

# Planning Policy & Built Heritage Working Party



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Friday, 6 January 2023

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held in the **Council Chamber - Council Offices** on **Monday, 16 January 2023** at **10.00 am**.

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours

Members of the public who wish to ask a question or speak on an agenda item are requested to notify the committee clerk 24 hours in advance of the meeting and arrive at least 15 minutes before the start of the meeting. This is to allow time for the Committee Chair to rearrange the order of items on the agenda for the convenience of members of the public. Further information on the procedure for public speaking can be obtained from Democratic Services, Tel: 01263 516108, Email: [Lauren.Gregory@north-norfolk.gov.uk](mailto:Lauren.Gregory@north-norfolk.gov.uk).

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so must inform the Chairman. If you are a member of the public and you wish to speak on an item on the agenda, please be aware that you may be filmed or photographed.

Please note that Committee members will be given priority to speak during the debate of agenda items

**Emma Denny**  
**Democratic Services Manager**

**To:** Mr A Brown, Mrs P Grove-Jones, Mr N Dixon, Mr P Fisher, Ms V Gay, Mr P Heinrich, Mr R Kershaw, Mr G Mancini-Boyle, Mr N Pearce, Mr J Punchard, Dr C Stockton and Mr J Toye

All other Members of the Council for information.

Members of the Management Team, appropriate Officers, Press and Public



**If you have any special requirements in order to attend this meeting, please let us know in advance**

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

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## A G E N D A

**1. APOLOGIES FOR ABSENCE**

**2. PUBLIC QUESTIONS**

**3. MINUTES**

1 - 14

To approve as a correct record the Minutes of a meeting of the Working Party held on Monday 12<sup>th</sup> December 2022.

**4. ITEMS OF URGENT BUSINESS**

To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

**5. DECLARATIONS OF INTEREST**

15 - 20

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest. Members are requested to refer to the attached guidance and flowchart.

**6. UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)**

**7. ANY OTHER BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**

**8. LOCAL PLAN SUBMISSION: PROPOSED MODIFICATIONS (SITE ALLOCATIONS)**

21 - 90

Summary: This report seeks to agree a schedule of modifications to the Local Plan which the Authority will request the Inspector to incorporate as part of the Local Plan examination process. It considers the requests for such modifications made by respondents to the recent Regulation 19 consultation on the proposed submission version of the Plan. The appointed Inspector will determine if these modifications should be made when the Plan is examined.

The report covers the proposed site allocations section of the Plan and any consequential amendments to the Proposals Map.

A deferred item from the previous meeting relating to employment land provision is also considered.

Recommendations: **1. Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that the appended Schedules of proposed modifications along with the**

**Proposed Submission version of the Local Plan be submitted for independent examination.**

- 2. To delegate minor amendments in the finalisation of the submission version & Schedules and associated documents to the Planning Policy Manager and Policy Team Leader in conjunction with the Portfolio Holder.**

Cabinet Member(s) Cllr Andrew Brown	Ward(s) affected All
All Members	All Wards

Contact Officer, telephone number and email:

Mark Ashwell, Planning Policy Manager 01263 516325 [mark.ashwell@north-norfolk.gov.uk](mailto:mark.ashwell@north-norfolk.gov.uk)

Matthew Gutteridge, Senior Planning Officer 01263 516224 [matthew.gutteridge@north-norfolk.gov.uk](mailto:matthew.gutteridge@north-norfolk.gov.uk)

## **9. EXCLUSION OF PRESS AND PUBLIC**

To pass the following resolution (if necessary):

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

- 10. TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA**
- 11. ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**

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## PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 12 December 2022 at the Council Chamber - Council Offices at 10.00 am

### Committee

#### Members Present:

Mr A Brown (Chairman)	Mrs P Grove-Jones (Vice-Chairman)
Mr N Dixon	Mr P Fisher
Ms V Gay	Mr P Heinrich
Mr R Kershaw	Mr G Mancini-Boyle
Mr N Pearce	Mr J Punchard
Mr J Toye	

#### Officers in Attendance:

Planning Policy Manager (PPM)  
Assistant Director – Planning (ADP)  
Senior Planning Officer – CD  
Senior Planning Officer – ST  
Democratic Services Officer – Regulatory

#### Also in attendance:

Ms J Armstrong (Public Questions)

### 37 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllr C Stockton, there were no substitute Members in attendance.

### 38 PUBLIC QUESTIONS

- i. There was 1 public question from Ms J Armstrong with relation to Agenda Item 11 - Local Plan Submission Modifications (Policies) re Policy HC2, proposed modification reference LPS252.
- ii. The PPM responded to the public question and suggested that the proposed modification be left as an issue for the Planning Inspector to consider through the examination process, clarifying that the public representation had been made in writing and would be supplied to the Inspector. He stated that the Council had appraised the area and were satisfied that it met the qualifying criteria and contributed to openness, and further commented that Members were in a difficult position to make a judgement on this matter without seeing the land.

He cautioned Members against applying weight to the Examiners comments put forward in the report regarding the emerging Blakeney Neighbourhood Plan referenced by the Public Speaker, stating that the Examiner's final decision had not yet been reached.

The PPM noted a couple of issues raised in the submission and commented that there was no requirement for open land areas to be publically accessible, this was therefore not a consideration, nor would Officers rely upon the fact that a site is located within a conservation area or AONB, as they were separate designations made for different considerations. The PPM

stated that the determining factor for this matter was whether the parcel of land contributed towards the openness of that part of Blakeney.

- iii. The public speaker was granted a supplementary question and asked for evidence cases which related to the garden.
- iv. The PPM advised that Officers had appraised all existing open land areas of the core strategy, undertaken site visits and assessed whether the existing boundaries should be retained or not. He stated that the criteria for designation required subjective assessment.

The PPM noted the conflicting assessments from two different Inspectors, one with regard to a Planning Appeal and the other in relation to the emerging Blakeney Neighbourhood Plan, forming two opposing views as to whether the land should be designated. He concluded that the Planning Inspector for the Local Plan would be best placed to make a decision through the examination process.

- v. Cllr J Toye agreed with the course of action set out by the PPM and questioned if Members were sufficiently qualified to make a judgement and stated that the Inspector for the Local Plan would be a specialist sitting above opinions and would consider all representations submitted through the examination process.
- vi. Cllr V Gay noted this would be a third Inspectors decision, and there was grounds to consider that a third decision would be decisive. She asked whether there had been other gardens in the District treated in the same manner as this parcel of land.
- vii. The PPM advised other land had been treated in the same manner, and reiterated the qualifying criteria was whether a piece of land contributes to openness of this part of the settlement in a positive meaningful way, irrespective of its use. He confirmed it was a subjective opinions based assessment of the quality of space, and not its function. The PPM noted the historic nature of the site, being one of openness as part of the larger pastures, which had subsequently changed with the land owner forming boundaries around the curtilage of their property, altering the character of that area from the date of its original designation under the core strategy. He advised that Officers have since specifically reviewed each designated open land area and had formed the opinion that the land continued to deserve designation, and concluded that the fairest approach would be for the Local Plan Inspector to come to a decision as part of the examination process.
- viii. Cllr N Dixon considered that he was not sufficiently well informed of both arguments, including pros and cons to make a decision either way, and stated he was content to accept the PPM's recommendation.
- ix. The PPM noted that the public speaker's representation was contained within a later item, and should Members accept the Officers recommendations, the modification would not be accepted and would be put before the Local Plan Inspector for consideration.

The PPM advised that all written representations made at the Regulation-19 (Reg-19) stage would be presented to the Local Plan Inspector, along with working party papers, minutes, transcripts of the meetings and others. He

further added that, as part of the process it was often the case that the Inspector invited individuals to make representations at hearing sessions. It was at the Inspector's discretion to allow representations, with the PPM advising these were public meetings which anyone was able to view.

**39 MINUTES**

The Minutes of the Planning Policy & Built Heritage Working Party held 14<sup>th</sup> November 2022 were approved as a correct record.

**40 ITEMS OF URGENT BUSINESS**

None.

**41 DECLARATIONS OF INTEREST**

None.

**42 UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)**

- i. The Chairman noted that the Infrastructure Delivery Plan (IDP) had been circulated to Members, as requested at the last meeting, on 3<sup>rd</sup> December by email.
- ii. Cllr N Dixon stated that he was pleased to have received the IDP and asked when the working party would be considering this document. He commented it would be a missed opportunity if the IDP was not considered in a timely manner.
- iii. The PPM clarified that the IDP was originally presented to the working party for information only, and it was not asked that Members adopt or endorse its contents in any way.
- iv. Cllr N Dixon considered that the IDP was fundamental and stressed that this document should be discussed and debated. He stated that the failure to recognise the importance and be able to deliver on infrastructure, would let down the new Local Plan and its deliverability, and concluded that the salient points of the IDP need to be presented to the working party at an appropriate stage.
- v. The PPM agreed to bring the IDP to the February 2023 working party meeting.
- vi. Cllr N Pearce endorsed Cllr N Dixons comments, and thanked the PPM and his team for providing the IDP as requested. He considered that that the IDP was a fundamental piece of work and welcomed the PPM's comments that the IDP would be brought to the working party in February.

**43 ANY OTHER BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**

None.

**44 LOCAL PLAN AND NEIGHBOURHOOD PLANS UPDATE (VERBAL UPDATE AND PRESENTATION)**

- i. The PPM advised that a revised Local Plan timetable had been published and supplied an update on the process. He commented that the Reg-19 consultation had been undertaken earlier in the year, however since the consultation Nutrient Neutrality (N.N) guidance had been published which had further delayed the programme.
- ii. The PPM added that a library of live background evidence since the Regulation 18 consultation, including alternatives which were considered, all representations that were made, sustainability appraisal reports, all of the technical evidence such as viability assessments would be submitted as part of the examination process. Officers were in the process of preparing additional background papers for the Inspector which would explain in detail how the evidence had been used, and provide reasoned justification for the different policy approaches adopted.
- iii. He advised that Officers considered the plan to be sound, meriting submission, and welcomed Members questions at the next meeting about associated risks, noting that it was important that the working party address such issues. He further added that Members may wish for advice at the next meeting about what might appear in the next version of the NPPF, to be published around Christmas, which may bring in some radical changes to the plan making process and what could be included in Local Plans.
- iv. Nevertheless, the PPM remained optimistic about the Local Plan which he considered to be in a good place, though accepted and acknowledged that between now and examination that there were various factors outside the Council's control, which were at play.

#### **45 LOCAL CYCLING AND WALKING INFRASTRUCTURE DELIVERY PLAN**

- i. The PPM introduced the local cycling and walking infrastructure delivery plan report, which was for information only, and advised that Norfolk County Council (NCC) would soon be launching a full public consultation on walking and cycling strategies which affected different areas of the District. He commented that there was the option, in the New Year, for NNDC to form a collective response rather than each individual ward Member responding.
- ii. Cllr J Punchard welcomed the consultation and reflected on a route located from Little Ryburgh, through Fakenham to Wells-next-the-sea which he considered to be poorly maintained, and noted the difficulties faced by Fakenham Town Council in getting Norfolk County Council to carry out repair works.
- iii. The PPM advised this was an early consultation on options, and there would be an opportunity to comment on things missing, and commented that he was uncertain of the timeline for when consultation would be launched, though it was expected within the first quarter of 2023. Officers had engaged in conversations with NCC, who were aware of growth strategies contained in the Local Plan, which would aid to inform their work.
- iv. Cllr J Toye expressed his support for the consultation, and in Members being able to make their own individual representations, noting that focus was concentrated on towns which in some respect already had infrastructure for people to use. He considered that 40% of North Norfolk residents lived in the



countryside, which he felt had been neglected, in terms of the health and well-being and the benefits of being in the countryside, and because much of the Districts affordable housing was contained on exception sites, in rural localities, in need of better linkage. Cllr J Toye welcomed future discussion on this matter.

- v. Cllr R Kershaw supported the comments made by Cllr J Toye, and considered it important that electric bikes be considered as it would aid to de-risk cycling, would help aid tourism, and access of older generations.

## **46 LOCAL DEVELOPMENT SCHEME**

- i. The PPM introduced the Local Development Scheme and advised that it was a formal requirement when submitting the Local Plan for examination that the timetable be submitted as well as the stages followed when preparing the plan. He noted that there had been earlier timetables which had been stalled by the introduction of the White Paper and NN guidance, and advised that the main changes were alterations to submission dates (February/ March 2023) with the expectation that recommendations would be agreed by Council. The PPM stated that after submission there would be a year or more delay until adoption, pending the Local Plan Inspector's decision. It would be for the new administration to adopt the Local Plan based on the timetable as set out.
- ii. Cllr J Punchard asked if Officers knew what the impact the County Deal would have on the Local Plan.
- iii. The PPM advised this was unknown, but that he had not seen anything which could indicate that the Local Plan process would be adversely impacted.
- iv. Cllr J Toye noted s.26, p.23 of the report, 'significant risks' and asked what constituted as a significant risk?
- v. The PPM advised the current Local Plan provided a sound basis for day to day decision-making, with the new Local Plan introducing some significant changes to deliver growth in the District. Site allocations contained in the last plan in 2011 were largely built out, with the exception of Fakenham, and the new plan also introduced a suite of environmental policies including bio-diversity net-gain, energy efficient construction and others. The PPM commented that the longer it took for the new plan to be submitted and adopted, the longer it would take to address housing need, deliver homes, introduce those new standards, and the greater the risk would be around the 5 year housing land supply. The longer the Council were without an up-to-date plan, the greater potential there would be for unplanned growth. Further, as government policy changes, the work which had been undertaken on the Local Plan begins to become outdated. The PPM stated there would be financial and reputational risks should the Council need to re-consult.
- vi. Cllr J Toye stated that, whilst he was happy with the scheme, it was important not to rush the Local Plan through to examination if it was not considered adequate.
- vii. The PPM advised if Members considered that more time and consideration were required into aspects of the Local Plan resulting in changes to main

modifications, this would result in a delay to the timeline.

- viii. The Chairman commented that one significant risk was the impact of the Levelling Up and Regeneration Bill, and expressed his desire to see the Local Plan submitted before this bill was passed.
- ix. Cllr P Heinrich noted that press reports indicated that the rigid housing targets would disappear through the Levelling Up regeneration Bill, though acknowledged this was not guaranteed. He asked how this may impact on the 5 year housing land supply and on future housing targets.
- x. The PPM commented that press coverage related to a letter sent by Michael Gove, the Secretary of State for Levelling Up, Housing and Communities, to backbench MPs which announced the intention to get rid of centralised methodology for establishing housing targets. However, the language used in the letter expressed the intention to consult on an alternative to the centralised target system. The PPM considered that the formulaic approach contained within the NPPF would likely soon be gone, and what it would be replaced with was a matter of conjecture. He commented that targets would still need to be evidence based and establish a sensible need figure, likely tethered to ONS population figures. The PPM commented that NNDC departed from the standard methodology, instead considering local evidence, which resulted in around 1,500 dwellings fewer than the standard methodology procedures recommended. He considered there to be a clear correlation between market housing growth and delivery of affordable housing, stating that the need for accommodation would not disappear because the government considered that a different formula should be applied. The PPM affirmed that there remained significant inward migration, and 2,500 people on the waiting list for affordable housing, and advised it was these figures which determined the housing figures in the emerging Local Plan.
- xi. Cllr V Gay observed there was not a direct relationship between housing targets and house building. She asked if, after the Regulation 22 stage' submission of the plan, whether it strengthened the case for the reliance upon the emerging local plan, as she understood that greater weight could be applied to emerging Local Plans as they passed through various stages.

The PPM affirmed that as each stage was passed, and as the plan got closer to adoption, greater weight could be attributed to the emerging Local Plan. He advised that two principal factors need to be taken into account, 1. The extent to which the emerging Local Plan was subject to challenge, and 2. Whether emerging policies aligned with the NPPF.

- xii. Cllr R Kershaw proposed the Officers recommendation. Cllr V Gay seconded.

**IT WAS UNANIMOUSLY RESOLVED** by 11 votes for.

**Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet the revised timetable for the submission, examination and adoption of the North Norfolk Local Plan and that the Local Development Scheme be brought into effect as of the date of the next meeting and published as required by section 15 of the Planning and Compulsory Purchase Act 2004 (as amended).**

## 47 LOCAL PLAN SUBMISSION: PROPOSED MODIFICATIONS (POLICIES)

- i. The Chairman introduced this item, and reflected prior working party meetings culminating in this report. He cautioned Members against seeking to make substantial modifications at this stage and argued that Members had been afforded opportunities prior.
- ii. Cllr J Punchard sought clarity over the recommendation, and the process the recommendation would take through the Councils Democratic process.
- iii. The Chairman advised that the recommendation was for the Working Party to recommend to Cabinet that the schedules of the proposed modifications along with the proposed submission version of the Local Plan be submitted for independent examination. This would then be brought to Full Council as a recommendation from Cabinet, pending its approval.
- iv. The PPM introduced the item and Officers recommendations. He confirmed that schedule 4 was formed of modifications which Officers considered merited consideration by the Planning Inspector, as they improved the plan. The PPM advised that vast majority of proposed modifications did not alter the substance of the plan, rather they made clearer for the reader the intention of what the Council wished to achieve, making it easier for the decision maker.

He advised that there were other changes consisting of typographical errors, consistency and presentational issues, which were proposed to be included for consideration by the Inspector en bloc, as these were uncontentious presentational changes.

The PPM noted that Members had been provided the schedule of representations in full around 8 weeks prior, with the information also being made available on the portal. Within the Agenda Papers, Members had been provided with schedule 3 – containing a summary of the key issues and Officer's responses, schedule 4 – the proposed minor modifications, and a separate main modification on NN.

With Regards NN, the PPM advised that the Council must meet the habitat regulations requirement as this was a legal requirement of the Local Plan. In order to meet this requirement, the proposals contained within the plan must mitigate their impact on the receiving watercourses, in this instance the impact of phosphorus and nitrogen pollution on the river Wensum and the Broads. The PPM advised that a policy requirement had been added to the Local Plan that no development take place unless it demonstrated NN, in addition to some contextual background information explaining what this issue was, and how it impacted on the development industry, effectively serving as an embargo on specific development in those catchment areas which failed to address NN. Had the Local Plan been submitted 6 months prior, he considered that it would have been challenging to get through examination as the Council did know what mitigation may look like or what the financial impact may be. Mitigation strategies were now much clearer, and costs were anticipated to be around £5,000 per dwelling as an average. That costs had been averaged in an update of the viability assessment, ensuring that those costs did not undermine the deliverability of other policy considerations. The PPM considered this policy fix was sufficient, though

acknowledged the Planning Inspector would still ask questions about mitigation strategies.

The PPM did not propose to discuss schedule 3 verbatim, rather, he proposed to address the key issues of the report under each topic area.

- v. Cllr J Punchard whilst agreeing with the PPM's approach, challenged the lack of scrutiny of schedule 3 by Members, though commented he personally did not consider there to be issue with the recommendations set out by Officers in schedule 3.
- vi. The PPM advised he would refer to key representations, and trusted that Members had thoroughly considered the document and understood its contents.
- vii. The PPM proceeded to go through the key issues of the plan:

#### Climate Change (P.52 of the Agenda Pack, s 2.3 onwards)

The PPM advised there were two opinions on this matter, the first from the development industry, which considered the requirements to be excessive. The second, which considered that the policies in the emerging Local Plan did not push the agenda far enough, particularly in regard to matters such as energy efficient construction and biodiversity net gain, but explained that there is a whole suite of new 'green' policies all of which are significant steps forward, which are seen to be as far as we can go at the moment but, in terms of deliverability and viability, it would allow for further changes, particularly in regard to the Council's net zero carbon target by 2030.

He reflected that nowadays Local Plans do not last 15 years and would be in a 5 year cycle of review. It was reasonable to believe that what was written today would not be in place in 10 years' time and is likely to be subject to fairly significant review in 5 years' time.

#### Housing Allowance (P.53 of the Agenda Pack, s 2.7)

The PPM reflected on the differences of opinion with respect of housing target, with those in the development industry considering more could and should be done, and that the housing target provided by the Council would not address housing need and the Council should be allocating more land. Such representations considered that the departure from the standard methodologies was not justified, and questioned the achievability of the Local Plan with respect of housing delivery.

Officers considered the Council's housing target to be reasonably justified, based on a well evidenced approach, and accepted that much of the large scale growth in North Walsham and Fakenham would not occur prior to 2036.

Significantly, if the standardised methodology was removed, as had been eluded by press following publication of the letter sent by Michael Gove, the Secretary of State for Levelling Up, Housing and Communities to backbench MPs, the argument to adopt the standard methodology was weaker. This would make the Council's position more defensible.

#### Distribution of Growth. (P.53 of the Agenda Pack, s 2.8 and 2.9)

The PPM stated that the contentious debate largely focused on small growth villages, with growth in the towns broadly supported. He noted that there were arguments against individual sites but nothing against the logic of putting growth in the larger settlements in the District. The Policy approach for Small Growth Villages is to allow 6% growth on small unallocated sites, allowing for infill development and development outside the settlement boundaries subject to compliance with a range of criteria.

Whilst it was anticipated that only 400 dwellings would be produced through the small growth villages, the arguments against were critical on service provision in those areas, considering it to be unsustainable growth, or occupied by 2<sup>nd</sup> home owners. Officers were satisfied that the approach was the correct one for the reasons outlined.

#### Infrastructure provision and viability (P.53 of the Agenda Pack, s 2.10)

The PPM advised that Officers considered that the plan sets out an ambitious growth strategy, well supported by infrastructure, and the approach was considered to be necessary, reasonable, proportionate and costed. In order to ensure the right information is submitted, Officers have introduced a range of validation requirements which would aid the Development Committee to reach decisions, help the Local Authority register applications, noting this would be at a cost when making a planning application.

#### Employment (P.55 of the Agenda Pack, s 2.16 and 2.17)

The PPM considered there to be some debate about the adequacy of employment land supply, and stated that Officers had identified in the Local Plan a supply of land that, based on historic take-up rates would be suitable for around 50 or 60 years. However, this did not tell the full picture as the land was distributed across the district and was concentrated in some locations.

The PPM commented that policy E3 of the plan addressed development outside of designated employment land and was analogous to the rural exceptions policy, but for employment development. He was satisfied that as the Council had a flexible policy allowing for employment development away from Employment Land, absolute supply was less critical with respect of consideration, and Officers did not believe there was a compelling need for more Employment Land than had been specified.

Regarding Tourism policy issues, the emerging Local Plan takes the view that the Council would not support new build tourism accommodation, including static caravans, in the countryside policy area. He reflected that this was a deliberate policy choice, previously debated at the Working Party, and noted historic placement of caravan sites in the district in the 1960's.

- viii. Cllr N Dixon stated that whilst he broadly agreed with the argument set out by the PPM, he considered there to be scope for beneficial change particularly with respect to the allocation of employment land. Cllr N Dixon commented that there should be some provision which allowed flexibility in locations where it is known that there was a demand for high quality employment development, and acknowledged this may not be suitable for all areas. He further argued that, if the Council were committed to its desire to create sustainable communities, having employment close to housing development was important. Failure to include the above within policy, in a sufficiently clear and deliverable way, would result in developers walking

away.

Cllr N Dixon sought confirmation whether, on existing tourist accommodation sites (which otherwise would have been excluded from the emerging Local Plan), if replacement was permitted for those sites of a lower quality.

- ix. The PPM advised that the new tourism policy would not prevent replacement, upgrading, or expansion of existing businesses. He argued that by focusing the policy on improving and putting investment in existing sites, it would maximise the benefit of what there already was.

He recited Policy E3, and added that first priority would be given to allocated, designated employment sites, before then being opened to alternative sites, with a positive presumption for permission.

*Cllr N Pearce left the meeting at 11.42am.*

- x. Cllr N Dixon sought to ensure that the route to alternative employment sites was eased, noting it had been a challenge in the past which risked opportunities and stressed the importance of being policy agile.
- xi. Cllr P Grove-Jones reflected that there had always been a huge push for residential accommodation but employment land was often pushed into the background. She asked the PPM what was the percentage of built out employment land when compared to residential, and noted that within the east of the district residents were often forced to travel for work due to the lack of employment sites.
- xii. The PPM commented that he was unaware of the percentage asked and advised that there was not a direct correlation between house building and employment. He noted that the work force was shrinking due to an aging population in the district who were retired, and further reflected that North Norfolk traditionally had lower unemployment figures when compared to the rest of the country. The PPM commented that one of the key issues surrounding employment was not the prevalence of employment land supply, rather it was the low wage economy. The PPM stated that there was an extremely modest appetite for inward investment and acknowledged several designated employment land sites remain undeveloped for 20 years.
- xiii. Cllr J Toye highlighted a formatting issue with p.54 of the Officers report, 213 and 215 were duplicated and asked this be correct before the report was considered by Cabinet.

Cllr J Toye commented that small growth villages provided employment through way of village shops, garages and pubs, employing local people, and spoke favourably of these businesses growing and expanding and the need for increased housing to sustain these communities. He was assured that this had been covered off within the emerging Local Plan.

- xiv. Cllr G Mancini-Boyle sought the current position of Natural England with regard to Nutrient Neutrality.
- xv. The PPM advised that the position had shifted, and Natural England along with it, with a raft of work on catchment areas being completed, and developers beginning to offer up mitigation proposals.

- xvi. Cllr J Toye ask if at the next meeting, when site allocations were to be discussed, if Members would be asked to consider the allocation of sites for mitigation schemes.
- xvii. The PPM stated that he would shy away from identifying specific areas and allocations for mitigation.
- xviii. The ADP advised that a report was being discussed by the Corporate Leadership team in December which would outline how the Norfolk Councils were preparing for a joint venture with Anglian Water. He noted that the mitigation may include remedial actions in terms of water efficiencies for properties owned or managed by Housing Associations or Councils, and there may be instances in which agreements were made in relation to existing septic tanks that discharge into special areas of conservation. Short term measures may be inclusive of delivery of catch crop cover, crops on areas of land that take agriculture out of discharges of nitrates and phosphorus into the sensitive environments. It was anticipated that this report be discussed by Cabinet in January 2023, with the venture of joint Councils to be looking at the delivery of mitigation as early as March 2023 going hand in hand with developers securing their own bespoke mitigation funded by themselves, and Natural England's scheme of mitigation, funded by central government. The ADP stated that the difficulty of allocating mitigation sites is that some schemes may not require land to be made available.
- xix. Cllr N Dixon spoke on policy E3 and in particular mixed allocations, he commented that one of the issues was when landowners were unprepared to release land at commercial value without an additional, enabling residential development, providing a recovery of land value.
- xx. The PPM advised that he would be reluctant to offer up the policy change asked for at the meeting, but that he would reflect on Members comments that they would like an item on policy E3, in particular how Employment Development outside of development boundaries may work, at the next meeting.
- xxi. Cllr N Dixon advised that he would be content with this approach and welcomed this item being brought to the next meeting.
- xxii. The PPM affirmed that he would bring this item back, after proper consideration of the policy in full. He advised that he would circulate any proposed amendments to Members in advance of the next meeting.

*The Meeting took a break at 12.05pm and resumed at 12.18pm.*

*The ADP left the meeting at 12.05pm.*

- xxiii. The PPM advised that he would not go through schedule 3 line by line, and noted that there were a few key themes which appeared through the representations. The first theme, was the need or otherwise for one policy to repeat the requirement of another policy, however the PPM considered in rebuttal that there was no need to do so, and that all development proposals have to comply with all of the policies in the plan. To repeat each policy would result in reams and reams of policy requirements. The second theme was around language and effectiveness, with it being a matter of judgement

for the decision maker, rather than the use of objective measurements. The PPM stressed the importance of context when making planning judgements, against a set of criteria and not prescriptive measurements.

- xxiv. Cllr V Gay queried the submission for Historic England 'undesigned' vs 'non-designated' (schedule 3 p.64 of the Agenda Pack) noting that the undesigned formula had been used later in schedule 4, and asked for clarity if undesigned implied that a decision had been taken not to designate something, whereas non-designated was a factual observation that something was not designated. She wanted to ensure that the implication was understood.
- xxv. The PPM commented that he would take this matter away and would clarify the use of language and the difference between non-designated and undesigned, to ensure it was properly aligned through the document.

The PPM advised of the distinction between schedules 3 and 4, with schedule 4 including the proposed minor modifications. He noted that there was no distinction in the legislation between minor and main modifications and it was a matter of judgement. It was broadly understood that in labelling something as a 'main modification' it would be a matter in which the Planning Inspector for the Local Plan would consult on publically, at their discretion. Minor modifications proposed amendments to correct grammatical or typographical anomalies, or small tweaks to policy without changing the intention of the policy. The PPM advised there may be instances in which the Inspector considered something presented as a minor modification to be a main modification, worthy of consultation.

- xxvi. Cllr J Punchard sought clarification for table two, p.215, small growth villages, he understood that the figures marked in red were the amended figures but questioned why some had the amended figure, with another figure in brackets next to it.
- xxvii. The PPM advised that the 0 figure was where there were no allowance in the village because it was highly constrained by something, i.e. flood risk area, despite these settlements meeting the qualifying criteria.

The PPM proceeded to go through schedule 3 from p.187 onwards and discussed the distinction between spatial strategic policies and other policies in the plan as required by the NPPF. He noted that an appendix would be included within the plan listing whether a policy was strategic or not, importantly Local Neighbourhood Plans had to comply with strategic policies of a Local Plan. He further commented on other minor modifications including the inclusion of references to the East Marine Plan and updates to the Glasgow Climate Pact (post Reg-19) providing contextual information.

The PPM continued to go through the schedule from page 192, and highlighted that additional information had been introduced to explain the distinction between small, medium and high turbine, which would aid applicants and decision makers. Page 193 included textual updates and clarifications, nothing which changed policies themselves. The PPM noted changes on page 194, Coastal Management Adaptation, providing clarity that the policy is about reducing risk but offering a degree of flexibility with its wording. On Page 195 the PPM noted the submission pertaining to Bio-diversity net-gain (modification 3.10.10) which related to the type of



development necessary to demonstrate net biodiversity gain, he commented that the policy as drafted in the plan referred to 'all development should deliver 10% biodiversity net gain' and the intention of the legislation, when published, would be to exempt small scale development proposals from the requirement. The PPM proposed that there should be a development threshold, i.e if building a new house this would need to demonstrate bio diversity net-gain but not for a minor porch extension.

*Cllr P Fisher left the meeting at 12.40pm*

- xxviii. Cllr N Dixon sought clarity for instances in which a building plot held a substantial bio-diversity value to it, but was designated as a development plot and built upon, would that scheme have to demonstrate that it had achieved or would achieve 10% bio-diversity net gain over and above the starting point.
- xxix. The PPM advised as this was for a new dwelling it would need to demonstrate 10% improvement. It was understood that a matrix would be introduced by the government which would ensure 'like of like' biomass replacement i.e replacement of an oak tree for an oak tree, rather than a wildflower meadow. The PPM noted this may include on and offsite schemes.
- xxx. Cllr J Toye commented that a potential downside was that not all sites had been mapped and therefore it would be difficult to measure.
- xxxi. Cllr V Gay agreed with Cllr J Toye and added that she had noted the growing support for biodiversity within representations, which had not been the case upon creation of the core strategy. Cllr V Gay reflected that England was one of the least biodiverse nations.
- xxxii. The PPM continued going through schedule 3 from p.198, and advised that the section of red text effectively recorded the current position with drainage at Horning. P.199 included a change of wording from substantial to proportionate as requested, and separately special strategy changes to offer greater clarity to avoid applicants splitting parcel of land to resist affordable housing development, undermining policy obligations. P.200 largely consisted of technical updates referring to various organisations which now exists, as well as Health Impact Assessments which were a new requirement within the policies where developers of significant development proposals had to complete an assessment and checklist of the impact of the development on health. Considerations include access to footpaths, cycleway, bus routes and possible contributions through S106 contributions to doctor's surgeries, to name a few. The threshold had been set at 500 dwellings, however this had been lowered following representations.
- xxiii. Cllr V Gay supported the reduction in the threshold to 250 dwellings, and sought confirmation that the Council would defend the proposed modification during the planning inspectorate process.
- xxiv. The PPM advised that, as the Council were tabling the modifications, the Council would support and defend the modifications during the inspection process, positively promoting their incorporation in the Local Plan.

The PPM continued to go through schedule 3 from p. 201 and noted the

proposed modifications and included some slight rewording and the inclusion of clearer criteria. P.204 referenced the NNPF which may be subject to change with the new NPPF which would require Officers to go through and align references, and a change in wording from 'should' to 'must' strengthening the language. P.209 included changes to working from 'entirety of the structural elements' to 'a substantial proportion of the structural elements' allowing for greater flexibility.

*Cllr P Grove Jones left the meeting at 12.58pm.*

P.212 included considerations for policy E3, which the PPM advised would be returned to the working party as requested earlier in the meeting. The PPM continued to note the changes from p.13 – 215 before reiterating the Officers recommendation.

xxxv. Cllr V Gay requested a change to the recommendation could be amended to include 'in consultation with the Portfolio Holder'.

xxxvi. Cllr R Kershaw proposed acceptance of both of the Officers Recommendation subject to the amendment put forward by Cllr V Gay, Cllr V Gay seconded.

**IT WAS UNANIMOUSLY RESOLVED** by 8 votes for.

**Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that the Schedules of proposed modifications along with the Proposed Submission version of the Local Plan be submitted for independent examination.**

**To delegate minor amendments in the finalisation of the submission version & Schedules and associated documents to the Planning Policy Manager in conjunction with the Policy Team Leader and Portfolio Holder.**

**48 EXCLUSION OF PRESS AND PUBLIC**

None.

**49 TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA**

None.

**50 ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE**

None.

The meeting ended at 1.10 pm.

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Chairman

## Registering interests

Within 28 days of becoming a member or your re-election or re-appointment to office you must register with the Monitoring Officer the interests which fall within the categories set out in **Table 1 (Disclosable Pecuniary Interests)** which are as described in "The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012". You should also register details of your other personal interests which fall within the categories set out in **Table 2 (Other Registerable Interests)**.

**"Disclosable Pecuniary Interest"** means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in Table 1 below.

**"Partner"** means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

1. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.
2. A 'sensitive interest' is as an interest which, if disclosed, could lead to the councillor, or a person connected with the councillor, being subject to violence or intimidation.
3. Where you have a 'sensitive interest' you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

## Non participation in case of disclosable pecuniary interest

4. Where a matter arises at a meeting which directly relates to one of your Disclosable Pecuniary Interests as set out in **Table 1**, you must disclose the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest, just that you have an interest. Dispensation may be granted in limited circumstances, to enable you to participate and vote on a matter in which you have a disclosable pecuniary interest.
5. Where you have a disclosable pecuniary interest on a matter to be considered or is being considered by you as a Cabinet member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it

## Disclosure of Other Registerable Interests

6. Where a matter arises at a meeting which **directly relates** to one of your Other Registerable Interests (as set out in **Table 2**), you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

## Disclosure of Non-Registerable Interests

7. Where a matter arises at a meeting which **directly relates** to your financial interest or well-being (and is not a Disclosable Pecuniary Interest set out in Table 1) or a financial interest or well-being of a relative or close associate, you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.
8. Where a matter arises at a meeting which **affects** –
  - a. your own financial interest or well-being;
  - b. a financial interest or well-being of a relative, close associate; or
  - c. a body included in those you need to disclose under Other Registrable Interests as set out in **Table 2**

you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied

9. Where a matter **affects** your financial interest or well-being:
  - a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
  - b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

10. Where you have a personal interest in any business of your authority and you have made an executive decision in relation to that business, you must make sure that any written statement of that decision records the existence and nature of your interest.

**Table 1: Disclosable Pecuniary Interests**

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

<b>Subject</b>	<b>Description</b>
<b>Employment, office, trade, profession or vocation</b>	Any employment, office, trade, profession or vocation carried on for profit or gain. [Any unpaid directorship.]
<b>Sponsorship</b>	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
<b>Contracts</b>	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the

	<p>councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council —</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
<b>Land and Property</b>	<p>Any beneficial interest in land which is within the area of the council.</p> <p>'Land' excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.</p>
<b>Licenses</b>	<p>Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer</p>
<b>Corporate tenancies</b>	<p>Any tenancy where (to the councillor's knowledge)—</p> <p>(a) the landlord is the council; and</p> <p>(b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</p>
<b>Securities</b>	<p>Any beneficial interest in securities* of a body where—</p> <p>(a) that body (to the councillor's knowledge) has a place of business or land in the area of the council; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were</p>

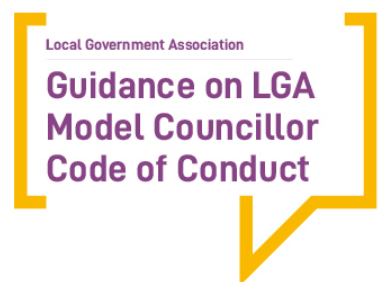
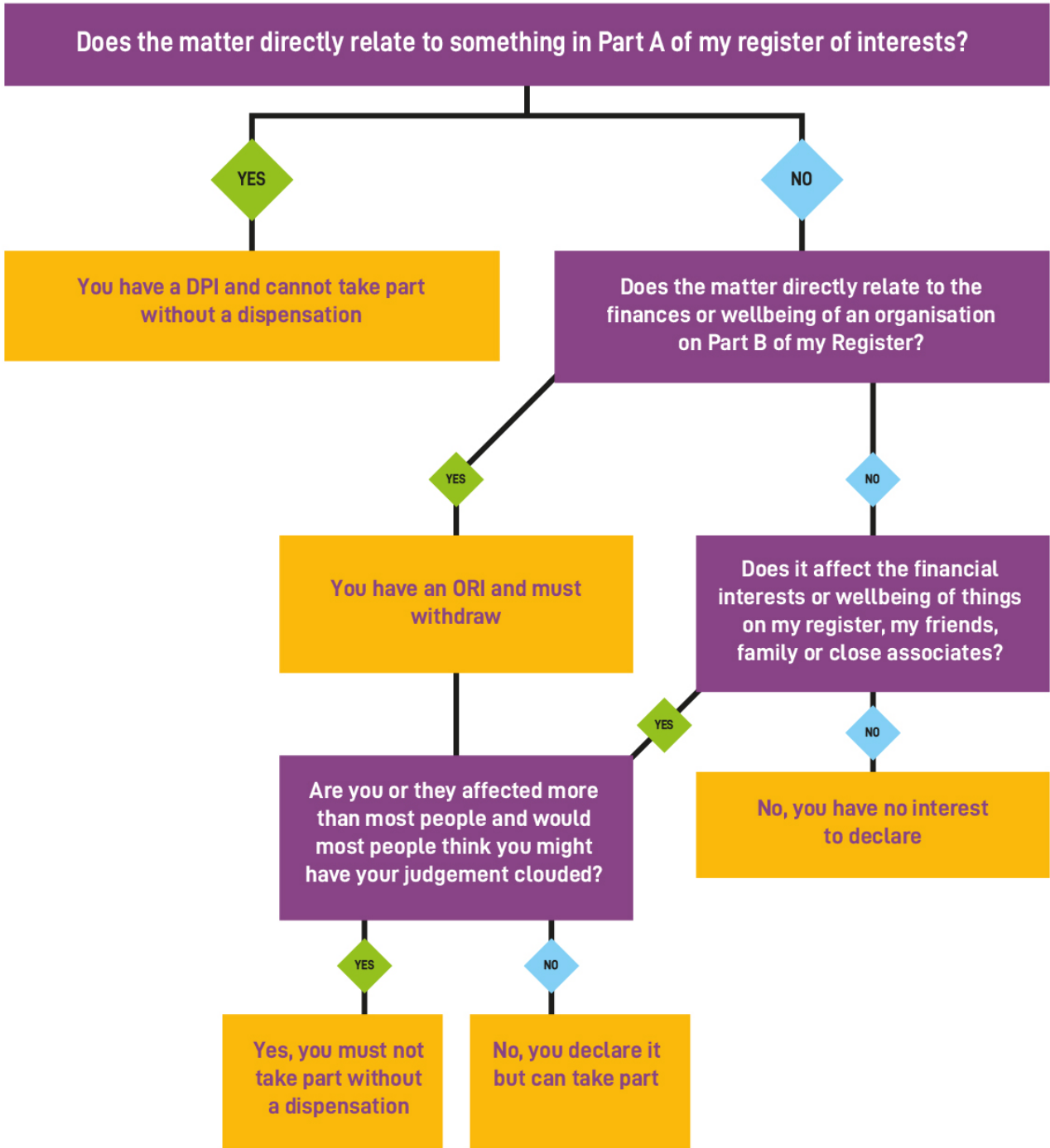
	spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
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\* 'director' includes a member of the committee of management of an industrial and provident society.

\* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

**Table 2: Other Registrable Interests**

<p>You have a personal interest in any business of your authority where it relates to or is likely to affect:</p> <ul style="list-style-type: none"><li>a) any body of which you are in general control or management and to which you are nominated or appointed by your authority</li><li>b) any body<ul style="list-style-type: none"><li>(i) exercising functions of a public nature</li><li>(ii) any body directed to charitable purposes or</li><li>(iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)</li></ul></li></ul>
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**Local Plan Submission: Proposed Modifications (Site Allocations)**

**Summary:**

This report seeks to agree a schedule of modifications to the Local Plan which the Authority will request the Inspector to incorporate as part of the Local Plan examination process. It considers the requests for such modifications made by respondents to the recent Regulation 19 consultation on the proposed submission version of the Plan. The appointed Inspector will determine if these modifications should be made when the Plan is examined.

The report covers the proposed site allocations section of the Plan and any consequential amendments to the Proposals Map.

A deferred item from the previous meeting relating to employment land provision is also considered.

**Recommendations:**

- 1. Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that the appended Schedules of proposed modifications along with the Proposed Submission version of the Local Plan be submitted for independent examination.**
  
- 2. To delegate minor amendments in the finalisation of the submission version & Schedules and associated documents to the Planning Policy Manager and Policy Team Leader in conjunction with the Portfolio Holder.**

Cabinet Member(s) Cllr Andrew Brown	Ward(s) affected  All
All Members	All Wards
<p>Contact Officer, telephone number and email:</p> <p>Mark Ashwell, Planning Policy Manager 01263 516325 <a href="mailto:mark.ashwell@north-norfolk.gov.uk">mark.ashwell@north-norfolk.gov.uk</a></p> <p>Matthew Gutteridge, Senior Planning Officer 01263 516224 <a href="mailto:matthew.gutteridge@north-norfolk.gov.uk">matthew.gutteridge@north-norfolk.gov.uk</a></p>	

## 1. Deferred Item from previous meeting – Employment land provision

- 1.1 At the December 2022 Planning Policy and Built Heritage Working Party concerns were raised about the Plans approach towards the designation of employment land and specifically if the approach would be sufficiently flexible to meet future needs. A decision was deferred at the request of Officers to allow for this area of policy to be considered in further detail.
- 1.2 The evidence of historic employment land development rates in the District has been used to review the total supply of designated and allocated employment land in the District. These designations and allocations essentially protect sites from other forms of development and reserve it for employment generating uses. This evidence does not justify extensive new designations or allocations. The Plan nevertheless allocates new employment land and mixed allocations in some locations and retains the majority of the employment land designations contained in the current Core Strategy in order to provide a broad distribution of available sites. The Plan also recognises that there are sometimes difficulties with matching the specific requirements of developers, which are often very localised, with the available supply of land. To address this concern policies SS2 and E3 of the Plan both allow for employment growth on unallocated sites, including those in the designated Countryside Policy Area, provided it is first demonstrated that the designated sites are not suitable. The purpose of this approach is to ensure that the designated sites are prioritised over other locations whilst also ensuring that employment creating developments are not lost to a community by virtue of a lack of suitable land. This approach is entirely consistent with the NPPF which states at para 85:

*‘Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist’.*

- 1.3 As drafted in the Plan, Policy E3 (attached at Appendix 4), whilst allowing for employment developments outside of boundaries, includes a further list of qualifications limiting the categories of employment to ones which require a rural location. The types of use permitted by the policy are listed as permissible examples rather than an exclusive list and the policy makes this clear by using the term ‘*not limited to*’ when describing the permitted uses. Nevertheless, representations make the case that these additional qualifying criteria are too restrictive and there should be no need to limit the types of employment development to the listed uses if the applicant has already demonstrated that designated sites are not suitable. Officers concur that the policy, as drafted, could potentially operate in a more restrictive manner than its intended purpose. Therefore, a minor modification, under reference PMIN/E3/01 to the policy is proposed in order to remove any ambiguity. The impact of this modification would be to make clear that all types of employment creating developments could in principle be located outside of adopted development boundaries if the applicant has first demonstrated that

allocated sites are not suitable. It would remain the case that such proposals would need to comply with other aspects of adopted policies relating to issues such as highway safety, amenity and the protection of designated heritage and wildlife sites.

- 1.4 It is also recommended that this proposed minor modification should be reflected in the wording of the 'purpose of the policy' included in the Plan.
- 1.5 The case was also made at the last meeting that this flexibility may not be sufficient and any policy should also support mixed use developments as a mechanism to encourage land owners to release land. An example at Hoveton was referenced where permission had been granted for both a small housing scheme and an associated job creating development and in that case it was suggested that it was unlikely that the employment aspects of the proposal would have preceded without the 'enabling' housing development.
- 1.6 The principle of 'enabling development' has been established/accepted for many years. The term is used to describe those circumstances where it is shown to be necessary to allow development which would otherwise be contrary to policy as a mechanism to provide finance to fund another development which should be delivered in the public interest but is not in itself viable or deliverable.
- 1.7 Whilst not disagreeing that such enabling approaches may be necessary in some circumstances, Officers do not support the inclusion of enabling development provisions within the policy itself. The acceptance of such approaches within the policy is likely to lead to all employment proposals being promoted with 'enabling' development as landowners are likely to simply adopt the stance that land would not be made available for employment development *unless* housing was included. Such an approach is also likely to further undermine the delivery of allocated sites as these would risk being viewed as less desirable. The absence of enabling development principles within the policy itself does not prevent the case being made for such proposals as was the case with the Hoveton example but it is considered that the onus should remain with the applicant to demonstrate on a case-by-case basis why such approaches are essential. Consequently, no further modification to the policy is recommended.

## **2. Schedule of modifications -Sites Allocations**

- 2.1 In December 2021 Members of the Planning Policy and Built Heritage Working Party resolved that the Local Plan sites section be agreed as the basis for undertaking the Regulation 19 consultation of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 2.2 The Plan underwent public consultation at Regulation 19 Publication Stage between January and March 2022. Before submitting a Draft Plan for examination, the Local Authority must under Regulations 20 and 22 provide a summary of the main issues raised in those representations and supply a copy of the representations upon submission along with supporting documentation which in the opinion of the local planning authority is relevant to the preparation of the Local Plan.

- 2.3 The Regulation 19 consultation sought views around legal compliance and soundness of the proposed submission version of the Local Plan and gave respondents the opportunity to suggest modifications for the Inspector to consider. The Council received a total 697 representations from 190 respondents. A proportion of the responses received were not made using the prescribed consultation response form and did not request modifications. A large number of responses related to multiple topic areas, policies, or sites in the Plan, or to other supporting documents and or included additional uploaded PDF documents to explain and support the representations. In order to review the representations, Officers undertook an exercise to split such comments and append them to the relevant section of the Plan on the consultation portal.
- 2.4 All the representations remain publically available through the Councils Planning Consultation portal and on submission this will be signposted to the appointed inspector. In addition, all the representations have been compiled into a single PDF version. This Schedule of Representations, Schedule 1, details all the representations received during the consultation period, in Local Plan section order, and will also be made available at submission, as per the requirements of the regulations.
- 2.5 In advance of the January Working Party meeting, Members of the PPBHPW received a copy of Schedule 1, (4.11.22).
- 2.6 It is not possible to make changes to the pre submission document at this stage in the process as the Local Plan has been subject to consultation and is the intended submission document. Representations made at Regulation 19 Stage are considered by the appointed Inspector who will determine if the Plan is legally compliant and sound. Prior to formal submission for examination, the Authority may however consider the representations and invite the Inspector to modify the Plan as part of the examination process.
- 2.7 Officers have now reviewed the consultation feedback and any requested modifications that have been put forward. A summary of the requested modifications along with the Council's response in relation to each section of the Plan is attached as Schedule 3. Where a modification is accepted and proposed by Officers, these are transposed in to the attached Schedules 4 and 5 as proposed modifications. The Inspector will be invited to accept and make these changes as part of the examination process.
- 2.8 Schedule 3 contains only a summary of the requested modification(s) and details a short and often standardised response(s). At this stage, it is not the intention of the schedules to formulate detailed rebuttals or reasoned arguments. Similarly, it is not the purpose of these schedules to summarise the wider feedback received from those who objected or supported the Plan but did not seek specific modifications. Such wider representations will be considered by the Inspector.
- 2.9 Both schedules, once finalised, along with a tracked change version of the proposed submission version of the Plan incorporating the requested modifications will form part of the submission documentation. It will be up to the Inspector to agree to any proposed modifications and the detail and reasoning for such changes will be discussed during the examination

process. Overall, there is merit in agreeing to request the recommended modifications for reason of clarity, consistency, and correction of facts at this stage as this is beneficial to the overall examination process.

- 2.10 In the regulations, modifications are classified as either **minor** or **main**. Minor modifications comprise clarifications, corrections, presentational changes and small adjustments to policies or the supporting text of the Plan or Proposals Map. Main modifications are those which are necessary for the Plan to be found sound and/or materially affect the policies or proposals. If agreed by the Inspector, it is likely that the main modifications will be subject to an additional consultation as directed by the Inspector as part of the examination process. It is possible that further modifications, both minor and main, will be proposed during the examination and therefore this list is subject to on-going change and why, following examination, the Plan will require full Council approval for adoption in line with the constitution.
- 2.11 The majority of modifications are considered minor in nature and consist of typing corrections, punctuation and factual updates. A number of others bring clarity and consistency to the policies and supporting text and help address issues raised in interpretation and the intent of the policies. Where representations seek modification to particular policies where the requested modification is addressed adequately elsewhere in the Plan, no modifications are proposed, as proposals will be assessed against the Local Plan and any relevant Neighbourhood Plan as a whole. There is no need for individual policies to repeat requirements included in policies elsewhere in the Plan.
- 2.12 Depending on how the submitted Draft Plan advances, and the pace of national policy change it may be necessary to propose further substantive modifications at the examination and/or add additional consultation stages to the overall timetable. Members may be aware that government has published a revised National Planning Policy Framework prospectus for consultation. If it transpires that there is a need for further substantive modification(s), due to legislative change ahead of the examination this will be reported to the Working Party.

### **3. Regulation 19 proposed modifications – Site Allocations**

- 3.1 The key areas of requested modifications are broadly outlined below and covered in schedules 3,4, and 5 attached.
- **Promotion of alternative sites** – Site owners and promoters of sites which have been discounted at previous stages of plan preparation seek reinstatement of sites either on grounds that the Plan allocates insufficient growth or that a discounted alternative is preferable or more deliverable than one of the proposed allocations. These modifications have not been recommended.
  - **Seeking deferral of policy requirements for negotiation at later planning application stage.** Each of the proposed site allocations is subject to specific policy requirements which must be complied with in order to secure planning permission. Some representations seek to argue for less prescription in some of the site allocation policies

particularly in relation to amounts of open space, specialist elderly homes provision and other criteria on the basis that these can/should be considered at application stage when the specific nature of any development proposal is being considered. In the main, requests for such modifications are resisted as they would dilute the intention of the Plan and introduce uncertainty.

- **Seeking additional policy criteria in the site allocations policies.** These representations fall into three categories, the first making the case for the inclusion of 'missing' criteria which have been applied to some sites but not to others (these have been largely recommended), those seeking to add new requirements to the site allocation policies which are already included elsewhere in the Plan (largely rejected on the basis of unnecessary repetition), and those which seek new or modified criteria within the policies to improve their effectiveness (largely accepted).
- **Deletion of Holt Employment Land.** The Plan includes a new allocation of employment land at Hempstead Road, Holt. The site owner has withdrawn this site and made clear that it will not be made available for development during the period covered by the Plan. As such, the proposed allocation would not be deliverable and should be deleted for that reason. No alternative or suitable site was put forward.
- **Increase the site sizes at Cromer, Hoveton, Wells and Stalham (Maps included as Appendix 5).** The following are recommended;
  - Site HOV1, Hoveton – A significant increase to the size of the site put forward by the site promoters in order to improve layout and site viability. The modification would ensure that drainage, highways, and landscaping issues could be addressed in a more comprehensive manner. It is not proposed to increase the quantum of development.
  - Site C22, Norwich Road, Cromer – minor alterations to the site area to ensure that the likely full extent of highway access works are included within the allocated area.
  - Site ST23, Yarmouth Road Stalham – enlargement of proposed allocation to include the garden area of an adjacent property. The garden is already within the development boundary of Stalham and hence development would be policy compliant but its inclusion within the allocated area may facilitate more comprehensive development by allowing for vehicular access to the garden via the wider allocation.
  - Site W07/1 in Wells - updating to include an access point to Mill Road within the area allocated.

#### 4. Recommendations

**Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that the Schedules of proposed modifications along with the Proposed Submission version of the Local Plan be submitted for independent examination.**

**To delegate minor amendments in the finalisation of the submission version & Schedules and associated documents to the Planning Policy Manager and Policy Team Leader in conjunction with the Portfolio Holder**

## **5. Legal Implications and Risks**

- 5.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy approaches must be justified and underpinned by up to date and proportionate evidence, be informed by appropriate sustainability appraisals and take account of and demonstrate how public feedback, national policy & guidance have been used to inform the production through the application of a consistent methodology.
- 5.2 The statutory process requires plan production to accord to the statutory requirements as set out in The Town and Country Planning (Local Planning), (England) Regulations 2012 (as amended). Failure to undertake Plan preparation in accordance with the regulations and NPPF is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.
- 5.3 There remains a residual risk of planning reform which, could undermine the production of the Plan to date through the proposed white paper along with further changes to the National Planning Policy Framework, either through incremental changes or substantive changes leading to wholesale replacement. Early submission reduces the risks associated with changes in government policy and puts the authority in a stronger position to take advantage of any subsequent transitional arrangements should they be introduced. If production is extended there remains an increased risk of early Plan review, further evidence gathering and substantial time and costs along with increased pressure and challenge on the continued use of existing adopted policies.

## **6. Financial Implications and Risks**

- 6.1 Failure to undertake plan preparation in accordance with the regulations is likely to render challenge and result in less weight being given to the evidence documents and would result in further officer resources and associated costs. If production is extended there remains an increased risk of early Plan review and substantial costs along with increased pressure and challenge on the continued use of existing adopted policies

Appendix 1 – Schedule 3 – Summary of requests for modifications and officer responses

Appendix 2 – Schedule 4 – Recommended requests for Minor modifications

Appendix 3 – Schedule 5- Recommended requests for Main modifications

Appendix 4 – Employment Policy E3

Appendix 5 – Policies Map modifications (map extracts)

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**Representations on the  
Proposed Submission Version Local Plan**  
(Regulation 19 Stage)

**Schedule 3 (Sites)**

**Requested Modifications & Council Response leading to proposed modifications**

**Draft for Planning Policy Built Heritage Working Party**

Schedule 3 - Requested Modifications & Council Response

Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
LPS129	Mr John Edwards	9.1 Places & Sites - Introduction	Para 9.1.4	Para 9.1.4 the basis of the definition of settlement boundaries needs to be classified as it does not refer to topography or urban form. It appears to be simply a result of dwellings planned and, consequently, arbitrary.	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>Para 9.1.4 provides general context on the purpose of such boundaries. The methodology used to review boundaries is included in separately published evidence documents and need not be included in the Plan.</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS435	Mrs Raj Bains, Boyer Planning (Richborough Estates)	9.2 Places & Sites - Site Allocations	Policy DS1	Promoting alternative site – Land at Paston Gateway (H0160) in replacement of NW62/A, as the Council have underestimated their housing target.	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting Site Assessment Booklets</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS234	Mrs Sarah Mitchell (RSPB)	9.2 Site Allocations	Policy DS1	Cromer and Sheringham should be included within HRA screening process due to their proximity to the Greater Wash SPA.	<p>The whole Plan including policy DS1 and the individual site allocations has been subject to HRA/ AA. Natural England through LPS762 confirm their agreement with the conclusions and that Natural England is satisfied that the Habitats Regulations Assessment (HRA) (Footprint Ecology, 9th December 2021) has provided a robust assessment of the Regulation 19 stage of North Norfolk District Councils Draft Local Plan in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and having regard to relevant case law. The plan wide HRA screens out likely significant effects for policy DS1 and Cromer/ Sheringham sites allocations in relation to the Greater Wash SPA.</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS728	Mrs Debbie Mack (Historic England)	9.2 Site Allocations	Policy DS1	Amend policies to include recommended wording from HIAs.  Revisit supporting text and policy wording to ensure sufficient detail and consistent approach with respect to the historic environment.	<p>The conclusions of the HIA have been taken into consideration in the selection and finalisations of the preferred site allocations and policy requirements. More detail can be found in the individual Site Assessment Booklets. The purpose of Policy DS1 is to allocate the Council's preferred sites. The Individual site allocation policies contain the necessary policy requirements in relation to the historic environment once all factors have been considered. Further comments made in relation to specific site policies are considered against each site where submitted.</p> <p><b>Conclusion</b> No change proposed</p>	No	
LPS359	Mr Ollie Eyre, Deloitte (Church	9.2 Site Allocations	Para 9.20-9.29	Promoting alternative site in Ludham – Land South of Norwich Road & 8 smaller sites in Horning which were not considered previously.	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The comment does not relate to the policy proposed and largely seeks to promote alternatives sites.</p>	No	

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	Commissioners for England)				<p>Alternative sites and options have been considered in the development of the HELAA, and the Local Plan, and previously been consulted on. More information can be obtained from the supporting Site Assessment Booklets.</p> <p><b>Conclusion</b> No change proposed.</p>		
LPS112	Dr Victoria Holliday	9.2 Site Allocations	Policy DS1	<p>Designation of new homes for principal residency in coastal towns and villages.</p> <p>Provision of infrastructure (especially parking and health care) prior to development in Holt.</p>	<p>Comments noted. The purpose of Policy DS1 is to allocate the Council's preferred sites. The Council does not consider it necessary to amend the policy or Plan as proposed. The comment largely repeats previous comments under LPS 86/ 49. The issue of second homes, principal residency and possible impacts on the housing market and what measures including land use planning could be used to influence and mitigate perceived negative impacts has been investigated by the Council. These matters were fully considered at Overview and Scrutiny committee July 2022 and set out in the impact of second homes report. The Council supports further legislative changes to enable the retention of increased tax revenue collected by 2nd tier authorities along with seeking further legislative changes to request that all second and holiday homes require planning permission.</p> <p>A modification (PMin/HC1/01) has been proposed in relation to lowering the threshold for Health Impact Assessments and Policy HC5 of the Plan provides for the delivery of necessary supporting infrastructure.</p> <p><b>Conclusion</b> No change proposed.</p>		
LPS306	Mr Sam Hazell, Lawson Planning Partnership (White Lodge Ltd)	9.2 Site Allocations	Policy DS1	<p>Promoting alternative site in High Kelling – Former Four Seasons Nursery.</p> <p>In order to enable housing development that reflects local circumstances and needs and to make the Plan sound, it should be modified to identify site allocations for housing developments of appropriate scale at Small Growth Villages, to contribute to meeting local need (including affordable) and support local rural vitality and services viability, in accordance with the NPPF.</p> <p>High Kelling has a good range of services and is well related to the towns of Holt to the west, and Sheringham &amp; Cromer to the northeast, via sustainable travel modes, and the principal road network.</p> <p>We request that the site at the Former Four Seasons Nursery, High Kelling, is allocated for residential development as set out in our letter of 18th June 2019 submitted in response to the Reg 18 consultation, attached. The site is located in a sustainable location, where it will support both existing services in the settlement of High Kelling and that of those nearby. This underused site forms part of the established village functionally and visually and has the potential to provide much needed housing, including making a meaningful contribution to the affordable housing need in</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Policy SS1 sets out how growth in High Kelling can accord with the Plan without the need to rely on specific site allocations.</p> <p><b>Conclusion</b> No Change proposed.</p>	No	

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				the village. Our 2019 submission with attached feasibility layout demonstrates that this site can be laid out in a manner which respects the prevailing character of the area and the amenities of nearby adjacent properties. It is considered that this amendment would address the soundness objection.			
LPS471	Mrs Kirstie Clifton (Trinity College Cambridge) (Define Planning and Design)	9.2 Site Allocations	Policy DS1	It is proposed that the residential development capacity (site FO1B) should include a range from 350-560 dwellings (rather than just the upper limit as currently specified in the policy), plus 100 units of elderly care accommodation, open space and supporting infrastructure. In this way, the policy will avoid unnecessarily restricting the delivery of development across the majority of the site within the control of Trinity College Cambridge.	<p>Comments noted. This comment largely repeats concerns raised under the site-specific policy and contained in LPS472. A Modification is proposed under LPS472 (PMIN/11.1/01) for reasons of consistency. The Council agrees with the proposed modifications to the policy wording in regard to the inclusion of '100 units of elderly care provision' in order to be consistent with criterion 8 in the site-specific policy.</p> <p>The Council do not agree with the inclusion of a range of dwellings to be delivered on site as this provides uncertainty over how much growth could be achieved in the settlement and in the Plan-Period overall. Development of the site in phases in accordance with an agreed master plan would not restrict delivery of development across the majority of the site.</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS799	Mr Darl Sweetland (Anglian Water)	9.2 Site Allocations	Policy DS1	<p>Anglian Water is aware that Natural England (NE) are in the early stages of assessing the implications of growth in Norfolk on water quality at European level designated nature conservation sites. The water courses which NE may seek to require developers to show that their development would not add to nutrient pollution include the Wensum, Bure, Ant and Thurne. Sixteen of the 35 settlements identified for growth would be served by WRC which discharge treated wastewater into these water courses. If none of the developments at these locations could demonstrate Nutrient Neutrality, circa 1450 homes would need to allocate to other settlements and sites. This assumes that sites with existing planning permission/ already in construction could continue to be built.</p> <p>SUPPORT: In view of the current emerging position on nutrient neutrality Anglian Water recognises the need – in Policy F10, for example – for the Council to require:</p> <p><b><u>Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with the Water Framework Directive obligations.</u></b></p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The requested modification to F10 is already included within Policy F10 (as criterion 10). A modification in relation to Nutrient Neutrality has also been proposed separately under PMAIN/CC13/01</p> <p><b>Conclusion:</b> No change proposed.</p>	No	
LPS803	Mr Steve Kosky, Turley Planning (Pigeon Investment Management Ltd)	9.2 Site Allocations	Policy DS1	<p>Promoting alternative site in Cromer – Land at Runton Road/Clifton Park C10/1</p> <p>These representations conclude that in order for the Draft Local Plan to be found sound that it is strongly recommended that the promoted Site is reinstated as an allocation.</p> <p>This reinstated allocation will help to address the shortfalls arising from the significant compound number of delivery issues identified by these representations at a number of</p>	<p>The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets however, the site was discounted for a number of reasons not least due to wildlife concerns and landscape impacts, Coalescence concerns and SA considerations.</p> <p><b>Conclusion</b> No Change proposed</p>	No	

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				<p>other strategic sites in Cromer, Fakenham and North Walsham.</p> <p>The Site can assist with these shortfalls by delivering approximately 55 new homes, including approximately 19 new affordable homes, together with Extra Care accommodation, on land south of the A149 and west of Clifton Park, in accordance with recommendations of Officers of the Council.</p>			
LPS521 LPS522 LPS523 LPS524 LPS256	Mr William Horner	10. Cromer	Policy C22/2	Promoting alternative site by third party (not landowner) in Cromer, located on western end of Cromer, Clifton Park C10/1.	<p>The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets however, the site was discounted for a number of reasons not least due to wildlife concerns and landscape impacts, Coalescence concerns and SA considerations.</p> <p><b>Conclusion:</b> No change proposed.</p>	No	
LPS657	Mr Lyndon Swift (Weybourne Parish Council)	10. Cromer	Para. 10.0.8	The Plan should maintain existing access to the countryside.	<p>Comments noted. The Council does not consider it necessary to amend the Plan.</p> <p>All site-specific policies in the Plan include reference to improvements to landscape and biodiversity, and specific policies elsewhere seek improvements in connectivity and reference improving public footpaths and cycle routes to promote active travel. Work is underway separately with Norfolk County Council to produce an investment plan to improve walking and cycling access- NCC intend to hold further engagement on the emerging LCWIP which identifies priority routes and areas of investment in early 2023.</p> <p>No specific modification has been proposed</p> <p><b>Conclusion:</b> No change proposed.</p>	No	
LPS602 LPS603 LPS604	Mr David Dewbery	10.1 Land at Cromer High Station, Norwich Road, Cromer	Policy C07/2	<p>Promoting alternative site by third party – Land West of Roughton Road (C19/1) in Cromer.</p> <p>As an alternative, there is another Site known as West of Roughton road, Cromer (C19/1) which should have been given more credibility during this plan process. This site has been favourably rated by the Council during site assessment and was only dismissed because Highways thought access was difficult. Since then, an alternative access has been identified and NCC Highways have confirmed it could not object and would support a development of around 85 -100 dwellings.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>A number of alternative options have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets. Site C19/1 was not considered for allocation due to several constraint issues that could not be mitigated, including impacts on the AONB, the quality of the highway network being unable to support large scale growth, and poor access to services and facilities when compared to other preferred sites. Whilst highway network issues may be addressed via smaller scale development other concerns remain in relation to impacts on the AONB and site location in relation to services.</p> <p><b>Conclusion:</b> No change proposed.</p>	No	
LPS247	Julia Edwards, Corylus (Innova Property Ltd)	10.2 Former Golf Practice Ground, Overstrand Road, Cromer	Policy C16	To make plan sound: review SA/evidence base – our observations suggest sites south of Cromer are better located, without deliverability concerns and further from sensitive coastline and nearby village of Overstrand	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The most appropriate sites have been selected based on a thorough assessment of submitted sites in Cromer. More information can be obtained from the supporting site assessment booklets</p>	No	

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					<b>Conclusion:</b> No Change proposed.		
LPS486	Mr Mark Singer, Barton Wilmore (Sutherland Homes)	10.2 Former Golf Practice Ground, Overstrand Road, Cromer	Policy C16	Propose alternative wording to Policy C16: <ul style="list-style-type: none"> <li>Land amount to approximately 6.4ha, as defined on the policies map, is allocated for development of approximately 150 dwellings <b>and 60 units of</b> elder care accommodation, public open space and associated on and off-site infrastructure. <b><u>The precise number of dwellings and elderly care accommodation will be determined with reference to up-to-date evidence around need and other site-specific considerations.</u></b></li> <li>On Criteria 4. – On site delivery of <del>not less than 1.31 hectares of</del> <b>sufficient</b> multi-functional open space together with its ongoing maintenance.</li> <li>On Criteria 5. – Retention and enhancement, <b>where possible</b>, of hedgerows and trees around the site, including the protection of existing woodland within the site and the provision of a landscaped buffer along the northern and western boundaries.</li> </ul>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed.  The Policy sets a minimum requirement for open space requirement in line with the open space standards set out in policies elsewhere in this Plan. The requested modification would result in the setting of a lower policy threshold. Biodiversity and habitat creation are an important part of climate change resilience  <b>Conclusion</b> No change proposed.	No	
LPS690	Mrs Laura Joyce (Natural England)	10.2 Former Golf Practice Ground, Overstrand Road, Cromer	Policy C16	Inclusion of new criteria in Policy C16  In line with then Plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. This allocation is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.	The Council does not consider it necessary to amend the Plan as proposed. The Council HRA has undertaken an appropriate assessment. Policies elsewhere in the Plan require consideration of the AONB and its special qualities. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA /AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.  <b>Conclusion</b> No change proposed	No	
LPS141	Miss Naomi Chamberlain (Norfolk County Council - Highways)	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	The allocation needs to be increased to include additional land further south of the proposed area and east of the A149 (Policy Map C22/2), enabling provision of an on-line roundabout at the south access from the site to the A149.	Modification is proposed in order to facilitate the requirements of criterion 2 of this policy. Increasing the site boundary to accommodate the provision of highways improvements would not be a significant issue, given the wider land outside the current site boundary is within the same land ownership. (Revised Policies Map extract at Appendix 5)  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/10.3/01 & PMIN/10.3/02
LPS243	Julia Edwards (Brown & Co and Corylus Planning)	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	The boundary of the site should be increased to accommodate several concerns including: <ul style="list-style-type: none"> <li>Being able to provide the two required access points, including a new roundabout on the A149;</li> </ul>	Additional land should be allocated to accommodate the provision of highways improvements, the Council has agreed to this proposed modification (see PMIN/10.3/01 above).  It is not considered appropriate to further increase the site boundary to accommodate the other concerns raised due to the	Yes	PMIN/10.3/01 & PMIN/10.3/02

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				<ul style="list-style-type: none"> <li>Being unable to provide required landscape mitigation within the current site boundary to the south;</li> <li>Routes would need to be made through Beckett's Plantation to connect the two sides of the site, though this is contrary to the site-specific policy's requirement to protect the plantation;</li> <li>The site policy requires a new footpath connection to Roughton Road, however the site boundary only abuts residential dwellings on Roughton Road with no possible access to the road itself.</li> </ul>	<p>site's location within the AONB and the Council's intention to limit impact on the AONB as much as possible. Footpath links would be on land in the control of the site promoter and need not be allocated in order to secure delivery.</p> <p><b>Conclusion</b> No change proposed.</p>		
LPS281	Miss Jane Gardner	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	Creating an accessible and continuous pathway on the west side of the Norwich Road will be required for complete safe access to the development for people.	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The policy under Criteria 1 already includes the requirement for new segregated cycle and pedestrian footways to serve the site.</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS505	Mr Mike Jones (Norfolk Wildlife Trust)	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	<p>Due to the proximity to existing woodland on site, Beckett's Plantation, we recommend that the following is added to the policy text.</p> <p><b><u>'In order to help buffer the existing woodland on site from indirect impacts from new housing, a stand-off distance of at least 20m should be secured from any new built development. It is recommended that delivery of Biodiversity Net Gain includes an element of natural vegetation to buffer the existing woodland edge, preferably through natural regeneration from the woodland'.</u></b></p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>There is already a policy requirement in C22/2 which references the protection of Beckett's Plantation and providing appropriate mitigation for biodiversity and landscape impacts. The need for a buffer, and its size, is a matter which can be considered at application stage when the mix and layout of land uses within the site is known.</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS730	Mrs Debbie Mack (Historic England)	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	<p>Amend criterion 15 to read:</p> <p><b><u>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including Pine Tree Farmhouse, a grade II listed building. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</u></b></p> <ul style="list-style-type: none"> <li><b><u>Retain and strengthening hedges/ trees around and within the site</u></b></li> <li><b><u>and incorporating tree planting within the site</u></b></li> <li><b><u>Introducing a landscape buffer to the southern boundary</u></b></li> <li><b><u>landscaped buffer along the western boundary of the site</u></b></li> <li><b><u>Dwellings of one or one and a half storey height on the southernmost part of the site.</u></b></li> </ul> <p>Amend HIA to include new site area.</p> <p>The southern part of the site should be left open for open space, sports provision and allotments with careful landscaping along the eastern edge of the site to protect Pine Tree Farm. These requirements should also be included in the policy.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>Bullet point 1 - In regard to retain/strengthening hedgerows and trees around the site, this requirement is already included in the policy as Criterion 8.</p> <p>Bullet point 2 - is already included in the policy as Criterion 8.</p> <p>Bullet point 3 - the western boundary of the site abuts residential development, providing a landscape buffer would not benefit the wider landscape due to the already existing development.</p> <p>Bullet point 4 - this would limit the possible masterplanning on the site and could impact on other areas of site if such a restriction was in place, would discourage mixed house types in the design of the site. The Policy already requires the impacts on the AONB to be addressed.</p> <p><b>Conclusion</b> No Change proposed.</p>	No	
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<p>Amend Policy F01/B to read:</p> <p>Land amounting to 26.5 hectares <b><u>including 5.05 hectares of existing sporting uses</u></b>, as defined on the policies map, is allocated for residential development of <b><u>between 350 and 560 dwellings, 100 units of</u></b> elderly persons accommodation,</p>	<p>Comments noted, a modification is proposed for reasons of consistency. The Council agrees with the proposed modifications to the policy wording in regard to the inclusion of '100 units' in order to be consistent with criterion 8 in the site-specific policy.</p>	Yes	PMIN/11.1/01

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				public open space, and associated on and off-site infrastructure.	The Council do not agree with the inclusion of a range of dwellings to be delivered on site as this provides uncertainty over how much growth will be achieved in the settlement and in the Plan-Period overall.  <b>Conclusion</b> Agree to requested modification (part).		
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> <li>Amend Criterion 1: The <b>submission, approval and implementation</b> of a comprehensive masterplan to address access and sustainable transport, layout, landscaping, phasing and conceptual appearance;</li> </ul>	Comment noted, a modification is proposed for reasons of providing further clarity of the requirements set out in the site-specific policy and to remain consistent with other policies.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/11.1/02
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> <li>Amend Criterion 2: The <b>submission, approval and implementation</b> of a comprehensive access strategy and Transport Assessment providing for safe and convenient access to the A148, together with any necessary junction improvements along the length of Fakenham by-pass including at the A148/B1105 and A148/A1065 junctions;</li> </ul>	Comment noted, a modification is proposed in order to provide further clarity of the requirements set out in the site-specific policy and to remain consistent with other policies.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/11.1/03
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> <li>Amend Criterion 3: <b>Appropriate</b> provision of off-site mains water reinforcement;</li> </ul>	Comments noted, a modification is proposed for reasons of providing further clarity of the requirements set out in the site-specific policy and to remain consistent with other policies.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/11.1/04
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> <li>Amend Criterion 5: Retention or replacement of existing sporting uses <b>totalling circa 5.05 hectares</b> including the rugby club and sports centre;</li> </ul>	The Council does not consider it necessary to amend the policy as requested. The Policy is clear in its requirement to replace existing recreational facilities in the event that they are developed and there is no need to specify quantity.  <b>Conclusion</b> No change proposed.	No	
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> <li>Amend Criterion 6: On site delivery of multi-functional open space <b>to reflect allocated and/or retained uses in accordance with Open Space Standards set out in Appendix 2 of the Plan;</b></li> </ul>	The Council does not consider it necessary to amend the Plan as proposed. The Policy sets a minimum requirement for open space requirement and reinforces the requirements around open space standards set out in policies elsewhere in this Plan. The mix of provision between retention of existing and replacement can be determined via the required Master Plan for the site and subsequent planning applications.  <b>Conclusion</b> No change proposed.	No	
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> <li>Remove Criterion 7: <del>Submission, approval and implementation of the findings of a health impact assessment;</del></li> </ul>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The criterion reinforces the policy requirement of HC1 and is considered an important consideration in the overall allocation. Modifications suggested elsewhere would lower the site size threshold for Health Impact Assessments meaning that the proposed scale of development on this site would require such an assessment.  <b>Conclusion</b>	No	



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					No change proposed.		
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> <li>Criterion 8: <b>The submission and approval of a development phasing plan which demonstrates the delivery</b> of all aspects of the allocated <b>and/or retained uses</b>, including not less than 100 units of specialist elderly persons accommodation;</li> </ul>	<p>Comments noted, a modification is proposed in order to provide further clarity of the requirements set out in the site-specific policy and to remain consistent with other policies. The phrase 'demonstrate' instead of the currently in-place 'ensures' does not guarantee site specific requirements will be delivered so is not agreed.</p> <p><b>Conclusion</b> Agree to requested modification (part).</p>	Yes	PMIN/11.1/05
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> <li>Criterion 10: <b>Demonstrate</b> that there is adequate capacity in road, drainage and educational infrastructure taking account of existing planned growth</li> </ul>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Policy as drafted is sufficiently clear.</p> <p><b>Conclusion</b> No change proposed</p>	No	
LPS691	Ms Laura Joyce (Natural England)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	In line with then Plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. This allocation is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.	<p>The Council does not consider it necessary to amend the Plan as proposed. The Council's HRA has undertaken an appropriate assessment and LSE have been ruled out in relation to urban, hydrological and recreational effects The policy includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA /AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p> <p><b>Conclusion</b> No change proposed</p>	No	
PC075	North Norfolk District Council	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	Criteria No. 5 of the Policy makes reference to retention or replacement pitches, but should also ensure that any possible replacements <b>are of a better or equivalent value to the existing.</b>	<p>Comments noted. The Council agrees to the proposed modification.</p> <p><b>Conclusion</b> No change proposed</p>	Yes	PMIN/11.1/06
LPS506	Mr Mike Jones (Norfolk Wildlife Trust)	11.2 Land Adjacent to Petrol Filling Station, Wells Road, Fakenham	Policy F02	We recommend that the policy wording is updated to include reference to the need for an ecological assessment as part of any application.	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The requirement for ecological Assessment is covered elsewhere in the Plan.</p> <p><b>Conclusion</b> No change proposed</p>	No	
LPS63	Ms Laura Joyce (Natural England)	11.2 Land Adjacent to Petrol Filling Station, Wells Road, Fakenham	Policy F02	<p>Inclusion of new criteria in Policy F02:</p> <p>The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The policy includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p>	No	

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				provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	<b>Conclusion</b> No change proposed		
LPS694	Ms Laura Joyce (Natural England)	11.3 Land at Junction of A148 and B1146, Fakenham	Policy F03	Inclusion of new criteria in Policy F03:  The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The policy includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.	No	
PC076	North Norfolk District Council	11.3 Land at Junction of A148 and B1146, Fakenham	Policy F03	Consistent wording regarding policy compliance is missing from policy, only policy in plan not to have this wording.	Comments noted. Council agrees to the proposed modification for consistency with other policies in the Plan.  <b>Conclusion</b> No change proposed.	Yes	PMIN/11.3/01
LPS507	Mr Mike Jones (Norfolk Wildlife Trust)	11.4 Land South of Barons Close, Fakenham	Policy F10	The river and its floodplain are major green infrastructure assets for the Fakenham and the district and we recommend it is retained as green space.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Criterion 5 already identifies the land adjacent to the river as green space and as an area not appropriate for residential development.  <b>Conclusion</b> No change proposed.	No	
LPS696	Ms Laura Joyce (Natural England)	11.4 Land South of Barons Close, Fakenham	Policy F10	This policy supports residential developments which may result in an increase in recreational use of designated sites. This allocation also borders ditches that, subject to modifications, will discharge into the River Wensum SSSI and SAC. Water pollution is a contributing factor to the unfavourable condition of the River Wensum SSSI and SAC, as explored in the Site Improvement Plan. And so, in line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to consider appropriate drainage strategies and determine no likely significant effects on nearby designated sites.	Comments noted. Criteria 7 of Policy F10 already includes the requirement that addresses this issue. The Council's HRA concludes that the allocation policy wording is sufficient for it to conclude no adverse effects on integrity alone or in combination at plan level.  <b>Conclusion</b> No change proposed.	No	
LPS509	Mr Mike Jones (Norfolk Wildlife Trust)	12.1 Land North of Valley Lane, Holt	Policy H17	To ensure that this allocation will not lead to deterioration of the CWS, the policy wording should be updated to make reference to the adjacent CWS, to ensure that any site design leaves a sufficient buffer between the site and the CWS to avoid indirect impacts from residential properties and for sufficient measures to be included in any planning consent to ensure that visitor pressure impacts on the CWS are mitigated for. Due to proximity to the CWS, we also recommend that the policy wording makes clear that any proposal here will need to be accompanied by a detailed ecological assessment.	Comments noted, Modification is proposed to reference 'County Wildlife Site' in Criterion 2 for clarity, reflecting the designation which applies to Spout Hills and to ensure appropriate attention is given to the presence of a CWS.  The requirement for an ecological assessment will be assessed at the application stage, and it is not considered necessary to add this to site-specific policy requirements.  <b>Conclusion</b> Agree to requested modification (part).	Yes	PMIN/12.1/01
LPS731	Mrs Debbie Mack (Historic England)	12.1 Land North of Valley Lane, Holt	Policy H17	Replace Criterion 1 with: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Holt Conservation Area, Hill House, Methodist Church, both Grade II Listed Buildings. Development should include the	Comments noted. The Council does not consider it necessary to amend the Plan as proposed.  Bullet point 1. The proposed development is located to the rear of existing dwellings which already impact on views of the Glaven Valley,	No	

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				<p>following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> <li>- Seek to retain a view toward the Glaven Valley from Norwich Road</li> <li>- Retain and strengthen hedgerow on the eastern boundary of the site, particularly on the north eastern corner to mitigate potential impact upon Hill House and the Methodist Church.</li> <li>- Provide strong landscaping along the southern and northern boundaries of the site</li> <li>- A Heritage Statement is required to assess the archaeological importance of the site.</li> </ul>	<p>Bullet point 2. There is already a requirement in Policy H17 under criterion 3 to retain and enhance mature hedgerows and trees around the site.</p> <p>Bullet point 3. There is already a requirement in Policy H17 under criterion 2 to provide appropriate landscaping to soften the development edge with Spout Hill CWS.</p> <p>Bullet point 4. This requirement is already set out in Policy ENV7.</p> <p>The requirements for archaeological assessments are addressed elsewhere in the Plan.</p> <p><b>Conclusion</b> No changes proposed.</p>		
LPS697	Ms Laura Joyce (Natural England)	12.1 Land North of Valley Lane, Holt	Policy H17	<p>This policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and/or Foul Sewage Drainage Strategy as part of the development proposal.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p> <p><b>Conclusion</b> No change proposed</p>	No	
LPS142	Miss Naomi Chamberlain (Norfolk County Council - Highways)	12.2 Land at Heath Farm, Holt	Policy H20	<p>The following revision is required to point 1 of policy H20 'Access being delivered off Nightjar Road <u>and existing new</u> A148 roundabout...'</p>	<p>Agree. Modification is proposed for reasons of clarification.</p> <p><b>Conclusion</b> Agree to requested modification.</p>	Yes	PMIN/12.2/01
LPS333	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.2 Land at Heath Farm, Holt	Policy H20	<p>Insert into the Site-specific policy requirements <u>on</u> the need to provide a 1.3 hectare wide landscape buffer along the east and south-east boundary of the site.</p>	<p>Comments noted, a modification is proposed to improve the effectiveness of the Plan to ensure deliverability of the site and the Plan as a whole.</p> <p>Insert new criterion: 'Development proposals should provide a landscape buffer long the east and south-eastern boundary of the site of approximately 1.3 hectares.'</p> <p><b>Conclusion</b> Agree to requested modification.</p>	Yes	PMIN/12.2/02
LPS333	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.2 Land at Heath Farm, Holt	Policy H20	<p>Proposed modification to Policy H20 Criterion 1: Access being delivered off Nightjar Road and new A148 roundabout and delivery <u>a</u> of-footpaths-connections-to footpath FP9a</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. It is an existing public right of way, Unnecessary change to policy.</p> <p><b>Conclusion</b> No change proposed.</p>		
LPS333	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.2 Land at Heath Farm, Holt	Policy H20	<p>Proposed modification to Policy H20 Criterion 3: Submission of a Transport Statement identifying sustainable traffic mitigation measures. <u>Reasonable endeavours will be used to scope out the feasibility of the delivery</u> of enhanced pedestrian improvements across and along the A148 to facilitate pedestrian access to the medical centre, and bus stops on Cromer road and the east side of the town.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Using terms such as 'reasonable endeavours' and 'feasibility of delivery' lacks certainty.</p> <p><b>Conclusion</b> No change proposed</p>		

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LPS333	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.2 Land at Heath Farm, Holt	Policy H20	<del>On-site provision of minimum of 1.55 ha open space; </del> <b>Open space will be delivered in accordance with the standards set out in the Local Plan.</b>	Comments noted, final form and quantity of development on the site is influenced by strategic landscape buffer, gas pipeline crossing the site, access and relationship with adjacent uses. It is accepted that at this stage it is difficult to quantify precise requirements for open space. Revised wording ensuring compliance with adopted standards having regard to final development scheme at application stage is appropriate .  <b>Conclusion</b> Requested modification recommended.	Yes	PMIN/12.2/03
LPS732	Mrs Debbie Mack (Historic England)	12.2 Land at Heath Farm, Holt	Policy H20	Propose modification to Criterion 2: Remove wording and replace with the following:  Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Heath Farm House and Barn North of Heath Farm House, both Grade II Listed buildings. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> <li>• Further landscaping to be provided along the north western boundary of the site</li> <li>• Landscaping along the southern boundary of the site</li> <li>• Low density and single storey development to the southern, northern and western parts of the site</li> <li>• Open space to be located within the south eastern part of the site and strong landscaping to be provided along the south eastern boundary of the site to provide a buffer between residential development and Heath Farm and Heath Farm Barn</li> </ul>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The first sentence is covered by Policy ENV7.  Bullet point 1. The term ‘further landscaping’ is vague, and Criterion 2 of the site-specific policy already covers the provision of appropriate landscaping to mitigate impacts on Heath Farm. Bullet point 2. This is already being addressed through another proposed modification to the policy by the landowner – see LPS333 (PMIN/12.2/0.1)  Bullet point 3. This will have an impact on the number of dwellings and building type being delivered on site and may impact on the delivery of other necessary required infrastructure. The form of development, its impact on heritage assets and the need or otherwise for single storey buildings can be considered at application stage.  Bullet point 4. Repeat of second bullet point. The issue is being addressed by landowner. Location of open space will be determined through the application process.  <b>Conclusion</b> No change proposed.	No	
LPS732	Mrs Debbie Mack (Historic England)	12.2 Land at Heath Farm, Holt	Policy H20	Add heritage mitigation diagram from p 332 of HEP to Plan.	Comment noted. The Council does not consider it necessary to amend the Plan as proposed. The policy appropriately addresses heritage concerns through the site-specific policy requirements. A modification in relation to landscaping has also been proposed in response to LPS333. (PMIN/12.2/02)  <b>Conclusion</b> No change proposed		
LPS699	Ms Laura Joyce (Natural England)	12.2 Land at Heath Farm, Holt	Policy H20	This policy support developments which may result in an increase in recreational use of and urban effects on designated sites. We recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites and support the mitigation measures highlighted in the HRA.	Comments noted. Criteria 10 of Policy H20 already includes the requirement that addresses this issue the Council’s HRA concludes that the allocation policy wording is sufficient for it to conclude no adverse effects on integrity alone or in combination at plan level.  <b>Conclusion</b> No change proposed.	No	
LPS335	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	Proposed modification: To remove the proposed allocation from the Local Plan as the landowner confirms the site is no longer available for development and does not have a realistic prospect of	Comments noted, a modification is proposed to remove the site as it is no longer available and deliverable. Further discussions with the landowner have confirmed his desire to remove this site from the Local Plan’s proposed allocations.	Yes	PMIN/12.3/01

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				delivering the required growth within the timeframe of the Plan.	<b>Conclusion</b> Agree to requested modification.		
LPS143	Miss Naomi Chamberlain (Norfolk County Council - Highways)	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	Policy H27/1, point 2 refers to a new roundabout at the A148, this is an existing junction. Clarification is required as the Highway Authority would not wish to support an additional junction at the A148.  The following revision is required 'Access being delivered off Nightjar Road and existing A148 roundabout and no access from Hempstead Road.'	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The site is no longer available for development as per modification PMIN/12.3/01.  <b>Conclusion</b> No change proposed.	No	
LPS510	Mr Mike Jones (Norfolk Wildlife Trust)	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	Section 6.19 of the HRA notes that the potential for hydrological impacts on the Norfolk Valley Fens SAC remains from this allocation. We are concerned that an adverse effect on the SAC has been ruled out in the HRA through deferral to project level HRA.  Whilst a project level HRA may be able to demonstrate avoidance of adverse effects at the planning application stage, insufficient evidence has been provided at this stage to definitively rule out adverse effects, and so the inclusion of this employment allocation. This means there remains a risk to the delivery of the plan if project level HRAs are unable to demonstrate that adverse effects on the SAC will be avoided.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. A project level HRA is the appropriate mechanism due to the potential for a variety of uses and schemes. The site is however removed from the Plan as is no longer available for development as per modification PMIN/12.3/01.  <b>Conclusion</b> No change proposed.	No	
LPS733	Mrs Debbie Mack (Historic England)	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	The policy needs amending to incorporate the wording from the Heritage Impact Assessment. We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.  Replace criterion 1 with: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Heath Farm House and Barn North of Heath Farm House, both Grade II listed buildings and the Glaven Valley Conservation Area. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment): <ul style="list-style-type: none"> <li>• Retain and strengthen landscaping along the southern boundary of the site</li> <li>• Retain and strengthen landscaping along the eastern boundary of the site</li> <li>• Retain prominent trees to the west</li> <li>• Provide a strong landscaping buffer on the northern boundary of the site</li> <li>• Smaller scale development to the south and south eastern parts of the site</li> </ul>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The Conclusions of the HIA have been taken into consideration in the selection and finalisations of the preferred site allocations and policy requirements. More information can be found in the site assessment booklets. The site is no longer available for development as per modification PMIN/12.3/01.  <b>Conclusion</b> No change proposed.	No	
LPS34	Mrs Kerry Walker	13 Hoveton	13.1	Proposed modification: flood modelling and incorporate into future development plans for commercial centre. NNDC must use traffic flows, air pollution and bridge life span to support a whole settlement approach. Currently the plan for Hoveton does not measure from a whole settlement position,	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Commercial centre is not being provided for as part of the site allocation. The Policy includes reference to the Wroxham and Hoveton Network Improvement Strategy Action Plan.  <b>Conclusion</b> No change proposed.	No	

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LPS264	Mr Geoff Cook	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	The number of houses required needs to be accurate - is it 120 including the care home or 120 plus the care home and if so, how many in the care home. Account needs to be taken of the recent developments at Church Farm (25) and Tilia Park (28) The brownfield site off Station Road needs to be assessed	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The quantum of development on site is <b>120 in addition</b> to the provision of specialist elder care.  Other sites, both with permission and future capacity have been considered when preparing the Plan.  <b>Conclusion</b> No change proposed.	No	
LPS615	Cllr Nigel Dixon (NNDC Ward Member for Hoveton & Tunstead)	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	The development must deliver a new strategic solution to the current persistent overwhelming of the existing foul water network in Hoveton and the regular incidents of raw sewerage flooding in several parts of Hoveton caused by inundation by surface/river water ingress and routing all foul water through the Hoveton village centre. <ul style="list-style-type: none"> <li>The development must include a mini roundabout junction on Tunstead Rd aligning with the entrance to Two Saints Close to create safer access to both estates and to help moderate excessive speed of traffic leaving and entering Hoveton.</li> <li>The density of the development must be in keeping with the majority of Hoveton and include substantial areas for wildlife habitat, conservation and biodiversity gain. This includes minimising the destruction of the highly valued and habitat rich Hawthorne hedge along Tunstead Rd and replanting the lost section along the north side of the site joining up with the roadside hedge.</li> <li>The development must deliver traffic solutions to improve flow capacity for vehicles, cyclists and pedestrians as well as air quality in the village centres of Hoveton and Wroxham. This includes setting aside the heavily discredited and abortive Wroxham &amp; Hoveton Network Improvement Strategy Action Plan and starting afresh with an open evidence based strategic approach with full community involvement.</li> <li>The development must ensure greater capacity and reduced waiting times at Hoveton and Wroxham Medical Centre and access to local NHS Dentistry.</li> </ul>	<b>Agreed</b>  The proposed main modification to enlarge the site and increase the number of dwellings is intended to ensure development viability and allow for the issues identified to be comprehensively addressed.  <b>Conclusion</b> Update policy criteria to require comprehensive drainage strategy, limit numbers of dwellings on enlarged site to no more than 150, include junction improvements in Tunstead Road and require Transport Assessment to consider and address off site highway impacts.	Yes	
LPS545, LPS547, LPS544, LPS546	Mr Alastair Curran, Planning Places Ltd (FW Properties)	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	It is considered that the original quantum of development be reinstated, alongside the small area of land to the north of the site be included in the allocation. This would ensure the allocation is not only sound but can deliver substantial public benefits quickly for the existing residents of Hoveton. Furthermore, wording regarding potential solutions to the foul drainage issue could also be incorporated into the allocation policy text, securing a more sound strategy.	Comments noted, a modification is proposed in order to improve the effectiveness of the Plan. Additional land will assist in the provision of requirements set out in the site-specific policy.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/13.1/01 & PMAIN/13.1/0
LPS734	Mrs Debbie Mack (Historic England)	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Wroxham Bridge and the Grade II* Listed Church of St. Peter. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> <li>Retain and enhance landscaping on the northern and southern boundaries of the site</li> <li>Retain strong landscaping on the western boundary of the site</li> </ul>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. These points are already addressed within the site-specific policy for HV01/B.  <b>Conclusion</b> No change proposed.	No	

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				<ul style="list-style-type: none"> <li>Lower density, single storey dwellings on the northern part of the site</li> </ul>			
LPS37	Mr Michael Rayner (The Battlefields Trust)	14 North Walsham	Para 14.03-14.15	<p>To ensure soundness of the Plan we suggest adding reference to this heritage asset elsewhere in the draft plan as follows:</p> <p>14.0.3 Add the following: North Walsham has the non-designated heritage asset of the North Walsham Battlefield site.</p> <p>14.1.5 Add the following bullet point: the non-designated heritage asset of the North Walsham Battlefield site.</p> <p>This would ensure the Plan sets out a positive strategy for the conservation and enjoyment of the historic environment in line with para. 190 of the NPPF. By including these additional references to the 'Battlefield site' it would ensure consistency within the Local Plan and with national policy.</p>	<p>Comments noted, a modification is proposed for reasons of clarity for para 14.1.5. The change is a minor modification in the supporting text for policy NW01/B. Proposed change to 14.0.3 is unnecessary as the paragraph is referring to constraints relating to designated/significant landscape assets which the battlefield site is not.</p> <p><b>Conclusion</b> Agree to requested modification.(part)</p>	Yes	PMIN/14.1/01
LPS163	Miss Naomi Chamberlain (Norfolk County Council - Minerals & Waste)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	<p>The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019.</p> <p>'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'</p>	<p>Comments noted, a modification is proposed for reasons of consistency with other site-specific policies in the plan with this requirement, and to remain consistent with advice.</p> <p><b>Conclusion</b> Agree to requested modification.</p>	Yes	PMIN/14.1/02
LPS144	Miss Naomi Chamberlain (Norfolk County Council - Highways)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	<p>Policy NW01/B must include a requirement to undertake a Transport Assessment to include the A149 / B1150 traffic signal junction and implement any agreed mitigation measures.</p>	<p>Comments noted, a modification is proposed for reasons of consistency with other site-specific policies in the plan, and for adherence to consultee advice. The following criterion should be included within the policy:</p> <p><u>"A transport assessment should be undertaken to identify possible mitigation measures, if necessary, for the A149/B1150 and wider transport network"</u></p> <p><b>Conclusion</b> Agree to requested modification.</p>		PMIN/14.1/03
LPS450	Mr Jake Lambert, Bidwells (Hopkins Homes)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	<p>Supporting text at paragraph 14.1.5 states that the site is subject to an Area based Tree Preservation Order. The TPO is, at the time of writing, in draft form, and a rather blunt instrument to restrict tree loss on the site. Engagement with the District Council's Tree Officer is being undertaken to refine the TPO to better reflect the arboricultural condition of the site, following survey work undertaken in 2021. This part of paragraph 14.1.5 is not justified by evidence, and is therefore not consistent with Paragraph 35(b) of the NPPF.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. TPO issues can be considered at application stage.</p> <p><b>Conclusion</b> No proposed change.</p>	No	
LPS450	Mr Jake Lambert, Bidwells (Hopkins Homes)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	<p>Supporting text at paragraph 14.1.5 also states that the off-site mains water reinforcement and enhancement to the foul sewerage capacity will be required. As part of the emerging development proposals, Anglian Water have prepared a pre-planning assessment report to guide the foul water drainage strategy. In this report, included at Appendix A of this representation, Anglian Water state that the North Walsham Water Recycling Centre has capacity to treat additional flows from the development of the site. This element of the supporting text, and Part 7 of the policy, should therefore be amended to recognise the latest position in the local area. Without this acknowledgement, the paragraph fails to recognise the latest</p>	<p>Comments noted. The requirement relates to the foul water drainage <i>network</i> rather than the capacity at the waste Water Treatment Centre . No modification required.</p> <p><b>Conclusion</b> No proposed change</p>	No	

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				evidence received from the statutory undertakers, causing non-conformity with Paragraph 35(b).			
LPS450	Mr Jake Lambert, Bidwells (Hopkins Homes)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Part 9 of the Policy requires not less than 100 units of specialist elderly persons accommodation to be provided on site, in accordance with Policy HOU2. As described at paragraphs 2.16-2.20 of this representation, Policy HOU2 should be amended to omit the arbitrary care provision requirements included within the policy at present. Furthermore, market and local demands may determine that a facility comprising 100 units of accommodation is not viable at the site, so NW01/B requires flexibility in this aspect of the policy.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The requirement for elderly person's accommodation is evidence-based and reasonable any changes can be dealt with at application stage. Viability issues are adequately addressed in Policy HC5.  <b>Conclusion</b> No change proposed.	No	
LPS450	Mr Jake Lambert, Bidwells (Hopkins Homes)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	The requirement at Part 4 of the policy should be refined as detailed below: Provision of a <del>landscape buffer</del> <b>of an offset</b> of no less than 6 metres between the development site and the existing properties at Norwich Road and Nursery Drive;	Comments noted. Modification is proposed.  <b>Conclusion</b> Agree to requested change	No	PMIN/14.1/05
LPS513	Mr Tom Parish, Savills (JN Tofts)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Transport Infrastructure The Local Plan should be modified to set out clearly the transport infrastructure requirements to adequately facilitate the proposed development, ensuring this work is undertaken in a sequential manner if the development is phased.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Policy NW01/B achieves this already in conjunction with the larger site Policy NW62/A, which identifies transport mitigation measures.  <b>Conclusion</b> No change proposed.	No	
LPS513	Mr Tom Parish, Savills (JN Tofts)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Drainage The current policy drafting is weak in respect of the obligation, design and execution of the works required to mitigate the impact upon the adjacent property. The policy should be amended to ensure adequate measures, designed to facilitate the entire development are considered implemented at all stages of the process. Communication and engagement are a vital aspect of this, neither of which have been effective to date.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This matter can be addressed at the application stage, through appropriate discussions over masterplanning of the site.  <b>Conclusion</b> No change proposed.	No	
LPS735	Mrs Debbie Mack (Historic England)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Replace criterion 1 to read: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> <li>• Retain and enhance landscaping along the southern, south western and north eastern boundaries of the site</li> <li>• Retain the hedgerow along the northern boundary of the site along Nursery Drive</li> <li>• Retain the strong hedgerows and trees within the centre of the site</li> <li>• Lower density, single storey development to be located to the south of the site</li> </ul>	Comments noted. Agree to proposed modifications in part and have been dealt with already by NNDC, see proposed modification PMIN/14.01/05 below in relation to NNDC PC079.  <b>Conclusion</b> No change proposed.	No	
PC079	North Norfolk District Council	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Update policies relating to Heritage Impact mitigation to be fully in line with the mitigation options put forward in the HIA and Site Assessment Booklet.	Comments noted. Agree to proposed modification.  <b>Conclusion</b> Agree to requested modification	Yes	PMIN/14.1/06



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LPS704	Ms Laura Joyce (Fh27/1)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	We recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and/or Foul Sewage Drainage Strategy as part of the development proposal.	<p>Comments noted. The Council's HRA identified the potential for recreational impacts at screening stage. The policy includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5</p> <p><b>Conclusion</b> No change proposed</p>	No	
LPS65 LPS66	Dr Bianca Finger-Berry	14.2 Employment: Land East of Bradfield Road (NW52)	Para 14.2.1  Policy NW52	<p>Presentation in the local plan of NW52 as employment land is misleading, it is written as if it had already been allocated, rather than being a new proposal for consideration which was not detailed in any of the previous local plans. NW52 should not be designated as employment land as no review of current employment land has taken place and no need for additional employment land has been evidenced. An alternative for lorries to get to the industrial estate, such as lowering the Cromer Road so that high vehicles can go under the bridge should be given consideration to. No case has been made for the need of additional employment land. No review of existing employment land appears to have been done, as set out in government documents Employment Land Reviews (publishing.service.gov.uk).</p> <p>No new employment land should be designated whilst current land is not used in line with current permissions. A large proportion of current employment land is used for storage of redundant farm vehicles and lorries for which no permission exists. In addition, other parts of the land are used for storing rubble and crushing which has already led to noise complaints and the land is an eyesore. This use of employment land has not provided any additional employment for the local area. Current use of land, loss of a local amenity such as a campsite, and use and character of surrounding areas have not been taken into account when considering the allocation of this land.</p> <p>Further development of that land which will go up to a quiet lane will have a negative impact on the local countryside used by walkers, cyclists and horse riders. The land is unsuitable for employment land and the road.</p> <p>The sustainability assessment concludes it would have a negative impact and no reasons are given as to why this assessment should be ignored.</p> <p>The area should not be designated as employment land for the only purpose of enabling a road to be built at some future point.</p> <p>If a road was needed to link to the industrial estate, this should avoid properties if possible and provide the most direct link to the industrial estate as set out as the northern</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The need for additional employment land is evidenced and supported by an up-to-date quantitative and qualitative assessment through the Growth Sites Delivery Strategy 2021 and Background paper 3. The study reviewed a range of scenarios and concluded that a higher quantum of employment land would be required to ensure flexibility within the market and that any upturn in the market would be satisfied over the plan period. The Plan will increase the supply of undeveloped employment land in the District to 71.49 hectares (with 22.63 hectares of that supply in North Walsham), providing an increased supply in each area of the District, delivering choice and flexibility and meeting the identified development and future needs. The rationale for the allocation of this site is that it supports the requirement for access improvements from Bradfield Rd and connections over the railway to the Western extension. The proposal facilitates comprehensive development and addresses existing HGV circulation issues</p> <p>Consideration of alternative options have been given throughout the production of this plan.</p> <p><b>Conclusion</b> No change proposed.</p>		

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Page 46				<p>extension in previous papers such as P.15  <a href="https://www.north-norfolk.gov.uk/media/6315/north-walsham-western-link-road-feasibility-study-main-report.pdf">https://www.north-norfolk.gov.uk/media/6315/north-walsham-western-link-road-feasibility-study-main-report.pdf</a>.</p> <p>No reasons have been set out as to why the proposed link road is now following a much longer route past more properties impacting negatively on local residents and walking routes.</p> <p>A road built there would have a negative Impact on local wildlife – there is a Jubilee Wood adjacent to the site with evidence of bats, deer, hares and newts.</p> <p>The site is also unsuitable for development as the domestic water supply for the local houses passes under the land, there is concern about interruption and contamination of the local water supply to the settlement on the end of Lyngate Road.</p> <p>The bridge is unsuitable for lorries to pass, this road leading from the countryside into North Walsham and a local supermarket is used by walkers, cyclists and horses and it would be unsafe for them to use the road and cross the bridge alongside lorries. No consideration has been given to the impact of the increase in traffic which would be using the road to go to Knapton and Mundesley as well.</p> <p>M - Not allocated NW52 as employment land  Give considerations for an alternative to lorries reaching the industrial estate.</p>			
LPS10	Mr. Colin Hayward	14.2 Employment: Land East of Bradfield Road (NW52)	Policy NW52	<p>The NW52 is on rural countryside agricultural land owned by Scrap and Waste company seeking to profiteer from the destruction of the rural countryside and destruction of the rights of rural residents from the right to private and quiet life. The existing site operated by these owners have continuously failed to comply with County operation rules, have had massive fires and been subject to multiple complaints for noise disturbance. Such a development will increase heavy vehicle traffic on North Norfolk quiet lanes. If there is any industrial development this should be undertaken on the opposite side of the railway line where road access is better and away from residential land, for example off the Cromer Road near Waitrose.</p> <p>Not to extend the existing Cornish way site - But if it were to be extended ensure that Cornish Site development to only progress if new road from Cromer Road over railway line is constructed.</p> <p>NW52 for office premises only, NOT heavy industry such as waste management, vehicle dismantling, cement works, lorries etc. Also, there is a need to be mindful of the high pollution from the industrial site today with spotlights across fields into private dwelling. Such development to be subject to no light being visible beyond the boundaries of the site with all lights off after business hours.</p>	<p>NW52 was presented as an alternative option at Regulation 18 stage. In response to that consultation, NW52 was added to provide additional employment land. This site supports the requirement for access improvements from Bradfield Rd and connections over the railway to the Western extension and facilitates comprehensive development and addresses existing HGV circulation issues</p> <p><b>Conclusion</b></p> <p>No change proposed</p>	No	N/A

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				Access must be from Cornish Way only, or from new road from Cromer Road and Lyngate Road / Bradfield road to be closed to HGV vehicles and for access only for other vehicles. Also please be mindful that 4 properties on Lyngate Road have private mains water pipes across NW52 and this supply would have to be safeguarded in the event of any development.			
LPS705	Ms Laura Joyce, Natural England	14.2 Employment: Land East of Bradfield Road (NW52)	Policy NW52	Sound – Subject to project level HRA where appropriate. In line with the plan's HRA, we recommend that a project level HRA and/or appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.	Comments and support noted. The Council does not consider it necessary to amend the Plan as proposed. The plan wide HRA screens out likely significant effects on European sites from the implementation of this policy.  <b>Conclusion</b> No change proposed	No	N/A
PC080	NNDC	North Walsham 14.2 Employment: Land East of Bradfield Road (NW52)	Para 14.2.1	For consistency the paragraph numbering should start after the heading 'Description' not before the explanation text above the site plan.	Comment noted, A modification is proposed for reasons of consistency.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/14.2/01
LPS72 LPS83	Dawn Moore  Mr Paul Harris (Broadland District Council)	14.3 Land West of North Walsham	Section 14.3	The strategy for housing in North Walsham completely fails to take into consideration the negative effects of increased traffic volumes on Station Road in Coltishall.  Identify by means of a study and then address the problems associated with the B1150 at Station Road in Coltishall.  Substantial additional growth in North Walsham could significantly increase the traffic volumes felt on the arterial routes into Norwich, particularly the B1150 and also the B1145/A140 and A1151 and that the Plan should consider and address any potential impacts on these roads.  A feasibility study into the North Walsham Link Road dated November 2020 does not appear to consider wider impacts beyond the built-up area of North Walsham and the key traffic routes into the town in the immediate vicinity of that area.  It is unclear to what extent the transport model used has specifically considered other planned growth in the area at Coltishall e.g. additional employment growth at Scottow Enterprise Park. Also, there appears to be no assessment of recorded accidents within the area, the reason for these accidents and the effect that the identified increase in traffic might have on these.  <b>Modification</b> Broadland District Council considers that it is necessary to prepare and/or provide proportionate evidence in relation to the proposed growth at North Walsham to effectively address the soundness issues outlined in the Council's	Policy CC9 requires Traffic Impact Assessment for all larger development proposals and the need for such assessment is referenced in the Plan, including in the preamble to Policy CC9 (para 14.3.4). Given the scale of this proposal, explicit reference to this requirement in the Site Allocation Policy (NW62/A) would add clarity.  The allocation referred to is not objected to by the County Council as Highway Authority. The approach is supported by transport assessments undertaken in cooperation with the Highways Authority and their consultants (WSP).  Further detailed worked has been commissioned.  Modification is proposed to Policy NW62/A for reasons of clarity. Add additional criterion under the 'Sustainable Transport' heading – <b>'14. Submission and implementation of a Transport Assessment to include consideration of the impacts (with mitigation required) on the surrounding network including the route to Norwich via Coltishall.'</b>  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/14.3/01

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				response. North Norfolk District Council should engage with the Broadland District Council and Norfolk County Council as part of the process of preparing and/or providing this evidence.			
LPS144	Miss Naomi Chamberlain, Norfolk County Council - Highways	14.3 Land West of North Walsham	Policy NW62/A	Policy NW01/B must include a requirement to undertake a Transport Assessment to include the A149 / B1150 traffic signal junction and implement any agreed mitigation measures.	Comments noted, a modification is proposed for reasons of consistency with other site-specific policies in the plan, including NW01/B, and for adherence to consultee advice.	Yes	PMIN14.3/02
LPS162	Miss Naomi Chamberlain (Norfolk County Council - Minerals & Waste)	14.3 Land West of North Walsham	Policy NW62/A	The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019. 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	Comments noted, a modification is proposed for reasons of conformity with consultee advice. <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/14.3/03
LPS393	D L Ritchie Will Trust (David Jones)	14.3 Land West of North Walsham	Policy NW62/A	Amend delivery timescales set out in the trajectory as they are too ambitious compared to the national average for sites of a similar scale.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The trajectory in the Plan is indicative and is not agreed upon by developers. The Council accepts that these timelines will likely change. <b>Conclusion</b> No change proposed.	No	
LPS511	Mr Mike Jones (Norfolk Wildlife Trust)	14.3 Land West of North Walsham	Policy NW62/A	As any development in this area would lead to the large scale loss of farmland habitats, with potentially significant impacts on farmland bird species, it will need to be accompanied by a robust biodiversity net gain assessment which takes into account the needs of the species assemblage dependant on these habitats, as well as the habitats themselves. The proposal also crosses the Weavers Way CWS, which will need to be safeguarding and buffered from indirect impacts (noise, light etc.). We recommend that the policy text refers to the above requirements.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The need to address biodiversity net gain is provided for in other policies within the Plan. <b>Conclusion</b> No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Land to the west of North Walsham to provide a mixed-use sustainable urban extension amounting to 108 hectares, as defined on the Policies Map, is allocated for <del>approximately</del> <b>at least</b> 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a road linking Norwich Road, Cromer Road and the industrial estate.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Change would alter the allowed quantum of development on site and affect the site's ability to deliver other policy requirements.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	<del>Prior approval and adoption of</del> A comprehensive Development Brief incorporating a site wide Vision and Master Plan demonstrating how the development will respond to the particular characteristics of the site and detailing the delivery of all of the uses and infrastructure required in this policy, <b>will be submitted with the first planning application for the site. The approved Development Brief and Vision and Masterplan shall inform any further applications for the site.</b>	This is one of a number of similar representations made by the site promoter seeking flexibility in the policy around the timing of submission of Master Plans and other details which are currently required before planning permission is granted (the term 'prior approval' is used in the policy. The requested amendment(s) seek to allow for the parallel submission and approval of such details with a planning application rather than prior to an application being submitted.  The current wording in the plan allows for such parallel consideration so no amendment is recommended. <b>Conclusion</b> No change proposed.	No	

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LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	<del>Prior approval</del> of A site wide Design Code to complement the Development Brief detailing the design principles for all development and land uses <b><u>will be submitted with the first planning application for the site. The approved Design Code shall inform any further applications for the site.</u></b>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. (as above)  <b>Conclusion</b> No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	<del>Prior approval</del> of A Green Infrastructure Strategy detailing the delivery of the green infrastructure including new areas of open spaces, play areas, sports pitches, strategic landscaping and green corridors, <b><u>will be submitted with the first planning application for the site. The approved Green Infrastructure Strategy shall inform any further applications for the site.</u></b>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. (as above)  <b>Conclusion</b> No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Development proposals will provide the following specific green infrastructure: i. <b><u>at least approximately</u></b> 17.47 hectares of new public open space including a new 'town park' of <b><u>at least approximately</u></b> 2ha, new sports pitches of <i>approximately</i> 2ha and a minimum of 2.4ha of allotments, <b><u>or, where appropriate and informed by discussions with relevant stakeholders, qualitative improvements considered to be of equivalent value;</u></b>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Would be inconsistent with proposed changes in the first proposed modification suggested. This modification would allow a way out of providing the required allotment and sport pitch provision by providing something else of 'equivalent value'.  <b>Conclusion</b> No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	A substantial area of strategic green infrastructure at a <del>minimum</del> of <b><u>approximately</u></b> 10ha to the south and western countryside edge of the development to create a new green edge of the town;	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The requirement should be seen as a minimum  <b>Conclusion</b> No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	<del>Prior approval</del> of A Drainage Strategy detailing the delivery of sustainable drainage and flood mitigation & storage measures that will be integral to the urban development and green infrastructure, including using surface water runoff as a resource that contributes to water sensitive urban design (WSUD) and integrating the water cycle within the built and green environment, <b><u>will be submitted with the first planning application for the site. The approved Drainage Strategy shall inform any further applications for the site.</u></b>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This would remove the requirement for the Drainage Strategy to be approved by the Council prior to the submission of an application.  <b>Conclusion</b> No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Delivery of a new road designed as an attractive main residential street through the development with mixed-use frontage usages and segregated cycle paths and footways. This new road should be suitable for HGV traffic (including high sided vehicles) and will connect Norwich Road to Cromer Road and <del>provide</del> <b><u>facilitate</u></b> a suitable route over the railway for access to the Lyngate/Folgate Rd industrial estate together with appropriate junctions, <b><u>to be informed and determined by technical evidence to be submitted with any planning application for the site. It should be delivered, in accordance with the phasing plan agreed as part of the Development Brief full, at the earliest opportunity;</u></b>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed.  <b>Conclusion</b> No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Off-site improvements to the highways and transport network including key junctions that require intervention and mitigation, <b><u>to be informed and determined by technical evidence to be submitted with any planning application for the site;</u></b>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This is implied as part of the application process.  <b>Conclusion</b> No change proposed.	No	

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LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Provision of community facilities including <i>land</i> for a new 2 form entry primary school focused in a broadly central location within the development, a local centre providing options for local convenience retail and health services and other community uses; Delivery of appropriate restrictions on the amount of private traffic (including HGV vehicles) that can travel along the Aylsham Road and Skeyton Road, <b>to be informed and determined by technical evidence to be submitted with any planning application for the site;</b>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This is implied as part of the application process.  <b>Conclusion</b> No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Options for the enhancement of facilities at North Walsham Football Club should be considered in line with local and national standards and guidance from Sport England and other sports bodies, <b>as part of the wider Green Infrastructure strategy for the site;</b>	Comments noted, a modification is proposed for reasons of clarification.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/14.3/03
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Delivery of <del>at least</del> approximately 1,800 homes built with a mix of dwelling types, sizes and tenures in accordance with Policy HOU2 of this Plan. A range of densities and layouts will provide variety within the scheme in line with the approved Design Code.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The term 'approximately' allows for a reasonable degree of variation both above and below the stated quantum of development. The term 'at least' would place no upper limit on the amount of development.  <b>Conclusion</b> No change proposed	No	
LPS436	Mrs Debbie Mack (Historic England)	14.3 Land West of North Walsham	Policy NW62/A	Amend criterion 6 to include the following wording from the HIA: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Bradmoor Farmhouse and Barns to the East of Bradmoor Farmhouse, which are Grade II Listed. Development should include the following mitigation measures, as shown on the masterplanning for the site as set out in the Regulation 19 Local Plan: Southern area of the site (Skeyton Road to Norwich Road) <ul style="list-style-type: none"> <li>• Retain and enhance hedgerow along Norwich Road (the south eastern boundary of the site)</li> <li>• Retain and enhance landscaping along the southern boundary of the site Middle of the site (Skeyton Road to Alysham Road)</li> <li>• Retain and enhance landscaping buffer along the Weaver's Way</li> <li>• Retain and enhance hedgerows along the western boundary of the site adjoining Tungate Road</li> <li>• Retain existing trees along Skeyton Road on the eastern boundary of the site. North of the site (Alysham Road to train track)</li> <li>• Retain and enhance the landscape buffer along the northern area of the site to the north of Cromer Road where the site adjoins the railway track and existing residential properties to the east.</li> <li>• Landscape buffer / public open space around Bradmoor Farm cottages to retain where possible the sense of an isolated farm holding.</li> <li>• Retain and enhance hedgerow along Greens Road</li> </ul> In addition, add reference to open space/sports facilities in southern portion of site to protect battlefield site.	Comments noted. Proposed modifications have been considered and already addressed by the Council through PC083 (see below) and proposed modifications PMIN/14.3/04 & PMIN/14.3/05  <b>Conclusion</b> Agree to requested modification (part).	Yes	PMIN/14.3/03-05

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PC083	North Norfolk District Council	14.3 Land West of North Walsham	Policy NW62/A	Update policies relating to Heritage Impact mitigation to be fully in line with mitigation options put forward in the HIA and Site Assessment Booklet.	Comments noted. Agree to proposed modification.  <b>Conclusion</b> Agree to requested modification	Yes	PMIN/14.3/04 & PMIN/14.3/05
PC084	North Norfolk District Council	14.3 Land West of North Walsham	Policy NW62/A	Add missing requirement for primary school provision.	Comments noted. Agree to proposed modification.  <b>Conclusion</b> Agree to requested modification	Yes	PMIN/14.3/06
PC082	North Norfolk District Council	14.3 Land West of North Walsham	Policy NW62/A	This refers to 'Lyngate/Folgate Road industrial estate' in contrast to 14.3.3, bullet 2, which describes 'North Walsham Industrial Estate'.  The industrial estate is formed around three principal routes: Lyngate Road, Folgate Road, Cornish Way – collectively 'North Walsham Industrial Estate'.  Change to: '...and provide a suitable route via Bradfield Road over the railway for access to the North Walsham Industrial Estate together with appropriate junctions.'	Comments noted. Agree to proposed modification.  <b>Conclusion</b> Agree to requested modification	Yes	PMIN/14.3/07
LPS706	Ms Laura Joyce (Natural England)	14.3 Land West of North Walsham	Policy NW62/A	In line with the plan's HRA, we recommend that a project level HRA and/or appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Comments noted. The Council does not consider it necessary to amend the Plan. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.  <b>Conclusion</b> No change proposed	No	
LPS707	Ms Laura Joyce (Natural England)	15.1 Land Adjoining Seaview Crescent, Sheringham	Policy SH04	The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Comments and support noted. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.  <b>Conclusion</b> No change proposed	No	
LPS708	Ms Laura Joyce (Natural England)	15.2 Former Allotments, Weybourne Road, Adjacent to The Reef, Sheringham	Policy SH07	The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an	The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.	No	

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				appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	<b>Conclusion</b> No change proposed		
LPS512	Mr Mike Jones (Norfolk Wildlife Trust)	15.3 Land South of Butts Lane, Sheringham	Policy SH18/1B	We recommend that the policy text is revised to ensure that there is an appropriate stand-off distance, of at least 20m, between any new built development and the woodland, to avoid direct impacts from construction, proximity to gardens and to minimise noise and light pollution into the woodland. As mitigation, we would also recommend additional vegetation screening between any housing and the woodland, either as new planting or preferably through allowing natural recolonization of a buffer strip from the existing woodland.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. A 20m buffer would have an impact on the number of dwellings provided on site. The site-specific policy includes the need to provide open space, which could incorporate such a buffer. Any discussions on the masterplanning of the site will be determined at the application stage.  <b>Conclusion</b> No change proposed.	No	
LPS738	Mrs Debbie Mack (Historic England)	15.3 Land South of Butts Lane, Sheringham	Policy SH18/1B	Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Upper Sheringham Conservation Area. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> <li>• Lower density dwellings on the north and the western extents of the site</li> <li>• Retain landscaping on the northern boundary of the site</li> <li>• Significant landscaping along the boundary of the west of the site to the east of the public right of way</li> <li>• Single storey dwellings on the west of the site to respect the wider landscape</li> <li>• Ensure development does not result in the loss of trees beyond the site boundary to the south of the site</li> <li>• Respect the significance of the Upper Sheringham Conservation Area</li> </ul>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The provision of landscape buffers is already included within the site-specific policy. Potential impacts on Conservation Areas and their settings is covered elsewhere in the Plan..  <b>Conclusion</b> No change proposed.	No	
LPS709	Ms Laura Joyce (Natural England)	15.3 Land South of Butts Lane, Sheringham	Policy SH18/1B	The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMs as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMs and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.  <b>Conclusion</b> No change proposed	No	
PC085	North Norfolk District Council	16.1 Land Adjacent Ingham Road	Policy ST19/A	Remove wording on criteria No. 8 'new wording required' as it should have been deleted from the policy before publication.	Comments noted. Council agrees to the proposed modification.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN16.1/01
PC087	North Norfolk District Council	16.1 Land Adjacent Ingham Road	Policy ST19/A	Update landscape comments to fully incorporate HIA mitigation proposals.	Comments noted. Council agrees to the proposed modification.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/16.1/02
PC088	North Norfolk District Council	16.1 Land Adjacent Ingham Road	Policy ST19/A	Update landscape comments to fully incorporate HIA mitigation proposals.	Comments noted. Council agrees to the proposed modification.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/16.1/03
LPS317	Mr Ian Reilly, Lanpro (Barry Lancaster)	16.2 Land North of Yarmouth Road, East of	Policy ST23/2	Include policy wording for the requirement to provide a road access point to an adoptable standard that will abut the client's land so access can be achieved from the allocation	Agree. Include additional land in allocated area (Appendix 5) and modify policy to require layout which provides for comprehensive development.	Yes	PMIN/16.2/01



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		Broadbeach Gardens, Stalham		site into the client's land (Edgefield) for future development. If appropriate, include the land in the allocation policy.	<b>Conclusion</b> Agree to requested modification.		
PC090	North Norfolk District Council	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	Criteria No. 4 as is currently worded allows room for developer to claim off-site highways provision is unnecessary. The policy then contradicts itself by then requiring a consideration towards traffic capacity, which as worded they too could claim no additional improvements are needed.	Comments noted. A modification is proposed for reasons of improving the effectiveness of the Plan.  <b>Conclusion</b> Agree to requested modification	Yes	PMIN/16.2/02
LPS739	Mrs Debbie Mack (Historic England)	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	Amend criterion 7 and 9 to read: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Stalham Conservation Area, the Stable Block, Church Farmhouse, the barn at Stalham Hall Farm and the Stewards House, all Grade II Listed and Stalham Hall, Grade II* Listed. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <b>Western Boundary of the site:</b> • A significant landscape buffer will be required along the western part of the proposed allocation to mitigate against potential impact upon the Conservation Area and nearby listed buildings. • Development on the western part of the site should be of a lower density/ single storey development. <b>Eastern Boundary of the site:</b> • A landscape buffer will be required along the eastern part and boundary of the site to mitigate against potential impact upon the nearby listed Stalham Hall. • Open space to be provided on the eastern part of the site to ensure the impact upon Stalham Hall is mitigated. <b>Northern Boundary of the site:</b> • Strong landscaping along the northern boundary to ensure a rural edge to the settlement • Lower density/ single storey dwellings on the northern part of the site Include diagram from HIA in Local Plan.	Comments noted, The Council has addressed some of the points raised in this representation through PC091 and PC092 (see below) and proposed modifications PMIN/16.2/03 & PMIN/16.2/04. This modification is proposed for reasons of improving the effectiveness of the Plan.  Some of these points are already addressed through other criteria in the site-specific policy. Stalham Hall is a significant distance away from the site and heavily obscured from long ranging views by existing vegetation that is not included within the site's boundary so will not be as risk of being lost.  <b>Conclusion</b> Agree to requested modification (part).	No	
PC091	North Norfolk District Council	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	Criterion 7 - Remove term 'respect' and change it to 'enhance' which is appropriate in terms of protecting an historical asset.	Comments noted. Agree to proposed modification for reasons of improving the effectiveness of the Plan.  <b>Conclusion</b> Agree to requested modification	Yes	PMIN/16.2/03
PC092	North Norfolk District Council	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	Criteria No. 7 and No. 9 should be merged together to avoid repetition. Delete Criteria No. 9 and merge with Criteria No. 7.	Comments noted. Agree to proposed modification for reasons of improving the effectiveness of the Plan.  <b>Conclusion</b> Agree to requested modification	Yes	PMIN16.2/04
LPS712	Ms Laura Joyce (Natural England)	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	ST23/2	This allocation will also feed into the Broads SAC, Broadland SPA and Ramsar. Due to phosphate concerns, as detailed in the Site Improvement Plan, Natural England agrees that a Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken before the development proposal proceeds. Furthermore, a project level HRA should also take place to determine no likely significant effects, both hydrological and recreational, of the development on the protected sites. The allocation is also located on Grade 1	Comments noted. The policy under criteria 6 already includes the requirement for a project level HRA in relation to wastewater treatment. The issue of nutrient neutrality and phosphates is covered through proposed main modification PMAIN/3.13/01. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMs as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMs and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.	No	

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				agricultural land. In line with paragraphs 174 and 175 of the NPPF, and SA1 of the Sustainability Appraisal, we recommend that any potential significant implications of the development proposals are also considered at the project level	<b>Conclusion</b> No change proposed		
LPS116	Dr Victoria Holiday	18.1 Land East of Langham Road, Blakeney	Policy BLA04/A	Add to policy Provision of high quality landscaping....to protect the residential amenities of neighbouring properties'	Agree that landscaping and general layout and form of development need to be carefully considered to protect the amenity of adjacent occupiers.  <b>Conclusion</b> Agree modification	Y	PMIN/18.1/01
LPS185	Greg Hewitt, Wells Town Council  (Andrea Long, Compasspoint Planning and Rural Consultants)	17. Wells-Next-the-Sea	Para 17.0.9	Para 17.0.9 needs to be amended to refer to the risk to the Quay and the east end in order to be justified. Consideration should be given to creating access corridors to the affected properties as outlined above from the south side as part of mitigation measures for sea level rise.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Comments unrelated to proposed site allocations.  <b>Conclusion</b> No change proposed.	No	
LPS184	Greg Hewitt, Wells Town Council  (Andrea Long, Compasspoint Planning and Rural Consultants)	17. Wells-Next-the-Sea	Para 17.0.5	The Local Plan should make clear references to the Natural England report which recommended a reduction in the amount of off-street parking.( NCA Profile: 77 North Norfolk Coast 2013), and its implications for the future planning of the town; the plan is not justified if it either omits or does not take proper account of relevant evidence.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This section relates to constraints and opportunities in relation to the two allocations being provided in the Plan. There is no need to reference the report as Natural England were consulted for both sites in Wells. The Council's adopted Landscape Character assessment SPD is the most up to date evidence in this respect  <b>Conclusion</b> No change proposed.	No	
LPS190	Greg Hewitt, Wells Town Council  (Andrea Long, Compasspoint Planning and Rural Consultants)	17. Wells-Next-the-Sea	Section 17	The Open Land Area designation (Mill Road Allotments) should be removed from this site as it is unclear what purpose the designation serves generally but here specifically. Instead, the site can be identified as a potential site for Community Led Development.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The area is designated as such because it is an area of designated and undesignated open space (allotments and wider area) which makes an important contribution to the appearance or opportunities for informal recreation in the area.  <b>Conclusion</b> No change proposed.	No	
LPS399	Holkham Estate  (Mr Garth Hanlon, Savills)	17. Wells-Next-the-Sea	Section 17	Insert new policy XXX to read <b>Land amounting to 7.3 hectares is allocated for continuing use as a seasonal public car park. The car park shall only be used on a seasonal basis from 1st March to 31st October. Development will be subject to compliance with adopted Local Plan policies and car parking standards.</b>	Comments noted. The Council does not consider it necessary to amend the policy as requested. All the alternative options submitted to the council have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets.  <b>Conclusion</b> No change proposed.	No	
LPS436	Holkham Estate	17. Wells-Next-the-Sea	Section 17	Promotion of alternative site: <b>Land south of Warham Road, Wells-next-the-Sea</b>	Comments noted The Council does not consider it necessary to amend the policy as requested. A number of alternative options	No	

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	(Mr Garth Hanlon, Savills)			<b>Land amounting to approximately 12.4 Ha is proposed to be allocated for residential development of approximately 210 dwellings and 0.75 hectares of land for light industrial commercial workspace.</b>	have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets  <b>Conclusion</b> No change proposed.		
LPS434	Mr. Peter Terrington	17.1 Land South of Ashburton Close (W01/1)	Policy W01/1	W01/1 should remain outside the development boundary of Wells, and that the site is developed as an exception site. I feel sure Homes for Wells, or another affordable housing provider, would be pleased to acquire the site and develop it, for the benefit of local people. The Council's recommendation, unhelped by the Inspector, at the hearing for the previous LP, to bring nW01/1 forward as an exception site must be upheld. Clearly there is a paramount need for affordable housing, for local people, in Wells, and this can be achieved through the development of a rural exceptions site on W01/1.	Comments noted. The Council does not consider it necessary to amend the policy as requested. This site has not come forward as an exception site as previously intended. The proposed allocation will deliver a proportion of deliverable housing.  <b>Conclusion</b> No change proposed	No	
LPS213	Miss Naomi Chamberlain, Norfolk County Council	17.2 Land Adjacent Holkham Road (W07/1)	Policy W07/1	Paragraph 17.2.4 needs to be amended to reference Mill Road.	Agree. Modification is proposed for reasons of clarification. Change reg from Mill lane to Mill rd <b>Conclusion</b> Agree to requested modification.	Yes	PMIM/7.2/0.1
LPS153	Miss Naomi Chamberlain, Norfolk County Council	17.2 Land Adjacent Holkham Road (W07/1)	Policy W07/1	Policy W07/1, point 3 must be amended to Provision of convenient and safe vehicular access to site from Mill Road, in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB) and to the satisfaction of the Highway Authority.	Agree. Modification is proposed for reasons of clarification. <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/17.2/0.3 & PMIN/17.2/04
LPS262,LPS415	Mr Tony Fullwood	17.2 Land Adjacent Holkham Road (W07/1)	Policy W07/1	Amend the wording of W07/1 Land Adjacent Holkham Road as follows: Land amounting to 2.6 hectares ( <b>increase site area to include land necessary to achieve vehicular access from Mill Road and other pedestrian cycle links specifies in the policy</b> ), as defined on the Policies Map ( <b>amend Policies Map to include land necessary to achieve access from Mill Road and other pedestrian cycle links specifies in the policy</b> ), is allocated for residential development of approximately 40 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure.	Comments noted. Modification agreed in part to ensure that sensible vehicular access to Mill Road can be provided. <b>Conclusion</b> Agree to requested modification in part.	Yes	Modify plan as per Appendix 5
LPS310	Mr Clive Albany	18.1 Land East of Langham Road, Blakeney	Policy BLA04/A	The Para 6 of the Policy document should be amended to the wording in the paragraph below that was agreed to on Dec 21st. (see attached file ) The NNDC Planning officer agreed in writing to amend the end of Para 6 to read " <b>to facilitate access and protect the residential amenities of adjacent occupiers</b> ".	Comments noted. A modification is proposed for reasons of clarification and to ensure consistency <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/18.1/01
LPS184	Mr Clive Albany	Policy BLA04/A Land East of Langham Road	Policy BLA04/A	BLA04/A should be abandoned and BLA07 designated as the preferred allocation. It will mitigate all of the above concerns that make BLA04/A inappropriate in a village set in an AONB.  The land of BLA07 is owned by the county council (NCC). NNDC should have approached NCC to acquire outright or at least agree a very long term lease for a portion of this land. Broadland Housing Trust approached Blakeney Parish Council and the Blakeney Neighbourhood Housing Association suggesting to work together to provide social housing on part of BLA07. The Parish Council supported this initiative. The plan was to build 8 social housing properties on a small strip of this land running alongside to Langham Road.	Comments noted. The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan. The site is already inside the settlement boundary but forms part of the important open space for Blakeney and development would result in a loss of beneficial use. More information is contained in the site assessment background paper. <b>Conclusion</b> No change proposed	No	

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				NNDC should review this now as a viable option as it has obvious environmental and social benefits for the village. The use of a small part ( probably only 0.25ha) of an unused playing field is more beneficial to Blakeney and its environment than BLA04/A in that it achieves broadly the same key housing objective of delivering 8 social housing units without the need to use up valuable agricultural land and spoil the setting of Blakeney village when entering via the B1156.			
LPS698	Ms Laura Joyce (Natural England)	18.1 Land East of Langham Road, Blakeney	Policy BLA04/A	In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and/or Foul Sewage Drainage Strategy as part of the development proposal.	The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.  <b>Conclusion</b> No change proposed	No	
LPS428	Mrs Maggie Deeley	19.1 Land East of Astley Primary School, Briston	Policy BRI01	A full traffic survey should be conducted to assess the current issues on Fakenham Road and the results published.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The highway authority do not object to the allocation. Further detail of the site access arrangements can be considered at application stage.  <b>Conclusion</b> No change proposed.	No	
LPS429	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Land amounting to 1.4 hectares, as defined on the Policies Map, is allocated for residential development of approximately <del>25</del> <b>40</b> dwellings, public open space, school parking and associated supporting on and off-site infrastructure.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This would represent over development on the site and would limit the ability of the site to provide for the required infrastructure as set out in the site-specific policy. The use of 'approximately' to describe the number of dwellings proposed provides for a reasonable degree of flexibility.  <b>Conclusion</b> No change proposed.	No	
LPS429	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Retention of existing roadside hedges, <b>except where removal is required to facilitate access</b> , and setting back of development on both road frontages;	Agree. Modification is proposed for reasons of clarification.  <b>Conclusion</b> Agree to requested modification.	Yes	PMIN/19.1/01
LPS429	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Provision of a car parking area for the school (pick up and drop off), <b>unless already provided on an alternative site</b> ;	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Both BRI01 and BRI02 are best situated to provide this infrastructure requirement. The Policy requirement as currently worded is nevertheless sufficiently flexible to allow for either on or off site provision.	No	

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					<p><b>Conclusion</b> No change proposed.</p>		
LPS429	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Provision of a layout of development which <b>would</b> protect, or relocates, the existing water main <del>that crosses the site if</del> <b>located on the site;</b>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The water main is located within the site's boundary and is likely to require relocation.</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS743	Mrs Debbie Mack (Historic England)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	<p>Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> <li>• Respect and reflect the massing and heights of surrounding dwellings and buildings, many of which are single and one and a half storeys in height;</li> <li>• Existing hedgerows / landscaping to be retained and enhanced on the eastern, western and southern boundaries and preferably on northern boundary depending on access arrangements.</li> <li>• Open space should be located in the south-western area of the site, incorporating the existing pond.</li> </ul>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. These requirements are already set out in the criteria in the site-specific policy. It is not possible to determine the most suitable location for open space at this time. This will be determined through the application process.</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS28	Mrs Maggie Deeley	19.2 Land West of Astley Primary School, Briston	Policy BRI02	A full traffic survey needs to be done and published, due to the access issues onto The Lane and Fakenham Road. The proposal needs to be reduced by at least two thirds to reduce congestion, pollution (especially outside a school) and accidents.	<p>Comments Noted. The Council does not consider it necessary to amend the Plan as proposed. The site-specific policy indicates an option for the developers to decide which access point from Hillside or Fakenham Road will be the most appropriate, and a traffic assessment may be included within that decision as part of the application process.</p> <p><b>Conclusion</b> No change proposed.</p>		
LPS39, LPS57	Mr Ian Ruston	19.2 Land West of Astley Primary School, Briston	Policy BRI02	The entrance to BRI02 should be chosen to be onto Fakenham Road and could be the same entrance as that which is proposed to give parking for those vehicles collecting and dropping off children attending the school.	<p>Comments noted. The site-specific policy indicates an option for the developers to decide which access point from Hillside or Fakenham Road will be the most appropriate, and a traffic assessment may be included within that decision as part of the application process</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS464	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.2 Land West of Astley Primary School, Briston	Policy BRI02	<p>Setting back of development from the road frontage along Fakenham Road, <b>unless an alternative design approach is identified as more practical and feasible;</b></p> <p>3. Provision of a car parking area for the school (drop-off and pick-up) <b>unless already provided on an alternative site;</b></p> <p>7. On-site delivery of <b>not less than approximately</b> 1 hectares of public open space on the site frontage with Fakenham Road, <b>unless an alternative design approach is identified as more practical on site;</b></p> <p>9. Retention and enhancement of existing hedgerows and landscaping to all the site boundaries particularly to the east and west,</p>	<p>Comments noted. A modification is proposed in relation to the first proposed change only.</p> <p><b>Conclusion</b> Agree to requested modification (part).</p>	Yes	PMIN/19.2/01
LPS551, LPS553, LPS23	Ms Louise Tarling	19.2 Land West of Astley Primary School, Briston	Policy BRI02	The proposed allocation should not include Hillside as a potential access route.	Comments noted. The site-specific policy indicates an option for the developers to decide which access point from Hillside or Fakenham Road will be the most appropriate. Suitability of either option can be determined at application stage.		

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					<p><b>Conclusion</b> No change proposed.</p>		
LPS744	Mrs Debbie Mack (Historic England)	19.2 Land West of Astley Primary School, Briston	Policy BRI02	<p>Add criterion from HIA to read: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including, Manor Farmhouse, a grade II listed building. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment):</p> <ul style="list-style-type: none"> <li>• Take account of the coalescence of settlements by providing landscaping to the eastern boundary by strengthening and enhancing the existing boundary treatment to create a physical gap in the built form between the two settlements</li> <li>• Respect and reflect the massing and heights of surrounding dwellings and buildings, which are a mixture of single and two storeys</li> <li>• Existing hedgerows / landscaping to be retained and enhanced on the western and northern boundaries</li> <li>• Landscaping to the eastern boundary should be extended and enhanced to create a gap between the settlements</li> <li>• Open space should be located on the eastern boundary to further create a gap between the settlements</li> </ul> <p>The policy should be amended to read, Development should preserve the grade II listed Manor Farmhouse and its setting. Also add diagram.</p>	<p>Comments noted.</p> <p>Partly agreed, add additional requirement to Policy to ensure impacts on Heritage Assets are properly considered and addressed.</p> <p><b>Conclusion</b> Agree to requested modification (part)</p>	Yes	PMIN/19.1/02
LPS348	Miss Natalie Beal (Broads Authority)	20 Ludham	20.0.2 & 20.0.3	Ludham, para 20.0.2 and 20.0.03 references to the 'Norfolk Broads' change to Broads Authority Executive Area?	<p>Comments noted. The Council agrees to the proposed modification.</p> <p><b>Conclusion</b> Agree to requested modification</p>	Yes	PMIN/20.0/01 & PMIN/20.0/02
LPS395	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	20 Ludham		<p>As set out in our separate representations on Policy HOU 1, there is no justification for the comparatively low level of growth proposed in this sustainable Large Growth Village. Furthermore, the Council has neglected to assess all the sites submitted to it and has not updated the HELAA since 2017.</p> <p>There is a need to identify additional site allocations in Ludham to achieve both the current level of allocated development and help to sustainably meet the need for more site allocations to meet the district's true LHN.</p>	<p>Comments noted. The Local Plan identifies the appropriate level of sustainable growth that the settlement can accommodate.</p> <p><b>Conclusion</b> No change proposed.</p>	No	
LPS329	Mr Ollie Eyre, Deloitte (Church Commissioners for England)	20 Ludham		<p>The Council has failed to justify the re-allocation of the Ludham sites from the previous Plan and explained why it considers that the sites will now be delivered in this Plan period.</p> <p>This needs addressing in order for the policy to be justified. Please see full representation for further detail.</p>	<p>Comments noted. The Council has undertaken work and actively engaged with the promoters of the proposed allocations in Ludham to ensure deliverability within the plan-period.</p> <p><b>Conclusion</b> No change proposed.</p>	No	

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LPS397	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	20.1 Residential: Land South Of School Road (LUD01/A)	Policy LUD01/A	<p>To ensure that Ludham delivers sufficient housing to meet its share of the district's needs, we consider that the site allocation at Land South of School Road should be extended to include adjoining land to the south and west of the existing allocation. This land was submitted previously but has so far not been assessed in the HELAA.</p> <p>We have enclosed a Location Plan at Appendix 1 [of our representation] that shows the extent of the adjoining field that is owned by our client and we are pleased to set out three options for the allocation/development of our client's land.</p> <p>Amend Policy LUD01/A to the following depending on the option:</p> <p>Land amounting to approximately <b>2.2, 4.6 or 6.1 hectares [depending on option chosen]</b> <del>1-25</del> hectares, as defined on the Policies Map, is allocated for residential development of approximately <b>20, 35 or 64 dwellings [depending on option chosen]</b> inclusive of open space and associated on and off-site infrastructure. Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site specific requirements:</p> <p>Provision of a highway access via Willow Way and <b>School Road [options 2 and 3 only];</b></p> <p>2. Provision of pedestrian footway to connect with the school bus service stop on School Road <b>and a footway connection to Norwich Road along the existing field access;</b></p> <p>4. <del>Retention and safeguarding of trees along the western boundary that are covered by a group Tree Preservation Order;</del> <b>[N.B. There are no TPO trees. It is assumed that this requirement has been copied from Policy LUD06/A by mistake].</b></p> <p>5. Delivery of a high quality landscaping scheme particularly along the western boundary <b>and along a view corridor to towards the Grade I listed church from the corner of School Road and Pound Road;</b></p> <p>6. Development should have careful attention to form, <b>building heights, densities</b> and site layout in order to allow for views from School Road to the Grade 1 Listed church;</p> <p>10. Delivery of <del>not</del> <b>at least</b> approximately <b>0.5, 2.2 or 3 ha [depending on option chosen]</b> of public open space;</p>	<p>Comments noted. The land adjacent to the proposed allocation has been assessed as sites LUD01/B to the west and LUD01 to the south. The outcome of these assessments is presented in the Ludham Site Assessment Booklet.</p> <p>The Council has noted the proposed modification to criterion 4 of the Policy and propose a modification to correct this factual error. The remaining proposed modifications to the policy are not relevant to the proposed allocation.</p> <p><b>Conclusion</b> Agree to requested modification (part).</p>	Yes	PMIN/20.1/01
LPS396	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	20.2 Residential: Land At Eastern End Of Grange Road (LUD06/A)	Policy LUD06/A	<p>No evidence has been presented to justify why the allocation of Land at eastern end of Grange Close has been rolled over, given that there have not been any planning applications on the site in the 10 years since it was first allocated in 2011. The Council's Five-Year Supply of Housing Land (April 2020) identifies Land at the eastern end of Grange Close as having no current developer interest and that there is no likelihood of the delivery of the housing within the five-year period. The Local Plan states at paragraph 20.2.3 that the owners of the site have indicated support for the allocation, but given the</p>	<p>Comments noted. Impact on TPO has been assessed and access is achievable.</p> <p><b>Conclusion</b> No change proposed</p>	No	

Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
				<p>history of the site we do not consider this to be sufficient to conclude that the site is deliverable. In fact, the Council's own housing trajectory recognises the uncertainty here and doesn't forecast delivery on the site until 2032/33. There is clearly insufficient evidence to demonstrate that the site is deliverable during the plan period and the policy cannot therefore be considered effective or sound.</p> <p>Further, we note that the policy wording requires the provision of highways access via Grange Close and the retention and safeguarding of trees along the western site boundary that are covered by a group Tree Preservation Order (TPO). As shown on the photograph below that looks east along Grange Close, it will clearly not be possible to construct an access to adoptable standard without resulting in the loss of at least one of these protected trees and potentially two others when the impact of excavation in root protection areas is taken into account. It is clearly not appropriate or sound, given that there are reasonable alternatives, to allocate a site that cannot be accessed without removing TPO trees.</p> <p>Policy LUD06/A is not sound and should be deleted from the Local Plan in favour of other more suitable and deliverable sites.</p>			
LPS396	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	20.2 Residential: Land At Eastern End Of Grange Road (LUD06/A)	Policy LUD06/A	<p>Propose alternative site: Land at Catfield Road LUD02/A</p> <p>All sites in Ludham score amber for Utilities Capacity and the site is only scored amber for Flood Risk due to a very small area to the west of the site being in Flood Zone 2. This area needn't be included in the developable area of the site and could be utilised as natural greenspace which would easily resolve this sole constraint to development on the site.</p>	<p>Comments noted The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan, including LUD02/A. More information can be obtained from the supporting site assessment booklets</p> <p><b>Conclusion</b> No change proposed</p>	No	
LPS703, LPS702	Ms Laura Joyce, Natural England	20.2 Residential: Land At Eastern End Of Grange Road (LUD06/A)	Policy LUD06/A & Policy LUD01/A	<p>This policy supports residential developments which may result in an increase in recreational use of designated sites. This allocation will also feed into Ludham WRC and ultimately discharged into the Broads SAC, Broadland SPA and Ramsar. Due to the surface water ingress concerns highlighted in the plan's HRA, we agree that a site-specific Water Catchment and Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken prior to the development proposal proceeding. Furthermore, a project level HRA should also take place to determine no likely significant effects, both hydrological and recreational, of the development on the protected sites.</p>	<p>Support noted. Criteria 9 and criteria 5 (LUD01/A &amp; LU06/A) already contain the requirement to undertake a project level HRA in relation to sewage infrastructure in line with the Council's HRA. For clarity a modification is proposed to ensure it is clear that wider hydrological issues are also assessed. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMs as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMs and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p> <p><b>Conclusion</b> Agree to requested modification (part)</p> <p>Add following text to end of Criteria 9 &amp; 5 of policy LUD01 and 6:</p>	Yes	PMIN/20.2/01 PMIN20.1/02



Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
					<b>And hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity on the protected sites from alone or in combination.</b>		
LPS145	Miss Naomi Chamberlain, Norfolk County Council - Highway Authority (Engineer (Major & Estate Development))	21.1 Residential: Land off Cromer Road & Church Lane (MUN03/B)	Policy MUN03/B, Criterion 3	Policy MUN03/B, point 3 should be revised to enable provision of a highway access at Cromer Road, or if not feasible, at Church Lane, to the satisfaction of the Highway Authority.	Comments noted. Council agrees to requested modification to the Policy. <b>Conclusion</b> Agree to the requested modification	Yes	PMIN/21.1/01
LPS214	Miss Naomi Chamberlain, Norfolk County Council - Highway Authority (Engineer (Major & Estate Development))	21.1 Residential: Land off Cromer Road & Church Lane (MUN03/B)	Policy MUN03/B, Criterion 4	Policy MUN03/B, point 4 should be revised to require a continuous footway at the Church Lane site frontage, along with off-site improvements to provide continuous footway at Church Lane, between Cromer Road and the existing footway at Station Road, to the satisfaction of the Highway Authority.	Comments noted. Council agrees to the requested modification to the Policy. <b>Conclusion</b> Agree to the requested modification	Yes	PMIN/21.1/02
LPS211	Norfolk County Council - Minerals & Waste Policy	21.1 Residential: Land off Cromer Road & Church Lane (MUN03/B)	Policy MUN03/B	The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019. <i>'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'</i>	Comments noted. Council agrees to the requested modification to the Policy. <b>Conclusion</b> Agree to requested modification	Yes	PMIN/21.1/03
LPS745	Mrs Debbie Mack (Historic England)	21.1 Residential: Land off Cromer Road & Church Lane (MUN03/B)	Policy MUN03/B	Amend policy to include wording from HIA: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including the view of the Church of All Saints a grade II listed building (from Church Lane) and the proximity and low level of the former railway villas within Mundesley Conservation Area in relation to the site. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> <li>Given the elevated position of the northern part of the site, consideration should be given to the height and scale of new residential development in relation to the lower level adjacent dwellings to the east of the site.</li> <li>The layout should also ensure for the retention and strengthening of as much existing landscaping as possible and in particular, the landscaping associated with the railway cutting on the eastern side of the site.</li> <li>Any residential development should be set back from the eastern boundary to avoid the important view of the church when looking north along Church Lane.</li> <li>The layout, scale and height of any new residential development should also take account of the Victorian Villas located on the east side of the site, which are set at a significantly lower level than the site, by not positioning any</li> </ul>	Comments Noted. The policy as written already addresses the proposed modifications raised in each bullet point. <b>Conclusion</b> No change proposed.	No	

Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
				new dwellings too close to these existing properties and giving consideration to their orientation and height, in order that they would not dominate or overlook/ overshadow. Include diagram from HIA in Local Plan. Update HIA to reflect new site area.			
LPS695	Ms. Laura Joyce	21.1 Residential: Land off Cromer Road & Church Lane	Policy MUN03/B	The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Comments noted. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.  <b>Conclusion</b> No change proposed	No	
PC097	North Norfolk District Council	21.1 Residential: Land off Cromer Road & Church Lane	Policy MUN03/B	Change to 'approximately 2 hectares'.	Comments noted. Modification is proposed for reasons of clarification.  <b>Conclusion</b> No change proposed	Yes	PMIN/21.1/04
LPS235	Ms Sarah Mitchell, (RSPB)	22 Tattersett	Policy E7	We suggest the Plan acknowledges the presence of stone-curlew at this site and the need for further assessments: Given the scale and location of the proposed allocation we would expect to see an Environmental Impact Assessment (EIA) as part of the development planning stage, and this should include an assessment of the effects of the development on breeding stone-curlews. The assessment will need to be informed by a search of historical stone-curlew records (which can be obtained from the RSPB) and a new stone-curlew survey on any suitable habitat outside of Sculthorpe Airfield within at least 1500m of the development site. This survey should take place over three consecutive breeding seasons to allow for annual variation in habitat suitability due to changes in crop cover on arable land. Based on these survey results the level of impact will require assessment and we consider that mitigation will be required to avoid, as far as possible, impacts on the stone-curlew population which could be of national significance. If impacts cannot be avoided then the application should not be consented.	Comments noted. Modification is proposed for reasons of clarification.  The plan wide HRA screens out likely significant effects on European sites . Policy E7 (land at Tattersett Business Park) contains, at criterion 4, the requirement to demonstrate that a proposal will have no adverse impacts on protected wildlife and no change is required. The issue would be considered at implementation stage. However, there is merit, for reason of clarification, to include a further reference in para 22.1.4, under constraints, that any proposal would need to take into account the potential presence of nesting Stone Curlew and other protected species and suitable habitat outside of Sculthorpe Airfield within at least 1500m of the development site.  <b>Conclusion</b> Agree to requested modification (part).	Yes	PMIN/22.1/01
LPS713	Ms Laura Joyce, Natural England	22.1 Employment: Tattersett Business Park		Due to its proximity to SSSIs, any potential impacts of the development on designated site features should be fully considered and assessed. Priority habitats and species, such as Stone Curlew, should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.			
LPS160	Miss Naomi Chamberlain, Norfolk County	22.1 Employment: Tattersett Business Park	Policy E7	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy E7 is currently unsound; as it is inconsistent with national policy in relation to mineral resource safeguarding.	Comment noted, a modification is proposed for reasons of conformity with consultee advice. Add standard safeguarding criteria.	Yes	PMIN/E7/01

Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
	Council (Minerals & Waste Policy)			<p>The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019.</p> <p>‘The site is partially underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.’</p>	<p><b>Conclusion</b> Agree to requested modification.</p>		
LPS746	Mrs Debbie Mack, Historic England	22.1 Employment: Tattersett Business Park	Policy E7	<p>Whilst there are no designated heritage assets within the site boundary, there are two scheduled monuments (a bowl barrow and a saucer barrow) to the southwest of the site. Any development has the potential to impact upon the setting of these heritage assets. However, dependent upon the precise nature and scale of development and with careful landscaping along the southwestern edge of the site some development should be possible on this site.</p> <p>The site is considered in the Heritage Impact Assessments. We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 277). However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>Either: Add criterion to read: “Development should preserve and enhance the scheduled monuments to the southwest of the site and their settings. Or: add wording from HIA: “Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment):</p> <ul style="list-style-type: none"> <li>• Retain and enhance landscaping on all boundaries of the site.</li> <li>• Retain existing green spaces between units on the site</li> <li>• Retain footprint and scale of existing former airbase buildings</li> </ul>	<p>Comments noted ,a modification is proposed for reasons of clarification.</p> <p><b>Conclusion</b> Agree to requested modification.</p>	Yes	PMIN/E7/02

Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
LPS606	Ms Kerry Harris, Thornage Parish Council	22.1 Employment: Tattersett Business Park	Policy E7	<p>For the avoidance of confusion, there should only be one reference to an “E7” policy, noting that the same prefix is also applied to Land at Tattersett Park.</p> <p>As this is a site specific allocation, and, the only one for Tattersett it could be more sensibly identified as “TATT1” with commensurate changed references within Section 22 of the Plan.</p>	<p>Comments noted, a modification proposed for reasons of clarification and consistency.</p> <p><b>Conclusion</b> Agree to requested modification.</p>	Yes	PMIN/22.1/02
N/A	North Norfolk District Council	10.1 – 22.1	Policy C07/2, Policy C16, Policy C22/2, Policy F01/B, Policy F02, Policy F03, Policy F10, Policy H17, Policy H20, Policy HV01/B, Policy NW52, Policy NW62/A, Policy SH04, Policy SH07, Policy SH18/B, Policy ST19/A, Policy ST23/2, Policy W01/1, Policy W07/A, Policy BLA04/A, Policy BRI01, Policy BRI02, Policy LUD01/A Policy LUD06/A Policy MUN03/B Policy E7	<p>Amend relevant criterion in each site-specific Policy in the Plan to include the following wording</p> <p><u>submission, approval and implementation</u></p> <p>This is to ensure that where Policies currently require the ‘submission’ of details the Policy also requires the ‘approval’ of details and their subsequent ‘implementation’.</p>	<p>Comments noted. Agree to the proposed modification.</p> <p><b>Conclusion</b> Agree to requested modification</p>	Yes	PMIN10.1/01

**Representations on the  
Proposed Submission Version Local Plan  
(Regulation 19 Stage)**

**Schedule 4**

**Proposed Minor Modifications**

**Draft for Planning Policy Build Heritage Working Party**

## Representations on the Proposed Submission Version Local Plan (Regulation 19 Stage)

### Schedule 4 - Proposed Minor Modifications ( SITES)

The following table sets out a working list of potential modifications to the North Norfolk Local Plan which the Council are proposing as minor changes, clarifications and corrections to address points raised during the Proposed Submission consultation. It is not possible to make changes to the document at this stage in the plan process as the Local Plan has been subject to consultation. During the Examination of the North Norfolk Local Plan, the Council will request the appointed Inspector to consider the requested amendment as a proposed modification. The modification are suggestions by the Council as to modifications which could be made to address concerns raised by those who made representations on the Plan. The schedule is split into 'Minor Modifications', and includes 'Inconsequential changes' and 'Policies Map Modifications'. Minor Modifications are those that do not materially affect policies, and could be considered clarifications and corrections, inconsequential changes are those which address inconsistencies such as presentational, typographical and grammatical errors, such Policy Map modifications are mainly amendments to the Policies Map which supports the Plan, but is not part of the Plan.

These modifications mainly address inconsistencies and errors in the geographical presentation of the extent of policies however It will ultimately be at the Inspector's discretion whether these suggested modifications are necessary and appropriately worded. The Inspector may consider that some of the suggested Modifications and Inconsequential changes are in fact 'Main Modifications'. Main Modifications are those which are necessary for the plan to be found sound and/or materially affect the policies.

Agreed by the Inspector, the modifications will be subject to an additional consultation as directed by the inspector following the Local Plan Examination. It is possible that further main and minor modifications will be proposed during the examination and therefore this list is subject to change.

The table below relates to wording, tables, diagrams and maps in the North Norfolk Local Plan Proposed Submission Publication. The table sets out the following information:

1. Proposed potential modification reference (suggested change)
2. Page number - The page number of the North Norfolk Local Plan Proposed Submission publication
3. Policy / Site / Paragraph / Figure – The section North Norfolk Local Plan Proposed Submission publication
4. Proposed Modification – detail of the amendment proposed
5. Reason for change – details of why the change is proposed/justification for change

The following format has been used to denote modifications:

- red text\_ = new text suggested
- ~~Strikethrough text~~ = text proposed for removal

## Representations on the Proposed Submission Version Local Plan (Regulation 19 Stage)

### Schedule 4 - Proposed Minor Modifications

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
PMIN/14.2/01	14.2 Employment: Land East of Bradfield Road (NW52	Para 14.2.1	202	PC080, NNDC	<p>Paragraph numbering should start after the heading 'Description' not before the explanation text above the site plan.</p> <p>Remove the 14.2.1 numbering from its current position and start with the first paragraph of the 'description'. This will obviously re-number the rest of the paragraphs in this section.</p>	For consistency with other sections of the plan.
PMIN/22.1/01	22.1 Employment: Tattersett Business Park	Para 22.1.4	262	<p>LPS235, Ms Sarah Mitchell, (RSPB)</p> <p>LPS713, Ms Laura Joyce, Natural England</p>	<p>Additional 4th bullet</p> <ul style="list-style-type: none"> <li><a href="#">The potential presence of nesting Stone Curlew and other protected species on any suitable habitat, outside of Sculthorpe Airfield, within at least 1500m of the development site.</a></li> </ul>	For clarity and consistency
PMIN/22.1/02	22.1 Employment: Tattersett Business Park	Heading / Site Map / Policy E7	261/262	LPS606, Ms Kelly Harris, Thornage Parish Council	<p>Change the site's reference number and all references to it from E7 to TAT01 to avoid having two policy E7's in the plan and for consistency with how other sites are named. Also, consequential changes required to Policy DS 1 (p151)</p> <p>On p261:</p> <p>22.1 Employment: Tattersett Business Park (<del>E7</del>) <a href="#">(TAT01)</a></p> <p>Also change the reference on the site plan, the map caption, and update policies mapping accordingly.</p>	For clarity and consistency

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
					On p262 in Policy box:  Policy E7 <a href="#">TAT01</a>	
PMIN/E7/01	22.1 Employment: Tattersett Business Park	Policy E7	262	LPS160, Miss Naomi Chamberlain, Norfolk County Council (Minerals & Waste Policy)	Add a further criterion to the policy in relation to mineral resource safeguarding as follows:  <a href="#">6. The site is partially underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.</a>	To add clarity to the plan and to address concerns raised in Rep ID LPS160 by Norfolk County Council
PMIN/E7/02	22.1 Employment: Tattersett Business Park	Policy E7	262	LPS746, Mrs Debbie Mack, Historic England	Add a further criterion to the policy in relation to the protection of nearby designated heritage assets as follows:  <a href="#">7. Two Scheduled Monuments are situated to the southwest of the site. Development of the site should preserve or enhance these designated heritage assets and their settings.</a>	To add clarity to the plan and to address concerns raised in Rep ID LPS746 by Historic England
PMIN/10.3/01	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	163	LPS141, Miss Naomi Chamberlain, Highways Authority Norfolk County Council  LPS243, Julia Edwards, Brown & Co, Corylus Planning	Amend Criteria 2 of the Policy to the following and update relevant policies map:  2. Provision of two vehicular access points onto the A149 including the provision of a roundabout at the southern access.	To ensure safe access arrangements can be provided
PMIN/10.3/02	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	163	LPS141, Miss Naomi Chamberlain, Highways Authority Norfolk County Council	Update Policies Map for Policy C22/2 to identify the additional land east of the A149 required to accommodate access arrangements.	To ensure safe access can be provided.



Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representer	Proposed Modification	Reason for change
				LPS243, Julia Edwards, Brown & Co, Corylus Planning		
PMIN/11.1/01	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	170	LPS472, Mrs Kirstie Clifton, Define Planning, Trinity College Cambridge	Amend 1 <sup>st</sup> paragraph of the Policy to the following:  Land amounting to 26.5 hectares, as defined on the Policies Map, is allocated for residential development of approximately 560 dwellings, <b>100 units of</b> elderly persons' accommodation, public open space, and associated on and off-site infrastructure.	To provide clarity and be consistent with Criterion 8 of the policy.
PMIN/11.1/02	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	170	LPS472, Mrs Kirstie Clifton, Define Planning, Trinity College Cambridge	Amend Criterion 1 of the policy to the following:  <del>The Prior Approval</del> <b>submission, approval and implementation</b> of a comprehensive masterplan to address access and sustainable transport, layout, landscaping, phasing and conceptual appearance;	To provide clarity in the criterion of the policy.
PMIN/11.1/03	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	170	LPS472, Mrs Kirstie Clifton, Define Planning, Trinity College Cambridge	Amend Criterion 2 of the Policy to the following:  <del>Prior approval</del> <b>submission, approval and implementation</b> of a comprehensive access strategy and Transport Assessment providing for safe and convenient access to the A148 together with any necessary junction improvements along the length of Fakenham by-pass including at the A148/B1105 and A148/A1065 junctions;	To provide clarity in the criterion of the policy.
PMIN/11.1/04	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	170	LPS472, Mrs Kirstie Clifton, Define Planning, Trinity College Cambridge	Criterion 3: <b>Appropriate</b> provision of off-site mains water reinforcement;  Amend Criterion 3 of the Policy to the following:  <b>Appropriate</b> Provision of off-site mains water reinforcement;	To provide clarity in the criterion of the policy.

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
PMIN/11.1/05	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	171	LPS472, Mrs Kirstie Clifton, Define Planning, Trinity College Cambridge	Amend Criterion 8 of the Policy to the following:  <del>Delivery of comprehensive development in accordance with agreed</del> <u>submission and approval of a development phasing plan</u> which ensures delivery of all aspects of the allocated uses including not less than 100 units of specialist elderly persons accommodation; and,	To provide clarity in the criterion of the policy.
PMIN11.1/06	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	171	PC075, North Norfolk District Council	Amend Criterion 5 of the Policy to the following:  5. Retention or replacement of existing sporting <u>facilities</u> <del>uses</del> including the rugby club and sports centre, <u>replacement facilities should be of equal or added value and suitable to serve the needs of Fakenham;</u>	To improve the effectiveness of the Policy.
PMIN/11.3/01	11.3 Land at Junction of A148 and B1146	Policy F03	175	PC076, North Norfolk District Council	Add following text below the first paragraph of the Policy:  <u>Planning permission will be granted subject to compliance with the policies of this Plan, and the following site specific requirements:</u>	For consistency with other policies in the Plan.
PMIN/12.1/01	12.1 Land North of Valley Lane, Holt	Policy H17	184	LPS509, Mr Mike Jones, Norfolk Wildlife Trust	Amend Criterion 2 of the Policy to the following:  Site layout, scale and massing which incorporates suitable landscaping and buildings that retain a soft edge to the settlement from Spouts Hill <u>County Wildlife Site;</u>	The provide clarity in the criterion of the significance of Spouts Hill.
PMIN/12.2/01	12.2 Land at Heath Farm, Holt	Policy H20	186	LPS142, Miss Naomi Chamberlain, Norfolk County Council - Highways	Amend Criterion 1 of the Policy to the following:  Access being delivered off Nightjar Road and <del>new</del> <u>existing</u> A148 roundabout and delivery of footpath connections to footpath FP9a;	To provide clarity in the criterion of how access arrangements will be achieved.
PMIN/12.2/02	12.2 Land at Heath Farm, Holt	Policy H20	186	LPS333, Jack Millar, Strutt & Parker, North Norfolk Tomatoes	Insert new criterion (no. 2) below Criterion 1 of the Policy and amend subsequent criterion numbers accordingly.	To improve the effectiveness of the Plan to ensure deliverability of

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
					<u>2. provision of a landscape buffer, of approximately 1.3 hectares adjacent to the east and south-eastern boundary of the site;</u>	the site and the Plan as a whole.
PMIN/12.2/03	12.2 Land at Heath Farm, Holt	Policy H20	186	LPS333, Jack Millar, Strutt & Parker, North Norfolk Tomatoes	Amend Criterion 8 of the Policy to the following:  On-site provision of <u>open space will be delivered in accordance with the standards set out in the Local Plan;</u> <del>minimum of 1.55 ha open space;</del>	To be consistent with other modification changes to the policy.
PMIN/12.3/01	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	189	LPS335, Jack Millar, Strutt & Parker, North Norfolk Tomatoes	To remove the proposed allocation from the Local Plan as the landowner confirms the site is no longer available for development and does not have a realistic prospect of delivering the required growth within the timeframe of the Plan.  <u>Remove entirety of Policy H27/1 and supporting text (pages 188-190) and any references to the policy from the Local Plan, including Policy DS1 &amp; update table in Policy E1 and amend the Policies Map accordingly.</u>	Modification is proposed for reasons of correction.  Discussions with landowner have confirmed decision to remove this site from the Local Plan's proposed allocations.
PMAIN/13.1/01	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	195	LPS545, Mr Alastair Curran, Planning Places Ltd, FW Properties	Amend first paragraph of the Policy to the following and update the relevant policy map:  Land amounting to <del>6.4</del> <u>10.6</u> hectares, as defined on the policies map, is allocated for development of approximately <del>120</del> <u>150</u> dwellings, elderly persons accommodation, open space and associated on-site and off-site infrastructure.	Modification is proposed in order to improve the effectiveness of the Plan. Additional land will assist in the provision of requirements set out in the site-specific policy. Must provide a revised site boundary that can be incorporated into the Policies Map.
PMIN/13.1/01	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	195	LPS545, Mr Alastair Curran, Planning Places Ltd, FW Properties	Update Policies Map for HV01/B to show increased boundary of the site.	For clarity and to update factual information in the Plan.

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
PMIN/14.1/01	14.1 Mixed Use: Land at Norwich Road and Nursery Drive	Para. 14.1.5	201	LPS37, Mr Michael Rayner, The Battlefields Trust	<p>Insert new bullet point into para 14.1.5 which reads as the following:</p> <ul style="list-style-type: none"> <li><a href="#">The non-designated heritage asset of the North Walsham Battlefield Site.</a></li> </ul>	Agree to change to para 14.1.5. Modification is proposed for reasons of clarity. The change is a minor modification in the supporting text for policy NW01/B.
PMIN/14.1/02	14.1 Mixed Use: Land at Norwich Road and Nursery Drive	Policy NW01/B	201	LPS163, Miss Naomi Chamberlain, Norfolk County Council - Minerals & Waste	<p>Insert new criterion (no. 10) at the end of the Policy which reads as the following:</p> <p><a href="#">10. The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.</a></p>	Modification is proposed for reasons of consistency with other site-specific policies in the plan with this requirement, and to remain consistent with advice.
PMIN/14.1/03	14.1 Mixed Use: Land at Norwich Road and Nursery Drive	Policy NW01/B	201	LPS144, Miss Naomi Chamberlain, Norfolk County Council - Highways	<p>Insert new criterion (no. 4) below criterion 3 of the Policy and amend subsequent criterion numbers accordingly.</p> <p><a href="#">4. a transport assessment should be undertaken to identify possible mitigation measures, if necessary, for the A149/B1150 and wider transport network</a></p>	Modification is proposed for reasons of consistency with other site-specific policies in the plan, and for adherence to consultee advice.
PMIN/14.1/05	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	201	LPS450, Mr Jake Lambert, Bidwells, Hopkins Homes	<p>Amend Criterion 4 of the policy to the following:</p> <p>Provision of an <a href="#">offset landscape buffer</a> of no less than 6 metres between the development site and the existing properties at Norwich Road and Nursery Drive;</p>	
PMIN/14.1/06	14.1 Mixed Use: Land at Norwich Road and Nursery Drive	Policy NW01/B	201	PC079 North Norfolk District Council	<p>Insert new criterion (no. 6) after criterion 5 of the Policy and amend subsequent criterion number accordingly.</p>	Internal review of consultee comments

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
					<u>6. Retain and enhance landscaping along southern, south-western and north-eastern boundaries of the site, whilst retaining and strengthening existing hedgerows within the site boundary, with particular regard to the northern boundary adjacent to Nursery Drive;</u>	identified missing policy requirements.
PMIN/14.3/01	14.3 Mixed Use: Land West of North Walsham	Policy NW62/A	206	LPS84, Mr Paul Harris, Broadland District Council	Insert new criterion (no. 8) at the beginning of the 'Sustainable Transport' section of the Policy and amend subsequent criterion numbers accordingly.  <u>8. a transport assessment should be undertaken to identify possible mitigation measures, if necessary, for the B1150, Aylsham Road, Cromer Road and the wider transport network;</u>	Modification is proposed for reasons of consistency with other site-specific policies in the plan, including NW01/B, and for adherence to consultee advice.
PMIN/14.3/02	14.3 Mixed Use: Land West of North Walsham	Policy NW62/A	207	LPS162, Miss Naomi Chamberlain, Norfolk County Council - Minerals & Waste	Insert new criterion (no. 18) after criterion no. 17, and insert new heading 'Mineral Safeguarding' and the following:  <u>Mineral Safeguarding</u>  <u>18. The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority</u>	Modification is proposed for reasons of conformity with consultee advice.
PMIN/14.3/03	14.3 Mixed Use: Land West of North Walsham	Policy NW62/A	207	Sarah Hornbrook, Bidwells  ESCO Developments, Flagship Housing Groups & Lovell Partnerships	Amend criterion 15 of the Policy to the following:  15. Options for the enhancement of facilities at North Walsham Football Club should be considered in line with local and national standards and guidance from Sport England and	Modification is proposed for reasons of clarification.

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
					other sports bodies, <u>as part of the wider Green Infrastructure strategy for the site;</u>	
PMIN/14.3/04	14.3 Mixed Use: Land West of North Walsham	Policy NW62/A	207	PC083 North Norfolk District Council	Amend Criterion 6 of the Policy to the following:  Proposals should <u>appropriately use design, layout and landscaping to</u> protect and enhance heritage assets and their settings, including designated and non-designated heritage assets, including the 'Battlefield Site'. <u>Landscape buffering and open space should be used to protect and enhance</u> Enhancements should provide This should include a design, layout and landscaping that protects the Listed Buildings at Bradmoor Farm;	Internal review of consultee comments identified missing policy requirements.
PMIN/14.3/05 (PC083)	14.3 Mixed Use: Land West of North Walsham	Policy NW62/A	207	PC083 North Norfolk District Council	Amend criterion 7 of the Policy to the following:  7. <u>retain and enhance existing hedgerows on Greens Road, and the south-eastern and western boundaries.</u> Landscape buffers and/or green corridors will be provided along the existing urban edge of the town to protect the amenity of existing residential areas, <u>and along Weaver's Way and the northernmost boundary. Retain existing mature trees along Skeyton Road and the eastern boundary of the site.</u>	Internal review of consultee comments identified missing policy requirements.
PMIN/14.3/06	14.3 Mixed Use: Land West of North Walsham	Policy NW62/A	207	PC084 North Norfolk District Council	Amend criterion 14 of the Policy to the following:  14. provision of community facilities including a new 2 form entry primary school <u>of not less than 2.5ha of land</u> focused in a broadly central location within the development'	Internal review of consultee comments identified missing policy requirements, as provided by education team at NCC.
PMIN/14.3/07	14.3 Mixed Use: Land West of North Walsham	Policy NW62/A	207	PC082 North Norfolk District Council	Amend Criterion 11 of the Policy to the following:  11. Delivery of a new road designed as an attractive main residential street through the	To correct a factual error.

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
					development with mixed-use frontage usages and segregated cycle paths and footways. This new road should be suitable for HGV traffic (including high sided vehicles) and will connect 206 Proposed Submission Version (Regulation 19 Publication) Local Plan 14 North Walsham Norwich Road to Cromer Road and provide a suitable route over the railway for access to the Lyngate/Folgate Rd <b>North Walsham</b> industrial estate together with appropriate junctions. It should be delivered, in full, at the earliest opportunity;	
PMIN/16.1/01	16.1 Land Adjacent Ingham Road	Policy ST19/A	227	PC085, North Norfolk District Council	Amend Criterion 8 to the following:  Provision of a Foul Drainage Strategy setting how additional foul flows will be accommodated within the foul sewerage network prior to the commencement of development clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA; <del>(new wording required)</del> ;	To correct an error.
PMIN/16.1/02	16.1 Land Adjacent Ingham Road	Policy ST19/A	227	PC087, North Norfolk District Council	Amend criteria No.6 of the Policy to the following:  6. Provision of a suitable landscaping scheme including retention of <b>existing</b> mature trees, <b>including those along the northern boundary</b> , and planting of new trees within the site;'	Internal review of consultee comments identified missing policy requirements
PMIN/16.1/03	16.1 Land Adjacent Ingham Road	Policy ST19/A	227	PC088, North Norfolk District Council	Amend criteria No.7 of the Policy to the following:  7. <del>Provision of</del> <b>Retention and enhancement of existing landscaping along the south-eastern boundary of the site and</b> appropriate landscape buffering to soften the views from the north of the site;	Internal review of consultee comments identified missing policy requirements

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
PMIN/16.2/01	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	229	LPS317, Mr Ian Reilly, Lanpro (Barry Lancaster)	Enlarge site to include garden of Edgefield and include new policy requirements.  <u>Provides for a layout of development which will allow for comprehensive development of the entirety of the allocation.</u>	To ensure comprehensive development of available land
PMIN/16.2/02	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	229	PC090 North Norfolk District Council	Amend criterion 4 of the Policy to the following:  Provision of a Transport Assessment <del>that</del> assesses <u>appropriate</u> whether off-site highway mitigation works <del>are necessary</del> . Specifically, consideration is required <del>for</del> of traffic capacity at any junctions between the site and the A149;	Internal review of consultee comments identified missing policy requirements
PMIN/16.2/03	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	229	PC091 North Norfolk District Council	Amend criterion 7 of the Policy to the following:  7. <u>appropriate</u> Layout, <u>and</u> design, <u>and of</u> landscape <u>buffering</u> , particularly on the eastern and western boundaries of the site, should be implemented, in order to protect and <u>enhance</u> <del>respect</del> the settings of the adjacent Listed Buildings, <u>other nearby heritage assets</u> and <u>the Stalham</u> Conservation Area;	To ensure clarity in the policy requirements after internal review.
PMIN/16.2/04	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	229	PC092 North Norfolk District Council	Remove criterion no. 9 from the Policy and amend subsequent criterion numbers accordingly.  <del>9. provision of landscape buffering on the western boundary of the site to mitigate impacts on nearby heritage assets and the Stalham Conservation Area;</del>	To ensure clarity in the policy requirements after internal review.
PMIN/17.2/01	17.2 Land Adjacent Holkham Road	Para 17.2.4	236	LPS213, Miss Naomi Chamberlain, Norfolk County Council	Amend paragraph to the following:  17.2.4 Vehicular site access should be provided via Mill Lane <del>Road</del> , subject to Highway Authority approval.	Modification is proposed to correct factual error



Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
PMIN/17.2/02	17.2 Land Adjacent Holkham Road	Para. 17.2.5	236	PC096, North Norfolk District Council	Amend Second bullet point of Para. 17.2.5 to the following:  Provision of suitable vehicle access off Mill <del>Road</del> <u>and land for appropriate junction improvements such as visibility displays.</u> <del>Lane or Holkham Road,</del>	Modification is proposed for reasons of clarification.
PMIN/17.2/03	17.2 Land Adjacent Holkham Road	Policy W07/1	237	LPS153, Miss Naomi Chamberlain, Norfolk County Council	Amend criterion 3 of the Policy to the following:  3. Provision of convenient and safe vehicular access to site from Mill Road, <u>in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB) and to the satisfaction of the Highway Authority;</u>	Modification is proposed for reasons of clarification.
PMIN/17.2/04	17.2 Land Adjacent Holkham Road	Policy W07/1	237	LPS153, Miss Naomi Chamberlain, Norfolk County Council	Update Policies Map of Policy W07/1 to include access onto Mill Road and appropriate land required to provide such access.	Modification is proposed for reasons of clarification.
PMIN/18.1/01	18.1 Land East of Langham Road, Blakeney	Policy BLA04/A	242	LPS310, Mr Clive Albany	Amend criterion 6 of the Policy to the following:  6. Provision of high quality landscaping along the northern, eastern and southern site boundaries, including the retention and enhancement of all existing boundary trees and hedgerows, having particular regard to the northern boundary and integration of public footpath FP6 into the development <del>to facilitate access and protect amenity,</del> <u>to facilitate access and protect the residential amenities of adjacent occupiers</u>	Modification is proposed for reasons of clarification.
PMIN/19.1/01	19.1 Land East of Astley Primary School, Briston	Policy BRI01	246	LPS429, Mrs Phoebe Heath, Bidwells, Mr Richard Waddingham	Amend Criterion 1 of the Policy to the following:  Retention of existing roadside hedges, <u>except where removal is required to facilitate access,</u> and setting back of development on both road frontages;	Modification is proposed for reasons of clarification.

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
PMIN/19.1/01	19.1 Land East of Astley Primary School, Briston	Policy BRI02	248	LPS464, Mrs Phoebe Heath, Bidwells, Mr Richard Waddingham	Amend Criterion 1 of the Policy to the following:  Setting back of development from the road frontage along Fakenham Road, <u>unless an alternative design approach is identified as more practical and feasible;</u>	
PMIN/19.1/02	19.1 Land East of Astley Primary School, Briston	Policy BRI02	248	LSP744, Debbie Mack	Add new policy criteria  <u>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including, Manor Farmhouse, a grade II listed building</u>	To ensure local heritage assets are appropriately considered
PMIN/20.0/01	20. Ludham	Para. 20.0.2	249	LPS348, Miss Natalie Beal, Broads Authority	Amend references to Norfolk Broads in Para. 20.0.2 to the following:  20.0.2 ....The Norfolk Broads <u>Authority Executive Area</u> are is located to the south of the settlement, where a number of environmental designations are situated and there is a degree of flood risk from both fluvial and surface water flooding...	To correct terminology
PMIN/20.0/02	20. Ludham	Para. 20.0.3	249	LPS348, Miss Natalie Beal, Broads Authority	Amend references to Norfolk Broads in Para. 20.0.3 bullet point 1 to the following:  The need to minimise the impact of development proposals on The Norfolk Broads <u>Authority Executive Area</u> and the landscape more generally	To correct terminology
PMIN/20.1/01	Policy LUD01/A	20.1 Residential: Land South Of School Road	253	LPS397, David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	Remove Criterion 4 from the Policy and amend subsequent criteria numbers accordingly.  <del>4. Retention and safeguarding of trees along the western boundary that are covered by a group Tree Preservation Order;</del>	To correct a factual error.

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
PMIN/20.1/02	Policy LUD01/A	20.1 Residential: Land South Of School Road	253	LPS702, Ms Laura Joyce, Natural England	Add following text to end of Criteria 9 policy LUD01/A:  Provision of adequate information in order to undertake a project Level Habitat Regulation Assessment, HRA, addressing issues relating to sewerage infrastructure, <u>and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity on the protected sites from alone or in combination;</u>	Modification is proposed for reasons of clarification.
PMIN/20.2/01	Policy LUD06/A	20.2 Residential: Land At Eastern End Of Grange Road	255	LPS703, Ms Laura Joyce, Natural England	Add following text to end of Criteria 5 of policy LUD06/A:  Provision of adequate information in order to undertake a project Level Habitat Regulation Assessment (HRA) prior to the commencement of development addressing issues relating to sewerage infrastructure, <u>and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity on the protected sites from alone or in combination;</u>	Modification is proposed for reasons of clarification.
PMIN/21.1/01	Policy MUN03/B	21.1 Residential: Land off Cromer Road & Church Lane	260	LPS145, Miss Naomi Chamberlain, Norfolk County Council - Highway Authority, Engineer Major & Estate Development	Add following text to Criterion 3 of the Policy:  3. Delivery of a highway access from Cromer Road, <u>or if not feasible, from Church Lane to the satisfaction of the Highway Authority;</u>	To allow flexibility in the policy for alternative approaches.
PMIN/21.1/02	Policy MUN03/B	21.1 Residential: Land off Cromer Road & Church Lane	260	LPS214, Miss Naomi Chamberlain, Norfolk County Council - Highway Authority, Engineer Major & Estate Development	Amend following text to Criterion 4 of the Policy:  4. Off-site provision for a new pedestrian and cycle route that uses the former railway embankment to connect Cromer Road and Church Lane, and a new pedestrian and cycle route which provides a continuous footway on Church Lane, <u>between Cromer Road and existing footway at Station Road, and</u> All Saints Way to	Modification is proposed for reasons of clarification.

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
					Links Road with appropriate crossing points and access into the site;	
PMIN/21.1/03	Policy MUN03/B	21.1 Residential: Land off Cromer Road & Church Lane	260	LPS211, Norfolk County Council - Minerals & Waste Policy	Add new criterion to the end of the Policy (Criterion No. 9) which reads as the following:  <u>The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.</u>	Modification is proposed for reasons of clarification.
PMIN/21.1/04	Policy MUN03/B	21.1 Residential: Land off Cromer Road & Church Lane	260	PC097, North Norfolk District Council	Amend first paragraph of the Policy to the following:  Land amounting to approximately 2-2 hectares, as defined on the Policies Map, is allocated for residential development of approximately 30 dwellings inclusive of open space and associated on and off-site infrastructure.	Modification is proposed for reasons of clarification.
PMIN/10.1/01	10.1 – 22.1	Policy C07/2, Policy C16, Policy C22/2, Policy F01/B, Policy F02, Policy F03, Policy F10, Policy H17, Policy H20, Policy HV01/B, Policy NW52, Policy NW62/A, Policy SH04, Policy SH07, Policy SH18/B, Policy ST19/A,	153-261	North Norfolk District Council	Amend relevant criterion in each site-specific Policy in the Plan to include the following wording, and any variations of this term to the wording at the start of each criterion number where appropriate:  <u>submission, approval and implementation</u>	For consistency across all policies in the Plan where appropriate.

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
		Policy ST23/2, Policy W01/1, Policy W07/A, Policy BLA04/A, Policy BRI01, Policy BRI02, Policy LUD01/A Policy LUD06/A Policy MUN03/B Policy E7				

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**Representations on the  
Proposed Submission Version Local Plan  
(Regulation 19 Stage)**

**Schedule 5  
Proposed Main Modifications (Sites)**

**Draft for Planning Policy Build Heritage Working Party**

## Representations on the Proposed Submission Version Local Plan (Regulation 19 Stage)

### Schedule 5 - Proposed Main Modifications

The following table sets out modifications to the North Norfolk Local Plan which the Council are proposing as MAIN changes, to address points raised during the Proposed Submission consultation. It is not possible to make changes to the document at this stage in the plan process as the Local Plan has been subject to consultation. During the Examination of the North Norfolk Local Plan, the Council will request the appointed Inspector to consider the modifications proposed.

Main Modifications are those which are necessary for the plan to be found sound and/or materially affect the policies. If agreed by the Inspector, the modifications will be subject to an additional consultation as directed by the inspector following the Local Plan. It is possible that further modifications will be proposed during the Examination and therefore this list is subject to change.

The table below relates to wording, tables, diagrams and maps in the North Norfolk Local Plan Proposed submission publication. The table sets out the following information:

1. Proposed modification reference
2. Page number - The page number of the North Norfolk Local Plan Proposed Submission publication
3. Policy / Site / Paragraph / Figure – The section North Norfolk Local Plan Proposed Submission publication
4. Proposed Modification – detail of the amendment proposed
5. Reason for change – details of why the change is proposed/justification for change

The following format has been used to denote modifications:

- Red text = new text suggested
- ~~Strikethrough text~~ = text proposed for removal



**Representations on the Proposed Submission Version Local Plan (Regulation 19 Stage)**

**Schedule 5 - Proposed Main Modifications (Sites)**

Proposed Mod Ref	Document Section	Policy / Para / Table / Figure / Map	Page	Representation Ref & Representor	Proposed Modification	Reason for change
PMAIN/13.1/01	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	195	LPS545, Mr Alastair Curran, Planning Places Ltd, FW Properties	Amend first paragraph of the Policy to the following and update the relevant policy map:  Land amounting to <del>6.4</del> <b>10.6</b> hectares, as defined on the policies map, is allocated for development of approximately <del>120</del> <b>150</b> dwellings, elderly persons accommodation, open space and associated on-site and off-site infrastructure.	Modification is proposed in order to improve the effectiveness of the Plan. Additional land will assist in the provision of requirements set out in the site-specific policy.

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#### Appendix 4 – Proposed modification to Policy E3 – Employment Development

Amend criterion 1 of Policy E 3 in the following manner:

1. New employment development outside of designated **Employment Areas, Enterprise Zones, Employment Allocations** or **Mixed Use Allocations** will only be permitted where it can be demonstrated that:
- (a) there is no suitable and available land on designated or allocated employment areas;
- and or
- (b) there are specific reasons for the development not being located on designated or allocated employment areas, including, but not limited to: ...

Also amend the ‘purpose of the policy’ in the following manner:

**The purpose of this policy** is to provide opportunities support for the expansion of existing rural businesses situated outside of designated Employment Areas with the potential to expand and thrive and new businesses which are either related to rural activities (such as agriculture and forestry) or where there are clear sustainability advantages for a business being located close to the market it serves. and Also, to recognise the importance of employment outside the designated Employment Areas to the wider economy by requiring such uses to be retained, where possible.

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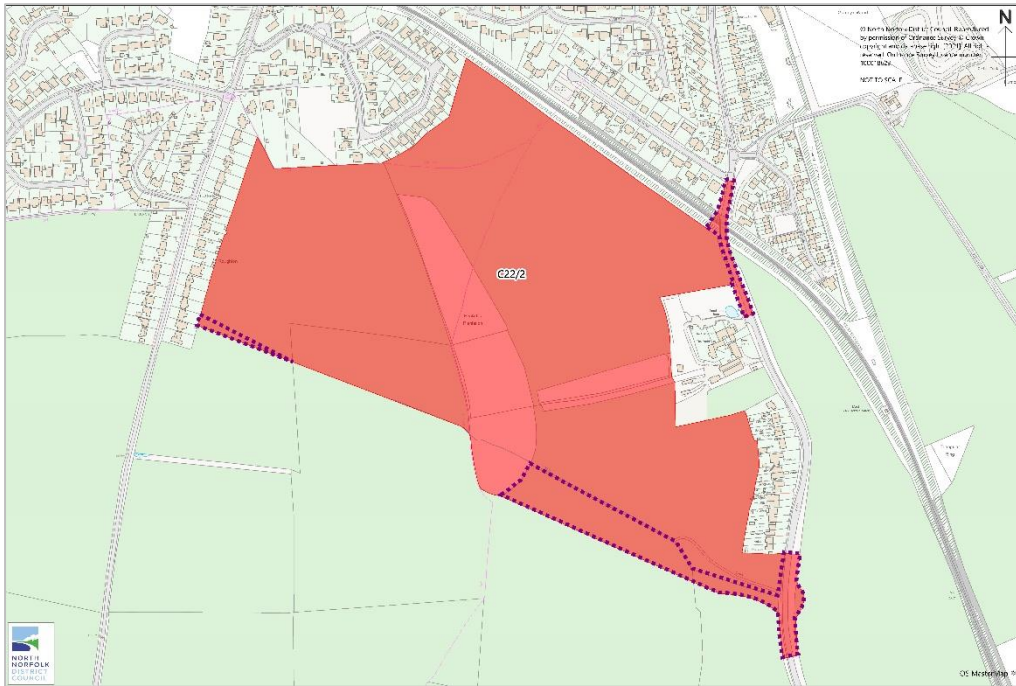
# Appendix 5 - Recommended Policies Map Modifications

## Map Key

- ■ ■ Inclusion of additional land

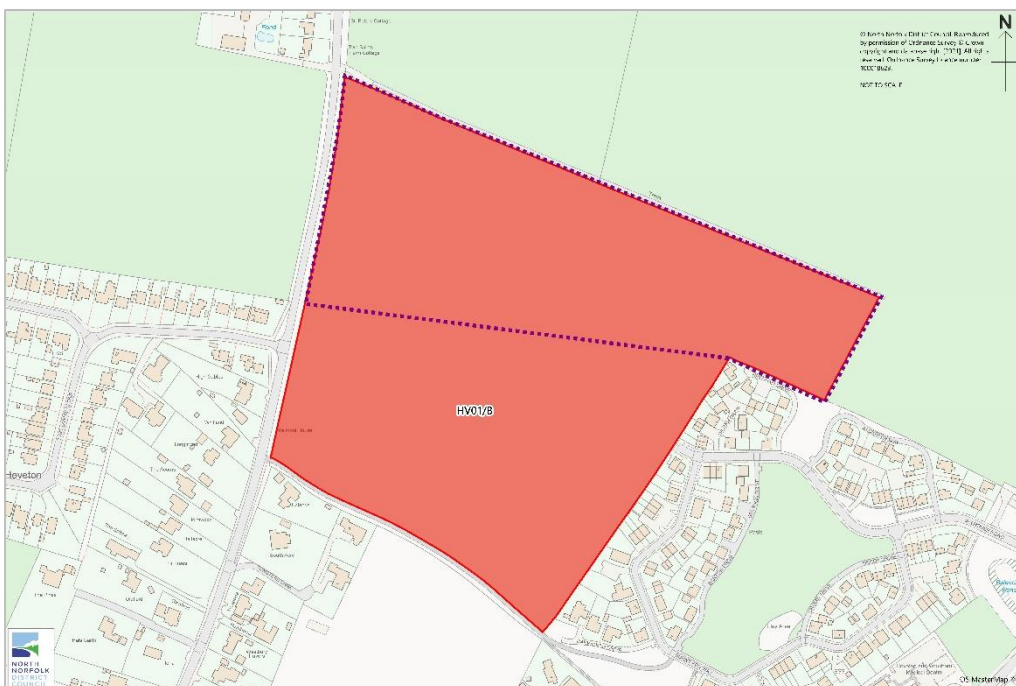
Mod Ref:

**Mixed Use: Land West of Pine Tree Farm (C22/2)**



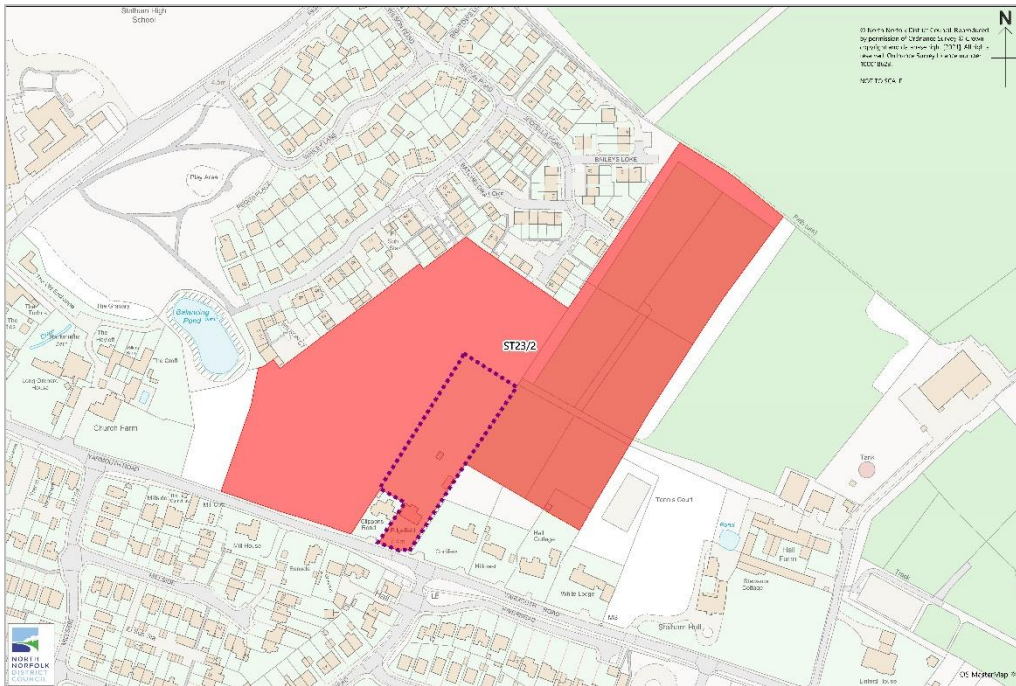
Mod Ref:

**Residential: Land East of Tunstead Road (HV01/B)**



Mod Ref:

**Mixed-Use: Land North of Yarmouth Road, East of Broadbeach Gardens (ST23/2)**



Mod Ref:

**Residential: Land Adjacent Holkham Road (W07/1)**

