <p>With respect to designating LGS Planning Practice Guidance states that:</p>	Remove “g. Mill Road Meadow (north of Mill Road) from the list of proposed Local Green Spaces.”

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
			<p>- <i>“Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making”.</i> (Paragraph: 007 Reference ID: 37-007-20140306)</p> <p>- <i>“Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space”.</i> (Paragraph: 011 Reference ID: 37-011-20140306)</p> <p>The proposed designation of Mill Road Meadow would clearly undermine the aims of plan making in the emerging Local Plan by introducing a very real constraint to the delivery of Policy W07/1. This is recognised by the assessment at Appendix D of the Neighbourhood Plan which states: <i>“Space covers part of the access to proposed allocation W07/1 in the emerging Local Plan and there could be a conflict if the LGS designation were to constrain the allocation from coming forward”.</i> The fact that this is recognised and yet the meadow is still proposed as LGS implies that it is the Neighbourhood Plan’s intention to frustrate the delivery of the emerging Local Plan allocation. This is clearly contrary to the PPG which states that Local Green Space designations should not be used in a way that undermines the aim of plan making to meet development needs and should be consistent with local planning for sustainable development. The inclusion of the site as LGS is therefore contrary to the basic conditions to have regard to national policies and guidance and to contribute to the achievement of sustainable development.</p> <p>In addition to the clear inappropriateness of designating land required to deliver an emerging housing allocation as LGS, we would also question whether the site is appropriate for</p>	

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
			<p>designation irrespective of this. The proposed LGS is located outside of the settlement boundary and within the AONB. It is therefore already protected by designation and there would be no additional benefit in designating it as Local Green Space. It is therefore contrary to the PPG in this respect also.</p>	
8. Environment Page 124	WNS14: Important Views	Object	<p>The entirety of Wells-next-the-Sea is already afforded the highest status of protection by virtue of its designation as part of the Area of Outstanding Natural Beauty. Notwithstanding this NP Policy WNS14 proposes that: <i>“The visual scenic value of the landscape and countryside in the parish outside of the defined settlement boundary will be protected from development that may adversely affect this character.”</i> This statement is unnecessary given the AONB location and it is also not strictly in accordance with NPPF paragraph 177 and footnote 60 which provide a more nuanced approach to assessing whether proposals constitute major development and if so whether there are exceptional circumstances in the public interest.</p> <p>We agree with the comments from North Norfolk District Council to the Regulation 14 consultation that the policy lacks adequate explanation and evidence to support it. Without this necessary evidence, the policy, as written is considered to be unjustified in identifying such wide ranging views.</p> <p>There is also a very real concern that certain views have been identified to potentially prevent development, as a number of views seem to be in locations of known proposals.</p> <p>Given the local landscape’s protection as AONB we consider that this policy provides an unnecessary additional layer of protection to land that already has the highest status. This will</p>	Delete the policy.

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
			only serve to frustrate sustainable development and is therefore contrary to the basic conditions. We would therefore recommend that the policy is deleted.	
9. Sustainability and Climate Change Page 128	WNS15: Sea level rise and flood risk	Support	No comments.	N/A
9. Sustainability and Climate Change Page 129	WNS16: Pollution	Support	No comments.	N/A
10. Area specific policies Page 131	WNS17: Wells Beach	Object	<p>Policy WNS17 states that:</p> <p><i>"...Proposals to expand the existing Pinewoods holiday park beyond its current footprint will not be supported."</i></p> <p>There is no justification or need for this policy approach. Any proposals for the expansion of Pinewoods would be judged under adopted Policy EC 10 or emerging Policy E6. Neither of these policies place a specific restriction on the expansion of tourism facilities, but they do include strict requirements on design and landscape considerations. A blanket ban on the expansion of Pinewoods is contrary to these strategic policies and would therefore fail to meet the basic conditions.</p>	<p>Delete the following text:</p> <p>"Proposals to expand the existing Pinewoods holiday park beyond its current footprint will not be supported."</p>
10. Area specific policies Page 133	WNS18: Wells Harbour	Support	No comments.	N/A

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



Norfolk County Council

Norfolk County Council Comments on the: Wells Next The Sea Neighbourhood Plan (Reg 16) 13 November 2023

1. Preface

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

2. Natural Environment

2.1. Policy WNS2: allocation of 45 new affordable dwellings at Two Furlong Hill (WELLS1):

It will be important that appropriate ecological surveys (i.e., Preliminary Ecological Appraisal and subsequent detailed protected species surveys as required) are carried out in support of any future planning application at this site.

As noted in the policy wording, it is strongly recommended that the dismantled railway which forms the southern site boundary and acts as a valuable green corridor, is suitably protected and buffered from development, for example by providing an undeveloped area of natural green space alongside this habitat feature.

We are pleased to note that the policy wording recognises there will be a requirement via the Environment Act for all such developments to achieve a minimum 10% net gain in biodiversity.

We are also pleased that policy states the requirement for a contribution towards the Norfolk Green Infrastructure & Recreational Impact Avoidance & Mitigation Strategy (GIRAMS). GIRAMS provides a mechanism for off-setting future increased recreational pressures. This funding stream is expected to not only mitigate impacts to internationally important wildlife sites, but also indirectly bring about a wider suite of beneficial outcomes, particularly for coastal parishes.

2.2. Policy WNS6: High Quality Design:

Regarding item I. Biodiversity, it may be beneficial to additionally make specific reference to the requirement for all new developments to achieve 10% Biodiversity Net Gain, and that BNG requirements can be used to help protect and buffer existing wildlife habitats on site.

2.3. Policy WNS9: Visitor Parking:

The proposed use of the pitch and putt site appears acceptable, however, it is important to note that Wells Meadow County Wildlife Site (CWS) is located immediately north of the parking area; it would therefore not be appropriate in any way extend the parking area further northwards. Impacts to the CWS should be carefully avoided, with no access for visitor parking provided to the CWS.

2.4. Should you have any queries with the above comments please contact the Natural Environment Team at neti@norfolk.gov.uk.

3. **Lead Local Flood Authority**

3.1. The Lead Local Flood Authority (LLFA) welcomes references retained in the Draft Neighbourhood Plan Regulation 16 and its proposed policies to flooding from various sources such as surface water, fluvial, tidal / coastal and the recognition that by considering flood risk early as part of all new development, it may be possible to avoid it or manage it more effectively, as well as recognising the impacts of climate change on flooding and new development. Of the 18 Policies proposed, Policy WNS2: Housing Allocation at Two Furlong Hill (Site Wells1), Policy WNS6: High Quality Design, Policy WNS13: Local Green Spaces and Policy WNS15: Sea Level Rise and Flood Risk and their supporting text, are of the most relevance to matters for consideration by the LLFA. The LLFA welcome that additional mapping has been included within the Regulation 16 Draft Document relating to some sources of flood risk within the Parish of Wells-next-the-Sea including Figure 16: Flood Risk, Figure 38: Extent of Flood Risk from Rivers and Seas and Figure 39: Extent of Surface Water Flood Risk, along with some references now made to groundwater flooding within Policy WNS15: Sea Level Rise and Flood Risk.

3.2. The LLFA welcomes references made within Section 9: Sustainability and Climate Change and Policy WNS15: Sea Level Rise and Flood Risk to flooding and surface water drainage matters, with the LLFA noting that Policy WNS15 has been enhanced from that contained within the Regulation 14 Version, setting out the need for all planning decisions to address the effects of climate change upon flood risk, including rising sea levels and directing development away from areas of known flood risk where possible to avoid exacerbating existing flooding problems.

3.3. The LLFA further welcomes that the Regulation 16 Draft Document has retained references within Policy WNS6: High Quality Design and Policy WNS15: Sea Level Rise and Flood Risk to encouraging the use of Sustainable Drainage Systems (SuDS) in all new developments to help reduce runoff rates by providing attenuation that stores water to help slow its flow, improve water quality by filtering pollutants to avoid environmental contamination and clean the water whilst increasing the biodiversity value of the area. The LLFA recommends that Policies WNS6 and WNS15 could be further enhanced by

references being made to the four pillars of SuDS within the Policy text, namely (water quality, water quantity, biodiversity, and amenity).

- 3.4. Notwithstanding the above, the LLFA still recommends that a full review of flooding within the Parish should be carried out to assess all sources of flood risk in Wells-next-the-Sea, including flood risk from groundwater and ordinary watercourses, supported by relevant mapping for all sources and covering the whole Parish.
- 3.5. The LLFA welcomes references made in the Regulation 16 document to the Wells-next-the-Sea Neighbourhood Plan supporting the Strategic Policies which deal with matters relating to flooding, drainage and climate change such as the North Norfolk Core Strategy (Adopted in 2008), Site Allocations Development Plan Document DPD (Adopted in 2011), along with the emerging North Norfolk Local Plan (NNLP) and the National Planning Policy Framework.
- 3.6. As stated in our previous Regulation 14 response, the LLFA still recommends reference be made in the document to the [Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document](#) (the most up to date version at the time of adoption) regarding surface water risk and drainage for any allocated sites or areas of proposed development.
- 3.7. According to LLFA datasets (extending from 2011 to present day) we have 2 no. records of internal flooding and 3 no. records of external/anecdotal flooding in the Parish of Wells-next-the-Sea. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. Please note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.
- 3.8. We advise that Norfolk County Council, as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 3.9. We are aware of AW DG5 records within the Parish of Wells-next-the-Sea, however, this will need to be confirmed with/by Anglian Water.
- 3.10. According to Environment Agency datasets, there are areas of surface water flooding (ponding) and surface water flowpaths present within the Parish of Wells-next-the-Sea.
- 3.11. The LLFA note the inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire Neighbourhood Plan area. Information on this and associated tools/reference documents can be found at:
 - [GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map](#)
 - [Norfolk County Council \(NCC\) – Flood and Water Management Policies](#)
 - [Norfolk County Council \(NCC\) – Lead Local Flood Authority \(LLFA\) Statutory Consultee for Planning: Guidance Document](#)

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

4. **Transport**

4.1. The draft policy addresses the Highway Authority comments from the Reg 14 consultation.

4.2. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at richard.doleman@norfolk.gov.uk or call 01603 223263.

Wells-next-the-Sea Neighbourhood Plan

Submission Draft June 2023

North Norfolk District Council Response - October 2023

Thank you for consulting North Norfolk District Council, NNDC on the submission Consultation version of the Wells-next-Sea Neighbourhood Plan.

Officers have previously made detailed commentary on previous emerging versions both formally at regulation 14 stage and informally on an emerging version of the submitted NP. It is noted that although changes have been made to incorporate some of the advice given from our previous representation and earlier discussion this year it is noticed that there have also been many other changes introduced across the plan policies and their supporting text which have had the opposite effect of introducing (and in cases reintroducing) new conformity issues and further ambiguity. In this submission version these matters will need to be resolved in order to ensure a deliverable Plan ahead of any referendum. It is recognised that much hard work has gone into the preparation of this neighbourhood plan and in the main it seeks to deliver on the ambition of the steering group and that of the community, however, there does also remain some concerns around the continued inclusion of unnecessary policies, and or criteria in policies/ approaches that are already in the development plan while other seem selective and not complete due to only reflecting partially the commissioned evidence. Although it is recognised that it is important the neighbourhood plan covers the issues raised by the community it is also equally important to review the existing development plan and not seek to introduce unnecessary ambiguity in decision making through the repetition of similar approaches to the existing strategic policies at District Level and in inadvertently mislead the general public on the scope and influence the Neighbourhood plan will have. The final plan must recognise that in decision making the development plan as a whole will be used in the determination of applications and that there is no need to reproduce policies especially where no local additionality is being gained or worse where conflict and ambiguity is being introduced to the decision-making process due to poorly worded policies and cross over. – even if they are supported through consultation.

Government guidance states that

“a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications “

Many policies in the draft plan would benefit from amended wording to ensure clarity for application and implementation purposes. The Council has suggested policy deletions where it considers the policy repeats other parts of the statutory development plan or the intended outcome of the policy cannot be achieved through the planning system. Alternative text has also been suggested where it is considered necessary to ensure further clarity and general conformity.

It is noticed that some of the policy areas continue to be justified by the inclusion of statements that the approach are/ have been supported at consultation events but are not justified through a level of qualitative or proportionate evidence. As advised at the outset and throughout the WNP production opinion and views of the local community and others that have a stake in the future of a neighbourhood plan area e.g. expressed through consultation, demonstrate that the policies in the

neighbourhood plan have been informed by the participation of the local community and others with an interest in the area and as such help meet the requirements of some of the basic conditions at examination but opinion itself does not provide the justification for the inclusion of a policy especially when such an approach may already exist in the wider development plan or there is up to date evidence available (but not used) that would led to a different conclusion. Some policy areas are justified through the inconsistent and incomplete assessments eg Local Green Space, LGS and have not had regard to published evidence. The council has suggested policy deletions where this is the case.

As this is the submission draft of the plan officers have in the main focused on matters it considers are related to the basic condition tests that the plan needs to meet in order to proceed to referendum

The basic conditions are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

This includes reference to factual errors and concerns over phrasing, repetition /duplication and conformity and the use of proportional evidence to justify an approach. All of which impact on the contribution the neighbourhood plan may have on achieving sustainable development. Suggestions for policy amendments are included in the tables below in these regards and also to improve the clarity, implementation and consistent decision making which are needed in order for the plan to be considered meeting the Basic conditions tests.

A number of policy areas are also considered aspirational and as such consideration should be given to amendment, separating these into a clearly identified aspiration section. Where necessary these have been identified in the table below.

Consequential amendments

A number of changes are sought that affect the basic conditions along with other minor amendments which will assist in interpretation and the application of the policies in the neighbourhood plan. Such changes along with any modifications recommended to the council through examination will undoubtedly lead to the requirement for further consequential amendments, corrections and updates to supporting text. It would be helpful if reference could be made in the final report that these should be made at the council's discretion prior to referendum (PPG Reference ID: 41-106-20190509).

Emerging Local Plan

The Wells next the Sea neighbourhood Plan is submitted at the time of an advance emerging local plan. The emerging Local Plan submission version was consulted on under regulation 19 in January 2022 and a draft shared with the group earlier in 2021 for reference. This strategic plan has since been submitted for independent examination in May 2023 and is considered to be at an advance

stage. Hearings are expected to take place in January / February 2024. The Council in its August and September 2023 Planning Policy and Built Heritage Working Party / Cabinet recommended to give weight to a substantive number of its policies in terms of Paragraph 48 of the NPPF.

There is no legal requirement to examine the Plan against emerging policy. However, PPG (PPG para 009 reference ID: 41-009-20190509) advises that the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which the Plan is tested. Furthermore town/parish councils and local planning authorities should aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging Local Plan and the adopted development plan with appropriate regard to national policy and guidance. Guidance also states that *It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. Paragraph: 009 Reference ID: 41-009-20190509*

Given the advance stage and the weight to be afforded to the Local Plan in line with para 48 of the NPPF by the Council there are strong reason to do so not least so that the NP remains up to date and relevant for the intended period but to ensure the WNP policies continue to attract weight in decision making after the adoption of the new Local Plan scheduled for the autumn of next year. Our recommendations continue to be that in the making of the Neighbourhood Plan, it should have regard of and also be in general conformity with the emerging Local Plan.

Habitat regulation Assessment, HRA

Although this HRA has been prepared to help the Council discharge its duties under the Habitats Regulations, the Council is the competent authority, and it must decide whether to accept this report or otherwise. Policy WSNO and the HRA report have not previously been seen by NNDC as the responsible body in terms of Habitat Regulations. It is noted that Natural England have been consulted on the HRA and had no objection to the HRA (last few pages of the HRA), although it appears to be a standard response and doesn't appear to consider the neighbourhood plan and duplication of policy or whether the suggested wording is acceptable in planning terms, only that it would result in the protection of Habitats sites. It is further noted that the HRA itself only puts forward the suggestion of the policy wording and clarifies that it would be subject to examination and amendment along with elements of the Plan.

Further, it should be noted that this HRA has been prepared for the purposes of preparing and examining the Plan on a pre-emptive basis and seems to be based on earlier emerging versions of the neighbourhood plan and bases its conclusions on the assumed incorporation of a number of site options and policy approaches which are not in the final draft plan as submitted. Commissioned in November 2022, the conclusions draw on the potential for a number of site options which were assessed but discounted and not included in the regulation 14 (July 2022) consultation version nor the submitted draft neighbourhood Plan (June 2023). The council undertook a screening exercise on the regulation 14 version of the Plan in December 2022 and published its screening determination in March 2023 following consultation with the statutory consultation bodies and recommended that the HRA took the findings into account.

The final submitted neighbourhood plan subsequently incorporates the full recommendations of the HRA/ Appropriate assessment as well as additional policy wording recommended by the council at regulation 14 stage on matters that addressed HRA issues. There is concern that the HRA as submitted has not fully considered the final policy wording and as such there is a disconnect between the HRA conclusions and the final version of the neighbourhood plan which has inadvertently resulted in duplication and ambiguity of policy wording in relevant policies. The Council have suggested policy deletion and alternative text where it is considered necessary.

Attached

Table 1: Detailed review by paragraph and policy with suggested considerations and amendments.

Appendix A NNDC Local Allocation Agreement Strategic Policy for exception sites

Table1: Wells Draft Neighbourhood Plan - submission version: Detailed review by paragraph and policy with suggested considerations and amendments

Paragraph	Comment	Suggested amendment
1.6	<p>Clarification it is worth at this point adding text that the Council is at an advance stage of a replacement Local Plan and that once adopted will replace the current Core Strategy and site allocations document up to 2036. As such it is this document that will set the strategic approach during the NP period and due regard is required to these in the production of the NP.</p> <p>Adding this text will also bring the para into line with that in para 1.17 and demonstrate to the reader that the contents of the emerging plan have also been referenced (as they clearly have)</p>	Change <i>context of the local plan</i> to that of the Core Strategy 2008 and Site Allocation DPD 2011 and the emerging Local Plan
2.13	<p>Clarification "<i>Investment in health is part driven by planned growth and from contributions from development</i>" additional text should be inserted to clarify that health provision is funded primarily through at the NHS</p>	Add at the end of the paragraph Investment in health is part driven by planned growth and from contributions from development and through investment from NHS England
2.18	<p>Clarification and factual update re number on the roll at Wells primary school. as written the text implies the roll is in decline. by adding the 2019 figure will show that the intake is approximately neutral</p>	Add 2019 roll information eg add ... in September 2020 and 201 in 2019
WNSO	<p>This is a new policy. The HRA and the policy have not previously been seen by NNDC as the responsible body in terms of Habitat Regulations. It is noted that Natural England have been consulted on the HRA and had no objection to the HRA/NP (last few pages of the HRA), although it appears to be a standard response and obviously doesn't consider duplication of policy or whether the policy is acceptable in planning terms, only that it would result in the protection of Habitats Sites. It is further noted that the HRA itself only puts forward the suggestion of the policy wording and clarifies <i>that it would be subject to examination and amendment along with elements of the Plan.</i></p> <p>A number of conclusions seem to be based on the appropriate assessment of potential sites and approaches that do not appear in the final draft np and should have been screened out at earlier stages.</p> <p>It would be more appropriate if the conclusions had been shared</p>	Remove criteria a and d - Rephrase criteria b and c. See the below for the full amended text. Add consequential changes to relevant policies as detailed in table below.

Paragraph	Comment	Suggested amendment
	<p>prior to finalisation with the Council as the relevant responsible body in Law.</p> <p>It is considered disproportionate for householder applications to have to demonstrate compliance with these four requirements. E.g SuDS are not always likely to be required. If the Policy is to be retained, consider applying to specific development types/size thresholds to avoid onerous and unreasonable requirements.</p> <p>Instead of <i>“All development proposals Should demonstrate compliance with</i> It is considered sufficient to require qualifying developments to "give consideration to the following potential pathways of impacts. Any site requiring an HRA would then need to demonstrate how these potential pathways of impacts could either be screened out at Stage 1 in the absence of mitigation, or progressed to the Appropriate Assessment, AA.</p> <p>It's worth noting that Natural England's SSSI Impact Risk Zones would require us (NNDC) to consult them for "All planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures." at any location within the Wells parish boundary. With this in mind, NE would pick up on any potential pathways of impacts not sufficiently considered within an HRA. They would also be able to provide the most recent information regarding bird populations and disturbance impacts obtained from their ongoing research.</p> <p>Recreational pressures: This is a strategic requirement which is adequately covered in the emerging local Plan and LPA policies as a legal requirement for the Council to meet the Conservation and Habitat Species Regulations 2017 (as amended) and as agreed with Natural England, NE, is already an adopted strategy. (March 2022). Such reptation is not required, proportional or desirable across the development plan in a</p>	

Paragraph	Comment	Suggested amendment
	<p>bespoke policy. The GIRAMS is a joint LPA initiative (across the whole of Norfolk). It should be noted that the strategy applies to all residential and tourism proposals that result <u>in the net gain of overnight accommodation</u> and not just residential and is a strategy that is based upon the evidence quoted in the np HRA and agreed with Natural England, NE.</p> <p>The issue is, that the making of the neighbourhood plan is not likely to have a significant effect on a European site ,Es, either alone or in combination with other plans and projects in relation to recreational impacts - this is a strategic matter and the Council are content that the matter is addressed through the inclusion of appropriate wording in relevant individual policies in the NP (as amended) and the adopted strategies in the wider development plan where the overall cumulative growth in North Norfolk and the wider region has been included and accounted for. This includes through a generous windfall assumption growth brought forward through any neighbourhood plans.</p> <p>Irrespective of the above: “Adequate provision of adequate and proportionate Green Infrastructure and adequate financial contributions” - overuse of adequate is perhaps a sign that the wording is too prescriptive! The GIRAMS includes specific requirements for contributions towards a scheme of avoidance (set and reviewed through the LPAs) and mitigation measures and for larger larger-scale proposals of 50 units plus through the additional provision of onsite enhanced green infrastructure (EGI) or contributions towards off-site strategic green infrastructure. Further background on this can be obtained from the submitted LP policy ENV5 and the GIRAMS itself. Both of which are available in the submitted Local Plan document library ref numbers [A1] & [G9] here</p> <p>The inclusion of the suggested draft wording in a separate policy (<i>subject to review at examination</i>) and in other associated policies throughout the np is considered unnecessary and has also led to</p>	

Paragraph	Comment	Suggested amendment
	<p>duplication and ambiguity as the final plan already incorporates policy wording in this area which does not seem to have been taken in to account in the wells NP HRA.</p> <p>It should also be noted that the criteria is in any case, already included in the relevant NP policies for completeness on the earlier recommendation of the council.</p> <p>Visual and noise disturbance</p> <p>It should be noted that the AA draws in part its conclusions on this item through the assessment of sites which are not included in the final np but were considered as part of the evidence base. (HRA page 93).</p> <p>It is questioned if all development will be able to deliver on this requirement and suggested that all development is further defined as <i>meeting the criteria of Natural England SSSI Impact Risk Zones Officers consider that this reduces the need for householder applications in a lot of circumstances and actually increases the 300m requirement in most cases.</i></p> <p>Loss of Functional linked Habitats</p> <p>It appears that the AA considers potential allocations including those discounted in the process and not limited to the site proposed in the plan. (HRA page 94-95).</p> <p>It is assumed here that the phrase <i>“provide evidence”</i> means an ecological report and that if no suitable habitats are present, impacts can be ruled out. Where applicable proposals will need to be subject to a project level HRA.</p> <p>Water Quality</p> <p>It appears that the conclusions of the NP HRA/AA are based upon the consideration of discounted potential allocations which are not in the final neighbourhood plan. The AA considerers that it is unlikely that the NP would lead to adverse water quality impacts alone and that policy wording in other plans would mitigate in-combination effects.</p>	

Paragraph	Comment	Suggested amendment
	<p>The final HRA of the emerging Local Plan concludes that <i>adverse effects on integrity can be ruled out alone for all European sites due to the protective policy ENV4 which ensures the need to rule out adverse effects on integrity before permission is granted.</i> It goes on to say that <i>This will ensure that any specific risks associated with particular locations and relating to WRC capacity, surface drainage or other hydrological issues are addressed at the point where such details can be set out and identified in the necessary detail.</i></p> <p>The adopted Local plan under policy EN9 has a similar policy around not permitting development that causes indirect and or adverse effects to nationally designated sites, designated areas and or protected species. As such it is concluded that taken as whole it is unnecessary to include policy criteria d in this NP</p>	
<p>Revised text</p> <p>Para 4.11</p> <p>The final SEA and HRA Appropriate Assessment, AA reports are supporting documents to the Neighbourhood Plan and their recommendations have been reviewed taken on board in full in this version of the Neighbourhood Plan and have led to the preparation of the Policy below which applies to all qualifying development within the Neighbourhood Area. The policy seeks to ensure compliance with the Conservation of Habitats and Species Regulations 2017 (as amended) and enable growth in the NPA through the implementation of measures to avoid adverse effects on the integrity of Habitats sites arising from cover likely significant effects generated by the Policies of the Neighbourhood Plan in relation to a number of factors, but principally in relation to recreational pressure, visual and noise disturbance, and loss of functionally linked habitat and water quality.</p> <p>The use of information provided by Natural England on SSSIs through the identified Impact Risks Zones RZs can be used by developers, consultants and members of the public who are preparing to submit a planning application to help consider whether a proposed development is likely to affect a SSSI and choose whether to seek pre-application advice from Natural England and or the Council. This will allow any potential impacts to be taken into account within the planning application and so minimise the risk of delays at the formal planning stage. Through the use of the SSSI Impact Risk Zones mapping available through Magic Map Application (defra.gov.uk) by applying the statutory land based designation layer and the SSSI Impact Risk Zones information and considerations/features on each type of development can be retrieved by clicking on the information button and then the risk layer on the map</p> <p>Add NEW para 4.12</p> <p>Natural England advise that potential impacts from most types of development requiring planning permission are covered by the SSSI IRZs. One important exception is any development proposal with the potential to impact on coastal processes. The SSSI IRZs do not currently cover potential risks from coastal schemes such as coastal defences, cliff stabilisation, cross beach structures, harbour and marina development. Natural England should be consulted on any coastal scheme which is likely to affect a coastal SSSI.</p>		

Paragraph	Comment	Suggested amendment
<p>Revised WSNO <i>All developments within the NPA should give consideration to the following potential pathways of impacts upon European Wildlife Sites [this being the term used in section 4.10]:</i></p> <p><u>Visual and Noise Disturbance</u></p> <p>a. Any development meeting the criteria of Natural England SSSI Impact Risk Zones will need to consider the impacts of visual and noise disturbance upon the qualifying bird assemblages of the North Norfolk Coast SPA / Ramsar. This may require the use of modelled construction noise levels against pre-construction baseline noise measurements (to be agreed with Natural England) and the implementation of mitigation measures such as the provision of screens, selection of less noisy equipment or techniques, and damping / noise shielding of equipment. Visual screening is likely to be required for development sites within 300m of the SPA / Ramsar and/or functionally linked habitats with direct line of sight of known bird roosts.</p> <p><u>Loss of Functionally Linked Habitat</u></p> <p>b. Where the development site is assessed as providing suitable habitat for overwintering North Norfolk Coast SPA / Ramsar bird species within an Ecological Impact Assessment (EclA), non-breeding bird surveys will be required. These must be undertaken in accordance with the most recent survey guidelines and include survey visits in autumn, winter and spring when the SPA / Ramsar is used by designated bird species. Where surveys identify site use by a significant population (i.e. 1% of the qualifying population) of a designated bird species, the site will be considered functionally linked to the SPA / Ramsar with avoidance and mitigation measures required. A project-specific Habitats Regulations Assessment will be required to ensure functionally linked habitats are safeguarded.</p>		
5.1	Correction	The emerging Local Plan was submitted for examination in April May 2023.
5.1	The reference to having regard to the emerging LP as the strategic policies that will cover the neighbourhood plan period is welcomed and advisable if the Plan is to stay relevant and up to date for the intended period. Correction change remove wording will	This Neighbourhood Plan will has also had regard to the strategic policies contained in the emerging Local Plan in so far as is reasonable given these policies are yet to be examined.
5.3- 5.5	For clarity the Town council have not sought to set or agree a local housing requirement with the council.	
5.27	Clarification – exception sites – Paragraph 5.27 is part of the supporting text and incorrectly defines exception sites. in defining such sites in general as done they are not necessarily restricted to sites adjacent to the development boundary - amend text accordingly	Affordable housing can be delivered through the use of ‘Rural Exception Sites’. These are sites immediately adjacent to but outside of the settlement boundary and are identified for development as an ‘exception’ to the settlement boundary . prevailing policy set in Local Plans . Such sites might not ordinarily expect to gain planning permission and are known as ‘Rural Exception Sites’.

Paragraph	Comment	Suggested amendment
WNS1	<p>General comments</p> <p>The Council is supportive of the delivery of affordable housing delivered through Community Led Housing Groups, including Community Led Trusts, CLTs as long as such development contributes to meeting a local and affordable need and is of an appropriate scales and location, has public support and housing is retained in perpetuity for those with a connection to the local community. The approach is seen as in addition to the adopted and emerging rural exception policies and adds a further defining element to emerging submitted Local Plan policy SS3 – Community Led Development. However as written there are a number of concerns which need to be clarified through policy alterations in order to meet the basic conditions, aid implementation by bringing clarity to the approach, removing ambiguity and aligning (limit) the policy to that of land use matters only. These are detailed below.</p> <p>Neighbourhood Plan policies must relate to planning matters and that the requirement of affordable housing provision through planning policy (via a section 106 agreement) being made available first to eligible households as written, is not strictly a planning matter. The NP can properly record the community’s aspiration that affordable housing should meet local needs, including key workers but it should not be done in such a way that implies that a matter of occupation and support for a specific site is a matter for the neighbourhood plan steering group or town council or indeed Homes for Wells, and linked to the “agreement” with any individual CLTs allocation (occupation) policy. This sits outside planning policy and land use planning and any allocations policy of a CLT is a matter for its members to decide.</p> <p>(For clarity, Homes for Wells is a local community housing enabling group that is a registered provider and a charitable community benefit society who aim to provide affordable housing to the people of Wells and the surrounding parishes of Stiffkey, Holkham, Wifton and Warnham).</p>	

Paragraph	Comment	Suggested amendment
	<p>Countryside development for affordable housing in perpetuity (i.e in the countryside policy area- is that area defined on the local plan policies mapping and that sits outside the settlement boundaries of the designated growth settlements in the settlement hierarchy) is already permitted with demonstration of a proven local housing need through Core Strategy policies HO3 and HO5 and will be, via the emerging Local Plan policies HOU3 and HOU4. To this extent the locational approach in WNS1 adds an element of local distinction that remains in general conformity when applied to CLTs only as the council's exception policies and when WNS1 will apply.</p> <p>It should however be noted that preference through adopted and emerging exception policy is already given to those with <u>a local connection</u> and housing need through the Councils Local Allocations Agreement which is detailed in the Councils adopted Housing Strategy. A copy of the Local allocation's agreement is appended to this response for information. Any CLT developing its separate allocation (occupation) policy around a priority to those being key workers and local connection will need to have regard to this. (not least to ensure Council support but also that of funding opportunities and compliance with equalities).</p> <p>The principle and the element of additional local distinction of the policy approach in this NP is supported subject to a number of changes which are considered essential to bring clarity, remove ambiguity and align the policy with land use planning in a way so it can be implemented</p>	<p>See for information local allocation agreement appendix A.</p>
WSN1	<p>Clarification criterion a – assume the intention is that development would need to be made affordable in perpetuity. Amend text accordingly.</p> <p>It is also suggested that criterion a, becomes part of the paragraph above as the main guiding principle and the criteria below re numbered.</p>	<p>a. Remains affordable and is made available is restricted as such in perpetuity.</p> <p>Proposals for the development of Community Led Housing schemes on sites outside of but immediately adjacent to the settlement boundary and well related to the built-up area will be supported on an exceptional basis where there is a proven local need and where such housing remains affordable and is made available is restricted as such in perpetuity and where they comply with all of the following criteria:</p>

Paragraph	Comment	Suggested amendment
		Re number b,c,d as a,b & c
WSN1	<p>Criterion b The criterion should be amended to allow for the flexibility envisaged through the cascade between key workers & local connection and not just be restricted to those identified as key workers. As written criterion also conflicts with criterion 3.</p>	<p>Amend text as below: b-a. Is made available for people identified as being in housing need, who are able to demonstrate a local connection and/ or relevant key workers, by virtue of being unable to buy or rent properties in the parish at open market prices.</p>
WNS1	<p>Criteria C The policy seeks to condition support for any site to that of an agreed CLT allocation (occupation) policy. This sits outside the scope of planning. You cannot condition neighbourhood plans or other support for such sites subject to third party agreement to a housing allocation policy (occupation) in this way.</p> <p>Secondly the approach is silent on with whom any such agreement is intended to be agreed with. The district Council is the relevant Housing Authority and any CLT would be advised to seek agreement with the Council on such matters not least as this would determine if the Council is in a position to provide housing support but it is contended that planning permission for a development site /proposal could not be conditional upon such agreement. Nor should the policy imply a level of control over such a CLT's housing allocation policy by the np. Such matters are up to the membership.</p> <p>The policy implies there is an element of agreement between the town council, NNDC as the planning and Housing Authority and all current and future CLTs and their housing providers. Such an agreement has not been sought and is not in place.</p> <p>It is acknowledged that there is an agreement between the Council and Homes for Wells (and which seems in part to be repeated in</p>	<p>C-b Is offered in the first instance to people in line with the agreed Community Land Trust (CLT) allocation policy (see Appendix B) in the</p>

Paragraph	Comment	Suggested amendment
	<p>Appendix B and linked to the Policy). However, it is wrong to seek to impose this unique (and restrictive) set of circumstances on potential new CLTs and any delivery partners that may be partnered with.</p> <p>Concern here that the policy as written is seeking to control the terms of reference of any CLT or community group that might be formed in regard to its members occupation policy.</p> <p>The move between cascades needs to be qualified in the policy with an appropriate time limited. As written, it is open ended and inoperable and not supported.</p> <p>A period of 3 months would be supported, this being the time limit used between cascades in the PPG in relation to first homes Paragraph: 008 Reference ID: 70-008-20210524</p> <p>Reference to the Council's Local Allocations Policy is incorrect. This should refer to the Local Allocations Agreement rather than policy.</p> <p>The whole of criterion C should be replaced as detailed opposite.</p>	<p>absence of take up, the District Council's Local Allocations policy will apply.</p> <p>Is offered in line with community led housing group's allocation policy which should include reference to local connection and key workers* . If after a period of three months there has been no take up then the District Council's Local Allocations Agreement will apply.</p> <p>**</p> <p>* add footnote at the bottom of the policy box: keys workers definitions should be based on the NNPF (Sept 23) definition of Essential local Workers</p> <p>** add footnote with the reference to the Councils Local Allocation Agreement.</p>
WNS1	Clarification Last Paragraph: replace last para re GIRAMS with revised text HRA text for consistency.	<p>To avoid adverse effects on the North Norfolk Coast SPA / Ramsar / SAC all residential development will need to satisfy the requirements of the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS). This will include adequate provision of adequate and proportionate Green Infrastructure and adequate financial contributions towards the mitigation measures identified in the GIRAMS</p> <p>Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)</p>
Appendix B	<p>Appendix B</p> <p>Notwithstanding the objection to the policy and the removal of the connection to this appendix through the changes put forward, there</p>	Delete Appendix B

Paragraph	Comment	Suggested amendment
	<p>remain concerns around the approach taken should it remain. WNP Appendix B is not robust or justified and clumsily set out through the use of an “example” allocation policy used by Homes for Wells. Such matters will be for the members of any future trust to decide, and it is wrong to seek to restrict the development of new CLTs though the imposition of the terms operated through by Homes for Wells or provide a competitive advantage through planning.</p> <p>Appendix B quotes partial and selective text taken from the “better team” website which is understood to be a recruitment web site?</p> <p>It would be more robust and clearer if the definition in Appendix B was based on that contained in the NPPF glossary under Essential Local workers and linked to the policy. (See criterion c/ b amended text above).</p> <p>The Council is satisfied that any further local definition of key workers and local connection should be left up to the relevant community led housing group or community led housing trust and their members. Such detail is not a matter for NP policy.</p> <p>The NPPF Glossary defines ‘Essential local workers’ as: Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.</p> <p>Delete Appendix B</p>	<p>Update references accordingly</p>
	<p>By way of further explanation for context only</p> <p>Occupation is not a land use matter for Planning and there is no justification in national policy. Furthermore, the Council uses its own Local Allocations Agreement (see Appendix A to this response) as part of the strategic Housing Strategy. The North Norfolk Housing Allocations Scheme has been developed in accordance with the Housing Act 1996 as amended by the Localism Act 2011, relevant statutory regulations and regard has been made to the Codes of Guidance and the Council’s Homelessness Strategy, Tenancy Strategy and the public sector equality duty. In developing the Housing Allocations Scheme the provisions in the Homelessness Reduction Act 2017 have also been considered. An Equality Impact Assessment of the Housing Allocations Scheme has been undertaken and is available on request. The North Norfolk Housing</p>	

Paragraph	Comment	Suggested amendment
	<p>Allocations Scheme has been designed to be used by North Norfolk District Council and the Registered Providers and Housing Associations who participate in the North Norfolk Your Choice Your Home Scheme through choice-based lettings. The Local Allocations Agreement includes 7 criteria which provide a basis for determining priority between applicants for affordable housing on exception sites including low-cost home ownership products <u>based on their local connection to the parish in</u> which a property is located and the adjoining parishes. Priority is provided through local to the villages and towns in North Norfolk. In the event that there are no applicants with these connections, the property can be allocated to an applicant who has a wish to live in a particular town or village but who does not have a connection. The Local Allocations Agreement gives preference to applicants with strong local connections to the parish in which the property being allocated is located and the adjoining parishes equally. This is because there will be some towns or villages which have very little affordable housing stock and some towns and villages where it will not be possible to develop new affordable housing because of constraints including sensitive local environments, coastal erosion, flooding and lack of available land. It is essential that applicants with strong local connections to such towns and villages are not disadvantaged as a result. Shortlisting is undertaken based on the strength of local connection, with applicants with the strongest connections shortlisted above those applicants with lower connections. The approach qualifies that an application with a local connection of highest priority is given to a person that has lived in the parish or adjoining one for at least 3 consecutive years and has previously lived at any time in the parish for 5 years or more or <u>are employed</u> in the parish or adjoining parish or has a family member who has lived for at least 5 consecutive years in the parish or adjoining parish. The criteria are then cascaded out reflecting the need to give priority by current residence, former residence, and employment and family connections. Further detail can be found in the Local allocation's agreement. Irrespective of the comments above on the District council's affordable housing allocation policy, the agreement already provides preference criteria which address the issues of connection and work but in such a way that it is operable, fair and deliverable</p>	

WNS2	<p>Paragraph 1 – this is contextual rather than operational and should be moved to the supporting text. The allocation is for the plan period. The reference to 2036 is superfluous</p>	<p>Delete para 1 from the policy and move to the supporting text. Remove reference to 2036</p>
	<p>Paragraph 2 -Questioned if a site allocation policy can allocate and restrict development of the site to a specific type of developer. Eg a community led housing group. In addition, it is questioned if a community group could finance the delivery of such a large scheme independently and without partnership and it would be better to word the policy so as to allow for a partnership between local community led housing groups and other organisations. This would help ensure the site is delivered.</p> <p>Altering the text to allocating specifically for <u>affordable housing</u> will address this issue and ensure more flexibility in delivery and ensures the policy focus is on the use of land. The policy also then aligns better with the intentions stated in para 5.37.</p>	<p>Amend the policy as below:</p> <p>A site of approximately 1.89ha at Two Furlong Hill (as defined on figure 27) is allocated as a Community Led Housing for affordable housing development for a minimum of 45 dwellings and associated infrastructure.....</p>

	<p>The reference to the number of dwellings is repeated elsewhere in the policy – repetition should be removed.</p> <p>The supporting text could usefully set out the expectation of the landowner around development through a CLT.</p> <p>Given the steer in the policy to para 5.37 it is clear that the intent here is to use the NPPF definition of affordable housing and not restrict occupation to the same rigour as any CLT approach.]</p> <p>Criteria k – re appropriate contributions to mitigation measures in the GIRAMs. The phrasing in this policy criteria aligns and is consistent with the advice given and this response and is supported.</p>	
WNS3	<p>2nd para re foot note 24 and ref to HELAA- the HELLA does not provide evidence of need. Reference should be deleted.</p>	<p>Re foot note 24: amend as below:</p> <p>This can include the Housing Vision Needs Assessment any HELAA or District level information</p>
WNS3	<p>2nd para – the use of the word, “as appropriate” suggests an element of flexibility in the policy application. Such ambiguity should be removed. Note that the Local Plan submitted policy HOU2 requires the same mix of not less than 50% two and 3 bedroom properties but goes further in stipulating that this is then provided as approx. 20% two bed and 80% 3 bed</p>	<p>Amend text as below:</p> <p>should, as appropriate, include elements of the following:</p>
WNS3	<p>Third bullet (accessibility of housing) – general comment – in this case the Local Plan adds more detail to this requirement through the use of minimum space standards and the use of M4(2) and M4(3) accessible and adaptable homes. the wording as written does not add any further local distinction apart from the general reference to bungalows</p>	<p>Consider removal of third criterion.</p>
WNS3	<p>4th bullet - To be in compliance with strategic policies the Council requires a split of 80% social rent and 20% low-cost home ownership. This has been tested through up-to-date viability appraisals that support the Local Plan.</p>	<p>Delete and amend as detailed below in next comment.</p>
WNS3	<p>5th bullet – The clarification that first homes should be a maximum of 25% is welcomed and this is in general conformity with the emerging Local Plan (policy HOU2) and national policy however it remains that it is considered unhelpful and unnecessary repetition to reinforce</p>	<p>Replace third para and bullet 4 and 5 with:</p> <p>Where affordable housing is proposed as part of a wider scheme it should principally comprise the following:</p> <ul style="list-style-type: none"> • 60 per cent Social and Affordable Rented

	<p>national policy and emerging Local Plan policy through reference in this way to the tenure split and in particular first homes in this policy.</p> <p>It is considered that it raises issues which will undermine the aims of the neighbourhood plan and the Council's flexibility around delivery as well as introduce unnecessary conformity issues and ambiguity that should not be left to be resolved at application stage or through the adoption of the submitted Local Plan.</p> <p>The direct reference to the use of first home is considered not desirable or required in the policy or Wells and as such the section of the policy should be removed and replaced with wording that reinforces the need to deliver a policy compliant amount of affordable housing which then would reinforces the requirement to maximise the delivery of affordable housing.</p> <p>A more contextual explanation is provided in the commentary below</p>	<ul style="list-style-type: none"> ● 40 per cent Affordable Routes to home ownership consisting of: <ul style="list-style-type: none"> ○ Up to 25per cent First Homes (of the overall total) ○ 15per cent Shared Ownership (of the overall total). <p>On site provision of the highest proportion of affordable housing will be provided. As a minimum this should be in line with the requirements of the local Plan.</p>
<p>5.40</p>	<p>Correction amend reference to planning practice guidance as being policy – it should be corrected to guidance and the explanation updated</p>	<p>In terms of affordable homes, 25per cent are required to be First Homes (in line with Government policy) the national Planning Practice guidance provides a recommendation that 25% of affordable housing should be First Homes</p>
	<p>First homes explanation</p> <p>In high value areas such as Wells, First Homes are unlikely to be affordable to many first-time buyers as a 30% discount on the market price is in all likelihood still unaffordable. As such the use of first home is considered not desirable in Wells or the wider district. It is expected that First homes will also not be profitable for developers and as such the inclusion of them in schemes will affect viability and, in all likelihood, reduce the amount of affordable housing on any given site. This approach would be against WNP and NNDC aims and objectives. We accept that first home is included as an affordable product in the NPPF.</p> <p>The requirement for at least 25% to be first home sits in the Planning Practice Guidance. Paragraph: 001 Reference ID: 70-001-20210524, but this is guidance and not policy. We would prefer more flexibility around the types of affordable housing to maximise the benefits at a local level and have previously advised the steering group not to include this requirement in the policy not least as it is a repetition.</p> <p>Amending the policy in such a way would allow the Council to apply a level of balance and judgment to each application around the type of housing and ensure this is better aligned to the need. If the policy wording is left in as written, then there is risk that as the LPA we would be compelled to seek 25% first homes in all applications. The added downside of this approach or risk is that it may negatively affect viability and thus reduce the amount of overall affordable housing we could permit. Its continued use in the Np policy raises a serious conformity issue which could and should be avoided.</p>	

<p>WNS3</p>	<p>4th paragraph re local occupancy has little to do with the policy title of housing mix</p> <p>The approach in para 4 without amendment is in direct conflict with the strategic policies of the Council as well as other policies of the np. It is also confusing and utilises incorrect terminology, adding little or no local distinction or cascade. The wording is considered flawed and perpetuates a misunderstanding of the current approach to local connection used in exception development.</p> <p>National planning policy and guidance states that neighbourhood plans <i>should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies</i> (see paragraph 13 and paragraph 29 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan or spatial development strategy¹.</p> <p>In terms of exception development, the Council’s Local Allocations Agreement includes 7 criteria which provide a basis for determining priority between applicants for affordable housing including low-cost home ownership products <u>based on their local connection to the parish in which a property is located and the adjoining parishes</u>. The Local Allocations Agreement gives preference to applicants with strong local connections to the parish in which the property being allocated is located and the adjoining parishes equally. This is because there will be some towns or villages which have very little affordable housing stock and some towns and villages where it will not be possible to develop new affordable housing because of constraints including sensitive local environments, coastal erosion, flooding and lack of available land. It is essential that applicants with strong local</p>	<p>Amend as detailed below:</p> <p>Outside Community Led development the occupation of all new affordable housing in the Neighbourhood Planning Area shall be limited to eligible households with a local connection to the Parish of Wells next the Sea or adjoining parishes (excluding the strategic allocations in the Local Plan) if at the time of letting there are no eligible households with a local connection, and/or the pool of eligible applicants with a local connection has been exhausted, occupancy shall be in accordance with the District Council’s Housing Allocation scheme Local Allocation Agreement</p>
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¹Paragraph: PPG: 044 Reference ID: 41-044-20190509 Revision date: 09 05 2019

	<p>connections to such towns and villages are not disadvantaged as a result. Shortlisting is undertaken based on the strength of local connection, with applicants with the strongest connections shortlisted above those applicants with lower connections. Further detail on this can be seen in the Appendix A to this response.</p> <p>Outside exception development all other affordable housing is seen as contributing to “general needs affordable housing” i.e the district need that the Local Plan seeks to meet in full, and the exclusion of the Local Plan strategic allocations in this respect is welcomed as they form a significant part in meeting the strategic needs as set out in the Local Plan.</p> <p>Subject to clarifications that outside community led development and the continuation of the exclusion of the strategic allocations, affordable housing could be limited to those with a local connection to Wells and surrounding rural parishes as defined in the Local allocations Agreement in the NPA. This approach would effectively apply the current exceptions policy approach to schemes outside the settlement boundary to all affordable housing inside and outside the settlement boundary adding a level of local distinction to help address local need that in the case of Wells Next the Sea could be considered to be justified and the policy as amended be considered to be in general conformity.</p> <p>In association with this amendment para 5.77 is also objected to and will need to be amended as detailed below</p>	
<p>5.71</p>	<p>The Council’s approach is to implement such policies through planning conditions and a s106 agreement. The additional legal obligation is required to draw the occupation restriction to the attention of future purchases, assist in the enactment and enforcement of the policy / condition should the property be subsequently sold and brings in the requirement for prior confirmation that the conditions of occupancy have been met. This is required to ensure the process works in perpetuity.</p> <p>Change bullet 2 for clarity and consistency in implementation</p>	<p>Bullet 2 - The policy will be implemented through the imposition of a planning condition or and legal agreement to ensure future occupiers are aware of the restriction and will need to satisfy the condition before occupation.</p> <p>Bullet 3 - Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or and condition and be obliged to provide this proof on the such information as the Local Planning Authority may reasonably require</p>

	<p>Change bullet 3 to align with councils' advice and practice. Combine with amended bullet 4 as detailed opposite.</p> <p>In line with required clarifications to WSN4 criteria 5, bullet 4 of para 5.41 also requires amending. There are discrepancies between the policy criteria and the text and in any case It is not considered appropriate to verify principal residency through the attendance of a minor at the school and or registration for health services. It must be linked to the owner of the property. For reasons of clarity and alignment with best practice amended text is required</p>	<p>in order to determine this condition is being observed on the written request of the District Council within 14 days.</p> <p>Bullet 4 – delete bullet 4 and combine with bullet 3 to align with councils' implementation and WSN4 Proof of residency can include being registered as an elector, and for local services such as health care.</p>
<p>5.77/WSN4</p>	<p>The exclusion of the strategic allocations from policy WNS4 is supported. The strategic allocations are there to also address wider district need including general needs affordable housing as evidenced through the Strategic Housing Needs Assessment and as such sit outside WNS4 and or the amended approach suggested.</p> <p>This comment should be read in conjunction with commentary on WNS4 below.</p> <p>The alteration and additional text that has been inserted into the submitted draft plan at para 5.77 has been done without consultation and the knowledge of NNDC and is objected to on a number of grounds specifically due to the conflict with the strategic local plan allocation:</p> <ul style="list-style-type: none"> • seeks to specify the specific numbers (incorrectly) of the submitted local plan strategic site dwellings, • seeks to stipulate the affordable housing mix on the submitted local plan strategic sites, and • seeks to reserve a specified number of dwellings to be developed by a specific local housing provider. • Not adequately justified or evidenced. <p>As a further amendment and or consequential change the text detailing the housing split ambition detailed in para 5.77 will need to be removed from the Plan. The text does not meet the basic conditions, is not in conformity with the submitted local plan and</p>	<p>Delete para-5.77.</p>

	<p>seeks to impose an obligation onto a strategic allocation which cannot be done. It is also considered outside the boundaries of neighbourhood planning and introduces significant ambiguity with the way it has been inserted into the body of the supporting text.</p> <p>It should be noted that the two strategic sites submitted as part of the emerging Local Plan have also undergone public consultation and any unresolved objections that will be resolved through local plan examination including but not limited to the objection on the principle of allocation by Wells town council. Such objections are best left to the Local Plan examination, and it is outside the scope of neighbourhood planning to seek changes or impose considerations to the submitted Local Plan in this way.</p>	
<p>5.78 (WNS4)</p>	<p>Para 5.78 – inconsistency with the text of policy WNS4 delete like for like so that the text matches that in policy WNS4</p> <p>This comment and change should be read in conjunction with commentary on WNS4 below and above.</p> <p>Due to the deletion of para 5.77 and the intention of policy WNS4 to exclude the strategic allocations from the policy requirements further clarifications and consequential change are required - amend the paragraph to clearly state the policy WNS4 does not apply to the strategic allocations.</p> <p>Clarification should also be added to para 5.78 around its exclusion to those new properties brought forward through PD rights stating that the approach can only be applied to development that <u>requires</u> planning permission.</p> <p>Further explanation could be added to the text as a consequential change in order to explain further the limitations and the advent of PD rights. If left unchecked the plan will provide an incorrect impression to any influence it may have.</p>	<p>Para 5.78 amend wording for consistency with policy and reasons of clarity.</p> <p>Para 5.78- Policy WNS4 will apply to all other new housing that requires planning permission outside the strategic allocations in the local plan and subsequent revisions (except like-for-like replacements) including those newly constructed or created from changes of use and/or the conversion of existing buildings. The policy also extends to Affordable Housing to ensure that even if a property/dwelling becomes open market housing through staircasing or the right to buy, it will still be occupied by full time residents.</p>
<p>WSN4</p>	<p>General comment: The council does not support the introduction of principal residency policies for a number of reasons and not least as it</p>	<p>Consider adding further contextual text as suggested.</p>

	<p>believes that unintended consequences of the approach is that it will push demand into the existing properties which are often the smaller more traditional properties ideally suited for first time buyers and those on a low income. As such the approach may in time be counterproductive to the overall aims and ambitions of the np. Nevertheless, it has been established that neighbourhood plans can include such a requirement as long as justified adequately that the approach will contribute to the achievement of sustainable development.</p> <p>It's recognised that Holkham estate as site owners of the majority of suitable and available sites in the parish and their objection to the use of the principal residency on sites in their ownership. This includes a controlling covenant on the WNP allocation WNP2 but where it is understood an agreement in principle has been reached. As such they are key partners to the delivery of growth in the parish for both the NP and the Local Plan. Given this it is understandable that a compromise approach has been reached around WNS4 and the exclusion of the np draft policy in relation to the strategic sites contained in the local plan.</p> <p>Reference for clarity to this though would be useful in the supportive text for wider understanding around the local circumstances and a clearer steer is required in the policy wording as suggested above</p>	<p>Add clarity to the policy with regard the last para and areas of policy exclusion – see policy amendment set out below.</p>
<p>WNS4</p>	<p>The policy is poorly written and includes unnecessary contextual text that is better suited to the supporting section of the neighbourhood plan. The definition should be altered to align better with the intended use and for consistency across other neighbourhood plans. The policy should be restructured to resolve ambiguity issues and aid implementation. The last part of the policy that seeks to determine the specific type and tenure in the submitted Local Plans' two allocations is objected to.</p> <p>It is not considered appropriate to verify principal residency through the attendance of a minor at the school. It must be linked to the owner of the property.</p>	<p>Amend the plan for consistency and clarity as detailed above in relation to para 5.77 and 5.88 . Amend the whole policy as detailed below.</p>

	<p>The last part of the policy is beyond the remit of the np. Not least as the np is being tested against the adopted Local Plan. It is also not possible to determine the strategic content of the emerging Local Plan in this way or provide alternatives to the council’s Housing Strategy or reserve housing development for a named provider. As such these elements of the policy and further paragraphs 5.77 and 5.78 are considered not to meet the basic conditions and be removed</p>	
<p>WNS4</p>	<p>The policy should be restructured and worded for clarity.</p> <p>Replace WSN4 with:</p> <ol style="list-style-type: none"> 1. All new open market housing outside the strategic allocations of the Local Plan (excluding replacement dwellings) permitted within the Neighbourhood Area will be restricted to ensure its occupancy as a Principal Residence. This relates to first and future occupation of the dwelling. This is to ensure that there is a supply of new housing for occupation by local people and to address the growth of dwellings used for holiday accommodation (either as a second homes or as holiday lets) which impacts upon the overall balance and sustainability of the settlement. 2. Principal Residence is defined as those occupied as someone’s main or sole residence where the residents spend the majority of their time when not working away from home:- 3. Proposals for holiday accommodation will not be permitted unless located on an established holiday complex. 4. These restrictions will be secured prior to the grant of planning permission through appropriate Planning Conditions or Planning Obligations created and enforceable under section 106 of the Town and Country Planning Act 1990, or any subsequent successor legislation. 5. Proof of residency can include being registered as an elector, and for local services such as health care, schools etc. Occupiers of homes with a Principal Residence condition will be required to keep proof (add footnote to policy) that they are meeting the obligation or condition, and be obliged to provide this proof on request of the North Norfolk District Council if/when North Norfolk District Council requests this information. <p>These restrictions will be secured prior to the grant of planning permission through appropriate Planning Conditions or Planning Obligations created and enforceable under section 106 of the Town and Country Planning Act 1990, or any subsequent successor legislation.</p>	

	<p>Note: This policy does not apply to the strategic allocations W01/1 at Ashburton Close and W07/1 at Holkham Road as identified in the emerging Local Plan as submitted in May 2023, subject to the provision of the proposed intermediate rented housing outlined in paragraph 5.76 above.</p> <p>Footnote to policy</p> <p>Foot note Proof of principal residency is via verifiable evidence which could include, for example, but not limited to residents being registered on the local electoral register.</p>	
WNS5/ 5.81	<p>The reference to such infill development would also be subject to policy WNS6 is not necessary however it provides the reader with some partial context which should be expanded on to provide the fuller picture and link into the amended policy below (last sentence).</p>	<p>last sentence in para 5.81 Such development would also be subject to Policy WNS6 and have regard to the Wells-next-the-Sea Design Guidance and Codes and the Character Appraisal</p>
WNS5	<p>In general, the criterion set out in the policy are largely covered in national and existing and emerging Local Plan policies (adopted plan policies EN4, EN8, CT5, CT6) and emerging policies (ENV6, ENV7, ENV8, CC9, HC7) and are also covered in the adopted North Norfolk Design Guide, SPD. Specific comments concerning the policy criterion for infill development, are as follows:</p> <p>The first sentence in the first paragraph is not related to the policy title and covers strategic matters which are outside the remit of neighbourhood planning and implies a level of control that the plan cannot control. It also implies that the neighbourhood plan and this policy <u>has identified specific sites for infill development</u> – it has not.</p> <p>As written the paragraph goes on to deliberately seek to restrict the extension of residential development outside the settlement boundary, which is not in conformity, wholly or partially with Core strategy policies EC2, re use of buildings in the countryside, SS2, Development in the countryside and HO3 affordable housing in the countryside plus a number of the emerging local plan policies and PD rights.</p> <p>The reference in the first paragraph to the focus of new housing development being limited to the <u>existing</u> adopted settlement boundary ignores the fact that the boundary will change on adoption of this neighbourhood Plan (incorporation WNS2) and also on</p>	<p>Delete first para The scale of new housing within the Neighbourhood Area will reflect the position of the town within the overall settlement hierarchy for the district as ‘a small growth town’. The focus of new housing development over the plan period will be on specifically identified sites or infill development within the existing adopted settlement boundary.</p> <p>or at the very least amended as below:</p> <p>The scale of new housing within the Neighbourhood Area will reflect the position of the town within the overall settlement hierarchy for the district as ‘a small growth town’. The focus of new</p>

	<p>adoption of the submitted local plan, The policy would have a very short life span as written.</p> <p>The para also implies that new infill and extensions will be on “specifically identified sites or infill development”. the policy does not identify any such opportunity sites and is misleading.</p> <p>As such the whole paragraph should be deleted and at the very least amended as below:</p> <p>The scale of new housing within the Neighbourhood Area will reflect the position of the town within the overall settlement hierarchy for the district as ‘a small growth town’. The focus of new infill housing development over the plan period will be mainly on specifically identified sites or infill development within the existing adopted within the identified settlement boundary of Wells Next the Sea.</p> <p>Much of the remaining policy is two general, brings no local distinction and is a repetition of what is already in the development plan. Amendments to each of the criterion are detailed below to avoid ambiguity, and bring clarity and focus to the plan:</p>	<p>infill housing development over the plan period will be mainly on specifically identified sites or infill development within the existing adopted within the identified settlement boundary of Wells Next the Sea.</p>
<p>WNS5</p>	<p>a) Requires the enhancement of the form and character of the street scene. This requirement would be stronger than that enshrined in legislation and the NPPF (para. 206) when applied across the whole parish. As such, the wording will need to be amended to accord with planning legislation and the NPPF.</p> <p>b) How would this criteria be applied if the surrounding properties are of differing materials, scale, massing and/or layout? Particularly as the criteria requires that a proposed infill dwelling should reflect all of these elements for all of the surrounding properties. In any event, these matters; materials, scale, massing and layout, are already covered by national guidance and existing and emerging local plan policies and the NNDC Design Guide.</p> <p>c) This repeats parts of a. and b. but adds height as a new matter for consideration. All matters are already covered by national</p>	<p>Amend wording to accord with planning legislation and the NPPF:</p> <p>a. Enhance the form and character of the street scene into which it will be inserted Conserve, and where possible, enhance the form and character of the street scene.</p> <p>b. Delete criterion.</p> <p>c. Delete criterion.</p> <p>d. Delete criterion.</p> <p>e. Delete criterion.</p> <p>f. Provide a safe vehicular access which would not have an unacceptable detrimental impact on highway safety. Provide sufficient car parking within the curtilage of the site appropriate to the size and type of dwelling to reduce the need for on street car parking and indiscriminate parking</p> <p>g. Have on site parking which would be provided in accordance with adopted highway standards. Vehicular parking should be provided in line with Local plan adopted standards</p>

	<p>guidance and existing and emerging local plan policies and the NNDC Design Guide-</p> <p>d) This matter is already covered by national and local plan policies.</p> <p>e) This matter is already covered by national and local plan policies.</p> <p>f) This matter is already covered by national and local plan policies.</p> <p>g) The council have adopted standards (in this case those of NCC) The requirement also conflicts with the Design Guidance and Design Codes document at DC.2.2 – Residential parking (i), which states 'Vehicle parking should mainly be provided on-site. In general, the approach to the provision of parking should be flexible.....' As such, the criteria should be amended to accord with this supporting document, as well as local plan policies.</p> <p>Extensions</p> <p>The criterion set out in the policy are largely covered in national and existing and emerging Local Plan policies (adopted plan policies EN4, EN8, CT5, CT6) and emerging policies (ENV6, ENV7, ENV8, CC9, HC7) and also covered in the North Norfolk Design Guide. Specific reference to holiday accommodation is confusing in relation to extensions in the policy wording and should be removed. Applying the approach to meeting <u>all</u> criteria would exclude a significant number of dwellings in Wells, given the character of the town and would not allow the flexibility envisaged in the NPPF.</p> <p>Specific comments concerning the policy criterion for extensions are as follows:</p> <p>h) This matter is already covered by national and local plan policies (see above).</p> <p>i) This is a repeat as it is covered in Policy WNS11 – Protecting the Historic Environment. In addition, the matter is already covered by national and local plan policies (see above).</p> <p>j) The matters are already covered by national and local plan policies (see above). The specific requirements of the criteria are unjustified and should be removed.</p> <p>k) This matter is already covered by national and local plan policies (see above).</p> <p>l) This matter is already covered by national and local plan policies (see above).</p>	<p>Remove duplicated criteria that are covered in existing and emerging local plan policies or if retained, refer to how they are worded in the local plan, to avoid conflict and diluting the intention. Better still, these criteria should be focussed on local considerations evidenced in the character appraisal. Without which there is no local consideration brought through the np.</p> <p>If retained, these needs justifying and improved phrasing adding further local considerations.</p> <p>Consider rephrasing.</p>
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	<p>m) Requiring sufficient on-site parking would not provide the flexibility needed to assess the individual circumstances of a proposed extension as set out in existing and emerging policies. The requirement also conflicts with the Design Guidance and Design Codes document at DC.2.2 – Residential parking (i), which states 'Vehicle parking should mainly be provided on-site. In general, the approach to the provision of parking should be flexible.....'. The wording also conflicts with WSN6(f) which states <i>where practical parking should be provided off- street</i> As such, the criteria should be amended to accord with this supporting document, WNS6, as well as local plan policies.</p> <p>Reflecting the character of wells, not all extension proposals would be on properties that currently have off street parking (or that could be provided) as such this criterion is restrictive and not positively prepared.</p> <p>n) This matter is already covered by national and local plan policies (see above).</p>	<p>Proposals should where practical retain sufficient car parking within the curtilage of the site appropriate to the size and type of dwelling</p>
<p>WSN5</p>	<p>Clarification re GIRAMS: replace last para re GIRAMS with revised text HRA text for consistency and alignment.</p>	<p>To avoid adverse effects on the North Norfolk Coast SPA / Ramsar / SAC all residential development will need to satisfy the requirements of the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS). This will include adequate provision of adequate and proportionate Green Infrastructure and adequate financial contributions towards the mitigation measures identified in the GIRAMS</p> <p>Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)</p>
	<p>Last sentence is unnecessary, WNS0 requires amendment see above, and in any case, this is a duplication - reference to it is already</p>	<p>Delate -See also Policies WNS0, WNS6 and the Design Guidance and Codes.</p>

	covered in the para above (as amended) and should be delated. reference to the consideration of other relevant policies is already coved in the supporting text at para 5.81 (as amended) and is not relevant as Planning law requires decisions are based on the on the Development Plan as a whole. The contextual remark is replaced by enhanced commentary at 5.81 as set out above)	
Para 5.87/ 5.88	Paragraphs 5.87 and 5.88 refer to national policy in relation to design but omit to refer to the existence and role of the existing and emerging local plan policies and the North Norfolk Design Guide adopted SPD that clearly reflect the NPPF and PPG in relation to design matters. As such, it appears to the reader that no regard has been or should be given to this tier of planning policy and guidance in decision making and as such is misleading.	Add reference to existing and emerging local plan policies and the North Norfolk Design Guide, which is an adopted SPD.
Para 5.89	Paragraph 5.89 should make proper reference to the supporting document, giving its full title and date produced – Wells-next-the-Sea Design Guidance and Codes Final Report (February 2022).	Add full reference to the Wells-next-the-Sea Design Guidance and Codes Final Report (February 2022).
Para 5.91 – 5.94	Perhaps missed opportunity to detail in these paragraphs the full complement of the existing design guidance available. In addition, it would be helpful for these paragraphs to summarise the matters that the Wells next the sea design guidance and codes cover.	Add summary of the matters that the design guidance and codes cover. i.e DC1- DC9 Overall, for clarity it would be better for this section and policy to only reference the matters contained within the Wells design guidance and codes evidence document
Para 5.95 – 5.97	Any details of consultation events are better placed within an Appendix and in any case should be reproduced in the consultation statement in order to be transparent. Note: evidence of consultation is only evidence that consultation has taken place, not evidence that justifies or substantiates an approach. Paragraph 5.97 omits any mention of local planning policies and design guidance, which will give the reader a false sense of the full suite of formal design related planning policies and guidance present at this local government level.	Include reference to existing and emerging local planning policies and NNDC design guide SPD. Add to para.

	<p>For consistency, clarity, and completeness, it would be helpful to add text making it clear the extent of guidance available in addition to this Np policy.</p>	<p>..... applicable to all new development irrespective of size and type (e.g. residential extensions, conversions, changes of use and non-residential developments). The policy requirements should be considered along with the national policy, the Local plan design policies and the adopted /emerging Design guidance published by NNDC.</p>
WNS6	<p>Correct Typo Well-next-the-Sea Design</p>	<p>Wells-next-the-Sea Design Guidance and Codes and the Character Appraisal</p>
WNS6	<p>In general, the criterion set out in the policy are largely covered in national and existing and emerging Local Plan policies (adopted plan policies EN4, EN6, EN8, EN9, EN10, CT5, CT6) and emerging policies (CC3, CC10, CC11, CC12, HC2, HC7, ENV6, ENV7, ENV8, CC9,) and also covered in the North Norfolk Design Guide.</p> <p>The criteria appear to summarise some selective elements of the design codes and parameters set out in the supporting Design Guidance and Codes Final Report. The Wells next the sea Design guidance and codes sets out 9 high level design codes each set around a specific topic and each which contain individual subsets addressing certain design areas and labelled DC- - DC 9. The matrix on page 41 identifies the character areas to which the codes relate. The policy does not follow this evidence and only seeks development to have accord with a select few codes and in some case only a select few sub codes. It is unclear why only some of these have been selected and why the many others have been left out of the policy. It is considered that a) all the guidance and design codes/ matrix needs to be referenced in the policy and b) the policy introduces significant ambiguity as written and is in conflict with other policies in the np which specifically mention adherence to the design guide as a whole. c) in order to avoid the significant length, omission and duplication of the design code details and findings, the policy wording should require demonstration of how a proposal has addressed the design matters identified within the relevant character area where the site is located as set out in the matrix on pages 41 and 42 of the document).</p>	<p>Recommend change</p> <p>The design of all new development in Wells-next-the-Sea will reflect the local distinctiveness and character of the town and seek to enhance its quality.</p> <p>Proposals should have regard to the guidance contained in the and demonstrate how they have addressed the design matters and relevant design codes identified within the relevant character area where the site is located in line with the Wells-next-the-Sea Design Guidance and Codes and the Character Appraisal 2023 contained therein.</p> <p><i>Add footnote in policy to ref matrix on page 41.</i></p> <p>Delete the rest of the policy</p> <p>Optional include the New development should accord with the following:</p> <p>a—e....</p> <p>apply consequential changes by detailing DC1- DC9 (<i>as identified on page 40 of the evidence document</i>) and the matrix (detailed on pages 41-42 of the supporting document) to supporting paragraphs above the policy or a add a separate appendix</p>

As written, whilst the opening sentence states that the design of all new development '**will** reflect the local distinctiveness', it then goes on to say that 'consideration **should** be given' to the Guidance and Design Codes document. Such wording will not require an applicant to demonstrate any adherence to it. In addition, some of the criteria cover matters that could ideally have formed separate policies, for example, regarding SuDS, biodiversity and open space. However these areas are already covered in the strategic policies of the Local plan where they are also covered in more detail. As such officers would not like to add any further duplication and ambiguity needs to be removed.

To resolve these issues and to evoke the whole of the design guide into decision making it is recommended the policy wording is altered to that that requires that proposals **must demonstrate how it has addressed the design matters identified within the relevant character area** where the site is located (see matrix on pages 41 and 42 of the document).

Consequently, therefore, the details of the design matters copied from the design code will not need to be duplicated in the policy itself and should be deleted.

This will add clarity, make the policy locally distinctive, remove conflict and confusion with the local plan, and address the seemingly random selection of design codes selected for inclusion in the policy.

Useful reference to each code and the matrix on page 41 could be added in the supporting text for greater clarity, and simplicity of use, or an appendix added to the plan listing all the design code DC1 – DC9.8. as detailed on page 41 of the evidence document. Such a change would be considered necessary only as a consequential change to supporting text should the policy be amended as suggested.

This will add clarity, make the policy locally distinctive, remove conflict and confusion with the local plan and other wnp policies and help make the policy effective by evoking the whole design code evidence and allow the local planning authority to apply it.

	<p>It is considered that there is no need to list the criteria but that the policy would be better to simply refer to the evidence contained in the submitted Design Guidance and Codes document as part of the plan or the relevant sections added as an appendix to the NP.</p> <p>Irrespective of the above comments are made separately on each criterion listed in the policy.</p> <p>As set out below the criteria are contained within this supporting design code document:</p> <ul style="list-style-type: none"> a. Contained in design code DC.1.1. b. Contained in design code. DC.1.2 c. Contained in design code. DC.1.2 d. Contained in design code. DC.2.1 e. Contained in design code. DC.2.1 f. Contained in design code. DC.2.2. This partly repeats points g. and m. in policy WNS5 and as it would apply to all development here, g. Contained in design code. DC.6.1. The absolute requirement for no development above two stories set out in first sentence of this bullet is considered unduly restrictive, as whilst such a height restriction would generally be the case, there are locations within the town where more than two storeys would serve a useful purpose (e.g. as a focal point) or where it would be in keeping with its surroundings (e.g. if the undeveloped site on the Quayside comes forward). h. Contained within design code. DC.6.2 i. Contained within design code. DC.6.4 How can density enhance the character of the existing settlement? Suggest amending wording to say 'in keeping. 	<p>Irrespective of the above, comments are made separately on each criterion.</p> <p>F - it is suggested that the parking criteria is clarified in policy WNS5 as suggested above to remove conflict between np policies and this criteria concentrate solely on the design feature. Parking: Parking should be provided off street, where practicable and designed to combine with landscaping to minimise the presence of vehicles and include provision of cycle parking and storage. Parking areas and driveways should be designed to minimise water run off through the use of permeable paving.</p> <p>G - The addition in this version of the plan of the clarifying text "unless this can be justified " is welcomed. However, a more appropriate wording may be to say "in keeping" with the character area and add this to the last sentence removing the earlier reference Consider: Development should be of a scale and design to reinforce the locally distinctive character of the area and shall be no more than two storeys high unless this can be justified..... For buildings over 2 storeys, the design shall demonstrate how heights of development will be in keeping with the character area and not be over-bearing</p>
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	<p>The criteria require some amendment in order to clarify that a proposal ‘positively contributes’ and that materials ‘should’ reinforce and ‘be respectful of’ local distinctiveness.</p> <p>j. Contained within design code. DC.7.1. Note, as written, this will lead to a proliferation of existing neighbourhoods, good or bad which is considered not in line with the np ambitions.</p> <p>k. Contained within design code. DC.8.1.</p> <p>l. Contained within design code. DC.8.2</p> <p>m. Contained within design code. DC.9.1.</p> <p>n. Contained within design code. DC.9.5</p>	<p>or dominant in the existing street scene and on the overall townscape.</p> <p>I - should be appropriate to the location of any new development and its surroundings and be in keeping with enhance the character of the existing settlement.</p> <p>J -consider rephrasing so development reflects the rich heritage of the and distinctive character and identity of Wells</p> <p>k. Consider open space as a separate policy or link with LGS policy given the number of elements to it.</p>
	Employment and retail	
6.5	<p>Correction The sites below are <u>not</u> identified in the existing Local Plan under EMP23 and E2.</p> <p>Site 1 is a plot that lies within the designated employment site EMP23 which is continued into the emerging local plan where policy E2 of the emerging local plan is a relevant consideration.</p>	<p>Delate incorrect texthowever there is scope for well-designed and sustainable schemes to come forward on each site, and a mix of uses is encouraged to enable that to happen. The sites below are identified in the existing Local Plan under EMP23 and E2.</p>
6.6	<p>Clarification site 1 – land south of Maryland is part of a current strategic employment land identified as EMP23 on the policies mapping and comes under policy E2 of the local plan</p>	<p>Amend text Site 1 - Land south of Maryland. Site lies within a designated strategic employment site EMP23 in the emerging Local Plan and continues to be has been identified for ‘employment generating development’ in the emerging Local Plan</p>
6.6	<p>Site 2 is that of the former public house which has now been demolished and is subject to a Lawful Development Certificate application for use as a carpark. Application CL/23/1307. The demolition permission 19/0688 was not tied to any redevelopment of the site. The application has an agreed extension of time for determination of 27.10.2023. The accompanying proposal states that this is accompanied by a letter of support from the town council which establishes its historical use as a car park and confirms that Town Council has no objection to the further improvement of this car park.</p> <p>With regard to the car park lawful use matter, if this was to be accepted this would not prevent the possibility of an application to</p>	<p>Para 6.6 amend para accordingly with relevant consequential changes – see WNS7 commentary below</p>

	<p>redevelop the site coming forward that could comply with the development plan and the emerging np policy. Although the NP wants to support the redevelopment of the site it does seem to clash with what the town council are saying in support of the use of the site as a car park.</p> <p>The site is subject to a pre application advice under DE21/20/0006. which concludes that the scheme as proposed (principally residential/retail) would not be considered acceptable (to the LPA) as it has not taken into account neighbouring development and is considered to be overdevelopment. The pre application advice advised that the proposal is not considered to accord with Policies EN 4, EN 5, EN 8, HO 2, CT 2, and CT 6. However, in the advice it is states that the Council have no objections to the re-development of the site for a combination of retail and residential development, provided that the proposal is for a much smaller scale for the residential part of the scheme.</p> <p>It appears that the pre application advice as referenced in the policy as footnote 36 is the sole justification for the policy use restrictions. It is considered that this does not provide the justification for the np policy to specify the uses, and this should be justified through supporting evidence. It's noted that the consultation feedback detailed in para 6.3 opinion states that it should be redeveloped for affordable housing. The site is also subject to flooding and is identified in flood zone 3 (see fig 16)</p> <p>Nevertheless, the council have no objection in the np identifying the site for mixed uses including residential on the upper floors provided that the policy is amended to reference appropriate scale of development. The preapplication advice does not provide the justification and for clarity all references to it should be removed from the policy.</p>	
WSN7	<p>Site one – the policy adds an element of local distinction by seeking to support residential use on the upper floors of the existing Strategic Employment site EM23. The approach however is in conflict with the</p>	<p>The policy has been amended to include the addition of a requirement for a flood assessment however the approach needs to be considered in line with national policy and reflect national</p>

	<p>specified strategic use with the addition of residential use on upper floors and potential reduction in strategic employment. This may well aid viability and delivery but in relation to the residential element its suitability / deliverability is questioned given the classification of residential as a “More Vulnerable use” and requirements to be informed by the sequential and exception testing in line with national flood policies and consideration of amenity. The site is in flood risk zones 2 and 3a where technically residential development should not be permitted in accordance with the Flood Risk vulnerability and Flood zone “incompatibility” table Flood risk and coastal change - GOV.UK (www.gov.uk)</p> <p>The reference to open market and affordable housing is not necessary but could be changed to align with and reinforce the NP aims and ambitions and worded to seek to deliver the maximum amount of affordable housing as this is the aim of the NP</p>	<p>guidance to development in flood zones its questioned if the approach can be justified.</p> <p>Consider amending working to</p> <p>(open market and affordable) <i>replace with maximising affordable housing</i></p>
WSN7	<p>Site 2</p> <p>As stated above re para 6.6 footnote 36 and the councils pre application advice should not be used to provide the justification for the policy approach and reference to it should be removed. However, there are no objections to the re-development of the site for a combination of retail and residential development, but on a much smaller scale for the residential part of the scheme.</p> <p>In line with the plans aims should the policy not align with the requirement to maximise affordable housing</p>	<p>Site 2: Land on south side of Freeman Street (former Ark Royal Public House) which is identified at an appropriate scale for a mix of uses including Commercial and Business Uses (Class E) and Retail (F2a and E(a)), with some residential and associated parking(footnote36)</p> <p>Delate Footnote 36 DE21/20/0006 – Application number.</p> <p>consider adding into the policy. <i>where proposed, residential development should maximise the amount of affordable housing.</i></p>
WSN7	<p>Amend last para GIRAMS text for consistency.</p> <p>GIRAMS is only payable in relation to qualifying development in relation to overnight accommodation with regards residential and tourism development</p>	<p>Proposals should also make appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).</p> <p>Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)</p>

<p>WSN8</p>	<p>To be in line with the adopted (policy EC5) , and emerging strategic, (policy E4), and national retail policies as wells as the contextual text in para 6.7 – 6.10 the policy should be amended to reference the primary shopping centre and identified town centre rather than the three named streets.</p> <p>The desire to attract and reserve occupation for small independent retailers is understood but sits outside planning policy.</p> <p>The wording introduces ambiguity in reference to the support of upper floor residential development. Its not clear if the policy is referring to the three named streets or wider town centre?</p> <p>Support for proposals for residential development above shop premises should be subject to the provision of a separate secure access, preferably at the rear of the property which does not result in a net loss of ground floor retail space and adequate parking provision is demonstrated.</p> <p>It's unlikely that occupation can be conditioned around only supporting the nighttime economy.</p> <p>The criterion a- f and especially c- f are all similar in nature and perhaps could be summarised into fewer more objective clauses. Criterion f is poorly worded and introduces ambiguity and implies that proposals will only be supported if they provide parking away from the premises. Not all proposal will need to do this or could be asked to contribute through s106 agreements. The reference is more appropriate for edge/ out of centre proposals where linked trips would be encouraged. as written the creation is also ad odds with the</p>	<p>Proposals for new or expanded retail in Staithe Street, The Quay and Freeman Street which would reinforce the retail role of the town and promote a diverse town centre will be supported. Proposals that would add to the number of independent retailers will also be supported.</p> <p>Proposals for residential development in the PSA these areas will be directed to first floor level. Residential development will be supported where it would add to the vitality and viability of the town centre outside of main shopping hours and support the night time economy and subject to the provision of a separate secure access, preferably at the rear of the property which does not result in a net loss of ground floor retail space and adequate parking provision is demonstrated.</p> <p>Proposals for retail and other main town centre uses in and around the town centre will be supported in line with the sequential test and where (if otherwise appropriate) they Proposals should contribute to the following aims where relevant and outline how they do so in relation to:</p> <p>a & b no change C – e, replace with one consolidated criterion Proposals should identify and contribute to appropriate public realm improvements that enhance pedestrian and cycle connectivity to the PSA and appropriate public urban spaces, provide for enhanced accessibility through improvements to street scope, lighting, signage, paving, and street furniture and have regard to the relevant design codes set out in the Wells next the sea Design Guidance and Codes 2023.</p> <p>Criterion f - replace with Providing for parking within easy walking distance from the town centre to encourage walking. Proposals outside the PSA edge and out of centre retail proposals should ensure adequate on-site parking is provided and accessible pedestrian routes and enhancements required to should be identified and proposed to enable linked trips to the PSA.</p>
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	stated aim of ensuring that growth does not contribute to further on street parking	
7.3	<p>The para references only the strategic growth through the local plan – for clarity it should also mention the 45 dwellings envisaged through the WNP site application WSN2.</p> <p><i>when the load on Wells' infrastructure may be 40 per cent higher than during the winter.</i> – seems to be a sweeping statement which is not evidenced.</p>	<p>Add least 70115 new dwellings within the town identified through the Local Plan and this neighbourhood plan..... when the load on Wells' infrastructure may be 40 per cent higher than during the winter.</p>
WSN9	<p>The approach is based on the opinions that such a policy is needed rather than any evidence. It also remains general and requires any applicant to demonstrate the need at time of application.</p> <p>The specific site mentioned has been used in the past as a seasonal car park and it is subject to ongoing live enquiries and discussion with NNDC as to the suitability of the site for both temporary use and or permanent use. The policy approach as now put forward address some of the councils' earlier concerns and comments but the reference to pitch and put site should be removed to ensure its clear that the approach is intended to address all potential proposals and not just one site in particular.</p> <p>All car parks whether seasonal, temporary or permanent have the potential to increase visitors.</p>	<p>Proposals that allow for suitably located car parks including temporary/seasonal car parking, for example at the Pitch and Putt site off Beach Road to be made available for visitors at peak times will be supported subject to:.....</p> <p>Delate fig 31 Beach Road car park</p>
WSN9	<p>Ref to project level HRA</p> <p>Its questioned why only those car parks in the Wells beach area would need a project level HRA due to the potential for increased foot fall. All car parks in the area for visitors have the potential to increase the use of the beach and the Wash & North Norfolk Coast SAC and North Norfolk Coast SPA / Ramsar / SAC, especially given the small scale of the town and its and proximity to European sites.</p> <p>The policy as written would limit any project level the assessment to one particular pathway and using the precautionary principle other potential pathways may occur depending on scale of any proposal.</p>	<p>Amend last para of the policy.</p> <p>Any planning applications for additional car parking in the Wells Beach area will need to be supported by a project-level Habitats Regulations Assessment, demonstrating that the impacts of any potential increase in recreational footprint are adequately mitigated.</p>

	Eg hydrological links, disturbance etc) As such the policy should not seek to limit the scope of the project level HRA which ultimately depends on the proposal.	
7.15	<p>Clarification the Local plan does not omit this land in the way suggested. It is not sought to be protected <u>as former railway</u> track bed as it is in use as a narrow-gauge tourist attraction between Wells and Walsingham (part of which sits outside the parish area). Also, it is understood there are there are no current plans to use it for wider railway connection of rail freight.</p> <p>In forming the local plan policy HC8, the Council consulted with NCC in relation to this matter and protection for the Wells to Walsingham light railway was not supported for inclusion and it has not been identified as part of any wider strategic rail strategy.</p>	Consider deleting the paragraph
WSN10	<p>Considered the elements of return to rail freight are aspirational and not evidenced. As such this element should be clearly identified separately outside the policy as an aspiration. The remaining policy should focus on safeguarding the remaining available track bed for the sustainable transport use. I,e pedestrian and cycle connectivity</p> <p>The policy refers to protecting railway land identified in fig 33 – a historical 1906 map of former railway routes which does not depict the current day position nor the extent of the former Walsingham to Wells railway track bed that remains in the parish.as part of the Wallsingham to Wells light railway track (tourism). The map clearly has no bearing on the existing track bed, or current uses of land including the extent of current railway land and the current Walsingham to wells light railway tourist route. The town has expanded over parts of the former railway bed identified in this map since 1906.</p> <p>Given the light railway tracked is in private ownership and used for tourism there will need to have been relevant consultation with the owners about this policy/ ambition. The land surrounding the</p>	<p>Separate the policy detailing into a separate aspiration around freight use and amend exiting policy WSN10 to reflect safeguarding wider track bed for sustainable transport.</p> <p>Remove / replace fig 33 with a more suitable map</p> <p>Add suitable map(s) which will clearly identify policy areas and distinguish between policy and aspirations.</p> <p>if this cannot be done then it is questioned if this policy can be justified</p>

	<p>“station” is also in separate ownership and parts are understood to being promoted for residential growth. Given no suitable mapping has been included to date there is concern that landowners have not been made aware of the policy and as such may not have had the opportunity to comment.</p> <p>Any map will need to separately identify the areas of land currently used for the Wells to Walsingham light railway, any areas of historical track bed where protection is sought for sustainable transport links and identify the specific parcels of land that are considered to have the potential to contribute to the future ambition / aspiration of the return to rail freight.</p>	
<p>8.1-8.11</p>	<p>To improve legibility, it would be helpful for this first section to have a subheading along the lines of Protecting the Historic Environment in order directly link to the corresponding policy WNS11 and also to refer to section ‘DC.5 Development affecting heritage assets’ within the Wells next the Sea Design Guidance & Codes. In addition, reference to the identified character areas within this document would be very useful to direct readers to the relevant information for these specific areas of the town and parish.</p> <p>In particular, rephrase paras. 8.6 - 8.8 as these are currently negatively worded and as such, do not appear to be in general conformity by being positively prepared in accordance with the NPPF (para. 16).</p> <p>Remove negative text and replace with summary of importance of good quality design and materials with reference to Wells next the Sea Design Guidance & Codes, for example, to sections DC.5, DC.6 and DC.7.</p> <p>It is welcomed that para. 8.10 mentions the NPPF and North Norfolk Design Guide SPD.</p>	<p>Consider adding subheading: Protecting the Historic Environment, to improve clarity and legibility of this section.</p> <p>Delete or consider rephrasing paras. 8.6-8.8 as advised opposite as these are largely negatively worded (indicating that the policy is not positively prepared), by summarising and referring to DC.5 Development affecting heritage assets within the Wells next the Sea Design Guidance & Codes.</p> <p>Summary along the lines of: the importance of good quality design and materials with reference to Wells next the Sea Design Guidance & Codes, sections DC.5, DC.6 and DC.7.</p>
<p>8.1 referring to Figure 9 Listed Buildings</p>	<p>Advise that the map, on page 24, needs to be made larger for legibility. Suggest putting Figure title reference underneath. This would allow the map to be of a more legible size and scale. As currently presented it is difficult to accurately identify most of the listed buildings.</p>	<p>Consider making the map larger for legibility by putting Figure title reference underneath. This would allow the map to be of a more readable size and scale.</p>

<p>8.1 referring to Figure 10 Wells Conservation Area (CA)</p>	<p>The CA boundary shown in Figure 10, on page 25, needs to accurately reflect the NNDC CA map dated August 2023. Trunch print template.swd (north-norfolk.gov.uk) In particular, see south-east area (and south part of eastern boundary (west side of Polka Road).</p>	<p>Check accuracy of Figure 10 CA map with NNDC map (see website link opposite) for details. There is concern that the map is inaccurate in the south-east area and the southern part of the eastern boundary (west side of Polka Road). See link opposite to map.</p>
<p>8.12-8.13</p>	<p>8.12: Consider removing generic text and alternatively refer to the positive advice regarding shopfronts in the Wells next the Sea Design Guidance & Codes DC.4 Shop fronts, particularly as there is no reference to the guidance in this paragraph. 8.13: Consider removing generic text about retail decline and add commentary about what has happened to the town centre uses/ retail in Wells.</p>	<p>Consider referring to Wells next the Sea Design Guidance & Codes DC.4 Shop fronts in para. 8.12 and removing policy style restrictive text. Consider rewording para. 8.13 to include reference to Wells town centre retail/ commercial issues.</p>
<p>8.14</p>	<p>The paragraph appears to quote much of DC.4.1, of the Wells next the Sea Design Guidance & Codes, as if it is policy. For example, 'In particular, no hanging signage should be permitted on High Street or Staithe Street.' This is misleading and should be removed, being contrary to Part 2, Class 5 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Rephrase text and signpost to the Wells Design Code relating to DC.4 Shopfronts, in terms of Signage at DC.4.1.</p>	<p>Remove text that has been lifted from the Wells next the Sea Design Guidance & Codes and replace with text that advises of the importance of signage design and signposting to the information with the supporting document (Signage at DC.4.1). As worded the text is misleading and is contrary the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 as detailed opposite.</p>
<p>8.15-8.17</p>	<p>Consider merging revised wording into section above as it falls under DC4 Shop Fronts guidance within the Wells next the Sea Design Code. Remove copied text from the DC.4.2 Lighting, and DC.4.3 Safety, for the same reasons as above. Refer to the guidance in a summary of positive information regarding lighting and safety in association with shopfronts.</p>	<p>Given that the advice relates to shopfronts, consider merging with section above for better legibility. Remove quoted text from Wells next the Sea Design Code and summarise guidance about lighting and safety in reference to the guidance document DC.4.2 and DC.4.3.</p>
<p>WNS11 Protecting the historic environment</p>	<p>In general, the policy duplicates national policy and existing and emerging local plan policies, but also includes wording that would conflict with Design Guidance. In order to be effective for Wells the Policy needs to connect to and directly refer to the Wells next the Sea Design Guidance & Codes' and the identified character areas, as at present there is no reference to this useful guidance in the policy. As written, the first and second paras. of the policy are direct quotes from the Wells next the Sea Design Guidance & Codes at DC.5, guidelines ii and iii., which do not form operable clauses and as such, do not add any further detail that can be implemented.</p>	<p>Amend wording in paras 1 and 2 and Add reference to the Wells next the Sea Design Guidance & Codes and the character areas identified along the following lines: Para1 'Development should respect the significance of any designated and non-designated heritage assets. Particular consideration should be given to maintaining their role in framing, punctuating, or terminating key views through or out of the town. Proposals should have regard to the Wells next the Sea Design Guidance & Codes and in particular how the development has been</p>

	<p>Most of the following matters are aspirational under the Conservation Areas part of the policy.</p> <p>a) reword to 'ensure wherever possible' or alternatively suggest moving to the supporting text as an aspiration.</p> <p>b) this is already covered by national and local plan policies</p> <p>c) this needs to link to the views identified in the character area appraisals and be rephrased to take account of them. How does this criterion tie into Policy WNS14 Important Views?</p> <p>d) this criterion needs to be linked to the character areas identified in the Wells next the Sea Design Guidance & Codes. As written, it would be impossible for new development to complement the entire settlement.</p> <p>e) these matters are partly covered elsewhere or cannot necessarily be controlled under the planning system, particularly in relation to their enhancement.</p> <p>f) remove or amend, to say promoting the appropriate use of.....'.</p> <p>Remove negative paragraph regarding non-traditional materials.</p> <p>Signage and shopfronts Para. should refer to Wells next the Sea Design Guidance on signage and shopfronts, Remove reference to highways and directional signs, which are under the control of Norfolk County Council, as the Highway Authority. Where an advertisement application is required, it can only be assessed on its visual appearance and public safety. The regulations do not require 'enhancement' of the character and appearance and as such, this phrasing will need to be removed, as it is contrary to the The Town and Country Planning (Control of Advertisements) (England) Regulations 2007</p>	<p>informed by the details of the relevant identified character area within the Guidance.</p> <p>Conservation Area Development proposals within the Wells-next-the-Sea Conservation Area should respect its historic character and appearance and its setting. This will be achieved by:</p> <p>a. Encouraging ensuring the retention and maintenance of traditional buildings and shopfronts which contribute to the overall character of the Conservation Area, wherever possible whether listed or not.</p> <p>b. Ensuring that new development is sympathetic to the special qualities of the Conservation Area and takes account of its historic significance.</p> <p>c. Protecting the setting of the Conservation Area from development which adversely affects views into or out of the Conservation Area</p> <p>d. Ensuring that new development complements the shape, form and layout of the settlement itself relevant character area and the attractive relationship which exists between the older buildings and the spaces around and between them.</p> <p>e. Encouraging the maintenance and enhancement of features and details which contribute to the town's local distinctiveness e.g., traditional shopfronts, trees, walls and railings.</p> <p>f. Requiring promoting the use of high-quality traditional building materials and detailing, where appropriate.</p> <p>Within the Conservation Area, use of non-traditional materials such as concrete tiles, artificial slates, plastic and aluminum windows and doors, cement render and modern bricks should be avoided.</p> <p>Signage and shopfronts Where new or reconfigured advertising and signage (including shopfronts, highway signage and directional signage) is proposed consideration should be given to its size, design, and siting to ensure that it enhances the character and appearance of the</p>
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		Conservation Area. Proposals that seek to rationalise or reduce the amount of signage in the Conservation Area will be supported.
8.18-8.21	There are considered to be some surprising omissions from the list, for example, the former F&G Smith maltings building on the Quay. However, given the local support for the buildings and features identified the proposed list is accepted, as far as it goes. It is not evident where in the NPPF it indicates that 'the effects of an application on the significance of any Non- Designated Heritage Assets should be taken into account in determining the applications,' as set out in Para. 8.19. Suggest accurate qualification of this paragraph and if this cannot be sourced, consider its removal.	Consider removal or revision to para. 8.19 as NPPF does not indicate that 'the effects of an application on the significance of any Non- Designated Heritage Assets should be taken into account in determining the applications.'
WNS12 Non-designated Heritage Assets	It appears that only the farmhouses cited in the list at 4, 11 and 12 have been assessed in WNP Appendix C but in the policy refers to the farms in their entirety. Revise titles to for necessary clarity as follows: 4. Mill Farm <u>house</u> buildings, 11. New Farm <u>house</u> , 12. Manor Farm <u>house</u> .. See below regarding the accurate designation of each non-designated heritage asset.	Revise Policy as follows:..... Amend first para. of policy as follows: The following historic buildings and features (as shown in Figure 34 defined in Appendix C) are identified as non-designated heritage assets due to their locally important character and historic features: 4. Mill Farm <u>house</u> buildings 11. New Farm <u>house</u> 12. Manor Farm <u>house</u>
Figure 34 Non-designated Heritage Assets	The map provided at Figure 34 on page 118, is not detailed enough to formally identify the non-designated heritage assets, particularly as a number of the designations relate to multiple buildings, for example 7. Whelk Sheds and their accurate identification will be important to be treated as a material consideration. A detailed map must be produced and provided to North Norfolk District Council for each non-designated heritage asset in Appendix C alongside the assessment and a suggested minimum of two maps produced here, replacing Figure 34, for example covering east and west of the parish to provide more legible information regarding the location of the non-designated heritage assets. Also, update the titles of non-designated heritage assets as set out in policy above.	A detailed map must be produced and provided to North Norfolk District Council for each non-designated heritage asset in Appendix C alongside the assessment and a production of two maps in replacement of Figure 34, for example covering east and west of the parish to provide more legible information regarding the location and extent of any curtilage of the non-designated heritage assets. As part of this, also update the titles of the non-designated heritage assets as set out in the policy above.
Appendix C	The details of each non-designated heritage asset in Appendix C must include an accurate map of its location with a line around the building(s) for clarity. 2. Requirement to state how many cottages there are in the main description	The details of each non-designated heritage asset in Appendix C must include an accurate map of its location with a line around the building(s) for clarity. 2. Required to state how many cottages there are in the main description

	<p>4. revise description to Mill Farmhouse to coincide with the assessment of the farmhouse.</p> <p>7. Ideally state how many Whelk Sheds the designation covers in the main description.</p> <p>11. revise description to New farmhouse</p> <p>12. revise description to Manor farmhouse</p>	<p>4. revise description to Mill Farmhouse to coincide with the assessment of the farmhouse.</p> <p>7. Ideally state how many Whelk Sheds the designation covers in the main description.</p> <p>11. revise description to New farmhouse</p> <p>12. revise description to Manor farmhouse</p>
<p>8.22 – 8.26</p>	<p>The paragraphs do not refer to existing and emerging NNDC local plan strategic policies CT1 and HC2 relating to open space or the Amenity Green Space Study (AGS), updated 2022. The AGS Study reviewed the sites suggested by Town and Parish councils for LGS designation against the NPPF and PPG at the time of study. The proposed LGS designations introduce conflict with existing and emerging NNDC open land area designations and relevant strategic policies. Additionally, these existing and emerging designations have not been explained during the NP public consultation process. The national guidance states that ‘LGS designation is a way to provide special protection against development for green areas of particular importance to local communities’ (PPG Paragraph: 005 Reference ID: 37-005-20140306). The PPG also advises that if land is already protected by designation, such as being within a conservation area, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.’ (Paragraph: 011 Reference ID: 37-011-20140306). These matters do not appear to have been effectively considered in the assessment of the proposed LGS land (see Appendix D comments) including the contents of the up-to-date AGS (2022). Some references are made and dismissed to existing NNDC open space designations, no other designations, such as the Norfolk Coast AONB and Wells conservation area appear to have been considered (relevant to all sites and a), b) and e) respectively. Given the importance of LGS designations, it is not documented in the NP that the relevant landowners have been contacted to advise them of the proposals to designate LGS (preferably at an early stage). See PPG Paragraph: 019 Reference ID: 37-019-20140306, Revision date: 06 03 2014). This is necessary to allow landowners the opportunity to make representations in respect of such proposals in the draft NP.</p>	<p>See below - recommendation is to delete the policy, due to conflict with existing and emerging open land area/ AONB/ Conservation Area designations, lack of public consultation regarding these designations and due to the lack of robustness of the assessments, where there is a high bar to meet the requirements of LGS designation.</p>

<p>WNS13 Local Green Spaces</p>	<p>As set out above there is considered to be a lack of consultation and comprehensive assessment, where many of the proposed LGS sites do not meet the high bar for designation and many of which have an existing or emerging designation as an open land area. As such, there is conflict between existing and emerging local plan designations and the proposed designations as LGS. See comments in Appendix D for comments on individual sites put forward for LGS designation, below.</p>	<p>Remove policy WNS13 for the following reasons. The proposed LGS designations conflict with Local Plan existing and emerging open land area designations, which will create significant confusion. The assessments (set out in Appendix D) are not considered to be of the required robust and high standard necessary to reach the high bar of LGS designation and consequently, contrary to national policy and advice. See also and in the comments for Appendix D, the LGS assessments have not been robustly evidenced. A number of sites have existing and/or emerging designations as open land areas and in a few cases, the LGS assessment conflicts with the conclusions of NNDC’s AGS Study (updated 2022) & conflict with the Core Strategic and emerging submitted Local plan and relevant strategic policies. Therefore, delete: a) The Buttlands b) Churchyard of St. Nicholas c) Market Lane Cemetery d) Home Piece open spaces e) Turning Circle at Bluebell Gardens. f) Mill Road Allotments g) Mill Road Meadow (north of Mill Road) The latter, due to the site forming part of the proposed strategic housing site allocation Policy W07/1 – Land at adjacent Holkham Road in the emerging local plan. As such, its inclusion is contrary to the para. 13 of the NPPF in that it would not support the delivery of strategic policies in the emerging local plan.</p>
<p>Appendix D</p>	<p>a) The Buttlands The assessment in Appendix D acknowledges NNDCs emerging (but not the existing and relevant Core strategy strategic policy) designation as an open land area and the resulting protection of the relevant Core Strategy and emerging strategic policies CT1 and HC2. Also, the assessment does not acknowledge the Norfolk Coast AONB designation or Wells CA designation. See assessment on page 45 of NNDC AGS (updated 2022), which states under the Reasoned Justification Summary, ‘The site does not</p>	<p>Remove all of the sites put forward for LGS designation for the reasons stated opposite.</p>

	<p>meet the tests for LGS. This site already benefits from open land area designation.’ In conclusion, it is considered that the site does not meet the tests for LGS and as such, is unjustified.</p> <p>b) Churchyard of St. Nicholas and old cemetery This land benefits from an open land area designation within the emerging local plan and the resulting protection of the emerging strategic policy HC2. The site also falls within the Norfolk Coast AONB and Wells CA designations, which are not considered in the assessment. See Appendix A of NNDCs AGS (updated 2022) page 181. In conclusion, it is considered that the site does not meet the tests for LGS and as such, is unjustified.</p> <p>c) Market Lane Cemetery. This land benefits from an open land area designation and the resulting protection from the emerging local plan strategic policy HC2 as well as falling within the Norfolk Coast AONB designation, which is not considered in the assessment. A full LGS assessment/ justification has not been provided. In conclusion, it is considered that the site does not meet the tests for LGS and as such, is unjustified.</p> <p>d) Home Piece open spaces. A larger area of land (incorporating the land identified here) benefits already from an open land area designation, in the emerging local plan and the resulting protection of the emerging strategic policy HC2, as well as being within the Norfolk Coast AONB. A robust LGS justification has not been provided. In conclusion, it is considered that the site does not meet the tests for LGS and as such, is unjustified.</p> <p>e) Turning circle at Bluebell Gardens (primary school). It is considered that this area of land does not appear to meet the significant tests to be designated as LGS and in particular how it is demonstrably special to the local community. The land falls within</p>	
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	<p>the Wells CA and the Norfolk Coast AONB designations, which have not been considered within the assessment.</p> <p>f) Mill Road allotments. This land does not meet the tests for LGS. A larger area of land benefits from an open land area designation in the emerging local plan and benefits from the resulting protection within the emerging strategic policy HC2. In addition, the land falls within the Norfolk Coast AONB designation, which has not been considered by the assessment. In conclusion, it is considered that the site does not meet the tests for LGS and as such, is unjustified.</p> <p>g) Mill Road Meadow (north of Mill Road) This land does not meet the tests for LGS. Such a LGS designation would conflict with the emerging strategic local plan site allocation policy W07/1 – Land at adjacent Holkham Road, in preventing sustainable development and prevent suitable access to the site allocation, contrary to national and local policy. The site also falls within the Norfolk Coast AONB designation, which is not considered within the assessment.</p>	
<p>8.27-8.28</p>	<p>The supporting text does not refer to the Norfolk Coast AONB designation, the Heritage Coast designation nor the relevant existing and emerging local plan policies that protect the landscapes and settings Nor does the text refer to the Landscape Character Assessment (LCA) SPD 2021 The generic text does not explain the purpose of the policy over and above the existing significant protection the landscape has from the existing and emerging strategic policies and does not fully reflect the LCA. As such, it is considered that the explanation in terms of methodology, choice of views, summary of view description, photographs set out in paragraph 8.28 are not of a consistent and detailed nature. Para. 8.27 Add footnote to NN Landscape Character Assessment SPD (2021) and also replace start of second sentence, as previous comment at Reg 14 has been accurately added 'These assessments</p>	<p>Consider deletion of the policy, regardless of the comments opposite and below. Proportionate and consistent evidence detailing the choice and methodology of the assessments undertaken for each identified important view has not been provided. It is noted that Para. 8.28: refers to the susceptibility and value criteria set out in NNDCs LSA 2021, which is an SPD that has been specifically produced for renewable energy development proposals. The Wells next the Sea Design Guidance and Code refers specifically to Views within the different character areas and it is questioned whether those advanced to Policy WNS14 are wholly justified. If the policy remains, an effective and transparent methodology must be used and preferably form an appendix to the NP, rather than being part of the supporting text. Para. 8.27 Add footnote to NN Landscape Character Assessment SPD (2021) and also replace start of second sentence, as previous</p>

	<p>were' with 'The latter was' or The Landscape Sensitivity Assessment was..</p> <p>Para. 8.28: refers to the susceptibility and value criteria set out in NNDCs LSA 2021, which has been evidenced specifically for renewable energy development proposals. .</p> <p>The assessment methodology has not been set out and tabulated to demonstrate a transparent and consistent approach.</p>	<p>comment at Reg 14 has been accurately added 'These assessments were' with 'The latter was' or The Landscape Sensitivity Assessment was..</p>
WNS14	<p>As detailed above, there is no clear methodology applied to explain the choice of the 9 particular views listed as requiring a policy to protect them over and above the protection afforded by existing and emerging local plan strategic policies.</p> <p>In particular, views</p> <p>Some of the views appear to be within the settlement boundary....see Figure 37</p>	<p>Delete policy WNS14 for the following reasons:</p> <p>The Policy is unjustified as it does not identify the complete list of views listed in the character area appraisals within the Wells next the Sea Design Guidance and Code document and as such, it appears incomplete. The 9 views identified appears arbitrary and an inconsistent application of the limited assessment criteria cited as being 'susceptibility' and 'value'.</p> <p>In addition, Views 1 and 9 appear to conflict with the policy wording about being outside the settlement boundary.</p>
Figure 37: Important views	<p>Where is the settlement boundary defined for the purposes of the policy?</p> <p>The Important Views proposed at 1 and 9 appear to be located within the settlement boundary.</p> <p>In addition, Figure 37 is not of a scale that provides the necessary detail about the position and extent of each viewpoint. A detailed map has not been produced for each viewpoint</p>	
WNS15	<p>The section describes in the main an existing flooding issue in a specific area of the town and seeks adjacent development to consider and deliver solutions which may not directly related to the proposal nor be necessary to make the proposal acceptable in planning terms and the requirements of para 57of the NPPF.</p> <p><i>Para 57 states that</i></p> <p><i>Planning obligations must only be sought where they meet all of the following tests26:</i></p> <p><i>a) necessary to make the development acceptable in planning terms;</i></p> <p><i>b) directly related to the development; and</i></p> <p><i>c) fairly and reasonably related in scale and kind to the development</i></p> <p>The SFRA identified areas subject to flood risks and warnings.</p>	<p>Consider deletion of the policy or amend with a focus on addressing climate change and use of materials as below:</p> <p>Eg</p> <p>Measures that provide for climate change adaptation and mitigation will be supported. Proposals for development located adjacent to identified flood risk areas should consider the potential impacts on adjacent properties and include opportunities for creating emergency escape access corridors for properties affected by tidal surge and incursion. This would also apply to proposals for new measures to address sea level rise particularly at East Quay.</p>

	<p>Elements of the policy are poorly worded eg as detailed in the final section of the policy - the intention of the policy is not to provide unconditional support to proposals that include SUDs and permeable materials but to support the use of the material in any proposal. The third paragraph is considered onerous and does not accord with national policy. The second paragraph is covered in national and local Plan policy and is not necessary. The para also conflicts with WNS 18 specifically which seeks to encourage development in the harbour area which is in flood zone 3</p> <p>It's recognised that addressing some of the issues is driven by a desire to reflect the issue raised by some in the community but reliance on this is not justification for the inclusion of the policy as written. It's not appropriate that land use policy around new development can fix existing issues especially when they are not necessarily in the scope of the Np or required to make the proposal acceptable in planning terms. Conflicts with NPPF need to be removed.</p> <p>Suggested that the policy in the main is delated where it does not accord with eh NPPF and or is unnecessary due to duplication with national and local plan policies. As a minimum the policy should be amended to only include support for climate change and the use of appropriate materials to assist in managing surface water. In places it is considered helpful to reinforce elements of local plan policy as suggested opposite, and which go some way as to ensuring the policy mentions and addresses the issues raised.</p>	<p>New development will be directed away from areas of known flood risk including flooding from groundwater, where possible and should be located so as not to exacerbate existing flooding problems.</p> <p>Any new development or significant alteration to an existing building within the Parish of Wells Next the Sea should be accompanied by an appropriate assessment which gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage.</p> <p>All new development should not materially increase flood risk to other aeras and incorporate surface water drainage measures to minimise its own flood risk. Proposals should demonstrate that the proposed development has appositve effect on surface water flooding on site and in surrounding area adjacent to the development, where appropriate and be able to demonstrate how it can mitigate its own flooding and drainage impacts, avoid increases of flooding elsewhere and seek to achieve green field run-off rates. '</p> <p>Proposals will be supported that use The incorporation of use of sustainable drainage systems including and the use of permeable materials instead of hard standings is supported'.</p>
<p>9.6-9.7</p>	<p>The paragraphs do not mention existing and emerging local plan policies regarding pollution matters, in relation to health, living conditions and the natural environment, which cover all of the areas of pollution mentioned in the policy. Light pollution is cited as being of particular concern in paragraph 9.7, but this is not translated into the policy wording. In addition, no reference is made to the</p>	<p>Remove or amend paragraphs to explain local justification/ evidence to support the inclusion of the policy over and above national and local plan policy. The information regarding light pollution in para. 9.7 is not comprehensive as it mentions some green spaces but not all and the navigational concerns need to be more detailed. In addition, this information does not get included into the policy itself.</p>

	<p>Given that some forms of development are permitted under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) it is considered appropriate to qualify the policy wording to be prefixed with 'Where planning permission is required..'</p> <p>The paragraph needs to explain the different types of pollution the policy is covering and the local concerns relating to these types of pollution.</p>	See below.
WNS16 Pollution	<p>The policy content is largely covered by existing and emerging local plan policies. Its inclusion does not appear to have been locally evidenced and as such, it does not set out any additional considerations and will introduce ambiguity if left as written.</p> <p>There does not seem to be any locally specific issue(s) that is/are not already covered within the development plan. As such, how would such a generic policy be reasonably applied.</p>	<p>Consider deleting Policy WNS16</p> <p>The policy content is covered by existing and emerging local plan policies (in accordance with the NPPF).</p> <p>The policy does not cite local evidence or specify areas of particular concern and as such, it does not set out any additional considerations for Wells with regards to pollution.</p>
10.1-10.3	<p>The supporting text does not provide any evidence to justify the content of policy WNS17 but provides a general description of the existing uses within the area and pressure from tourism, which also crosses into coastal management matters with regard to beach accessibility.</p>	<p>Consider rephrasing and providing additional information/ evidence about the content of Policy WNS17.</p>
WNS17	<p>The first and second paragraphs of the policy are statements, which firstly need to refer to the Wells Beach policy area and secondly should remove coastal management text relating to the retention of public access to the beach. How will visitors be encouraged to access the beach via other means of transport than the private car- this is not an operable clause and should be moved to the supporting text.</p> <p>The third and fourth paragraphs are negatively prepared by seeking to restrict any expansion of the existing holiday park and beach huts, without providing significant evidence and justification to do so, and conversely, the text goes on to support small scale (undefined in size or scale) retail development in the beach policy area, which appears to go against the assumed principle of not wanting to encourage more people into the area. These all of which are contrary to national and local plan policies regarding tourism and retail.</p> <p>The provision of retail would need to follow the sequential test that directs provision to the primary shopping area and then town centre.</p>	<p>Remove first and amend second paragraphs as suggested below: Wells Beach (as defined in figure 40) will continue to be a popular destination for visitors during the Neighbourhood Plan period. Public access to the beach will be maintained and visitors will be encouraged to access the beach via other means of transport than the private car. Proposals within the designated Wells Beach policy area (as defined in Figure 40) that provide for walking and cycling opportunities, including the creation or enhancement of pedestrian and non-motorised access routes to the beach will be encouraged.</p> <p>Delete third paragraph. No justification has been provided to on one hand restrict an existing holiday park business and on the other, encourage unfettered retail in the Beach Policy Area. Retail here is considered out of town and against national policy.</p> <p>If to be retained an assessment and evidenced position would need to be undertaken, detailing a suitable area for retail that also sets</p>

	<p>As such elements of the approach is in conflict with national and district strategic policy while other aspects remain a duplication. Ambiguity exists and will need to be quantified and justified in order to set a threshold on size. It should be noted that the emerging Local Plan introduces a 250sqm threshold. As written such an approach would seek to allow the development of all types of retail including convenience, comparison shopping and, cafés. What is the evidence that retail is required in this location? What would the impacts be on the existing car parking which would need to be displaced if such provision went ahead? Should any policy not stipulate no reduction in parking places or provide for an addition of X number of spaces? especially as this seems to be the local issue.</p> <p>Beach huts: The amended wording is a more positive approach of support subject to criteria. However, the justification for the inclusion of the policy is questioned. Why is there is a need for the policy and on what basis?</p> <p>Any beach hut provision would not have to contribute to the strategic GIRAMS strategy which is set up to ensure no adverse impacts on European sites in relation to in-combination effects in relation to net gain overnight accommodation and recreation al impacts and based. However, it is likely at a further project level HRA would have to look at “alone effects” in relation to the increased use and intensification of use.</p> <p>Given the location of the beach area and the SAC and the types of development supported area there is a requirement for a project level HRA in relation to all aspects of the policy. Such a requirement aligns with that set out in WSN9 as well. – amend the policy accordingly.</p>	<p>out an appropriate scale/ threshold and which would need to be identified on a policy map. In doing so there should be an assessment of alternatives and a sustainability appraisal. The policy or reasoned justification section should also clarify what type of retail is sought.</p> <p>Paragraph 4: Identify and justify the area where this criterion applies on the policy map: <i>Proposals to extend the area of beach huts beyond the existing area currently used for beach huts as identified on the policy map (Figure 40) will only be supported where:.....</i></p> <p><i>Para 4 – delete criteria b and ref to policy WSN0</i></p> <p>b. — appropriate contributions and mitigation measures are secured in line with the Norfolk Green infrastructure and recreational impact avoidance and mitigation strategy GIRAMS (in relation to recreational use)</p> <p>..... see also Policy WSN0 —replace with <i>Any planning applications and development in Wells Beach Area will need to be supported by a project-level Habitats Regulations Assessment.</i></p>
<p>Figure 40: Beach Policy area</p>	<p>The area defined on the map does not coincide with the beach area (no. 8 character area) in the Wells next the Sea, which is confusing. There is no explanation and justification as to why this is.</p>	<p>Consider revising the beach policy area to coincide with the beach area identified in the Wells Design Codes and Guidance.</p>

10.4-10.7	The supporting text describes the harbour activities but does not explain or justify the purpose of the policy. In particular, it does not define what para. 2 of the policy refers to in terms of 'onshore facilities' for visiting and resident boats. This is necessary in order to make the policy operable.	Amend the supporting text to explain and justify the policy and remove the ambiguity as detailed opposite.
WNS18	<p>The Wells Harbour policy area needs to be designated within the policy as well as referring to the map in Figure 41. It is noted that the Harbour policy area largely falls within the Beach policy area above and as such, there could be conflict between the two policies. For example, the support for improvements to onshore facilities (what is meant by this?) that benefit tourism and employment in the town through visiting and residents' boats could potentially conflict with the policy objective of restricting any further development/intensification other forms of tourist facilities/activities in policy WNS17.</p> <p>Any development whether it be onshore facilities that have a potential increase in boat related recreation or not will need an HRA due to the close proximity to the SAC. The potential for impacts is not restricted to recreational impacts alone and the policy should not seek to restrict the scope of the HRA in this way. There is concern that as written the policy offers unconditional support for unknown proposals and as such, requires amendments to qualify the development to some degree.</p>	<p>Development proposals that would preserve and enhance the character of Wells Harbour Area (as shown defined in figure 41) and its role as a working and functioning port will be encouraged. Support in principle is also given to proposals that would celebrate the maritime heritage of the town, the connections between the present town and its origins as a harbour and a port and underpin the role of the Harbor area as an important asset to the town.</p> <p>Appropriate and suitably scaled development proposals that would recognise the benefits to the town's employment and tourism provided by the harbour and would result in improvements to onshore facilities that benefit both visiting boats and resident boats will be supported encouraged.</p> <p>Any planning applications for onshore facilities and development in Wells Harbour Area will need to be supported by a project-level Habitats Regulations Assessment, demonstrating that the impacts of any potential increase in boat related recreation are adequately mitigated.</p>
Figure 41 Wells harbour policy area	It is noted that the Wells Harbour Area identified on the map overlaps with the Beach Policy Area.	
General comment	Along with any proposed modifications there will be a requirement for further consequential amendments, corrections and updates to supporting text. It would be helpful if reference could be made in the final report that these should be made at the council's discretion prior to referendum (PPG Reference ID: 41-106-20190509).	It would be helpful if reference could be made in the final report that these should be made at the council's discretion prior to referendum (PPG Reference ID: 41-106-20190509).
General comment	References to NPPF -	Update to Sept 2023 throughout where necessary.

Appendix A: NNDC Local Allocation Agreement Strategic Policy for exception sites

A) An applicant will have lived in the parish or adjoining parishes for at least 3 consecutive years at the point of allocation AND meet at least one of the following criteria:

- Lived for at least 5 years at any time in the parish or adjoining parishes OR
- Are employed in the parish or adjoining parish (permanent employment of at least 12 months and 16 hours per week) OR
- Have a family member who has lived for at least 5 consecutive years in the parish or adjoining parish at the point of allocation

B) An applicant will have lived in the parish or adjoining parishes for at least 3 consecutive years at the point of allocation AND meet at least one of the following criteria:

- Are employed in the parish or adjoining parish (permanent employment of less than 12 months and 16 hours per week) OR
- Have a family member who has lived for at least 3 consecutive years in the parish or adjoining parish at the point of allocation

C) An applicant meets at least one of the following criteria:

- Lived for at least 5 years at any time in the parish or adjoining parishes OR
- Are employed in the parish or adjoining parish (permanent employment of at least 12 months and 16 hours per week) OR W
- Have a family member who has lived for at least 5 consecutive years in the parish or adjoining parish at the point of allocation.

D) An applicant meets at least one of the following criteria:

- Lived for at least 3 years at any time in the parish or adjoining parishes OR
- Are employed in the parish or adjoining parish (permanent employment of less than 12 months and 16 hours per week) OR
- Have a family member who has lived for at least 3 consecutive years in the parish or adjoining parish at the point of allocation

E) An applicant meets at least one of the following criteria:

- Lived for at least 12 months at any time in the parish or the adjoining parishes OR
- Are employed in the parish or adjoining parish (temporary employment or permanent employment of less than 16 hours per week) OR
- Have a family member who has lived for at least 12 consecutive months in the parish or adjoining parish at the point of allocation

F) An applicant has a connection to North Norfolk as defined by the Housing Act 1996, Part VII.

G) An applicant wants to live in the parish but does not have a connection to North Norfolk as defined by the Housing Act 1996, Part VII.

Wells-next -the-Sea Draft Neighbourhood Plan Submission Version Consultation (Regulation 16)



Consultation Response Form

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

Responses to the consultation are invited between **Monday 2 October - Monday 13 November 2023**.

PART A and Part B MUST be completed in full.

Part A: Personal Details

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

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

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

Oral Examination

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

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

Yes, I wish to participate at an oral examination

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

Future Notification & Next Stages

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

Please notify me

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

Please return via email to planningpolicy@north-norfolk.gov.uk or by post to Planning Policy, North Norfolk District Council, Holt Road, Cromer, NR27 9EN. Representations must be received no later than Monday 13 November 2023. Late representations may not be accepted.

Signature:	<i>Tony Fullwood</i>	Date:13 November 2023
Print Name:	Tony Fullwood	
For official use only		
Date received:	Ref No:	

Part B: Representation Details

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

Basic Conditions

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

The relevant basic conditions for Neighbourhood Plans are:

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

In the table below please complete each column to show:

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

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

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
Page 85	WNS4: Principal Residence	Support	All the evidence supports the introduction of this policy.	
Design Guidance and Codes Page 93	Policy WNS6	Object	The Government has made clear the importance of design, and design codes in particular, and the role neighbourhood plans have in shaping locally appropriate design requirements. In order to ensure adherence to the Design Guidance and Codes (with resultant improvements in designs), the cross reference in Policy WNS6 to 'have regard to' the guidance contained in the Wells-next-the-Sea Design Guidance and Codes should be strengthened to 'compliance with'.	The cross reference in Policy WNS6 to 'compliance with the Wells-next-the-Sea Design Guidance and Codes'.

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
Retail and the town centre Page 100	Para 6.9	Object	<p>The Neighbourhood Plan incorrectly implies that revised permitted development rights allowing the change of use from shops and financial and professional services to other uses without the need for a planning application apply in Wells Primary Shopping Area and Town Centre. In fact, such permitted development does not apply under Class M within Conservation Areas and the whole of the Town Centre is located within the Wells Conservation Area. Policy E4 of the emerging Local Plan states that proposals for residential development within Primary Shopping Areas will be considered favourably provided that they are above ground floor level. For this reason, the loss of any retail floorspace within the Twon Centre is not supported and this misleading impression should be corrected.</p>	Correct the reference to permitted development rights allowing the change of use from shops and financial and professional services to other uses in Wells Town Centre.
Visitor parking Page 106	Policy WNS9: Visitor parking	Object	<p>Para 7.10 sums up the situation well. The number of day visitors is becoming excessive and that it has a detrimental impact on the environment of the town and the extremely sensitive nature conservation sites which surround it. Staithe Street and The Quay have a finite capacity to comfortably accommodate pedestrians, cycles and vehicles and this has already been reached with the existing supply of car parking spaces.</p> <p>Para 10.3 also notes the beach area is often very crowded which can create conflict with its environmentally sensitive surroundings – both in terms of landscape and nature conservation. The fragile habitat and natural beauty are threatened by overuse.</p> <p>By attracting significantly more visitors (particularly high volume, low spend day visitors), the town is in danger of ‘killing the goose that lays the golden egg’ - simply because the town achieves a reputation for being too congested, overcrowded and busy.</p>	Policy WNS9, and in particular the specific reference to the Pitch and Put site, should be deleted.

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
			<p>Given climate change, and its potentially significant impact on the town, there is also a need to focus on sustainable modes of transport. Growing green tourism with an emphasis on walking, cycling, bird watching and enjoying the natural beauty of the area is an appropriate strategy for Wells-next-the-Sea.</p> <p>Further visitor car parking is not the answer as this will:</p> <ul style="list-style-type: none"> • act as a magnet to a town with limited physical and environmental capacity, • attract day trippers not longer-term visitors, • create eyesores in the sensitive and visually open landscape surrounding the town, and • encourage unsustainable modes of transport. Policy WSN17 correctly states: 'Public access to the beach will be maintained and visitors will be encouraged to access the beach via other means of transport than the private car.' <p>Policy WNS9 inappropriately supports proposals for temporary/seasonal car parking per se and also specifically identifies the Pitch and Putt site off Beach Road to be made available for visitors at peak times. The Pitch and Putt site is a very extensive area of open land. Hundreds of parked cars occupying this site in peak times through the summer without the need for landscaping would have an unacceptable adverse impact on the landscape and character of the view in this sensitive location. Importantly, this policy is in conflict with WNS14: Important views which identifies views of visual scenic value of the landscape and countryside in the parish outside of the defined settlement boundary. The site is within the visual cone of View 5: View from Beach Road, over marshland, towards the Meals in the West. The Neighbourhood Plan states: 'This is a good, wide, uninterrupted view which includes the lifeboat house and maintains the open aspect of the harbour area; an undeveloped and natural area recovered from the sea by the Beach Bank'.</p> 	

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
			<p>The Neighbourhood Plan is therefore internally inconsistent. Policy WNS9 is in conflict with Policies WNS14 and 17.</p> <p>In addition, Policy WNS9 conflicts with</p> <ul style="list-style-type: none"> • the capacity of the town and beach to accommodate visitors, • protecting the landscape designated as an Area of Outstanding Natural Beauty, • protection of an important view identified in the Plan, • discouraging access the beach via means of transport other than the private car. <p>Overall this policy does not represent sustainable development.</p>	
Local Green Spaces Page 120	WNS13: Local Green Spaces	Object	<p>Local Green Spaces are identified within and outside the built up area of Wells.</p> <p>Mill Road allotments are correctly identified as a Local Green Space within the Neighbourhood Plan. The East End allotments are of equal value to the community particularly the benefits to mental and physical health and wellbeing and helping to define what makes Wells special. The East End allotments may be justified in exactly the same way as the Mill Road allotments as set out in Appendix C: Justification for Local Green Spaces</p> <p>There seems to be no justification for the omission of the East End allotments site as a Local Green Space.</p>	Designate East End allotments site as a Local Green Space

Section & Page No.	Policy / Objective / Para Number	Object / Support / Neutral	Comments	Proposed Change
Important Views Page 124	Policy WNS14	Support	<p>Strongly support protecting iconic views in Wells. Particular support is given to View 5 View from Beach Road, over marshland, towards the Meals in the West</p> <p>This is a good, wide, uninterrupted view which includes the lifeboat house and maintains the open aspect of the harbour area; an undeveloped and natural area recovered from the sea by the Beach Bank.</p> <p>It is noted that View 3 (the view of the town is defined from Beach Bank whereas View 5 is defined from Beach Road. View 5 is also observed from Beach Bank. Indeed the Photograph on Page 123 is from the Bank.</p>	Amend description of View 5: View from Beach Road and Beach Bank over the marshland to the Meals in the west.
Wells Beach Page 131	WNS17: Wells Beach	Support	Proposals to expand the existing Pinewoods holiday park beyond its current footprint should not be supported in order to protect the landscape designated as an Area of Outstanding Natural Beauty and an important view identified in the Plan.	

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

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

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

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